

International Markets Live Inc.

Global Web Privacy and Cookie Policy

Last updated: June 8, 2021

Please Read Carefully.

International Markets Live Inc., together with its subsidiaries and affiliates (collectively, “IM”, “we”, “us” or “our”), recognize the importance of protecting your privacy. Our Global Web Privacy and Cookie Policy (“Policy”) applies to your use of our global public websites (collectively, the “Site”), as well as your interactions with IM officers, employees and contractors. This Policy is designed to assist you in understanding how we collect, use, and safeguard and disclose your personal information and your choices in making informed decisions when using the Site. We also describe how you can contact us about our privacy practices.

Global Web Privacy Policy.

Your Acceptance Through Use.

This Global Web Privacy Policy describes how IM collects, uses and discloses certain personal information obtained through this Site. Please note that, to the extent permitted by applicable law, your use of this Site signifies your understanding and acceptance of the terms of this Global Web Privacy Policy. This Global Web Privacy Policy is incorporated into, and is part of, the Terms of Use, which govern your use of the Site in general.

The Types of Information We Collect.

We may collect information about you from a variety of sources. This includes information we collect from you directly; information provided to us by or on behalf of your IM Independent Business Owner (“IBO”) for purposes of providing a better customer experience for you; information we collect about you when you visit our sites or view IM online advertisements; and information we collect about you from other sources (where permitted by law).

Information we collect directly from you: We collect information directly from you when you choose to participate in our offers and programs or otherwise provide information directly to us. The following are examples of information we may collect directly from you:

- Name, email address, postal address;
- Username and password;
- Phone number or mobile number;
- Age;
- Date of birth;

- Name of your IBO enroller or sponsor;
- Demographic information;
- Future communication preferences;
- Contact information for friends you may wish us, or your IBO enroller to use. When you provide us information for these refer-a-friend messages we use the information only to send the message you request.

Information we collect when you visit our sites, use our services, or view our online advertisements:

We use cookies and other technologies to collect information about you when you visit our sites, use our services, or view online advertisements. The following are examples of information we may collect with these technologies:

- Your browser type and operating system;
- Web pages you view;
- Links you click;
- IP address;
- Sites you visited before coming to our Site;
- IM emails you open and/or forward;
- IM offers or links you connect to via emails;
- Information about your visits to the Personal Web Site of your IBO enroller;
- Your product or service selections and preferences.

How We Use Your Information.

Communications With You – Offerings and Services In Which You Expressed Interest:

When you visit or transact business on our Site, you may be required to register with us or be requested to provide us with personal and account information. When you provide us with this information, we may use it to contact you about the offerings or services in which you have expressed an interest. IM has a legitimate business interest to use the personal information we collect from you to provide such requested services. Where we have relied on your consent, however, if you tell us that you do not want us to use this information as a basis for further contact with you (by accessing our opt-out procedure described below), we will respect your wishes.

Communications With You – Newsletters and Marketing Purposes:

In order to keep our users and clients informed about our latest news, products and services, we may send e-mails and marketing communications to the email address provided to us while registering on our Site or requesting information from us. IM complies with applicable laws when

using your personal information for this purpose, and where applicable (such as in the EU) relies on your consent. Please be aware that we do sometimes partner with third parties to send marketing communications that promote a third party's products and services (for example, those of our business partners) as well as our own. If you elected to opt-in to any of our email lists, newsletters or other promotional offerings and later decide that you no longer wish to receive such newsletters or promotional e-mail from us, you may unsubscribe by following the instructions contained in each email we send to you (or use the opt-out procedure described below).

Professional Interactions With You – Relationship Management:

We may use your relationship data (collected when you communicate with an IM employee or agent via phone or email, for example) to provide you with products or services you request and manage our relationship with you. We may also use certain de-identified and aggregated data about our IBOs and members or visitor to our Site for our internal data analytics purposes. IM has a legitimate business interest to use the personal information we collect from you to provide such requested products and services and in order to be able to service our IBOs and members better. With your consent, we may send you information or services or a promotional nature that we consider may be relevant to you.

Other Uses:

We may also use the personal information we obtain about you for the following purposes:

- Operating, evaluating and improving our business (including developing new products and services;
- Managing our communications; determining the effectiveness of and optimizing our advertising; analyzing our products, services, websites, mobile applications and any other digital assets;
- Facilitating the functionality of our websites, and mobile applications and any other digital assets);
- Preparing and furnishing aggregated data reports, which may include anonymized information.

Enforcing our Terms and Conditions or other legal rights.

We also may use the information in other ways for which we provide specific notice at the time of collection. If you object to us using information in other ways you can email PrivacyAdministrator@im.academy.com.

Information Provided to Us About You by Third Parties.

Third-Party Content:

We may present or embed content on our Site that is provided by our third-party vendors. This content may contain links to other sites not operated by IM or may request personal information. For example, this content may ask for an email address to subscribe to alerts. This information is collected by our vendors and not by us. In some cases, these vendors may share the personal information they collect from you with us. We are not responsible for the privacy practices of our vendors. We encourage you to review their privacy policies to understand how they will use and share the personal information you provide to them.

Third Party Usage:

You may also separately share your information with other websites or entities, such as those that create professional marketing lists, to receive special offers and promotions from their affiliates. These Web sites or entities may share your information with us. IM is not responsible for and assumes no liability if a partner or other website or entity collects, uses or shares, any information about you in violation of its own privacy policy, or applicable law.

Third Parties with Whom We Share Your Personal Information.

Third Parties for Retargeting Advertising:

We will, in some cases, share information about how you use our Site with third-party vendors to present you with more relevant advertising. For example, our vendors may track your browsing activity on our Site using cookies to show you ads based on your interests when you browse the Web or use social media. Our vendors will, in some cases, also share information about your browsing activity on our Site with us for analytics purposes. IM relies on your consent for such processing of your personal information. More information on these cookies, including how to provide or revoke your consent, may be found in our Cookie Policy below.

Service Providers:

We may share your personal information with companies acting as our authorized agents or contractors in providing our services, including but not limited to the following categories of service provider:

- Infrastructure and IT service providers, including cloud service providers, Help Desk Support, Academy Video Support, Zendesk;
- Business service providers;
- Marketing, advertising and communications agencies;
- External auditors and advisors;
- Cookie analytics providers;

- Online advertisers;
- Providers of website testing and analytics services;
- Translation Service.

Each service provider must agree to implement and maintain reasonable security procedures and practices appropriate to the nature of your information in order to protect your personal information from unauthorized access, destruction, use, modification or disclosure. Because we operate globally, we may transfer your information to countries or jurisdictions that do not provide the same level of data protection as the country in which you are based. If we make such a transfer, we will, or our vendors will, as applicable, provide for the proper safeguards required by applicable law to ensure that your information is protected. More information on International Data Transfers information is below.

Where we share your personal information for our legitimate interests you can object to this disclosure. Please be aware that when you object to disclosure of your personal information for IM's legitimate interests it may affect the products and services we provide to you. More information on Your Rights are below.

Legally Affiliated Entities:

In the event that IM is merged, or in the event of a transfer of our assets, Site or operations, IM may disclose or transfer your personal information in connection with such transaction. In the event of such a transfer, IM will notify you via email or by posting a prominent notice on our Site for 30 days of any such change in ownership of IM resulting in a change of control of your personal information. We may also share your personal information with IM Independent Business Owners ("IBOs") affiliates in order to provide or offer products or services to you.

Legally Compelled Disclosure:

We will also disclose your personal information when required to do so by law, for example, in response to a court order or a subpoena or other legal obligation, in response to lawful requests by public authorities, including to meet national security or law enforcement agency's requirements, or in special cases when we have reason to believe that disclosing your personal information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (whether intentionally or unintentionally) our rights or property.

International Data Transfers.

Processing In the US and Elsewhere by Registration on This Site:

IM is a global business. We may transfer the personal information we collect about you to recipients, and your personal information may be stored and processed, in countries other than the country in which the information was originally collected, including the United States and elsewhere that may have less stringent data protection laws than the country in which you initially provided the information.

When we transfer your information to countries other than the country in which the information was originally collected, we will protect your information as described in this Policy or as otherwise disclosed to you at the time the data is collected (e.g. via program specific privacy notice) and will comply with all applicable data protection laws in making such transfers.

If you are located in a non-US jurisdiction, the transfer of personal information is necessary to provide you with the requested information and/or to perform any requested service. To the extent permitted by law, such submission also constitutes your consent for the cross-border transfer.

With respect to transfers originating from the European Economic Area to the United States and other non-EEA jurisdictions, IM has executed EU Standard Contractual Clauses with respect to personal information collected in the European Economic Area and transferred to IML in the United States and elsewhere.

Where allowed by applicable law, you may ask for further information on the safeguards that we have put in place to safeguard the transfer of your data to outside of the EEA by contacting us as indicated below.

Disclosure and Liability for Onward Transfer.

IM is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. IM may, as disclosed above in Third Parties with Whom We Share Your Personal Information, transfer personal information onward to third parties.

Complaints.

IM commits to resolve complaints about our collection or use of your personal information. Individuals with inquiries or complaints should contact IM at: PrivacyAdministrator@im.academy.com

Security.

IM endeavors to protect the security of your personal information and your choices for its intended use. We use Secure Socket Layers or SSL technology to protect the transmission of sensitive personal information such as your credit card number. We store your personal

information on a secure server, and use procedures designed to protect the personal information we collect from unauthorized access, destruction, use, modification or disclosure.

Although we will take (and require our third-party providers to take) commercially reasonable security precautions regarding your personal information collected from and stored on the Site, due to the open nature of the Internet, we cannot guarantee that any of your personal information stored on our servers, or transmitted to or from a user, will be free from unauthorized access, and we disclaim any liability for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. By using the Site, you acknowledge that you understand and agree to assume these risks.

How Long We Keep Your Personal Information.

We will only retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected, and to the extent permitted by applicable laws. We take steps to ensure that when we no longer need to use your personal information, we remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

Your Privacy Rights.

Marketing Communications:

When you register on this Site, we may ask you to select whether you would like to receive email and electronic communications from us such as offers, news, reports and other promotional communications. You may withdraw your consent or opt-out of receiving such communications at any time by contacting us as described below.

Additionally, where we process your personal information for our legitimate interests you will have the right to object to such processing. Please be aware that where you object to this sort of processing it may affect our ability to carry out tasks as listed in this policy.

You may contact us:

(a) by following the Opt-Out or unsubscribe instruction contained in the body of any marketing e-mail from us;

(b) by sending us an e-mail at PrivacyAdministrator@im.academy.com, including a copy of the e-mail you have received and by typing "Remove" in the subject line of your e-mail; or

(c) by mail: International Markets Live, Inc. 108 Village Square, Suite 146, Somers, NY 10589, Attention: Chief Financial Officer

Your election not to receive newsletters or promotional and marketing correspondence from us will not: (i) preclude us from corresponding with you, by email or otherwise, regarding your existing or past relationship with us, and (ii) preclude us, including our employees, contractors, agents and other representatives, from accessing and viewing your personal information in the course of maintaining and improving the Site.

Requesting Access to Your Personal Information and Other Rights:

You may also have rights under applicable law to request to review, access, correct, delete, port or object to our processing your personal information processed by us, and lodge a complaint with a supervisory authority. If so, you may do so by submitting your request to PrivacyAdministrator@im.academy.com.

Changes to this Policy.

We are a rapidly evolving, global business. We will continue to assess this Policy against new technologies and services, business practices as well as our clients' needs, and make changes to this Policy from time to time as required. If we make any material changes to this Policy, we will make changes here and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Policy changes).

Data Protection Officer.

We have appointed, where required by local law a data protection officer ("DPO"). If you have any questions or concerns about our personal data policies or practices, you may contact the DPO by emailing DPO@im.academy.

California Residents Privacy Notice.

If you are a California resident, the personal information we collect about you, and the business or commercial purposes for which it is used, is detailed above in The Types of Information We Collect and How We Use Your Information. For more information on our privacy practices and how to exercise your rights under California law, please see our [California Consumer Privacy Policy](#).

Nevada Residents

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: PrivacyAdministrator@im.academy.com However, please know we do not currently sell data triggering that statute's opt-out requirements.

Cookie Policy – Automatic Data Collection

By browsing on our Site, you are agreeing to our use of cookies.

What is a Cookie:

A cookie is a small text file that a website stores on your personal computer, telephone or any other device, with information about your navigation on that website. Cookies facilitate browsing and to make it more user-friendly. A cookie contains the name of the server it came from, the expiry of the cookie, and a value – usually a randomly generated unique number. Cookies do not give access to nor damage your computer.

How we use Cookies:

We use browser session cookies, which are temporary cookies that are erased from your device's memory when you close your Internet browser or turn your computer off, and persistent cookies, which are stored on your device until they expire, unless you delete them before that time.

For more information on our privacy practices and how to exercise your rights under California law, please see our [Cookie Policy](#).

If you would like more information about the third party cookies on our website and to find out more about your choice to not have your information used by third parties, please contact us at PrivacyAdministrator@im.academy.com

Contact Us.

You are always free to contact us if you have questions or concerns regarding this Policy, have a question or problem related to your use of the Site, or wish to exclude your personal information from our direct marketing purposes. Our standard business practice is to retain any communications from our Site visitors to help us to serve each of you better.

You may contact us by emailing PrivacyAdministrator@im.academy.com or by writing to us at 108 Village Square, Suite 146, Somers, NY 10589.