

# Privacy Policy

**Effective Date:** October 18, 2025

Whole Shift Wellness Ltd ("Company", "we", "our", or "us") operates wholeshiftmethod.com (the "Website"). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our Website.

Please read this Privacy Policy carefully. By using the Website, you agree to the collection and use of information in accordance with this policy. If you do not agree with the terms of this Privacy Policy, please do not access the Website.

## 1. Information We Collect

### Personal Data

We may collect personally identifiable information that you voluntarily provide to us when you:

- Register on the Website
- Subscribe to our newsletter
- Fill out a contact form
- Make a purchase or inquiry
- Participate in activities on the Website
- Contact us directly

Personal data may include:

- Name
- Email address
- Phone number
- Mailing address
- Payment information
- Date of birth
- Health and wellness information (if provided for services)
- Any other information you choose to provide

### Usage Data

We may automatically collect certain information when you visit our Website, including:

- IP address
- Browser type and version
- Pages you visit on our Website
- Time and date of your visit
- Time spent on pages
- Unique device identifiers

- Diagnostic data

## **Cookies and Tracking Technologies**

We use cookies and similar tracking technologies to track activity on our Website and store certain information. Cookies are files with a small amount of data that may include an anonymous unique identifier.

Types of cookies we use:

- **Session Cookies:** To operate our Website
- **Preference Cookies:** To remember your preferences and settings
- **Security Cookies:** For security purposes
- **Analytics Cookies:** To understand how visitors use our Website

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Website.

## **2. How We Use Your Information**

We use the information we collect for various purposes, including to:

- Provide, operate, and maintain our Website
- Process your transactions and manage your orders
- Improve, personalize, and expand our Website
- Understand and analyze how you use our Website
- Develop new products, services, features, and functionality
- Communicate with you, including for customer service, updates, and marketing purposes
- Send you newsletters and promotional materials (with your consent)
- Process your inquiries and respond to your requests
- Find and prevent fraud
- Comply with legal obligations

## **3. Legal Basis for Processing (GDPR)**

If you are from the European Economic Area (EEA), our legal basis for collecting and using your personal information depends on the data concerned and the context in which we collect it.

We may process your personal data because:

- You have given us permission to do so
- The processing is in our legitimate interests and not overridden by your rights
- To comply with the law
- We need to perform a contract with you

## **4. How We Share Your Information**

We do not sell, trade, or rent your personal information to third parties. We may share your information in the following situations:

### **Service Providers**

We may share your information with third-party service providers who perform services on our behalf, such as:

- Payment processing
- Email delivery
- Hosting services
- Analytics providers
- Marketing services

These service providers are contractually obligated to use your personal information only as necessary to provide services to us.

### **Business Transfers**

If we are involved in a merger, acquisition, or asset sale, your personal information may be transferred. We will provide notice before your personal information is transferred and becomes subject to a different Privacy Policy.

### **Legal Requirements**

We may disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency).

### **With Your Consent**

We may disclose your personal information for any other purpose with your consent.

## **5. Data Retention**

We will retain your personal information only for as long as necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

Usage data is generally retained for a shorter period, except when this data is used to strengthen security or improve functionality of our Website, or we are legally obligated to retain this data for longer periods.

## **6. Your Data Protection Rights (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights:

- **Right to Access:** You can request copies of your personal data
- **Right to Rectification:** You can request correction of inaccurate or incomplete data
- **Right to Erasure:** You can request deletion of your personal data
- **Right to Restrict Processing:** You can request that we restrict the processing of your data
- **Right to Data Portability:** You can request transfer of your data to another organization or directly to you
- **Right to Object:** You can object to our processing of your personal data
- **Right to Withdraw Consent:** If we rely on your consent to process your data, you can withdraw that consent at any time

To exercise any of these rights, please contact us at [info@wholeshiftwellness.com](mailto:info@wholeshiftwellness.com). We will respond to your request within one month.

## 7. California Privacy Rights (CCPA)

If you are a California resident, you have specific rights regarding your personal information:

- **Right to Know:** You can request information about the categories and specific pieces of personal information we have collected about you
- **Right to Delete:** You can request deletion of your personal information
- **Right to Opt-Out:** You can opt-out of the sale of your personal information (Note: We do not sell personal information)
- **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment for exercising your privacy rights

To exercise these rights, please contact us at [info@wholeshiftwellness.com](mailto:info@wholeshiftwellness.com).

## 8. International Data Transfers

Your information, including personal data, may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where data protection laws may differ.

If you are located outside the Netherlands and choose to provide information to us, please note that we transfer the data, including personal data, to the Netherlands and process it there.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## 9. Security of Your Information

We use administrative, technical, and physical security measures to protect your personal information. While we have taken reasonable steps to secure the personal information you

provide to us, please be aware that no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against interception or misuse.

## **10. Children's Privacy**

Our Website is not intended for children under the age of 18. We do not knowingly collect personally identifiable information from children under 18. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from children without verification of parental consent, we will take steps to remove that information from our servers.

## **11. Third-Party Websites**

Our Website may contain links to third-party websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **12. Marketing Communications**

With your consent, we may send you emails about our products, services, and other updates. You can opt out of receiving marketing emails from us by clicking the "unsubscribe" link in any marketing email we send or by contacting us at [info@wholeshiftwellness.com](mailto:info@wholeshiftwellness.com).

Please note that even if you opt out of marketing communications, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

## **13. Do Not Track Signals**

We do not currently respond to "Do Not Track" (DNT) signals from web browsers. We may use third-party services that may track your browsing activities across different websites.

## **14. Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page with an updated effective date.

We will notify you via email and/or a prominent notice on our Website prior to the change becoming effective. You are advised to review this Privacy Policy periodically for any changes.

Changes to this Privacy Policy are effective when they are posted on this page.

## 15. Contact Us

If you have any questions about this Privacy Policy, please contact us:

**Email:** [info@wholeshiftwellness.com](mailto:info@wholeshiftwellness.com)

**Company:** Whole Shift Wellness Ltd

We are committed to resolving complaints about our collection or use of your personal information. If you have questions or concerns regarding this Privacy Policy, please contact us first. If you have an unresolved privacy concern that we have not addressed satisfactorily, you may contact your local data protection authority.

**Last Updated:** October 18, 2025