

# Privacy Policy

Effective Date: May 13, 2020

The following Privacy Policy governs the online information collection practices of The Circle for Change. (“Company,” “we” or “us”). Specifically, it outlines the types of information that we gather about you while you are using the [www.thecircleforchange.com](http://www.thecircleforchange.com) website (the “Site”), and the ways in which we use this information. This Privacy Policy applies primarily to information which we collect online.

We have created this Privacy Policy to demonstrate our firm commitment to privacy and security. This Privacy Policy describes how our Company collects information from all end users of our Internet services (the “Services”), including those who access some of our Services but do not have accounts (“Visitors”) and those who may purchase products and/or pay a service fee to subscribe to the Service (“Members”).

Please read this Privacy Policy carefully. By visiting and using the Site, you agree that your use of our Site, and any dispute over privacy, is governed by this Privacy Policy. In an effort to comply with changes in technology, and the adoption of new regulations and laws, we may need to change our Policy at some point in the future, in which case we’ll post the changes to this Privacy Policy on this website and update the Effective Date of the policy to reflect the date of the changes. By continuing to use the Site after we post any such changes, you accept the Privacy Policy as modified.

## Introduction

We may collect and store personal or other information that you voluntarily supply to us online while using the Site (e.g., while on the Site or in responding via email to a feature provided on the Site). The Site only contacts individuals who specifically request that we do so or in the event that they have signed up to receive our messaging, or have purchased one of our products or services. The Site collects personally identifying information from our users during online registration and online purchasing. Generally, this information includes name and e-mail address for registration or opt-in purposes and name, email address, and credit card information when purchasing our products or services. All of this information is provided to us by you.

We also collect and store information that is generated automatically as you navigate online through the Site. For example, we may collect information about your computer’s connection to the Internet, which allows us, among other things, to improve the delivery of our web pages to you and to measure traffic on the Site. We also may use a standard feature found in browser software called a “cookie” to enhance your experience with the Site, and web beacons, to access cookies, count users who visit the Site, the date and time of visits, the pages viewed, time spent on our site, websites visited before and after our site, IP addresses, or open HTML-formatted email messages.

We use the information we collect from you while you are using the Site in a variety of ways, including using the information to customize features; advertising that appear on the Site; and, making other offers available to you via email, direct mail or otherwise.

Please keep in mind that whenever you voluntarily make your personal information available for viewing by third parties online – for example on message boards, web logs,

through email, or in chat areas – that information can be seen, collected and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

Some of our third-party advertisers and ad servers that place and present advertising on the Site also may collect information from you via cookies, web beacons or similar technologies. These third-party advertisers and ad servers may use the information they collect to help present their advertisements, to help measure and research the advertisements' effectiveness, or for other purposes. The use and collection of your information by these third-party advertisers and ad servers is governed by the relevant third-party's privacy policy and is not covered by our Privacy Policy. Indeed, the privacy policies of these third-party advertisers and ad servers may be different from ours. If you have any concerns about a third party's use of cookies or web beacons or use of your information, you should visit that party's website and review its privacy policy.

The Site also includes links to other websites and provides access to products and services offered by third parties, whose privacy policies we do not control. When you access another website or purchase third-party products or services through the Site, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting or the provider of such products or services.

Please also note that as our business grows, we may buy or sell various assets. In the unlikely event that we sell some or all of our assets, or one or more of our websites is acquired by another company, information about our users may be among the transferred assets.

## Personal Information Our Company Collects And How It Is Used

### Introduction

Members may be asked to provide certain personal information when they sign up for our products or Services including name, email address, and billing information (such as a credit card number). The personal information collected from Members during the registration process, newsletter opt-in, point of purchase, free gift sign-up (or at any other time) is used primarily to provide a customized experience while using our products and Services. Your information will never be disclosed, traded, licensed or sold to any third party. However, we may make limited disclosure of personal information under the specific circumstances described below.

### The Types of Information We Collect and Store

Some of the information we may collect about you and store in connection with the provision and fulfillment of our services to you may include:

- Name
- Email Address
- Mailing Address
- Billing Address

- Telephone Number
- Masked Credit Card Information (payments are processed by a third party payment processor which is PCI compliant, and are never stored on our servers)
- Traffic source
- Any notes or testimonials that you provide

#### How We Use Your Personal Information

The above personal information may be used for the following purposes:

- To operate, improve, or promote our Service
- To provide customer service or support
- To fulfill orders
- To process payments
- To contact you
  - When you have opted in to receive email messaging
  - To respond to your email inquiries. Specifically, when Visitors or Members send email inquiries to us, the return email address is used to answer the email inquiry we receive. We do not use the return email address for any other purpose, or share it with third parties.
- To monitor and analyze trends such as:
  - Purchase history
  - Sales reports
  - Behavior on the Site
  - Email clicks and opens
- To market our products and services through:
  - Email marketing
  - Advertising, including retargeting via Google and Facebook
  - Notifications
- To market affiliate and third party promotions
- Perform accounting, administrative and legal tasks

#### Who Has Access to Your Data Within Our Organization

Within our organization, access to your data is limited to those persons who require access in order to provide you with the Products and Services you purchase from us, to contact you, and to respond to your inquiries, including requests for refund. Employees only have access to data on a “need to know” basis.

## Who We Share Your Data With Outside of Our Organization, and Why

### Unaffiliated Third Parties.

We will not share or transfer your data to unaffiliated third parties without your consent. We may use service providers in connection with operating and improving the Site, to assist with certain functions, such as payment processing, email transmission, data hosting, managing our ads, fulfilling product sales, and some aspects of our technical and customer support. We will take measures to ensure that these service providers access, process, and store information about you only for the purposes we authorize, subject to confidentiality obligations, including through the execution of GDPR and CCPA-compliant Data Privacy Agreements or Addenda, as applicable.

### Affiliates.

We may share your data with our affiliates for the purpose of sending you marketing emails in the case of co-branded launches in which it was disclosed to you that you would receive email from our affiliate or “partner”. We may also share your data with our affiliates for the purpose of placing you on a suppression list to prevent you from receiving marketing messages from them. Where authorized as stated above, our affiliates may also send follow up emails to registrants of our launches who originated from their customer list.

We may also receive your data from third parties, such as our affiliates, when your email address appeared as part of the customer list associated with a co-branded launch. We will use these email addresses for the purpose of placing you on a suppression list to prevent you from receiving marketing messages from us, or where authorized, to send follow up emails to registrants of our launches who originated from an affiliate’s customer list.

### Authorities.

We may access, preserve, and disclose information about you to third parties, including the content of messages, if we believe disclosure is in accordance with, or required by, applicable law, regulation, legal process, or audits. We may also disclose information about you if we believe that your actions are inconsistent with our Terms of Service or related guidelines and policies, or if necessary to protect the rights, property, or safety of, or prevent fraud or abuse of, Company or others.

## Why We Store Information We Collect From You

We retain certain information that we collect from you while you are a member on the Site, and in certain cases where you have deleted your account, for the following reasons:

- So you can use our Site;
- To ensure that we do not communicate with you if you have asked us not to;

- To provide you with a refund, if entitled;
- To better understand the traffic to our Site so that we can provide all members with the best possible experience;
- To detect and prevent abuse of our Site, illegal activities and breaches of our Terms of Service; and
- To comply with applicable legal, tax or accounting requirements.

When we have no ongoing legitimate business need to process your information, we will either delete or anonymize it.

## Cookies and Tracking Tools

We use cookies to help you make using our website easier, such as:

- To remember your country and language preferences
- To deliver information that matches your interests
- To help us understand our audience and traffic patterns
- To let you automatically log into programs and parts of our site that require membership
- To manage and present site info displayed on our website that will be specific to you

We also use Web Beacons to collect non-personal data on how you use our site, such as how long did you visit our page, what web browser you're using, what's your operating system, and who's your Internet service provider. In addition we also use Google Analytics data and the DoubleClick cookie to serve ads based on a user's prior visits to our website. This data is collected from thousands of site visits and analyzed as a whole. This helps us build a better website to match our visitors' needs.

We may also place small "tracker gifs" or "beacons" on many of the pages on our website, in online advertising with third parties, and in our emails. We use these beacons, in connection with Cookies, to collect non-personal data on the usage of our site including but not limited to the date and time of the visit, the pages visited, the referring web page, the type of browser (e.g., Internet Explorer, NetScape), the type of operating system (e.g., Windows, Linux, or Mac), and the domain name of the visitor's Internet service provider (e.g., AOL). This information is collected about thousands of site visits and analyzed as a whole. This information is useful in, for example, tracking the performance of our online advertising such as online banner ads and to determine where to place future advertising on other websites.

## Advertiser Disclosures

### Facebook

As advertisers on Facebook and through our Facebook page, we, (not Facebook) may collect content or information from a Facebook user and such information may be used in the same manner specified in this Privacy Policy. You consent to our collection of such information.

We abide by Facebook's Data Use Restrictions.

- Any ad data collected, received or derived from our Facebook ad ("Facebook advertising data") is only shared with someone acting on our behalf, such as our service provider. We are responsible for ensuring that our service providers protect any Facebook advertising data or any other information obtained from us, limit our use of all of that information, and keep it confidential and secure.
- We do not use Facebook advertising data for any purpose (including retargeting, commingling data across multiple advertisers' campaigns, or allowing piggybacking or redirecting with tags), except on an aggregate and anonymous basis (unless authorized by Facebook) and only to assess the performance and effectiveness of our Facebook advertising campaigns.
- We do not use Facebook advertising data, including the targeting criteria for a Facebook ad, to build, append to, edit, influence, or augment user profiles, including profiles associated with any mobile device identifier or other unique identifier that identifies any particular user, browser, computer or device.
- We do not transfer any Facebook advertising data (including anonymous, aggregate, or derived data) to any ad network, ad exchange, data broker or other advertising or monetization related service.

## Data Security and Data Privacy Regulation

Our company's commitment to data security

We implement a variety of administrative, managerial, and technical security measures to help protect your personal information. Our Company has various internal control standards which relate specifically to the handling of personal information. These include certain controls to help safeguard the information we collect online. Our employees are trained to understand and comply with these controls and we communicate our Privacy Policy, practices and guidelines to our employees. However, while we strive to protect your personal information, you must also take steps to protect your information. We urge you to take every precaution to protect your personal information while you are on the Internet.

Additionally, while we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information. If we do discover a

security breach affecting your data, every effort will be made to provide a notification within 72 hours of our team learning of the occurrence.

#### General Data Privacy Regulation (GDPR)

The GDPR took effect on May 25, 2018, and is intended to protect the data of European Union (EU) citizens.

If you are a resident of the European Economic Area (EEA), or are accessing this Site from within the EEA, you have certain rights with respect to your data. We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us by sending an email to [info@thecircleforchange.com](mailto:info@thecircleforchange.com)

Rights that you may have, depending on the country in which you live, include:

- Accessing, correcting, updating, or requesting deletion of your information.
- If you request that your account be deleted, you will lose access to all of our programs in which you are actively registered.
- Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information.
- Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the “unsubscribe” or “opt-out” link in the marketing emails we send you. Additionally, you may update your email preferences by changing the settings in your account.
- Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.
- Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available [here](#).

#### Data Controller and Data Protection Officer

If you reside in a country in the European Economic Area or in Switzerland, then your personal data collected by Company is controlled by the Circle for Change and can be reached by email at [info@thecircleforchange.com](mailto:info@thecircleforchange.com). Company’s EU Data Protection Officer can also be reached by email at [info@thecircleforchange.com](mailto:info@thecircleforchange.com).

#### California Consumer Privacy Act (CCPA)

The CCPA takes effect on January 1, 2020, and is intended to protect the data of California residents.

If you are a resident of California, you have certain rights with respect to your data. We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us by sending an email to [info@thecircleforchange.com](mailto:info@thecircleforchange.com).

Rights that you may have, include:

- Requesting deletion of your information.
- If you request that your account be deleted, you will lose access to all of our programs in which you are actively registered.
- Opting out from the sale of your information to third parties.
- Requesting disclosure of the personal information we have collected about you and the types of third parties with whom it has been shared.
- Requesting the portability of your information.
- Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the “unsubscribe” or “opt-out” link in the marketing emails we send you. Additionally, you may update your email preferences by changing the settings in your account.
- Requesting that we not sell your information, by clicking on the corresponding link on our website.

Every effort will be made to respond to a verified request within a reasonable time, or the time-frame required by law.

### Children’s Privacy Statement

This children’s privacy statement explains our practices with respect to the online collection and use of personal information from children under the age of thirteen, and provides important information regarding their rights under federal law with respect to such information.

- This Site is not directed to children under the age of thirteen and we do NOT knowingly collect personally identifiable information from children under the age of thirteen as part of the Site. We screen users who wish to provide personal information in order to prevent users under the age of thirteen from providing such information. If we become aware that we have inadvertently received personally identifiable information from a user under the age of thirteen as part of the Site, we will delete such information from our records. If we change our practices in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from children under the age of thirteen as part of the Site.
- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the Site, we also do NOT knowingly distribute such information to third parties.
- We do NOT knowingly allow children under the age of thirteen to publicly post or otherwise distribute personally identifiable contact information through the Site.



- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the Site, we do NOT condition the participation of a child under thirteen in the Site's online activities on providing personally identifiable information.

#### CAN-SPAM Compliance

- We strictly abide by our obligations to comply with anti-SPAM laws.
- All emails that are sent to you by The Circle For Change include an unsubscribe link in them.
- You can remove yourself at any time from our mailing list by clicking on the unsubscribe link that can be found in every communication that we send you.
- We will remove you from our mailing list immediately.
- Additionally, all emails from us will have a clear "From" field that identifies us as the sender and will contain our address for contact purposes.

#### Revisions to this policy

Our Company reserves the right to revise, amend, or modify this policy, our Terms of Service, and our other policies and agreements at any time and in any manner, by updating this posting.

#### Where to direct questions about our privacy policy

If you have any questions about this Privacy Policy or the practices described herein, you may contact us through the contact information provided on this website or by emailing [info@thecircleforchange.com](mailto:info@thecircleforchange.com).