

Privacy Policy

Last updated: August 8, 2025

ViiRaa Inc. ("**Company**", "**we**", "**our**", or "**us**") respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes how we collect, process, retain, and disclose personal data about you when providing services to you through our websites, applications, products, and services that link to this policy (our "**Services**") and our practices for using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect:

- Through the Services.
- In communications, including email, text, chat, and other electronic messages, between you and the Services.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries) that does not link to this policy; or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the Services.

We may provide additional or different privacy policies that are specific to certain features, services, or activities.

Please read this policy carefully to understand our policies and practices regarding your information and how we treat it. By interacting with our Services or providing us with your information, you agree to the collection, use, and sharing of your information as described in this privacy policy. This policy may change from time to time (see [How We Retain Your Personal Data](#)). Your continued use of the Services after we make changes as described here is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children's and Minors' Data

Our Services are not intended for, and we do not knowingly collect any personal data from, children under the age of 18. If we learn we have collected or received personal data from a child under 18 years old without verification of parental consent, we will delete that information.

The Personal Data That We Collect or Process

"**Personal data**" is information that identifies, relates to, or describes, or can reasonably be linked to an identifiable individual. It does not include data that has been de-identified or aggregated such that it can no longer be used to identify a specific person.

The types and categories of personal data that we collect or process include:

- Account and contact information, including name, address [(such as home address, work address, or other address)], email address, phone number, [username,] and other contact information you provide us.

- Health and fitness data, including passive behavioral and fitness-related data about you via wearable devices that you connect to our Services. This may include information such as your sleep patterns, heart rate, blood sugar levels, exercise activity, and other wellness metrics. Please note: While we collect health and fitness information, we do not collect legally defined biometric identifiers (such as fingerprints, facial scans, or retinal scans). The data we collect from wearables is used for wellness and behavioral analysis and is not considered biometric identifying data under applicable law.
- Device and usage information, including details about your device and internet connection (e.g. IP address, device identifiers, browser type, operating system, and device model), as well as usage data such as the features you use, pages or screens you view, the dates/times of your visits, clicks and scrolls, and other interaction information. We may also collect general location information (such as city or country) based on your IP address or device settings, if you have enabled and consented to location information collection.
- Cookies and tracking data. Like most online services, we and our partners use cookies, pixels, and similar tracking technologies to collect usage data and recognize you across different services and sessions. This may include data about your browsing activities over time and across third-party websites or apps for purposes of analytics and targeted advertising (see [Your Rights and Choices About Your Information](#) below for more information).
- Payment information, including credit card or debit card information and information about the payment methods and services (such as PayPal or Venmo) you use in connection with the Services.
- Account history, including information about your subscription, account, transactions, purchases, order history, or discounts.
- Demographic information, including your age, gender, income level, education, or family or marital status, if you have consented to such information collection.
- Content and information you elect to provide as part of your profile or in any reviews you make through the Services or emails, chats, or other communications sent to us.
- Images, voice recordings, and videos collected or stored in connection with the Services, if you have consented to such information collection.
- Identity document information, such as Social Security and driver's license numbers, if you have consented to such information collection.
- Biometric information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data, if you have consented to such information collection.
- **OTHER INFORMATION COLLECTED**

In addition to the above, we may collect aggregated or de-identified data that does not directly identify you. For example, we might compile statistical information about all app users' blood sugar levels. Such aggregated data is not considered personal data under this Policy. If we ever

combine non-identifiable data with personal data in a way that could identify you, we will treat the combined data as personal data.

Some of the information identified above[, including identification document information, precise geolocation information, and biometric information, may be considered sensitive data under certain laws. If required under applicable law, we will collect and process sensitive personal data only with your consent. If you choose not to provide or allow us to collect some information, we may not be able to provide you with requested features, services, or information.

We also collect:

- **Statistics or aggregated information.** Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal data. For example, we may aggregate personal data to calculate the percentage of users accessing a specific Services feature.
- **Technical information.** Technical information includes information about your internet connection and usage details about your interactions with the Services, such as clickstream information to, through, and from our Services (including date and time), products that you view or search for; page response times, download errors, length of your visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from a page.

If we combine or connect non-personal statistical or technical data with personal data so that it directly or indirectly identifies an individual, we treat the combined information as personal information.

How We Collect Your Personal and Other Data

You Provide Information to Us

We collect information about you when you interact with our Services, such as when you [create or update an account or profile, fill out forms or fields on our app or website, respond to surveys or promotions, or communicate with us (for example, when you contact customer support or send us an email). Any information that you choose to submit in these interactions will be collected by us and associated with your account, if you have one.

Automatically Through Our Services

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect information that may include personal data. Information collected automatically may include usage details, IP addresses, operating system, and browser type, and information collected through cookies, web beacons, and other tracking technologies including details of your interactions with our Services, such as traffic data, location data, logs, and other communication data, and which resources and Services features that you access and use.

We may use these automatic collection technologies to collect information about your online activities over time and across third-party sites or other online services (behavioral tracking).

Using automatic collection technologies helps us to improve our Services and to deliver a better and more personalized experience.

The technologies we use for this automatic data collection may include:

- **Cookies.** A cookie is a small file placed on your device when you interact with the Services. You may refuse to accept or disable cookies by activating the appropriate setting on your browser or device. However, if you select this setting, you may be unable to access certain features of the Services.
- **Web Beacons.** Some parts of the Services or our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those parts or opened an email and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity).

These technologies help us improve our Services and deliver a better, more personalized experience.

Behavioral Tracking

We may work with third parties (such as analytics and advertising partners) that use tracking technologies to collect information about your activities over time and across different websites or online services. For example, we use analytics providers that collect information about how users use our website and app, which helps us understand user behavior and improve the Service. We (and/or these partners) may also collect information for use in interest-based advertising to show you advertisements on other sites or apps that are tailored to your interests based on your browsing history or app usage. See [Your Rights and Choices About Your Information](#) below for information on how you can opt out of certain tracking and targeted ads.

When you interact with the Services, there are third parties that may use automatic collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your device manufacturer.
- Your internet or mobile service provider.

These third parties may use tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your personal data or they may collect information, including personal data, about your online activities over time and across different websites, apps, platforms, and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

From Business Partners and Service Providers

We may receive personal data about you from other sources and combine that with information we collect directly from you. For example, we may obtain information about you from service providers that we engage to perform services on our behalf, such as analytics companies, advertising partners, or social media platforms. If we engage in joint marketing or partnerships,

our partners may provide us with certain information about you (such as demographic information or your interests) to better tailor our offerings. In addition, if you engage with ViiRaa content on third-party platforms (for instance, by clicking “like” or “follow” on our social media pages, or by logging into ViiRaa via a third-party account), those third-party services may send us certain information about you, such as your social media handle or profile information, subject to their own privacy policies and your privacy settings on those services.

How We Use Your Information

We use information that we collect about you or that you provide to us for a variety of business and commercial purposes. These purposes include:

- **Providing and Improving the Services:** We use your information to operate, maintain, and provide you with all of the content and features of our Services. For example, we process your data to display your health and fitness metrics in the ViiRaa app, to personalize your user experience, and to enable connectivity with your wearable devices. We also use the data to improve and develop our Services, which includes analyzing user activities and preferences to enhance functionality and user experience. In doing so, we may create aggregated insights from your information and use machine learning and artificial intelligence (“AI”) techniques to refine our offerings. For instance, we use the health and fitness data collected (in aggregated or de-identified form) to train our internal AI and machine learning models. These models help us to develop new features and programs, including our programs to identify and cultivate internet influencers, and to optimize how we deliver content and recommendations to our users.
- **Account Management and Customer Support:** We use contact and account information to manage your account, provide customer service, and communicate with you about your use of the Services. This can include sending you confirmations, technical notices, updates, security alerts, and administrative messages. We may also use your information to notify you about changes to our Services, such as new features or policy updates.
- **Fulfill Requests and Conduct Operations:** We process personal data as necessary to fulfill any purpose for which you provide it. For example, if you participate in a survey, contest, or promotion, we will use the information you submit to administer those programs. If you share information with us for a specific purpose (such as a testimonial or a referral to a friend), we will use it for that purpose. We also use information as needed to carry out our everyday business operations, such as maintaining our IT systems, debugging and repairing errors, analyzing data, and monitoring usage and security.
- **Marketing and Promotional Communications:** We may use your information to promote our Services and business. This includes sending you promotional materials or newsletters about new products, services, or special offers from ViiRaa that we believe may interest you. We may also use your information to personalize or target the marketing content we display on our own Services or on third-party websites (for example, showing you a ViiRaa advertisement on a social media platform that you use). Additionally, if you consent, we may send you marketing communications on behalf of third-party partners or advertisers, or facilitate the delivery of third-party promotions to you. (You will have the opportunity to opt out of marketing communications or certain advertising, as described in [Your Rights and Choices About Your Information](#) below.)

- Advertising and Analytics: We use data (often in aggregated or pseudonymous form) to measure the effectiveness of our advertising and to understand the demographics and preferences of our user base. For example, we may use your usage data and interactions to help our marketing partners find other people who have interests similar to yours (this is sometimes called creating “lookalike audiences” for advertising). We may also use information such as device identifiers and cookies to serve you with interest-based ads that align with your fitness interests or to cap how often you see a particular ad.
- Security and Fraud Prevention: We may use personal data to protect the integrity and security of our Services, assets, network, and users. This includes detecting, investigating, and preventing fraudulent transactions, spam, abuse, or other malicious activities. We use various tools and may collaborate with service providers (like security and anti-fraud services) to achieve these goals.
- Legal Compliance and Enforcement: We use and retain personal data as needed to comply with applicable laws, regulations, legal processes, or governmental requests. We may also use personal data to enforce our Terms of Service or other agreements, and to investigate or help prevent security issues, fraud, and other prohibited activities. If necessary, we will use your information to collect fees or recover debts owed to us, or to defend our rights and the rights of our users or others.
- Other Purposes: We may also use your information for any other purpose that we describe at the time of collection or to which you consent. We will only use your personal data in ways that are compatible with the purposes for which we collected it, or that you later authorize. If we intend to use your personal data for a purpose materially different from those listed above, we will provide you with notice and, if required, obtain your consent.

Who We Disclose Your Information To

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may also disclose personal data that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our organization and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ViiRaa Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by ViiRaa Inc. is among the assets transferred.
- To a business partner. When you choose to integrate or use third-party services in conjunction with ViiRaa (for example, linking a wearable device or syncing ViiRaa with another app), we may share certain information with the providers of those services as needed to fulfill your request. In such cases, you will have consented to or initiated the

sharing. For instance, if you instruct us to share data with a wellness program or social media platform, we will disclose information to that third party at your direction.

- To third parties to market their products or services to you with your consent or as permitted by law. We contractually require these third parties to keep personal data confidential and use it only for the purposes for which we disclose it to them. For more information, see [Your Rights and Choices About Your Information](#).
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Services, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our organization, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction, and sharing information in emergency situations to help prevent imminent harm.

We may share aggregated or de-identified information (which cannot reasonably be used to identify you) without restriction. For instance, we may publish reports on user trends or share statistics with partners about the overall usage of our Services. These reports will not contain any data that could be linked back to any specific individual.

Note on Categories of Disclosures: For purposes of certain privacy laws (such as the California Consumer Privacy Act), in the past 12 months we may have disclosed all of the categories of personal data described in [The Personal Data That We Collect or Process](#) to the types of third parties listed above, to the extent applicable. We do not disclose sensitive personal data (such as health or precise location data) except to service providers processing it on our behalf or as otherwise described in this Policy with appropriate protections.

Your Rights and Choices About Your Information

This section describes mechanisms you can use to control certain uses and disclosures of your information and rights you may have under state law, depending on where you live.

Advertising, marketing, cookies, and other tracking technologies choices:

- **Cookies and Other Tracking Technologies.** You can set your browser to refuse all or some browser cookies or other tracking technology files, or to alert you when these files are being sent. You can also often use your device or browser settings to delete cookies or

disable other tracking identifiers. If you disable or refuse cookies or similar tracking files, some Services features may be inaccessible or not function properly. Some browsers include a "Do Not Track" (DNT) setting that can send a signal to the online services you visit indicating you do not wish to be tracked. Because there is not a common understanding of how to interpret the DNT signal, our Services may not respond to all browser DNT signals. Instead, you can use the range of other tools to control data collection and use, including the cookie controls and advertising controls described in this policy.

- **Promotions by the Company.** If you do not wish us to use your information used to promote our own or third parties' products or services, you can opt out by at any time by using the "unsubscribe" link in the email. You can also opt out by logging into your account and adjusting your account settings and preferences or sending us an email stating your request. Please note that even if you opt out of marketing emails, we may still send you transactional or administrative communications related to your use of the Services (e.g. service notifications or account issues).
- **Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target audience preferences, you can opt out by using the "unsubscribe" link in the email. For this opt out to function, you must have your browser set to accept all browser cookies.
- **Disclosure of Your Information for Third-Party Advertising.** We may partner with third parties to display or deliver ads to you, both on our Services and elsewhere, based on information about your use of ViiRaa and other sites/apps over time. If you do not want us to share your personal data with unaffiliated or non-agent third parties for advertising and marketing purposes, you can also opt out by logging into your account and adjusting your account settings and preferences or sending us an email stating your request to legal@viiraa.com. We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Please note that even if you opt out of interest-based ads, you may still see non-personalized advertisements (for example, ads that are not tailored to you). Also, opting out via industry tools or device settings is browser- and device-specific; you should repeat these steps on each browser and device you use.

Location data choices:

- **Location Data.** You can choose whether or not to allow the Services to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some Services features may become inaccessible or not function properly.

Your State Privacy Rights

Depending on your state of residency, you may have certain rights related to your personal data, including:

- **Access and Data Portability.** Confirm whether we process your personal data and access a copy of the personal data we process. To the extent feasible [and required by state law, depending on your state], data will be provided in a portable format. Depending on your state, you may have the right to receive additional information and it will be included in the response to your access request.
- **Correction.** Request that we correct inaccuracies in your personal data that we maintain, taking into account the information's nature and processing purpose.
- **Deletion.** Request that we delete personal data about you that we maintain, subject to certain exception under applicable law.
- **Opt Out of Using Personal Data for Targeted Advertising, Profiling, and Sales.** Request that we do not use your personal data for these purposes.

Important: The exact scope of these rights vary by state. There are also several exceptions where we may not have an obligation to fulfill your request.

To exercise any of these rights, please submit a request to us through web form or email.

Some browsers and browser extensions support the Global Privacy Control (“GPC”) that can send a signal to process your request to opt out from certain types of data processing, including data "sales" as defined under certain laws. When we detect such a signal, we will make reasonable efforts to respect your choices indicated by a GPC setting as required by applicable law.

Nevada provides its residents with a limited right to opt out of certain personal data sales. Residents who wish to exercise their sale opt-out rights may submit a request to this designated address: support@viiraa.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.

If you are a California resident, additional information applies to you. You are afforded additional rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA). In the past 12 months, we have collected the following categories of personal information about California consumers, as categorized by the CCPA:

- Identifiers: e.g. name, email address, IP address, and other similar identifiers.
- Customer Records Information: e.g. contact information and any account credentials or profile information you provide.
- Internet or Other Electronic Network Activity: e.g. browsing or search history on our website, usage data from our app, device and cookie information, and interaction with our online services or ads.
- Geolocation Data: general location inferred from IP address or device (we do not collect precise GPS coordinates without your consent).

- Sensory Information: not collected (we do not collect audio, electronic, visual, or similar information as part of our Services, except any photos/media you may choose to upload, which would fall under content you provide).
- Professional or Employment Information: not collected (unless you separately provide it to us, which is not part of our typical Services).
- Inferences: we may infer preferences or characteristics from your usage of the Services (for example, inferring your sleep habits or fitness level from the data collected, or inferring product preferences for advertising purposes).

Additionally, some of the data we collect (such as health and fitness data from wearables) may be classified as sensitive personal information under California law (health information). We do not collect sensitive government identifiers (like Social Security or driver's license numbers), financial account passwords, or precise geolocation without consent. Any sensitive personal information we do collect (e.g., health metrics) is used only to provide the Services and for the limited purposes described in this Policy, and not to infer characteristics about you for unrelated purposes.

How We Protect Your Personal Data

We use commercially reasonable administrative, physical, and technical measures designed to protect your personal data from accidental loss or destruction and from unauthorized access, use, alteration, and disclosure. However, no website, mobile application, system, electronic storage, or online service is completely secure, and we cannot guarantee the security of your personal data transmitted to, through, using, or in connection with the Services. In particular, e-mail, texts, and chats sent to or from the Services may not be secure, and you should carefully decide what information you send to us via such communications channels. Any transmission of personal data is at your own risk.

The safety and security of your information also depends on you. You are responsible for taking steps to protect your personal data against unauthorized use, disclosure, and access.

How We Retain Your Personal Data

We keep the categories of personal data described in this policy for as long as reasonably necessary to fulfill the purposes described or for as otherwise legally permitted or required, such as maintaining the Services, operating our organization, complying with our legal obligations, resolving disputes, and for safety, security, and fraud prevention. This means that we consider our legal and business obligations, potential risks of harm, and nature of the information when deciding how long to retain personal data. At the end of the retention period, personal data will be deleted, destroyed, or deidentified.

Changes to Our Privacy Policy

We may update this policy from time to time, and we will provide notice of any such changes to the policy as required by law. The date the privacy policy was last updated is identified at the top of the page. We will notify you of changes to this policy by updating the "last updated" date and posting the updated policy on the Services. We may email or otherwise communicate reminders about this policy, but you should check our Services periodically to see the current policy and any changes we have made to it.

Contact Information

To exercise your rights or ask questions or comment about this privacy policy or our privacy practices, contact us at:

- Email: support@viiraa.com
- Subject line: Privacy Request – [Access | Deletion | Correction | Opt-out | Limit Sensitive Data | Portability | Appeal] – [Your State/Country]

To register a complaint or concern, please:

- Submit your complaint to support@viiraa.com with the subject line
- Privacy Complaint – [Short Summary].
- Please include: your full name, the email you use with ViiRaa, your state/country, a description of the issue (with dates/screenshots if helpful), and your desired outcome.
- If you're using an authorized agent, include a signed authorization or power of attorney.

Our review & timelines. We will acknowledge receipt within 10 business days and provide a written response within the timeframe required by applicable law (generally 30–45 days). If we need more time, we'll let you know why and when to expect a response.

Appeal. If you're not satisfied with our decision, reply to the same thread with the subject Privacy Complaint – Appeal. Your appeal will be reviewed by our Privacy Officer (not involved in the original decision).

Further recourse. If you still have concerns after our appeal, you may contact your local data protection authority or consumer protection agency. We will provide their contact details upon request.

We will verify your identity before acting on requests and will not discriminate against you for exercising your privacy rights.