

Privacy Policy of Wellspent

Wellspent collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

Owner and Data Controller

Wellspent GmbH
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Owner contact email: selcuk@wellspent.so

Types of Data collected

Among the types of Personal Data that Wellspent collects, by itself or through third parties, there are: Trackers; Usage Data; email address; Universally unique identifier (UUID); Data communicated while using the service; User ID; Application opens; name; diagnostics; product interaction; purchase history.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Wellspent.

Unless specified otherwise, all Data requested by Wellspent is mandatory and failure to provide this Data may make it impossible for Wellspent to provide its services. In cases where Wellspent specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by Wellspent or by the owners of third-party services used by Wellspent serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through Wellspent.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Wellspent (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Advertising, Analytics, User database management, Handling payments, Handling activities related to productivity, Infrastructure monitoring and Platform services and hosting.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Wellspent, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside Wellspent. For more information, please check the privacy policies of the relevant services. Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Adjust (Adjust GmbH)

Adjust is an advertising service provided by Adjust GmbH.

Personal Data processed: Trackers; Usage Data.

Place of processing: Germany - [Privacy Policy](#) - [Opt out](#).

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

MixPanel (MixPanel)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#).

Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question.

These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Calendly (Calendly, LLC)

Calendly is a service provided by Calendly, LLC, that facilitates online scheduling of appointments.

Personal Data processed: email address; name.

Place of processing: United States - [Privacy Policy](#).

Handling payments

Unless otherwise specified, Wellspend processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Wellspend isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

RevenueCat (RevenueCat, Inc.)

RevenueCat is a payment service provided by RevenueCat, Inc. The service allows the Owner to monitor and analyze the User and their purchase history and can be used to keep track of User behavior.

Personal Data processed: Application opens; User ID.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Infrastructure monitoring

This type of service allows Wellspend to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of Wellspend.

Sentry (Functional Software, Inc.)

Sentry is a monitoring service provided by Functional Software, Inc. .

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Platform services and hosting

These services have the purpose of hosting and running key components of Wellspend, therefore allowing the provision of Wellspend from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

App Store Connect (Apple Inc.)

Wellspend is distributed on Apple's App Store, a platform for the distribution of mobile apps, provided by Apple Inc.

App Store Connect enables the Owner to manage Wellspend on Apple's App Store. Depending on the configuration, App Store Connect provides the Owner with analytics data on user engagement and app discovery, marketing campaigns, sales, in-app purchases, and payments to measure the performance of Wellspend. App Store Connect only collects such data from Users who have agreed to share them with the Owner. Users may find more information on how to opt out via their device settings [here](#).

Personal Data processed: diagnostics; product interaction; purchase history; Universally unique identifier (UUID); Usage Data.

Place of processing: United States – [Privacy Policy](#).

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Wellspend, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Wellspend.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Wellspend.

Intercom (Intercom R&D Unlimited Company)

Intercom is a User database management service provided by Intercom R&D Unlimited Company. Intercom can also be used as a medium for communications, either through email, or through messages within Wellspend. Intercom Messenger may use Trackers to recognize and track Users behavior.

Personal Data processed: Data communicated while using the service; email address; Trackers; Universally unique identifier (UUID); Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

Users may also opt out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Wellspend or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Wellspend may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, Wellspend and any third-party services may collect files that record interaction with Wellspend (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Wellspend and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Wellspent (or third-party services employed in Wellspent), which can include: the IP addresses or domain names of the computers utilized by the Users who use Wellspent, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Wellspent who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Wellspent. The Data Controller, unless otherwise specified, is the Owner of Wellspent.

Wellspent (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Wellspent as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to Wellspent, if not stated otherwise within this document.

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