



## PRIVACY POLICY

Last Modified: January 22, 2017

Please note the words that are highlighted in **red** are listed in the Definition Section of this Privacy Policy Statement.

This privacy policy describes the treatment of information provided or collected on the sites where this privacy policy is posted. It also explains the treatment of information provided or collected on applications we make available on third-party sites or platforms if disclosed to you in connection with the use of the application. We follow this privacy policy in accordance with local law in the places we operate.

## Types of Information We Collect

We collect two basic types of information – **personal information** and **anonymous information** and we may use personal and anonymous information to create a third type of information, **aggregate information**. We collect the following categories of information:

- Registration information from the mobile app
  - First and last name

- Country
- Gender
- Age range
- Registration from the Billion Dollar Business Club certificate download on the Planet Mogul website
  - First and last name
  - Age range
- Location information when you visit our sites or use our **applications**, including location, information either provided by a mobile device interacting with one of our sites or applications (including through beacon technologies), or associated with your **IP address**, where we are permitted by law to process this information.
- Usage, viewing and technical data, including your device identifier or IP address, when you visit our site, use our mobile application on third-party sites or platforms or open emails when we send.

## **How We Collect Your Information**

- We collect information you provide to us when you participate on our site and **application** or otherwise interact with us or participate in **public forums**. Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our **applications**), the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this privacy policy and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications.
- We collect information through technology, such as cookies, Flash cookies and Web beacons, including when you visit our site and applications or use our applications on third-party sites or platforms.

## **Use of Your Information by Niche Marketing and Planet Mogul**

Niche Marketing will be the data controller for your information. We will use your information for the following:

- Provide you with the products you request
- Communicate with you about the transaction with us and send you information about features on our sites and applications or changes to our policies
- Consistent with local law and choices and controls that may be available to you

- Send you promotions for our platform or third-party products and services
- Send you offers and promotions for our products and services or third-party products and services
- Personalize content and experiences
- Provide you with advertising based on your activity on our sites and **applications** and on third-party sites and **applications**
- Optimize or improve our products, services and operations
- Detect, investigate and prevent activities that may violate our policies or be illegal

## **Sharing Your Information with Other Companies**

We will not share your **personal information** except in limited circumstances, including:

- When you allow us to share your **personal information** with another company, such as:
  - Electing to share your **personal information** with carefully selected companies so they can send you offers and promotions about their products and services
  - Directing us to share your **personal information** with third-party sites or platforms, such as networking sites
  - Please note that once we share your **personal information** with another company, the information received by the other company becomes subject to the other company's privacy practices.

## **Your Controls and Choices**

We provide you the ability to exercise certain controls and choices regarding our collection use and sharing of your information. In accordance with local law, your controls and choices may include:

- You may correct, update and delete access for the mobile app
- You may choose whether to receive from us offers and promotions for our products and services or products and services that we think may be of interest to you

- You may choose whether we share your **personal information** with other companies so they can send you offers and promotions about their products and services
- You may exercise your controls and choices by contacting [Rohena@NicheMktg.com](mailto:Rohena@NicheMktg.com)

## **Children's Privacy and Policy**

We recognize the need to provide further privacy protections with respect to **personal information** we may collect from children on our sites and applications. We don't ask for specific information such as birthdays, only age ranges. When we intend to collect information **personal information** from children, we take additional steps to protect **children's** privacy, including:

- Notifying parents about our information practices with regard to **children**, including the types of personal information we may collect from children, the uses to which we may put that information and whether and with whom we may share that information.
- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children, or sending information about our products and services directly to the children.
- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in an online activity.
- Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted – contact [Rohena@NicheMktg.com](mailto:Rohena@NicheMktg.com)

## **Data Security, Integrity and Retention**

The security, integrity and confidentiality of your information are extremely important to us. We have implemented technical, administrative and physical security measures that are designed to protect guest information from unauthorized access, disclosure, use and modification. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable. We will retain your

**personal information** for the length of time needed to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

## **Data Transfers, Storage and Processing Globally**

Whether your **personal information** is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information.

## **Changes to this Privacy Policy**

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide **notice** to you if these changes are material and, where applicable law, we will obtain your consent.

## **Comments and Questions**

If you have a comment or question about this privacy policy, please contact PLANETMOGUL. Our sites and applications may contain links to other sites now owned or controlled by us and we are not responsible for the privacy policies of those sites. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your personal information.

## **Definitions**

**Aggregate** Information means information about groups or categories of guests, which does not identify and cannot reasonably be used to identify an individual guest.

**Anonymous** Information means information that does not directly or indirectly identify and cannot reasonably be used to identify an individual guest.

**Application** means a program or service operated by us that may be displayed on various online, mobile or other platforms and environments, including those operated by third parties, which permits us to interact directly with our guests.

**Children** means individuals who we have identified are not of legal age to consent to the collection and processing of their personal information. In the United States and Latin America, the term “children” refers to individuals under 13 years of age.

**IP Address** is associated with the access point through which you enter the Internet and is typically controlled by your Internet Service Provider (ISP), your company or your university. We may use IP addresses to collect information regarding the frequency with which our visitors visit various parts of our site and applications and we may combine IP addresses with personal information.

**Notice** may be by email to you at the last email address you provided us, by posting notice of such changes on our sites and applications, or by other means, consistent with applicable law.

**Parents** means a parent or legal guardian.

**Personal Information** means information that identifies (whether directly or indirectly), a particular individual, such as the individual’s name, postal address, email address and telephone number. When anonymous information is directly or indirectly associated with personal information, this anonymous information also is treated as personal information.

**Public Forums.** Our site and application may soon offer message boards, conversation pages, blogs, chat rooms, social community environments, profile pages and other forums that do not have a restricted audience. If you provide personal information when you use any of these features, that personal information may be publicly posted and otherwise disclosed without limitation as to its use by use or by a third party. To request removal of your personal information from a public forum on one of our sites or applications, please contact [Rohena@NicheMktg.com](mailto:Rohena@NicheMktg.com)