

Privacy Policy

Provider of the website, a data controller

Well Balance s.r.o., a Czech Republic private limited company („Wellmee“, „provider“, „us“, „data controller“ or “we”), hereby provides information on the rules and principles of the collection and processing of personal data of users (“Users”, the “User”, or “you”) of the Wellmee website and/or platform and services contained within (collectively as the “Services“). This Privacy Policy (“Policy”) summarizes what information we collect from you when you use our Services and how is this information used.

We oblige to handle the information collected by us according to the law, esp. to Directive 95/46/EC and Regulation (EU) 2016/679 (GDPR).

Personal Data

By using website wellmee.com the User agrees with conditions and principles of our Privacy Policy. We do not collect any information that can be connected to the concrete user (name, address, phone number or e-mail), in case that user does not voluntarily impart them.

By using website user may impart his personal data to us and gives the approval to use them. We are authorized to use Personal Data, especially for analyses, presentation, and promotion. The User is entitled to withdraw approval anytime and apply all his rights resulting from the law. The approval to use Personal Data is provided voluntarily for an unlimited period of time and we can use it until it is withdrawn by the user. The User is entitled to withdraw approval anytime and apply all his rights resulting from the law.

This Privacy Policy (“Policy”) summarizes what information we collect from you when you use our Services and how is this information used.

1. Personal data: Collection & Processing

1.1. Personal data of Users is collected and processed in relation to the provision of the Services.

1.2. Personal data of each User is processed in the scope of the data provided by the User, or for which the User decides that the Wellmee is authorized to collect them.

1.3. We may collect your personal data while you register to use our Services, while you use our Services and during the process of sale or other provision of Wellmee Tokens.

1.4. The types of personal data which we collect may include your name, your photographic identification, your address, your phone number, your e-mail address, date of birth, and the way you use our Services; in order to verify the aforementioned, we may (during the Know Your Client process) collect information about the type, number and expiry date of the identification document you provide us with.

1.5. You are responsible for ensuring that all information submitted to Wellmee is accurate.

1.6. We may use your personal data in order to enable you to use our Services, to reply to your queries, to analyse your use of our Services, to verify your identity, to comply with any regulatory requirements, and to provide you with information about products and promotions that may be of interest to you. By accepting this Policy, you consent to above mentioned collection and use of your personal data.

2. Disclosure of personal data

2.1. We use your personal data for the purposes indicated at the time you provide us with such information, and/or otherwise for the purposes set out in this Policy and/or as otherwise permitted by law.

2.2. We may make available the personal data that you provide to us to our affiliates, agents, representatives, trusted service providers and contractors for these limited purposes. We shall share a list of the aforementioned persons on the Wellmee website.

2.3. We may also share Users' Personal Information with law enforcement or regulatory agencies, as may be required by law.

2.4. Any third party which receives or has access to personal data collected by Wellmee shall be required by us to protect such personal data and to use it only to carry out the services they are performing for you or for us.

3. Correction, updating and deletion of collected personal data

3.1. You have the right to access your personal data and to require the correction, updating and blocking of inaccurate and/or incorrect data by sending an email to us at info@wellmee.com.

3.2. You may also request the deletion or destruction of your personal data that we hold by sending an email to us at info@wellmee.com. Please note that Wellmee will action your request only where this is not inconsistent with its legal and regulatory obligations.

3.3. Upon your written request, we will inform you of the personal data relating to you that we hold and the use and general disclosure of your personal data. We will also give you a copy of the personal data we have retained.

4. Security

4.1. Wellmee pledges to protect all and any of your data to ensure its confidentiality, and to protect your personal data from loss, misuse, alteration or destruction.

5. Retention of personal data

5.1. We will hold your personal data only for as long as it is necessary for us to do so, having

regard to the purposes described in this Policy and our own legal and regulatory requirements.

5.2. Wellmee reserves the right to process anonymized data regarding the use of its Services.

6. Marketing

6.1. The User hereby acknowledges and gives his/her consent with the fact that within the provision of the Services, advertising and/or promotional messages may be displayed. This advertising may relate to the content of the Services, queries entered through the Services and also other information.

6.2. Wellmee may inform the User through commercial messages about its services or about the services and products of its affiliates or partners, and may do so using the user account of the User, as well as the email address of the User. The User hereby provides his/her consent with the aforementioned.

6.3. You have the right to ask us not to process your personal data for marketing purposes. You can exercise the right at any time by contacting us at info@wellmee.com.

7. Cookies & IP Addresses

7.1. We use cookies and use information collected from cookies to evaluate the effectiveness of our Services, analyse trends, and administer the Services. By using the Wellmee website, you agree that we may use cookies for the aforementioned purposes.

7.2. Wellmee may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our Users' browsing actions and patterns and does not identify any individual.

8. Change of this Policy

8.1. Wellmee may make changes to this Policy from time to time and in particular to accommodate any new data protection legislation which is enacted in the Czech Republic. Wellmee will notify you of any changes to the Policy by posting the changes on its site. We recommend that you revisit this Policy regularly so as to be apprised of any such changes.

9. Contact

9.1. If you have any questions, comments, or concerns regarding this Policy, please contact us at info@wellmee.com.

The effectiveness and change of the statement

We reserve the right to amend or modify this document anytime. The change takes effect by the publication on the website unless it is explicitly mentioned another date of effectiveness.

Latest update: 17.9.2018

EU GDPR Compliance

What is GDPR?

The GDPR is the new European privacy law that replaces the EU Data Protection Directive. The law requires that business protect the privacy and personal data of EU citizens and transactions that occur within EU member states.

What is Personal Data?

Personal data is any data that relates to an identified or identifiable natural person. Examples of personal data include identifiers such as name, location data, and unique online identifiers.

What are your (End user) rights in relation to GDPR?

As we - a processor and a controller - have rights and duties within processing your personal data, you have a list of rights. They are mentioned in detail in Articles 15-22 of Resolution. Here is the list of your 8 fundamental rights:

1. The End-user's right of access which means 1) the right to know whether data concerning him or her are being processed and 2) if so, access it with loads of additional stipulations (GDPR Article 15).

2. The End-user's right to rectification. When personal data are inaccurate, then controllers need to correct them indeed (GDPR Article 16).

3. The previously mentioned right to erasure or right to be forgotten with additional stipulations, among others if personal data has been made public (GDPR Article 17).

4. The End-user right to the restriction of processing. Simply said, the right of the consumer or whatever you call the natural person under the scope of the GDPR, to limit the processing of his/her personal data with, once more, several rules and exceptions of course (GDPR Article 18).

5. The right to be informed. In general, the GDPR requires providing clear and correct information from Controllers to End-users. Only this way is the End-user informed and could decide whatever he likes or dislikes. Simply said, if you are maintaining your Personal Data Policy, or any other subject related to Personal Data of any End-users you have to inform them before this event happened and give them time to decide if they want or won't participate anymore.

6. The right to data portability. This is again one of those End-user rights which we covered more in depth previously. With the right to data portability we're in GDPR Article 20, so, keeping in mind that End-user rights are covered in Articles 5 until 22 that means two more to go.

7. GDPR Article 21 is all about the End user's right to object. That does indeed mean what it says: End users can say they don't want the personal data processing to be done or going on. This might seem a bit overlapping with other End user rights but it isn't. Of course in practice the End user can, again within specific conditions, exercise the right to object and the right to be forgotten. Especially direct marketers and people who do profiling should pay a lot of attention to the right to object as it's a lot about them and certainly profiling with automated means (though not solely).

8. The End-user right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This is pretty much a copy and paste of GDPR Article 22, Paragraph 1, which ends the 'official' list of End-user rights.

Where and how you can apply our rights?

In every case and circumstances related to processing Personal Data, even it is just question or exercising a right or making a complaint - you can reach us by email info@wellmee.com.

We will work on your request immediately without any lack of time, but in the limit of one month from the moment of sending the request.

Some extraordinary and complicated cases would have need more time we are authorized to enlarge the limit for next two months. In those cases, you will be promptly informed.