

World Peace Initiative Foundation
Privacy Policy v.1.0
Last Updated: 28 August, 2020

In this Privacy Policy, "we," "us," "its" and "our" refer to the World Peace Initiative Foundation and its affiliates ("EnlightenMe"), and "you" and "your" refer to you.

Before using the application and/or website(s) containing the link to this policy (the "App"), please read carefully this Privacy Policy ("Policy") relating to your use of the App and the EnlightenMe services ("Services").

A. Introduction

This Policy tells you how we use and takes steps designed to protect personal information collected through use of the App and Services. This Policy covers only information that is collected through this App and our Services. This Policy does not cover other web sites that may be linked to or from this App or Services, and does not cover information that may be collected through software downloaded from this App or Services; nor does this Policy apply to practices of companies that we do not control or to people we do not employ or manage.

By accepting the Policy during registration, you expressly consent to our collection, storage, use and disclosure of your personal information as described in this Policy and to all other terms herein.

This Policy supplements other notices including our Terms of Service and is not intended to override or replace them.

For ease of reading, we have divided this Policy into several sections:

- A. Introduction
- B. What is personal information and what do we collect?
- C. How do we use your personal information?
- D. Sharing information
- E. Community sharing
- F. Password and security
- G. For how long do we keep your personal information?
- H. International transfers
- I. Applicability
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B. What is personal information and what do we collect from you?

The following personal information about you may be collected and stored by us (personal information as used in this policy include personal data as defined under applicable law(s)):

- (i) name, email address, photograph and precise or general geo-location;
- (ii) purchase information based on your activities on the App or Services;
- (iii) ordering, billing and other similar information you provide to purchase an item or service (which may also be captured by the app store that processes the details of your payment);
- (iv) activity and usage information based on your activities on the App or Services, such as statistics on your practice, achievement of milestones, etc.;
- (v) community discussions and posts, messages, dispute resolution, correspondence through the App and Services, and correspondence sent to us;
- (vi) computer sign-on data, statistics on page views and traffic to and from the App or Services;
- (vii) other technical information or data collected from App or Services traffic, including IP address and standard web log information;
- (viii) information that your mobile device sends when you use our Services, like a device identifier, user settings and the operating system of your device, as well as information about your use of our Services
- (ix) Facebook profile information, such as name, email address and Facebook ID, if you choose to log into the App and user our Services through Facebook.
- (x) supplemental or additional information we may request from you in the event previous information you've provided cannot be verified; and
- (xi) information that you voluntarily provide to us.

When you use the App we may collect and store information about your location (general or precise) by converting your IP address into a rough geo-location or by accessing your mobile device's GPS coordinates or coarse location if you enable location services on your device. We may use location information to improve and personalize our Services for you. If you do not want us to collect location information, you may disable that feature on your mobile device. You can stop all collection of information via the App by uninstalling the app. You can also reset your device Ad Id at any time through your device settings, which is designed to allow you to limit the use of information collected about you. You can stop all collection of precise location data through the App by uninstalling the app or withdrawing your consent through your device settings.

If you choose to invite a "Friend" to use the App and our Services, we will ask you for their email address. We will use this information to invite him or her to join the App. We store this information for the sole purpose of sending invitations. If you ask us to do so by providing your consent, we may also send e-mails inviting your friends from your 'Contacts' list.

If your Friend would like us to delete his or her information, they can do so by opting-out as described in each invitation or by contacting us at info@wpifoundation.org.

Third Party Resources Including Third Party Tracking Technologies

We also use the services of third parties to help us to collect various data about you and the way that you use the App in order to enable us to better understand your interests – both so that we can service content to you that we think will be of interest to you, and so that we can ensure that you are shown adverts delivered by third parties which are more likely to be of interest to you.

We may collect information from your company or employer, including your contact data; social networks when you engage with our content, reference our Service, or grant us permission to access information from the social networks; Research Partners (as defined below) that analyze information for research and statistical purposes; and publicly-available sources, including data in the public domain.

We use analytics services, such as Google Analytics, to help us understand how users access and use the Service. In addition, we work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services. For example, we place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.

As part of this process, we may incorporate tracking technologies into our own Service (including our website and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies may track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you (“Interest-based Advertising”).

Vendors and other parties may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

For further information on the types of tracking technologies we use on the Service and your rights and choices regarding analytics, Interest-based Advertising, and Matched Ads, please see the “Your Rights and Choices” section.

You may remove cookies from your computer at any time.

Please note that we will not ask (and are not required by law to ask) for your consent to deliver cookies which are strictly necessary for us to offer our App and/or Services to you, or to monitor the volume of traffic that passes through our App or websites.

For details of the cookies that we use on our App and/or our website, what those cookies do, and the privacy policies of the third parties which provide them (where relevant) please see our Cookies Policy.

Unless specifically set out in our Cookies Policy, we rely on our legitimate interests as our condition for processing your personal data on the basis set out in this section (specifically that we have a legitimate interest in optimising the App content and ensuring that you are served with relevant commercial communications as you use them).

C. How do we use your personal information?

We may combine your information with information we collect from other sources to improve the App. We do not sell or rent your personally identifiable information to third parties, in the traditional sense of the word “sell,” for their marketing purposes without your prior consent.

You agree that we may use your personal information as specified in the Terms of Service, and to:

- (i) fulfil the purposes disclosed when you provided your information to us;
- (ii) provide, deliver, and collect payment for the services, products, and customer support you request;
- (iii) review and process applications for employment;
- (iv) resolve disputes, collect fees, and troubleshoot problems;
- (v) prevent potentially prohibited or illegal activities, and enforce our App- and Service-related agreements;
- (vi) customize, measure, and improve our services and the App's content and layout;
- (vii) provide you with personalized content;
- (viii) tell you about targeted marketing, service updates, and promotional offers based on your communication preferences, to the extent that you have provided us with your consent to receive such communications under applicable law; and
- (ix) compare information for accuracy, and verify it with third parties. Further, we may disclose personal information to respond to legal requirements, enforce Terms of Service or App policies, in connection with a merger, sale of assets, or other similar corporate transactions, respond to claims that a listing or other content violates the rights of others, or protect the rights, property, or safety of any person.

Please note that this Section does not apply to our use of personal information which relates to your health ('Health Data'). For information on how your Health Data is used, please see below.

If you sign up to receive promotional materials from us via email we will use the information you give us to provide the communications you have requested.

When you receive such promotional communications from us, you will have the opportunity to "optout" (either through your Account or by following the unsubscribe instructions provided in the e-mail you receive). If you no longer wish to receive push notifications through our App, you may turn them off at the device level.

Please note that we do need to send you certain communications regarding the Services, such as communications regarding updates to our Terms of Service or this Privacy Policy, and you will not be able to opt out of those communications

D. Sharing Information

We may share your personal data with:

(i) members of our corporate family to help detect and prevent potentially illegal acts and provide joint services to requesting users;

(ii) service providers, consultants or similar contractors to support or enhance the App or our business operations, or to whom we contract in order to carry out transactions initiated by you, such as credit card processing organizations (see "Service Providers" below);

(iii) other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and solicited consent when using a specific service);

(iv) law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity;

(v) persons we believe in our sole discretion necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity;

(vi) other business entities, should we plan to merge with, or be acquired by that business entity;

(vii) third parties who will use the data for scientific research and study "Research Partners"; and

(viii) Where your account with us is connected to the corporate account of your employer or another organization with which you are affiliated (where your employer, workplace, or other organization with which you are affiliated provides a subscription to the Services or the App) data about your usage of the App may be accessible by that organization and may be personally identifiable to you. While that data is aggregated and intended to enable the corporate provider to monitor overall usage of the App by its personnel, you may be identifiable from it if your usage is very different from other members of your organisation or if your workplace has a small number of individuals who use the service. We may also share such aggregate information with other organizations in order to provide enterprise subscribers with the ability to benchmark the wellness activity of their workforce against that of other organizations. As noted above, while that information will be in aggregate form, you may be identifiable from it if your usage is very different from other members of your organisation or if your workplace has a small number of individuals who use the service.

We will not share your personal information with third parties in order for that third party to provide direct marketing communications to you.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your Rights and Choices” section below.

Research Partners

The data we collect through your use of our App and Services gives us a valuable insight into wellbeing and health data. As such many educational and scientific institutions want to further enhance society’s understanding of wellbeing and health by carrying out scientific research on the data.

Although there is a clear common benefit in providing Research Partners with this data we respect our obligations to provide you with appropriate safeguards and to treat your data with respect. Where we share your personal data with our Research Partners for scientific research and study, we will only provide them with pseudonymised copies of your data.

Furthermore, when we share your personal information with our Research Partners, we stipulate that they protect this data and do not use it for any other purpose than for scientific research and study. We take these relationships seriously and oblige all our Research Partners to sign contracts with us that clearly set out their commitment to respecting individual rights, their commitments to assisting us to help you exercise your rights as a data subject and that they have in place suitable technological and organisational measures so that your data is secure and protected. Our major Research Partners include a variety of universities and educational institutions.

Service Providers

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal information they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject. Our major service providers include a variety of various cloud hosting companies; and data analytics companies.

E. Community Sharing

In order to offer the services for which you will use the App or Services, your user ID may necessarily be displayed throughout the App and Services and to the public, as well as to your Teams if you are part of the Services used by an enterprise with which you are affiliated. All of

your activities on the App and Services will be traceable to your user ID. Notices are sent to other community members regarding suspicious activity and policy violations and refer to user IDs and specific items. Please understand that if you link your name with your user ID, others will be able to personally identify your activities.

Please note that once you make a public posting, you may not be able to change or remove it except as required by applicable law.

F. Password and security

Your password deserves careful thought and protection. Use unique numbers, letters, and special characters and do not disclose your password to anyone. If you do share your password or your personal information with others, remember that you are responsible for all actions taken in the name of your account. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. If your password has been compromised for any reason, you should immediately access your profile on the App to change your password and notify us immediately at info@wpifoundation.org.

We take reasonable administrative, physical and electronic measures designed to protect the information that we collect from or about you from unauthorized access, use or disclosure. No method of transmitting information over the Internet or storing information is completely secure and accordingly, we cannot guarantee the absolute security of any information.

G. For how long do we keep your personal data?

We will hold your personal information on our systems only for as long as required to provide you with the Services you have requested or to perform the purpose for which that data was collected.

Where you sign up to receive e-mail marketing from us we will retain your e-mail address on file should you ever 'opt-out' of receiving e-mails from us. We will retain your e-mail address in this way in order to ensure that we continue to honour and respect that opt-out request.

In some circumstances you can ask us to delete your data: see 'Your Rights' below for further information.

In some circumstances we may de-identify your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this data indefinitely without further notice to you.

H. International transfers

Your personal information may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction.

If you would like more information about how the mechanism via which your personal information is transferred, please contact info@wpifoundation.org.

I. Applicability

Except as otherwise expressly included in this Policy, this Policy addresses only the use and disclosure of information we collect from you. If you disclose your information to others, whether they are users on the App or other Apps throughout the Internet, different rules may apply.

The App and Services may, from time to time, contain links to and from the Services of our partner networks, advertisers and affiliates. If you follow a link to any of these external websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their policies. Please check these policies before you submit any personal information to these external websites.

J. Children

The App and Services are not directed to children under thirteen (13) years of age, and we do not knowingly collect personally identifiable information from such children. If you are younger than thirteen, please do not provide any personally identifiable information to us. If a person 13 years of age or younger has provided personal information to us, a parent or guardian of such person should contact us at info@wpifoundation.org so that we can remove such personal information from our database.

We reserve the right to limit participation in particular programs, offers or promotions to those over 18 years of age.

K Your Rights and Choices

EU Data Subject Rights

If you are a data subject located in the European Union you have a number of rights in relation to your personal information. Below, we have described the various rights that you have, as well as how you can exercise them.

Right of Access

You may, at any time, request access to the personal information that we hold which relates to you (you may have heard of this right being described as a "subject access request").

Please note that this right entitles you to receive a copy of the personal information that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal information lawfully. It is not a right that allows you to request personal information about other people, or a right to request specific documents from us that do not relate to your personal information.

You can exercise this right at any time by writing to us using the contact details set out info@wpifoundation.org and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

Your Right to Rectification and Erasure

You may, at any time, request that we correct personal information that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal information if you do not believe that we need to continue retaining it (you may have heard of this right described as the “right to be forgotten”). To do this, we recommend that you log into the App or Services.

We will not manually modify your personal information because it is very difficult to verify your identity remotely. Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal information when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal information that you ask us to erase we will tell you what that reason is at the time we respond to your request.

You must promptly update your personal information if it changes or is inaccurate. Upon your request, we will close your account and remove your personal information from view as soon as reasonably possible, based on your account activity and in accordance with applicable law.

Your Right to Restrict Processing

Where we process your personal information on the basis of a legitimate interest (see the sections of this Policy which explain how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

We may process your data on the basis of a legitimate interest in the following ways:

- Optimised App content
- Track products and services that are popular

You may also ask us to stop processing your personal information (a) if you dispute the accuracy of that personal information and want us verify that data's accuracy; (b) where it has

been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal information (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal information that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us using the contact details set out info@wpifoundation.org and telling us that you are making a request to have us stop processing the relevant aspect of your personal information and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

Your Right to Portability

Where you wish to transfer certain personal information that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party we are happy to consider such requests.

Your Right to object to automated decision making and profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal information, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

Rights of All Users

Your Right to stop receiving communications

Where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by writing to us at info@wpifoundation.org and telling us which communications you would like us to stop sending you.

Analytics and Advertising

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.

The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services).

You may also limit our use of information collected from or about your mobile device for purposes of serving targeted ads to you by going to your device settings and selecting “Limit Ad Tracking” (for iOS devices) or “Opt out of Interest-Based Ads” (for Android devices).

Please note that if you opt out using any of these methods, the opt-out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities’ statements regarding their opt-out options or programs.

Exercising your rights

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with

sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

L. Jurisdiction

The World Peace Initiative Foundation is located in the Kingdom of Thailand. All matters relating to privacy issues are governed by the laws of the Kingdom of Thailand.

M. Policy Changes

We may amend this Policy at any time by posting the amended terms on the App, which will automatically take effect after they are initially posted except as otherwise specified. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice in the Services prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

N. Contact Details

You may contact us at info@wpifoundation.org to request access, correction or deletion of any information we have about you, or to submit questions or complaints about this Policy.