

Rev.

Way2K PRIVACY POLICY

(Last Updated May 17, 2021)

1. Introduction

Personal data collected by **Way2K** are processed in accordance with the law on legal protection of personal data and other legal acts of every country we aim to do business. [All personal data collected from this site complies with the principles of the EU GDPR data protection act 1998 and May 25, 2018, and the California consumer protection act \(CCPA\).](#) By accessing this site you agree to the terms of this privacy policy and consent to the collection, processing, use or transfer of data as set out in this policy.

This policy (together with our Terms of Service) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By continuing to visit our website **Way2K.com** and other **Way2K** services, you accept and consent to the practices described in this policy.

2. Information Collection

When you interact with the Site or its Services, **Way2K** may collect Personal Data and other information from you, as further described below-

3. Personal Information We Collect About You (PIPEDA)

According to the California personal information protection and electronic documents act, 2000 (PIPEDA), “personal information” means information about an identifiable individual. The information you provide to **Way2K** is considered personal information it is possible to relate it back to you through your name, address, e-mail address, telephone number and any other information that can identify you. If information cannot be related to an identifiable individual it is considered anonymous. Whenever possible, **Way2K** works with anonymous information. This privacy statement does not apply to anonymous information.

We may collect or process the following information:

- **Metadata** - IP address, computer and connection information, referring web page, standard web log information, language settings, time zone, etc.
- **Device Information** - device identifier, device type, device plugins, hardware capabilities, etc.
- **Location** - GPS position.
- **Actions** - pages viewed, buttons clicked, time spent viewing, search keywords, etc.

4. **Personal Data you provide to us**

We collect Personal Data from you when you voluntarily provide such information. This can occur in several instances, such as when you send us a message relating to our Services and provide your name, email address, or contact us with inquiries. Wherever **Way2K** collects your Personal Data, we make an effort to provide a link to this Privacy Policy.

By voluntarily providing us with Personal Data, you are consenting to our use of it as per this Privacy Policy. If you provide any Personal Data, you acknowledge and agree that such Data may be transferred from your current location to the offices and servers of **Way2K** and its authorized third parties.

We may request, collect, or process the following information:

- **Account Details** - username, password, profile picture.
- **Contact Details** - email address, phone number.
- **Location Details** - physical address, billing address, time zone.
- **Identity Details** - full name, proof of identity (e.g. drivers' license, passport), proof of address (e.g. utility bill), photograph of the user.
- **Financial Information** - credit card details, wire transfer details, payment processor details (e.g. skrill, PayPal), tax numbers.
- **User Generated Content** - project descriptions and attachments, bid description, user profiles, user reviews, contest descriptions and attachment, user messages etc.

5. **How we use personal information**

The information we request, collect, and process is primarily used to provide users with the product or service they have requested. More specifically, we may use your personal information for the following purposes:

- to provide the service or product you have requested;
- to facilitate the creation of a User Contract (see Terms of Service for more information);

- to provide technical or other support to you;
- to answer enquiries about our services, or to respond to a complaint;
- to promote our other programs, products or services which may be of interest to you (unless you have opted out from such communications);
- to allow for debugging, testing and otherwise operate our platforms;
- to conduct data analysis, research and otherwise build and improve our platforms;
- to comply with legal and regulatory obligations;
- if otherwise permitted or required by law; or
- for other purposes with your consent, unless you withdraw your consent for these purposes.

The 'lawful processing' grounds on which we will use personal information about our users are (but are not limited to):

- when a user has given consent;
- when necessary for the performance of a contract to which the user is party;
- processing is necessary for compliance with our legal obligations;
- processing is necessary in order to protect the vital interests of our users or of another natural person.
- processing is done in pursuing our legitimate interests, where these interests do not infringe on the rights of our users.

We use automated decision when helping matching users to jobs. The primary way this occurs is through how we rank users. These rankings are produced by analyzing user generated content, user activity and the outcome of jobs; in this context, user generated content will include reviews that users receive when completing jobs. More information on these ranking guides can be found in our community articles. Automated decision making is also used to recommend potential jobs to our users and as a part of our marketplace security systems.

6. Non-Identifiable or Aggregated Data

When you interact with **Way2K** through our Site or Services, we receive and store certain personal non-identifiable information. This information is collected passively and cannot presently be used to specifically identify you as a person. We may store such information or such information may be included in information databases that are owned and maintained by **Way2K** its affiliates, agents or service providers. We also use "cookies" to collect personal non-identifiable information, such as your IP address, browser type, domain name, and the **Way2K** website pages that you visit. More information concerning cookies is provided below-

7. Cookies

Cookies are pieces of information that a website transfers to your computer's hard drive for record-keeping purposes. We use cookies to track your personal preferences and purchases as you navigate through our websites to save you from having to re-enter information every time you visit a **Way2K** making your next shopping experience at a **Way2K** website improved and better. To search our websites **Way2K** you need to have the cookies option turned on your web browser. Please reference your particular browser's instructions regarding the cookies option. If you choose to disable the cookies option on your web browser, you may be limited in your ability to use some or all of the features provided on **Way2K**.

8. Advertising Networks

From time to time, we may use one or more third-party online advertising networks to serve ads on our behalf, onto the Internet. Said third-party network may collect anonymous information about your visits to our website and record your interaction with our ads. This accomplished with features such as cookies, action tags, web beacons, and/or GIF tags located within **Way2K**. Occasionally, we may share anonymous information with third-party networks, in an aggregate form, to help us analyze and improve our website for future use. These third-party networks may also use information about your visit to our website and other websites in order to provide ads about goods and services that may strike your interest.

9. Marketing information:

If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our services, such as when you last opened an email from us or ceased using your our materials. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

10. Children Under Age

Way2K is directed to adults and does not knowingly collect personal from children under the age of 16. If you are a child under the age of 16, you must have your parent's or guardian's consent, and provide said consent to **Way2K**. If you are the parent or guardian of child under the age of 16 and you believe your child has provided personal information **Way2K**, please email us at info@Way2K.com.

11. Information Use

The information we collect on **Way2K** may be used to fulfill your requests or communicate special offers and other **Way2K** promotions to you. When you contact us, we give you the opportunity to receive notifications about special offers and other **Way2K** promotions.

12. Information Disclosure

We may disclose the information we collect about you (including personally identifiable information) to third parties in order to comply with certain laws, regulations, and/or governmental requests. We may also disclose such information for the following purposes: to verify or enforce compliance with our User Agreement and Privacy Policy, to process your request(s), to reduce credit risk, to protect against fraud/misuse/unauthorized use of the Site, or when we believe in good faith that the law requires such disclosure. Furthermore, we may also disclose such information to a successor entity in connection with a merger, consolidation, sale of assets or other corporate change affecting **Way2K**.

13. Information Sharing

We may share the information collected on **Way2K** website with agents or contractors who provide support for **Way2K**'s internal operations. Said parties may receive personally identifiable information- as such is needed to perform their duties. Please be assured that said parties may not use the information for any other purpose. If you do not want us to share such information, please email us at info@way2k.com.

14. Where we store your information

Way2K has a data privacy officer who is responsible for ensuring that your personal information is collected, used, disclosed (shared) and retained in compliance with applicable privacy regulations.

However, the data that we collect from you may be transferred to, and stored at, a destination outside the European economic area ("EEA") that may not be subject to equivalent data protection law.

Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognized legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy.

15. Securing Personal Data

Way2K takes reasonable steps to protect Personal Data via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. But unfortunately, no electronic transmission of information via the internet is ever fully secure- carefully decide whether you want to send us information electronically before actually doing so.

16. Your Rights As A Data Subject

In some jurisdictions (for example, the member states of the European Union) you may be entitled to certain rights in and to your personal data, subject to certain conditions and exceptions contained in applicable law. These rights may include the following:

- Request us to confirm whether your personal data is processed by us, and if we do, to obtain access to your personal data and certain information about it.
- Require the correction of your personal data if it is inaccurate or incomplete.
- Direct us to stop processing your personal data under certain circumstances.
- Erase or delete your personal data, for example, where the data is no longer needed to achieve the purpose for which it was collected.
- Restrict the further processing of personal data
- Request us not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (we currently do not engage in such processing and will notify you prior to doing so).
- Request to receive your personal data for transmission to, or to directly transmit to, another data controller in a structured, commonly-used and machine-readable format.

To protect your privacy and the security of your personal data, we will take reasonable steps to verify your identity before complying with such rights requests.

17. Privacy shield

Way2K adheres to the seven privacy shield principles of notice, choice, and accountability for onward transfer, security, data integrity, access, and recourse, enforcement and liability as they relate to personal data. **Way2K** verifies compliance to the principles through self-assessment. The privacy policy covering human resources data can be accessed on our intranet web site by all employees.

18. Legal bases for processing EEA users Data

If you are an individual in the European economic area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the services, including to operate the services, provide customer support and personalized features and to protect the safety and security of the services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. Your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, and this may mean no longer using the services

19. Your California Privacy Rights (CCPA)

We may elect to share information about you with third parties for those third parties' direct marketing purposes. California Civil Code § 1798.83 permits California residents who have supplied personal information (as defined in the law) to us to, under certain circumstances, request and obtain certain information regarding our disclosure, if any, of personal information to third parties for their direct marketing purposes.

If this law applies to you, you may obtain the categories of personal information shared by us and the names and addresses of all third parties that received personal information for their direct marketing purposes from us during the immediately prior calendar year (*e.g.*, requests made in 2018 will receive information about 2015 sharing activities).

To make such a request, please provide sufficient information for us to determine if this applies to you, attest to the fact that you are a California resident and provide a current California address for our response. To make such a request (limit one request per year), please send an email to: info@way2k.com with "California Privacy Rights" as the subject line.

20. Your right to withdraw consent

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us. You can exercise the rights listed above at any time by contacting us. If your request or concern is not satisfactorily resolved by us, you may contact our data protection officer, his email is info@way2k.com.

He can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

21. Opting out of messages from us

To opt-out of any future promotional messages from us, you should unsubscribe in the body of the promotional message that was sent to you (found at the bottom of the email) or send an unsubscribe request to us at info@way2k.com. We will process your request within a reasonable time after receipt.

22. Opting out of interest based advertising

The online advertising industry provides a service through which you may opt-out of receiving targeted ads from certain data partners and other advertising partners that participate in self-regulatory programs. We comply with the Self-Regulatory Principles for Online Behavioral Advertising set forth by the Digital Advertising Alliance (DAA) and the European Interactive Digital Advertising Alliance ("EDAA"). You can opt-out of targeted advertising from certain providers at www.aboutads.info/consumers. Please note that by opting out, you will continue to see generic advertising that is not tailored to your specific interests and activities.

Please note that cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted out on your device browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device. EU residents who have provided their consent to our use of cookies and similar technologies can use the EDAA's opt out tool which can be found at Way2K.

23. Data portability

Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not

to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create on the spaces you under your sole control, like your personal bit bucket repository

24. California Privacy CCPA

This section of the privacy policy provides information to California (“CA”) residents whose personal information is processed pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), whether through the Website or offline. It describes the categories of Personal Information that **Way2K** collects, and the purposes for which that information is collected.

This section does not apply to Personal Information that is protected under federal financial privacy laws. Personal Information does not include information that is publicly available or that has been de-identified or aggregated.

25. Notice For California Consumers – Your Privacy Rights under the (CCPA)

Under California’s “shine the light” law, California residents have the right to request in writing from businesses with whom they have an established business relationship

1. A list of the categories of personal information, such as name, address, e-mail address, and the type of services provided to that customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties’ direct marketing purposes, and
2. The names and addresses of all such third parties. To request the above information, please e-mail us at **info@Way2K.com**

We will respond to such written requests within 30 days following receipt at the mailing address above. We reserve the right not to respond to requests submitted other than to the address specified above or otherwise exempted by law. Please note that we are required only to respond to each user once per calendar year.

26. Additional EU Disclosures

We generally act as the data controller of your information submitted through our website and platform; however, under certain circumstances, User or Corporate entity may engage us to provide them with certain processing services related to information owned or controlled by the User or Corporate entity. We are not responsible for any User or Corporate entity's use of

information for which it is an owner or controller. As processor for a User or Corporate entity, we only act under their instruction with respect to the processing of your information. To learn more about how a User or Corporate entity may use such information, you should review its privacy policy.

If you are situated in the EU and have any complaints regarding our privacy practices as data controller, you have the right to make a complaint at any time to your local Supervisory Authority. We would, however, appreciate the chance to address your concerns before you approach your Supervisory Authority so please contact us in the first instance. If you are situated in the EU and have a complaint, please contact our privacy team

27. Provision of Personal Data and failure to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we will not be able to provide services to you

28. How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

29. Complaint to a Data Protection Authority

You have the right to submit a complaint concerning our data processing activities to our data protection officer

30. Complaints or Queries

If you have any queries regarding our data collection and protection practices or your rights, please do not hesitate to contact our data protection officer, at: info@Way2K.com

31. Privacy Policy Updates

We may revise this privacy policy from time to time, and will post the most current version on our web site. If a revision meaningfully reduces your rights, we will notify you.

32. To contact our Privacy Officer

If you have an enquiry or a complaint about the way we handle your personal information, or to seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer as follows:

By Email: info@Way2K.com

By Mail: Honolulu, Hawaii, USA

For the purposes of the GDPR, our Privacy Officer is also our Data Protection Officer (DPO).

While we endeavor to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing to our Privacy Officer, by mail or email as above. We will acknowledge your formal complaint within 10 working days of receipt.