

The Member Agreement below is effective for all members  
Last Updated on February 3, 2025

## **Data Privacy Policy**

TETRAGRAM CO., LTD takes your privacy very seriously. This privacy policy is designed to assist you in understanding how we collect and use the personal information you provide to us and to assist you in making informed decisions when using our site and our products and services. The content of wellbie.co and Wellbie are the service offerings of TETRAGRAM CO., LTD, a limited liability company registered in Thailand with company number 0135565030195. Wellbie integrates AI technology and nutrition science, guiding users to healthier diets & eating habits to achieve or maintain their ideal body weight. Wellbie and associated companies, and references in this document to “us,” “our,” and “we” refer to TETRAGRAM CO., LTD and wellbie.co.

This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use our Service because Users have the right to know what information we collect, how it is protected and used, and the circumstances under which it may be disclosed. This Policy describes the various ways that we collect and treat information and content provided by Users so as to enhance your use of our services while at the same time, protect your privacy.

This Privacy Policy addresses all the requirements set out in the GDPR. The General Data Protection Regulation (EU) 2016/679 (“GDPR”) is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). It also addresses the export of personal data outside the EU and EEA areas. The GDPR aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU. Please review this Privacy Policy before you use the Website, Mobile App or any of the services or features offered on or through the Site or through the Mobile App. By using the Website, Mobile App and its services and features, you agree to be bound by this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Website, Mobile App or any of the services or features offered on or through the Site or through the Mobile App.

This Policy does not cover information collected other than on or through the Website, Mobile App or any of the services or features offered on or through the Site or through the Mobile App, including without limitation offline and on sites linked to from the web site and its applications. It does, however, cover social media accounts of Wellbie. This Policy may be modified from time to time without advance notice. Continued use of our services by you will constitute your acceptance of any changes or revisions to the Policy.

### **1. Information Collected**

TETRAGRAM CO., LTD may collect certain personal information from you when you register to use the Website, Mobile App or its services and features. This includes all activities within the Website, Mobile App or its services, Mobile App or its services and features. We may also collect certain non-personally identifiable

information from users of our Website, Mobile App or its services, such as their Internet protocol address, the type of browser and operating system they use, the domain name of your Internet service provider, and the web pages, content and advertisements you may have visited, viewed or clicked on, referring / exit pages, date/time stamp and clickstream data. Our users can request their current information and past activities from their record through our web site via direct email contact. After the user permits, the rundown of information we will gather for our advertising framework comprises of Google and Facebook accounts, sexual orientations, age ranges, topics interested, real-time geo locations, current dwelling country, time span view in our Mobile App. Additionally, the Services utilise user-specific analytics that measures individual use of our Website, Mobile App or its services.

We collect this information in several ways, including the following:

- **Cookies:** Cookies are text files placed in your computer's browser to store your preferences. Cookies do not contain personal information, but if you choose to furnish us with personal information, this information may be linked to the data stored in the cookie. We may use "cookies" to maintain a record of your visits and to improve the content and services on our site.
- **Web Server Logs:** Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at this site, and the websites visited just before and just after our site. Google Analytics and Facebook Analytics may also use these details for Analytics purposes. Please visit the [Google Analytics Privacy Policy](#) and [Facebook Privacy Policy](#) to understand more about how they store data.
- **Mobile App Server Logs:** Information gathered through mobile app server logs may include the date and time of visits, the pages viewed, time spent at this site, and the websites visited just before and just after our app. We use Google Firebase Analytics and Facebook Analytics to use these details for Analytics purposes. Please visit the [Google Analytics Privacy Policy](#) and [Facebook Privacy Policy](#) to understand more about how they store data.
- **IP Addresses:** Our system may also collect your IP address, which is a numerical address that is used to identify a computer connected to the Internet. We may use your IP address to help diagnose problems with our server, to administer our site, to deliver web pages to you upon request, to tailor our site to the interests of our users, and to measure traffic within our site.
- **Public Posting and Blogs:** If you post in the comments of a blog post or chat on the Website (or anywhere on social media) and Mobile App, you should be aware that any information you share is visible to other users. Personally identifiable information you submit to one of these forums can be read, collected, or used by other individuals to send you unsolicited messages. TETRAGRAM CO., LTD is not responsible for the personally identifiable information you choose to submit in these forums. For example, if you choose to make information, which was previously non-public, available by enabling certain user features, TETRAGRAM CO., LTD will collect that information from your interaction, and the information will become publicly available.

## **2. Information from Minors**

TETRAGRAM CO., LTD does not knowingly collect information from children under the age of 18. Nor do we collect information from any individual under the age of 18 without the consent of a parent or guardian. If you believe that your child has registered on our site or that we have collected information from your child, please contact us immediately so that we can remove that information from our database.

TETRAGRAM CO., LTD does recognize that parents, guardians, or other adults may purchase our products for family use, including use by minors. We do not knowingly collect personal information from children under 13 for marketing purposes, but because some information is collected electronically, it can appear to be the personal information of the purchaser of the product and will be treated as such by this privacy policy.

## **3. Information You Share**

### **When you communicate with us**

When you consult with our customer service team, send us an email, post on our blog, or communicate with us in any way, you are choosing to share information with us. That information may include your name, physical address, email address, IP address, phone number, gender, location, purchase history, or other demographic information. By giving us this information, you consent to this information being collected, used, disclosed, transferred to Thailand and stored by us as described in this Privacy Policy.

### **When you join our mailing lists**

If you join one of our mailing lists, you choose to provide us with personal data such as your name and email address. We will always link to this Privacy Policy and explain how we would like to communicate with you. We only ever use your data to communicate with you in this way.

You can manage your preferences or unsubscribe at any time by following the links in emails we send you.

## **4. Information We Collect**

### **Emails**

If you join one of our mailing lists, we track how you interact with emails we send you. This helps us to understand what is important to you and improve the content we provide. We track whether you open our emails, which links you follow, and when you do so.

You can manage your preferences or unsubscribe at any time by following the links in emails we send you.

## **5. Information We Share**

### **External Processing**

We use third parties to provide services to us, such as:

- Google Analytics and Facebook Analytics help us analyze the use of these services. Please visit [Google Analytics Privacy Policy](#) and [Facebook Privacy Policy](#) to understand more about how they store data.

These companies process personal data on our behalf. We only provide these companies with the information needed to deliver the service. We enter into written contracts to ensure that the use of this data is consistent with this Privacy Policy.

### **Legal Disclosure, Safety and Security**

We may preserve, use, or disclose your personal data if we believe it is reasonably necessary to:

- Comply with a law, regulation, legal process, or governmental request
- Protect the safety of any person
- Protect the integrity of our platform, including to help prevent spam or abuse
- Address fraud, security, or technical issues
- Protect our rights or property or the rights or property of those who use our services
- Calculate nutritional values based on nutritional science to ensure you are provided with the most accurate and correct information.

## **6. Managing Your Data**

### **Understanding your rights**

It is essential that you understand your legal rights around your personal data and how we may use it. If you would like to discuss or exercise any of these rights, please contact our Data Controller at [contact@ttgr.io](mailto:contact@ttgr.io)

### **Right to be informed**

This Privacy Policy aims to inform you about how we process your personal data. You might also see specific messages when we collect personal data from you that explain why we ask for it.

### **Right of access**

You have the right to access a copy of your personal data and receive certain information about what the data is and how and why we are processing it. We will ask you to prove your identity before we can disclose any information.

### **Right to rectification**

You have the right to request a correction to your data if you believe that any information we hold is incorrect.

### **Right to erasure**

You have the right to request that we delete your data. There are some circumstances where we may need to keep your details, for example, if we are legally obliged to do so. If this is the case, we will explain and discuss these circumstances with you.

### **Right to restrict processing**

You can request that we restrict processing of your data, as an alternative to deleting it – this means that we will keep the data but stop processing for most purposes. You may want to exercise this right if you feel that the data is inaccurate, that our processing of it is unlawful, whilst we progress a request from you to object to processing, or if we have no further need of the data, but you require us to keep it in relation to the establishment, exercise or defence of a legal claim.

### **Right to data portability**

You have the right to request a copy of your data, in readable form, and have us transfer it to another organization. There are some circumstances where these rights may not apply, but where this is the case, we will always explain this to you.

### **Right to object**

You have the right to object to the processing of your data.

### **Rights related to automated decision making**

You have the right to avoid being subject to decisions based solely on automated processing (including profiling) which has a significant effect on you. We do not carry out any such processing.

## **7. Data Retention**

We keep records of your communications with us for six years in case we have to refer to a conversation or enquiry. This could be because it relates to our legitimate business interests; you are still in communication with us, or for legal reasons.

We keep your contact information on any mailing lists you chose to join unless you tell us otherwise. If you haven't opened one of our emails for some time, we may contact you to ask if you still want to hear from us. If you unsubscribe from a mailing list, we retain some necessary information to ensure we don't contact you again in the future.

## **8. Third-Party Websites and Links**

TETRAGRAM CO., LTD may link to websites, products and services operated by third parties. TETRAGRAM CO., LTD is not responsible for and does not endorse or accept any responsibility for the availability, contents, products, services or use of any Third Party Website, any website accessed from a Third Party Site, or any changes or updates to such sites.

These linked websites are only for your convenience, and therefore you access them at your own risk. You acknowledge that you bear all risks associated with access to and use of content provided on a Third Party Site and agree that TETRAGRAM CO., LTD and associated companies are not responsible for any loss or damage of any sort you may incur from dealing with a third party. You should contact the website administrator for the applicable Third Party Site if you have any concerns regarding such links or the content located on any such Third Party Site.

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

We may change this Privacy Policy from time to time. If we make a material change to this policy, we will publicize these changes on our website and Mobile App.

## **10. Contacting Us**

If you have any questions about this Privacy Policy, please contact us by sending e-mail to [contact@tgr.io](mailto:contact@tgr.io). Please note that information you submit through e-mail may not be secure; so please do not include credit card information or other sensitive information in your messages to us.