



W.E. INNOVATIONS, INC. PRIVACY POLICY

This policy was last updated: November 19, 2015

W.E. Innovations, Inc. (“we”, “us” or “our”) developed this service to make it easy to send and receive eGift Cards. We understand that privacy is important to both our online visitors and registered users. We respect your privacy and will take reasonable steps to protect your information.

Please also review, if applicable, your Terms of Service agreement with W.E. Innovations, which shall govern in the event of any inconsistency with this Privacy Policy.

1. WHAT DOES THIS PRIVACY POLICY APPLY TO?

This policy applies to all software and services that we offer, including the Exclusively Gifted eGift Card application that may be made available on a third-party website, or other services that we offer through our Website when you register for a W.E. Innovations Merchant account (collectively referred to as the “Services”).

This Policy does not apply to any website, product or service of any third-party company even if the website links to (or is linked from) our Website. W.E. Innovations does not operate or control those websites, products or services. Please always review the privacy practices of a company before deciding whether to provide any information.

By using our Website or Services, you are accepting the practices described in this Policy. If you do not agree with this Policy, delete all cookies, files and history from your browser cache after visiting our Website and do not visit or use our Website or Services. Your continued use of our Website or Services signifies your acceptance of this Policy.

2. INFORMATION COLLECTION AND USE

Broadly speaking, we collect information when you (1) provide it directly to us (2) when it has been made publicly available for the purpose of demos, and (3) passively through technology such as “cookies”.

The types of information that we collect and our use of that information will depend on whether you are a Website Visitor, eGift Card Purchaser, eGift Card Recipient or Merchant User, as described below.

Along with the information we collect that is specific to a user type, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive communications from us via email, please indicate your preference by clicking “unsubscribe” at the bottom of each email. However, if you have a Merchant Account with us, you will continue to receive certain email communications related to your account including information regarding transactions and your relationship with W.E. Innovations.

Personal Information:

The term “Personal Information”, as used in this Policy, refers to any information that can be used to identify a specific person, or any anonymous information (e.g., IP Address) that is linked to a specific person. Personal information does not include information that has been aggregated or made anonymous such that it can no longer be reasonably associated with a specific person.



Cookies and Web Server Logs:

Similar to many commercial websites, we utilize “cookies” and other technologies to collect non-personally-identifiable information from our Website and from other websites that use W.E. Innovations Services.

“Cookies” are a feature of web browser software that allows web servers to recognize the computer used to access a website. Cookies store information accessed through your browser to streamline activities on related web sites, and make the online experience easier and more personalized.

Information gathered through cookies and web-server log files may include information such as the date and time of visits, the pages viewed, IP addresses, links to/from any page, and time spent at a site. We use cookie data to measure web traffic and usage activity on our Website for purposes of improving and enhancing the functionality of our Website, to look for possible fraudulent activity, and to better understand the sources of traffic and transactions on our website and the websites of merchants that use W.E. Innovations Services.

Log files are used to monitor, measure, analyze, improve, and troubleshoot our Services. You can choose to disable cookies for our Website but this may limit your ability to use our Website and Services.

In order to understand and improve the effectiveness of our advertising, we may also use web beacons, cookies, and other technology to identify the fact that you have visited our Website or seen one of our advertisements, and we may provide that information to one or more third party advertising networks.

The information we provide may include the time and date of your visit to our website, pages viewed, links clicked and other non-personally identifying information. Those advertising networks may recognize the web beacon or cookie associated with your visit to our Website when you visit other websites on which they serve advertising, and they may make decisions about the advertisements you see based on it. We may choose to work with Google AdWords, Doubleclick, AdRoll or other advertising networks. Each of these companies has its own privacy policy, which we encourage you to review. For more information about advertising and tracking online, visit the Network Advertising Initiative. This website allows consumers to “opt out” of the behavioral advertising delivered by member companies. Additional information on that program can be found [here](#).

Website Visitors:

To simply browse our Website, you are not required to provide any Personal Information. However, we may gather non-personally-identifiable information, as described directly above, just for the purposes of monitoring and improving our Website and Services. We will not share this information with third parties except as a necessary part of providing our Website and Services, nor will we use it to target any advertisements to you.

eGift Card Purchaser:

When you create an eGift Card through our website, apps, or social handles or through a merchant’s website, apps or social handles, we will gather your name, email address, payment card information, and billing zip code. We store only your name, email address and billing zip code.

We use this information to complete eGift Card purchases that you choose to make, to send complete emails to the recipients of your eGift Card purchases, and to display your eGift Card orders in the manner you created.



We also share your contact information, but not your card information, with merchants as part of your purchases so they may assist you with any issues you may encounter with your eGift Card purchases and to help them create incentive programs for their top purchasers.

We will not share this information with other third parties except as a necessary part of providing our Website and Services. You should carefully review merchants' privacy policies to better understand how each uses your information.

eGift Card Recipient:

We may receive information about you from other users of W.E. Innovations via the Services ("Friend-Provided Information"), for example, your friend may provide us with your name and email address in order for us to deliver an eGift Card to you. We gather and store your name and email address, if provided.

We use this information to notify you via of eGift Cards created personally for you and to display these eGift Cards in the manner the purchaser intended.

We also share this information with merchants so they may assist you or the eGift Card Purchaser in locating "lost cards" and ensuring you have access to your eGift Cards.

We will not share this information with other third parties except as a necessary part of providing our Website and Services. We use Friend-Provided Information in accordance with this Privacy Policy, in the same manner we use Personal Information a user provides us about himself or herself.

Merchant User:

To gain full access to our Website and Services, you must register for a Merchant Account. When you register for an account, we collect Personal Information when you voluntarily provide it to us, such as the following:

- Your name, company name, location, email address, phone number, web sites, social handles, logo, brand color, and account password, to set up your user account and connect you to your merchant record.
- Your business and other government-issued identification numbers to verify your identity for underwriting purposes.
- Your Stripe Connect information to be able to process payments on your behalf.

We may retrieve additional Personal Information about you from third parties and other identification/verification services such as credit bureaus. With your consent, we may also collect additional Personal Information in other ways including emails, surveys, and other forms of communication. Once you begin using the Service through your Merchant account, we will keep records of your transactions and collect information of your other activities related to our Services. The foregoing Personal Information will be shared and disclosed as described below in "Sharing and disclosure of information".

Children's Online Privacy Protection Act:

Our Website and Services are directed to the general public. We do not knowingly collect information from children under 13 years of age or have any reasonable grounds for believing that children under the age of 13 are accessing our Website or using our Services. If we learn that we have inadvertently collected Personal Information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under age 13, please contact us.



3. SHARING AND DISCLOSURE OF INFORMATION

W.E. Innovations does not sell or rent your Personal Information to marketers or third parties.

We may share your Personal Information with trusted third parties who are integral to the operation of our Website and Services, including but not limited to affiliated businesses, payment processors, verification services and credit bureaus, as well as any third parties that you have directly authorized to receive your Personal Information. We may store your Personal Information in locations outside the direct control of W.E. Innovations, for instance, on servers or databases co-located with hosting providers.

We may disclose your Personal Information to law enforcement, government officials, or other third parties if: (i) we are compelled to do so by subpoena, court order or other legal process, (ii) we must do so to comply with laws, statutes, rules or regulations, including credit card rules, (iii) we believe in good faith that the disclosure is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our Terms of Service.

We will only disclose your Personal Information in response to such a request if we believe in good faith that doing so is necessary to comply with applicable law or a legal obligation to which we are bound. If we receive such a request, we will use reasonable efforts to give you prompt notice, so that you may contest it if you choose. We won't provide you such notice if we determine in good faith that either (a) we are not permitted to provide it under applicable law, or (b) that doing so would result in an imminent risk of death, serious physical injury or significant property loss or damage to W.E. Innovations or a third party.

In addition, in the event of a merger, acquisition, reorganization, bankruptcy, or other similar events, any information in our possession may be transferred to our successor or assign.

Affiliated Businesses:

In certain situations, businesses or third party websites we're affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service.

We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

A Merchant is an affiliated business. We may provide certain Personal Information to Merchants in connection with the selling and redemption of eGift Cards. Merchants are permitted to use that Personal Information only for the purpose of redeeming the eGift Card, and troubleshooting issues with the eGift Card purchase and sending processes. Merchants may only (a) use your name and email address, and no other information whatsoever, for the sole purpose of marketing Merchant's products and services to you and for no other purpose whatsoever (including marketing any products or services offered by other entities), (b) Merchant must provide you with an opportunity to opt-out of any further communications with Merchant in the first (and all subsequent) communications with you, and without limiting the foregoing, must comply with all applicable privacy laws in connection with use of your name and contact information, including without limitation CAN-SPAM, and (c) Merchant will not disclose your information (or any other Purchaser or Receiver's information) to any third party.



Consultants and Agents:

We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a payment processing company to receive and process your credit card transactions for us. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

User Profiles and Submissions:

Certain user information, including your name, email, messages, and content that such user has created while using the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our services.

Please remember that any content you voluntarily disclose online in a manner other users can view becomes publicly available, and can be collected and used by anyone.

4. CHOICE AND DATA RETENTION

We are required to collect certain Personal Information to confirm your identity and comply with our obligations. If you elect to not provide Personal Information in optional fields it may limit your ability to use our Services.

Merchants can update their company information by signing on to our Merchant Application or contacting us at 1-800-203-9317.

We may occasionally email you with information about offers or new services. You can opt out of these email communications by replying with unsubscribe in the subject line, or via an unsubscribe link included in such communications. However, you will continue to receive certain email communications related to your account including information regarding transactions and your relationship with W.E. Innovations.

If you wish to opt out of having cookies set on your browser (as described above), the only way to ensure that this happens is to manage the settings on your web browser to delete all cookies and disallow further acceptance of cookies. For more information, refer to your browser's technical information. You may also consider visiting aboutcookies.org, which provides helpful information about cookies. Note that disabling cookies on your browser prevents W.E. Innovations from tracking your activities in relation to our Website and Services. However, it may also disable many of the features available through our Websites and Services. We therefore recommend that you leave cookies enabled.

W.E. Innovations has a variety of obligations to retain the data that you provide us, both to ensure that eGift Card transactions can be appropriately processed, to identify fraud, and also to comply with laws applicable to us and to our payment processors. Accordingly, even if you close your W.E. Innovations account we will retain certain information as necessary to meet our obligations.

5. PROTECTION OF INFORMATION

Although no data transmission can be guaranteed to be 100% secure, we take reasonable steps to protect all Personal Information. W.E. Innovations maintains strict administrative, technical, and physical procedures to protect information stored in our servers, which are located in the United States. Access to information is limited (through user/password credentials and software systems) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process, sign-up information, and payment processing. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to building and files.



6. CHANGES AND NOTIFICATIONS

We reserve the right, in our sole and absolute discretion, to make changes to this Policy from time to time. Please review this Policy periodically to check for updates. If any changes are material and/or retroactive, we may provide additional notice and/or an opportunity to “opt-in,” as appropriate under the circumstances.

W.E. Innovations will provide you with disclosures and alerts regarding this Policy by posting them on our Website, by emailing the email address listed in your W.E. Innovations Merchant account, and/or by mailing to the physical address listed in your W.E. Innovations Merchant Account. You agree that electronic disclosures and notices have the same meaning and effect as if we had provided you with a paper copy. Such disclosures and notices in relation to this Policy shall be considered to be received by you within 24 hours of the time it is posted to our Website or emailed to you (unless we receive notice that the email was not delivered).

8. CONTACT US

If you have any questions or suggestions about this Privacy Policy or any of our privacy-related practices, please contact us at (800) 203-9317.