



Privacy Policy

(Parent Company)

NEEDS INC.™ PRIVACY POLICY AND NOTICE

By sharing the Privacy Policy for NEEDS INC.™ and his Companies (collectively, “we” or “us”), we hope to help you understand how information can create new opportunities for you, our customer, as well as to reassure you that we respect and honor customer requests to restrict and protect personal information. When we say NEEDS INC.™ we mean any and all companies affiliated with NEEDS INC.™ including but not limited to: Maxwell Vending Company, LLC (MVC), BluLine Institute™, Needs Incorporated, The Needs Company™, any and all EMP™ and VEX™ brand companies, Needs Inc. and all affiliates.

Why We Collect Personal Information

NEEDS INC.™ collects personal information to improve the manner by which we operate, offer our products and services, communicate with you about those products and services, and provide effective, timely customer support when needed. We will never rent or sell any of the personal information we collect from you to third parties, and we do not share your personal information except as set forth in this Privacy Policy.

The Kind of Personal Information Do We Collect

NEEDS INC.™ collects personal information in a variety of ways when you interact with NEEDS INC.™, including when you register or create an account with NEEDS INC.™; when you place an order at NEEDS INC.™; when you use NEEDS INC.™ products or services; when you visit NEEDS INC.™ pages or pages of certain NEEDS INC.™ partners; when you enter promotions or sweepstakes; when you subscribe to a newsletter or desire to be added to our mailing lists for other products or services; when you correspond or otherwise interact with us; and when you provide feedback in any of our online surveys, contact forms, or registrations. Information we collect may include: your name, e-mail address, phone number, address, product preference information, billing information, demographic information provided by you (such as language, gender and age, and, if applicable, content preferences and personalization information) and personal or property interest information. On occasion, we may ask

for additional information to enable us to provide with access to and use of certain information, materials and services. NEEDS INC.™ may combine information about you that we have the information we obtain from business partners or other companies.

Cookies and How Do We Use Them

Cookies are small data files that write to your hard drive for record keeping purposes when you visit a website. Cookies allow NEEDS INC.™ to measure traffic activity as well as to improve your user experience, for example by remembering your passwords and viewing preferences. Like other major websites, NEEDS INC.™ uses cookies to provide you with a tailored experience when visiting NEEDS INC.™ and using our major services. We treat any personal information that may be contained in cookies with the same level of confidentiality as other information you provide to us. If you wish to disable cookie functionality, you may do so by changing the security settings on your browser. However, portions of NEEDS INC.™ may not function or function as efficiently, without them.

Information Collected from Other Sources Social Media Widgets:

The Websites include social media features, such as the Meta's Facebook "Like" button, and widgets, such as the "Share This button" or interactive mini-programs that run on our Websites. These features may collect your Internet protocol address, which page you are visiting on the Websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Websites. Your interactions with these features are governed by the privacy statement of the companies that provide them.

Information from Third Party Services:

We may also obtain other information, including personal information, from third parties and combine that with information we collect through our Website. For example, we may have access to certain information from a third-party social media or authentication service if you log into our Services through such a service or otherwise provide us with access to information from the service. Any access that we may have to such information from a third-party social media or authentication service is in accordance with the authorization procedures determined by that service. If you authorize us to connect with a third-party service, we will access and store your name, email address(es), current city, profile picture URL, and other personal

information that the third-party service makes available to us, and use and disclose it in accordance with this Policy. You should check your privacy settings on these third-party services to understand and change the information sent to us through these services. For example, you can log in to the Services using single sign-in services such as Facebook Connect or an Open ID provider. These single sign-on services will authenticate your identity, provide you with the option to share certain personal information (such as your name and email address) with us, and pre-populate our sign-up form. Services like Facebook Connect give you the option to post information about your activities in the Services to your profile page to share with others within your network.

How We Protect Your Personal Information

NEEDS INC.™ safeguards the security of the data you send us with physical, electronic, and managerial procedures. We urge you to take every precaution to protect your personal data when you are on the Internet. To make purchases or service requests from NEEDS INC.™ website, you must use an SSL-enabled browser. NEEDS INC.™ uses industry-standard Secure Sockets Layer (SSL) encryption on web pages used to complete a purchase. This protects the confidentiality of your personal and credit card information while it is transmitted over the Internet. While NEEDS INC.™ takes precautions to ensure the security of your data, no one can completely guarantee the safety of data transmitted over the internet. It is important that you take steps to ensure the safety and security of your personal information, for example by not sharing passwords or other registration data.

How We Use Your Personal Information

NEEDS INC.™ uses your personal information in the following ways: Delivery and billing for our products and services, and to communicate with you concerning your account and customer service issues. This may include verifying authorization of credit card usage before any purchase of content or services. Transactional continuance through NEEDS INC.™ CRM. Improving our products and services by providing personalized content recommendations, language and location customization, and/or personalized help and instructions. To ask you to participate in surveys about products, services, news and events. Offering you product upgrades, content, services and other training courses for you to purchase. Providing you with content, services, instructions, and a more personalized experience based on personal information, such as your language preferences, zip/postal code, country locations, and any content or other preferences you provide. Providing you with news, free newsletters, updates, targeted advertising, promotions, and special offers. To

better understand how our products are used, including Web traffic patterns and what types of content are most popular with users of our products and services. Providing anonymous reporting for internal and external partners. Facilitating your participation in our online forums and helping to manage improper behavior by individuals using the forums.

How and When We Disclose the Information

We Collect NEEDS INC.™ may share your personal information with trusted vendors and partners who work with NEEDS INC.™. These partners are provided with your personal information to help NEEDS INC.™ communicate with you about offers from us and from our marketing partners. They are contractually required to keep this personal information secure and to only use it for the purposes for which it is provided. NEEDS INC.™ may send personal information about you to other companies or people when we need to share your information to provide the product or service you have requested or to provide a product or service to you. However, these companies are only permitted to use the personal information for these purposes. Data obtained through the short code program will not be shared with any third-parties for their marketing reasons or purposes. NEEDS INC.™ may also disclose your personal information if required to do so by law or in the good faith belief that such action is necessary to: (a) comply with law or legal process or if requested by duly authorized public authorities; (b) comply with the order of a competent judicial authority in any jurisdiction; (c) comply with legal process served on NEEDS INC.™; (d) protect and defend the rights or property of NEEDS INC.™, or our affiliated companies, their employees and agents; (e) enforce our terms of use; (f) protect against fraud or other illegal activity or for risk management purposes; (g) permit us to pursue available remedies or limit the damages that we may sustain; (g) act in urgent circumstances to protect the personal safety of users of NEEDS INC.™ products or the public at large. If NEEDS INC.™ should ever file for bankruptcy, or become insolvent, or be acquired by a third party, or merge with a third party, or sell all or part of its assets, or transfer substantially all or part of its relevant assets to a third party, then NEEDS INC.™ is entitled to share the personal information and all other information you have provided through the products and service to potential and subsequent business and merger partners. NEEDS INC.™ may share “cookie” and other data about traffic patterns or usage collected on NEEDS INC.™ with affiliated companies, its business partners or with third party advertisers or ad networks. Any data shared is anonymous and does not identify any user. NEEDS INC.™ may also include third party advertising. These third parties’ websites and advertisers, or the Internet advertising companies that work on their behalf, may use technology such as web beacons and cookies to send (or “serve”) the advertisements that appear on our Site directly to your browser. They automatically receive your IP address when this happens. They may also use cookies,

JavaScript, electronic images and other technologies to deliver advertisements, collect information about the effectiveness of their advertisements, and to collect anonymous information about your visits to NEEDS INC.™, such as the number of times you have viewed an ad (but not your name, address, or other personal information). If you would like more information about this practice, as well as your choices about not having this information used for online behavioral advertising by these ad networks, click here: http://networkadvertising.org/consumer/opt_out.asp. NEEDS INC.™ also contains links to other Websites and products. NEEDS INC.™ is not responsible for the privacy practices or the content of such Websites or products. Please visit the privacy policies of these third party sites in order to understand their privacy policies and data collection practices.

Rights You Have Regarding Your Data

You always have the right to request information about your stored data, its origin, its recipients, and the purpose of its collection at no charge. You also have the right to request that it be corrected, blocked, or deleted. You can contact us at any time using the address given in the legal notice if you have further questions about the issue of privacy and data protection. You may also, of course, file a complaint with the competent regulatory authorities. Many data processing operations are only possible with your express consent. You may revoke your consent at any time with future effect. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed. If you no longer wish to receive communications from NEEDS INC.™, you can opt-out from receiving such messages in the future by following the instructions in the message or contacting us at tellus@wdynd.com.

Account Data

Account data (“Account Data”) is personal information you provide us, or that we collect from you and your devices in connection with your access to and use of our Services (such as when you provide us information to register for an account, or information we collect about your browser when you connect to one of our Services, etc.). In legal terms, we collect and use this Account Data as a data controller. There are two general categories of Account Data we collect in order to provide you with the Services.

The Information You Give Us

Account information. You may provide us with information in connection with the creation and management of your account for the Services, such as a name, email address and an oral or written (typed) password to create a NEEDS INC.™ account. **Billing information.** If you have purchased a paid version of the Services, or if

you make another financial transaction using our Services (such as purchasing a Third-Party App), we (and our third-party payment processors) will collect information about the purchase or transaction. This includes billing details and credit card information, other account and authentication information. Other information. You may otherwise choose to provide us with information when you fill in a form, contact our customer support, respond to surveys or use other features of our Services. You may also provide us with other optional information as part of your account profile, including your usernames, avatars and links to the Social Network profiles you authenticate with your NEEDS INC.™ profile. Information we automatically collect from your use of the Services. Log data and usage information. Like most websites, when you view content on or otherwise interact with our Services our servers automatically record information, including information that your browser sends whenever you visit a Website or that your Application sends when you are using it. This log data may include your IP address, the address of the web page you visited before using the Services, your browser type and settings, your device information, the date and time of your use of the Services, information about your browser configuration and plug-ins, language preferences, unique identifiers, mouse tracks and cookie data. Location information. When you use our Services, we may collect information about your geographic location.

Account Data – How We Use It

We use, store, and process Account Data as a data controller to provide, understand, improve and develop our Services, keep our Services safe and to comply with our legal obligations. More particularly, we use it to:

Identify Our Users

We use Account Data to identify you when you call-in to your account. Provide Services We use Account Data to enable us to operate the Services and provide them to you, including to: Enable your access to our Services. Allow you to communicate with us and with other users. Verify your transactions, for purchase confirmation, billing, security, and authentication (including security tokens for communication with installed Third-Party Apps) Contact you about your account and provide customer service support, including responding to your comments and questions. Keep you informed about the Services, features, surveys, newsletters, offers, contests and events we think you may find useful or which you have requested from us. Sell or market our products and Services to you. Improve and optimize our Services. We use Account Data to: Better understand your needs and the needs of users in the aggregate, diagnose problems, analyze trends, perform analytics, conduct research and improve the features and usability of the Services, test and troubleshoot new products and better understand and market to our users. Analyze the Website or the other Services and information about our visitors and users, including research into our user demographics and user

behavior. Create aggregate (non-identifiable) statistics about users of the Services with a view to introducing improvements and improving usability of the Services. Keep our Services safe. We use Account Data to verify accounts and activity, maintain the integrity of our Services, and to keep the Services safe and secure. Account Data – Legal basis for use Our legal basis for collecting and using Account Data as a data controller will depend on the specific context in which we collect it. However, as a data controller, we will collect personal information from you where: We have your consent to do so, Where we need the personal information to perform a contract with you (e.g. to deliver the Services you have requested), or Where the processing is in our legitimate interests (and not overridden by your data protection interests or fundamental rights and freedoms). In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person. Where we rely on your consent to process Account Data, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal. If we ask you to provide Account Data to comply with a legal requirement, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interest which are not already described in this notice, we will make clear to you at the relevant time what those legitimate interests are.

Account Data – Access, control and correction of personal information and certain other important rights

As a user, you may update or correct most of your Account Data by logging in to your account to edit your profile or organization record. To make a request to have Account Data returned to you, removed, or to make additional corrections, please email our privacy team. Requests to access, correct, or remove your information will be handled within thirty (30) days and may be subject to a fee as permitted by applicable law. Depending on where you reside, you may have the right to exercise additional rights available to you under applicable laws with regards to the personal information NEEDS INC.™ holds about you as a data controller, including:

Right of erasure: In certain circumstances, you may have a broader right to erasure of personal information that we hold about you – for example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for as long as you maintain an account for our Services, or as needed to provide you with our Services, for record keeping purposes, to comply with our legal obligations, resolve disputes and enforce the Terms.

Right to object to processing: You may have the right to request that we stop processing your personal information and/or to stop sending you marketing communications.

Right to restrict processing: You may have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information we hold about you is inaccurate or unlawfully held).

Right to data portability: In certain circumstances, you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information to another data controller without hindrance. If you would like to exercise such rights, please contact us. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request. You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

Usage and Website Activity Information:

When you visit our websites, we or our third party service providers collect information about your use of the website: Your Internet service provider's address, your location as determined by your Internet Protocol (IP) address, the name of the Website or advertisement directing you, your user agent, as well as your clicks and activity on our Websites. We use this information to understand how to make our Websites more available and user-friendly to our customers as well as to provide you with advertising that may be of interest to you. This is described in more detail below. To learn how you can opt out of such advertising read below. We do not serve interest-based advertising to users we identify as using our websites from EU IP addresses.

Google and Adobe Analytics:

We use tools called "Google Analytics" and "Adobe Analytics" to collect some information we listed above about your use of the services. We use the information we get from Google Analytics and Adobe Analytics to improve the services. In order to collect this information, Google Analytics and Adobe Analytics may set cookies on your browser or mobile device or read cookies that are already there. Google Analytics and Adobe Analytics may also receive information about you from apps you have downloaded, that partner with Google or Adobe, respectively. We do not combine the information collected through the use of Google Analytics or and Adobe Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to the services to another application which partners with Google, is restricted by the Google Analytics Terms of Use and the

Google Privacy Policy. Please review those and see <http://www.google.com/policies/privacy/partners/> for information about how Google uses the information provided to Google Analytics and how you can control the information provided to Google. To prevent your data from being used by Google Analytics, you can download the Google Analytics opt-out browser add-on for Google Analytics which *can be found here*. Adobe's ability to use and share information collected by Adobe Analytics about your visits to the services to another application which partners with Adobe, is restricted by the Adobe Analytics Terms of Use and the Adobe Privacy Policy. Please review those and see <https://www.adobe.com/privacy/marketing-cloud.html> for information about how Adobe uses the information provided to Adobe Analytics and how you can control the information provided to Adobe. To prevent your data from being used by Adobe Analytics, you can download the Adobe Analytics opt-out browser add-on for Adobe Analytics *which can be found here*. The Google Analytics and Adobe Analytics products we use collect only anonymized IP addresses for IP's located in the EU.

Social Media

We engage with customers on various social media platforms like Facebook (Meta), Twitter, and Instagram. If you contact us on one of these platforms for customer service or otherwise, we may contact you via direct message. Those communications are governed by this policy as well as the policy of the relevant social media platform.

Cookies and Other Tracking Technologies

"Cookies" are small amounts of data that are stored on your computer. They find their way to your browser via a Web server. Cookies flag information about your activity on our Websites. This information helps us improve our Websites and make them friendlier and easier to use and allows us to market to you more effectively. We never use cookies to save passwords, credit card numbers or other highly confidential information. However, we use them and other tracking technologies to provide enhanced online marketing based on your interests and preferences. To learn about how to opt out of our cookies used for these personalized online ads, please click [here](#). Web cookies are used in some email messages and on our Websites to help us measure the effectiveness of those emails and for other analytical purposes. To learn how to opt out of our cookies used for these purposes click [here](#). We also contract with a Service Provider to help us assess visitation to our Websites. To do this, we place small pixel tags and cookies on our Websites. While these do allow our Service Provider to track your visits, the data retrieved cannot be used for any reason without our authorization. Although our Service Provider logs the information about your visit, we control how that data may and may not be used. We may track this information across the different devices you use to access the Websites. If you are accessing the Site from Canada, the Personal Information Protection and Electronic Documents Act

(or **PIPEDA**), governs the collection and use of personal information and how it's protected.

Canada Anti-Spam Law:

MVC complies with the Canada Anti-Spam Law. Consumers who provide us a Canadian mailing address will not receive unauthorized Commercial Electronic Messages (as defined under the Canada Anti-Spam Law) unless these individuals have "opted-in" to receive Commercial Electronic Messages **What are the Legal reasons we collect and disclose certain information?Legal basis for processing (EEA visitors only):**If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.However, we will normally collect personal information from you only where we need the personal information to perform a contract with you (e.g. to provide you with our Services), where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where we have your consent. In some cases, we may also have a legal obligation to collect personal information from you.If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time why we need to use your personal information. If we process personal information in reliance on your consent, you may withdraw your consent at any time.If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "Contact Us" section below.

Compliance with Laws and Law Enforcement Requests; Protection of Our Rights:

In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities,

suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Service Agreement, or as otherwise required by law.

Testimonials:

From time to time, we may post testimonials on the Websites that may contain personal information. We obtain Your consent to post Your name along with Your testimonial. If you wish to update or delete your testimonial, you can contact us at tellus@wdynd.com.

Community Forums:

The Websites may offer publicly accessible blogs, community forums, comments sections, discussion forums, or other interactive features (“Interactive Areas”). You should be aware that any information that you post in an Interactive Area might be read, collected, and used by others who access it. To request removal of your personal information from an Interactive Area, contact us at tellus@wdynd.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Live Events:

All events are live streamed and recorded. The purchase of any event ticket constitutes a release and waiver to use your likeness and/or photographs film, digital or video, with a worldwide transferable and irrevocable license for the purpose of promoting other events, marketing and advertising on social media, educational use, press coverage.

Transmission of Data to Other Countries: Your Personal Data is processed in the United States, where privacy laws may be less stringent than the laws in your country and where the government, courts, or law enforcement may be able to access your data. By submitting your Personal Data to us, you agree to the transfer, storage and processing of your Personal Data in the United States.
Your Rights Under EU Data Protection Laws:

If EU data protection laws apply to our processing of your information, you are entitled by law to access, correct, amend, or delete personal information about you that we hold. A list of these rights is below. You can access, amend or update your information by contacting us at tellus@wdynd.com. If you email us please include your previous and current full name, mailing address, email address and phone number. Your request should contain a detailed, accurate description of the data you want access to. For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. In the event that we refuse a request under rights of access, we will provide the individual with a reason as to why. Individuals in

the EU have the right to complain as outlined in dispute resolution section. A list of your rights is below: Right of access – the right to request a copy of the information that we hold about the individual. Right of rectification – the right to correct data that we hold about you that is inaccurate or incomplete. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Right to restriction of processing – where certain conditions apply to have a right to restrict the processing. Right of portability – the right to have the data we hold about you transferred to another organization. Right to object – the right to object to certain types of processing such as direct marketing. We do not engage in direct marketing to individuals that we know reside in the EU. Right to object to automated processing, including profiling – the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect. We do not currently engage in any automated processing or profiling of individuals we know reside in the EU.

How long do we keep your information?

You can delete your account or request that we delete your account by writing us at tellus@wdynd.com. If you choose to delete your account, we will begin the process of deleting your account from our systems. We retain your information after you request such deletion for longer periods for specific purposes to the extent that we are obliged to do so in accordance with applicable laws and regulations and/or as necessary to protect our legal rights or for certain business requirements. For example, when we process your payments, we will retain this data for longer periods of time as required for tax or accounting purposes. See below for specific reasons we would retain some data for longer periods of time: Security, fraud & abuse prevention – i.e. to protect you, other people, and us from fraud, abuse, and unauthorized access. Financial record-keeping – when you make a payment to us, we are often required to retain this information for long period of time for purposes of accounting, dispute resolution and compliance with tax, anti-money laundering, and other financial regulations. Complying with legal or regulatory requirements – to meet any applicable law, regulation, legal process or enforceable governmental request, as required to enforce our terms of service, including investigation of potential violations. Direct communications with us – if you have directly communicated with us, through a customer support channel, feedback form, or a bug report, we may retain reasonable records of those communications. Even if you delete your account, keep in mind that the deletion by our third-party providers may not be immediate and that the deleted information may persist in backup copies for a reasonable period of time. For any privacy or data-protection-related questions, please write to tellus@wdynd.com. If you are a resident of California, California law permits you to request certain information regarding the disclosure of your personal data by NEEDS INC.™, or its affiliates and subsidiaries, to

a third-party for direct marketing purposes. To make such a request, please email us at tellus@wdynd.com or write us at the address listed above. We respect children's privacy in particular. We do not target knowingly or intentionally collect personally identifiable information from children under the age of 13. By using the Site, you have represented and warranted that you are either 18 years of age or using the Site with the supervision of a parent or guardian. If you are under 13, you may not use the Site. If you become aware that your child has provided us with personal information without your consent, you are urged to email us at tellus@wdynd.com. If you would like to contact us for any reason regarding our privacy practices, please e-mail us at the following address: tellus@wdynd.com. Be sure to return to this Policy periodically to review the most current version of the Policy. We reserve the right at any time, at our sole discretion, to change or otherwise modify this Policy without prior notice; however, the date of any effective changes shall be reflected at the bottom of this page and upon request we will provide you with information regarding any changes made. **This policy was last updated on November 16, 2022.**