

PRIVACY POLICY

Welcome to Smart Vitamins, an app based service for tracking your supplement consumption and dosage (the “**Service**” or the “**App**”). The Service is owned and operated by WaterIO Ltd. (“**we**”, “**our**”, “**us**”, the “**Company**”).

This Privacy Policy (the “**Policy**”) explains our privacy practices for the services we offer through the Service. It describes how we collect personal information, use it and share it and the rights and options available to you with respect to your information.

This policy is integrated into our Terms of Service (the “**Terms**”) and is a part of them.

In short...

The following key points of the Privacy Policy are only brought for your convenience. They do not substitute the full Policy.

- **Information We Collect.** We collect information you actively provide us, such as name, email, phone number, height, weight and age. We also collect information about the supplements you take and your device geolocation. We may use third party analytics tools to collect information about your use of the Service and create statistics from such information. We also collect information about the personal computer or mobile device that you use to access the Service.
- **Using the Information We Collect.** We use the information we collect mainly to operate the Service, improve and customize it and develop new services.
- **Sharing the Information We collect.** We may share your information in order to operate, maintain and enhance the Service. We also share the information we have with the supplement manufacturer, which develops, manufactures and markets the supplement.
- **Aggregated Information.** We may use the information we collect from you to create de-identified, statistical or aggregated information, and make it available to others for any purpose.
- **Retention.** We retain your information for as long as we deem necessary for the purpose it was first obtained.
- **Security.** We implement measures to reduce the risks of damage and unauthorized access or use of information, but they do not provide absolute information security.
- **Children Privacy.** We do not knowingly or intentionally collect information from individuals who are under the age of 18.
- **Changes to the Policy.** We may change this Policy, by putting you on notice of such changes. Your continued use of the Service after the changes take effect indicates your acceptance of the amended Policy.

INFORMATION WE COLLECT

Registration Information. When you register to the Service, we will collect:

- Your contact information, including your name, phone number and email address
- Your selected password

Personal Information. In order to operate the Service, we also will collect:

- Your height, weight, age and consumption of supplements, and supplement intake regimen
- Your device geolocation
- Information you provide about your water consumption

Analytics Data. We may use third party analytics tools to collect information about your use of the Service and create statistics from such information. For example, we may record the frequency and scope of your use of the App, the duration of your sessions, and the interactions you make with the App's interface.

Device Information. We may collect information about your personal computer or mobile device that you use to access the Service, including its model, operating system, unique device identifiers, mobile network information and the Internet Protocol (IP) address through which you accessed the Service.

CHILDREN'S PRIVACY

We do not knowingly or intentionally collect information from users who are under 18 years of age. As stated in the Terms, you must be at least 18 years old to use the Service.

HOW WE USE YOUR INFORMATION

We may use the information we collect for the following purposes:

- Operating the Service and providing its features and functionalities (for example reminders to take your supplement);
- Sending you updates and other communications related to the Service;
- Improving and customizing the Service and developing new services;
- Collecting statistical and aggregated information about users' experience within the Service;
- Providing you with support, handling complaints and contacting you when we believe it is necessary;
- Enforcing the Terms and this Policy and preventing misuse of the Service;
- Complying with any applicable law and assisting law enforcement agencies and competent authorities, if we believe it is necessary or justified; and
- Taking any action in any case of dispute involving you, with respect or in relation to the Service.

SHARING YOUR INFORMATION

We may share the information outlined in this Policy, with others, in any of the following instances:

- With the supplement manufacturer, which develops, manufactures and markets supplements
- With our contractors and service providers, for data analysis and processing, bug reporting and handling, and in order to operate, maintain and enhance the Service;
- If you have breached the Terms, abused your rights to use the Service, or violated any applicable law. Your personally identifiable information may be shared with competent authorities and with any third party, if we believe it is necessary or justified;
- If the operation of the Service is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition);
- We may share personally identifiable information with our corporate group entities, but their use of such information must comply with the Policy.

AGGREGATED INFORMATION

We may use the information we collect, as outlined above, to compile anonymized or aggregated information. We may share, sell or otherwise communicate and make available such anonymized or aggregated information to any other third party, at our sole discretion. However, we will not knowingly or intentionally share information that can be reasonably used to reveal your identity or the identity of anyone tracked through the Service, without consent.

INFORMATION SECURITY

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. These measures do not provide absolute information security. Therefore, it is not guaranteed and you cannot expect that the Service will be immune from information security risks.

CALIFORNIA RESIDENTS

The following disclosures are made pursuant to California Online Privacy Act (CA Civil Code § 22575): when you use our Service, other parties, such as Google, may collect personally identifiable information about your activities over time and across different websites or online services.

DATA RETENTION

We retain personally identifiable information for as long as we deem necessary for the purposes set forth above. We may delete information from our systems, without notice to you, once we deem it is no longer necessary for the purposes set forth above.

CHANGES TO THIS PRIVACY POLICY

We may change this Policy. We will provide you notice of such changes through the App's interface or by email message. Your continued use of the App after the effective date of those amendments constitutes your consent to the amended Policy. If you do not consent to the amended Policy, we may terminate your account and block your access to, and use of, the Service.

CONTACT US

At any time, you may contact us with any question, request, comment or complaint that you may have with respect to the Service or these Terms, at info@water-io.com, or through our phone support as indicated on our website at <https://www.water-io.com/contact-us>.

Effective date of the policy: 15/05/2020