

# Kannaway Privacy Policy

Your privacy is very important to us. We want to make your experience on the Internet as enjoyable and rewarding as possible, and we want you to use the Internet's vast array of information, tools, and opportunities with complete confidence.

We have created this Kannaway Privacy Policy to demonstrate our firm commitment to privacy and security. This Privacy Policy describes how Kannaway collects information from all end users of our Internet services (the "Services") such as those who access some of our Services but do not have accounts ("Visitors") as well as those who may purchase Products and/or pay a monthly service fee to subscribe to the Service ("Members"). This policy also describes what we do with the information we collect, and the choices Visitors and Members have concerning the collection and use of such information. We request that you read this Privacy Policy carefully.

## Personal Information Kannaway Collects and How It is Used

### Introduction

Kannaway collects information in different ways from Visitors and Members who access the various parts of our Services and the network of Web sites accessible through our Service. We use this information primarily to provide a customized experience as you use our Products and Services, and generally do not share this information with third parties. However, we may disclose personal information collected if we have received your permission beforehand or in very special circumstances, such as when we believe that such disclosure is required by law or other special cases described below.

### Visit our site anonymously

You may visit our site anonymously, although each time you access the website, your internet browser sends as standard the following data to our web server: the date and time of access, the sender's IP address, the requested resource, the http method as well as the http user agent header. Our web server stores this data separately from other data; we are not able to assign this data to a specific person. Following anonymous evaluation for statistical purposes, this data is immediately deleted.

### Registration

Members may be asked to provide certain personal information when they sign up for our Products or Services including name, address, telephone number, billing information (such as a credit card number), and the type of personal computer being used to access the Services. The personal information collected

from Members during the registration process is used to manage each Member's account (such as for billing purposes). This information is not shared with third parties, unless specifically stated otherwise or in special circumstances.

KANNAWAY uses the transmitted personal data (e.g. title, name, address, email address, telephone number, fax number, transfer details), without prior express consent in accordance with the provisions of the German Federal Data Protection Act, solely for the purpose of fulfilling the contract.

However, in instances where Kannaway and a partner jointly promote our Services, we may provide the partner certain personal information, such as the name, address, and username of persons who subscribed to the Services as a result of the joint promotion for the sole purpose of allowing us and the partner to assess the results of the promotion.

In this instance, personal information may not be used by the partner for any other purpose. We may also generate non-identifying and aggregate profiles from personal information Members provide during registration (such as the total number, but not the names, of Members). As explained in more detail below, we may use this aggregated and non-identifying information to sell advertisements that appear on the Services.

## **Kannaway Partners and Sponsors**

Some products and services may be offered to Visitors and Members in conjunction with an affiliate, independent contractor seller or non-affiliated partner. To provide Visitors and Members some of these products and services, the partner may need to collect and maintain personal information. In these instances, you will be notified before any such data is collected or transferred and may decide not to use that particular service or feature.

Additionally, our partners may have advertisements or co-branded Web Pages that are cosponsored by an affiliate, independent contractor seller, or non-affiliated partner. Kannaway may share nonidentifying and aggregate information (except as described above), but not personal information, with such partners in order to administer the co-branded products or services offered.

## **Online Advertisements**

Kannaway may display our online advertisements. In those cases, we share aggregated and nonidentifying information about our Visitors and Members collected through the registration process as well as through online surveys and promotions with these advertisers.

Additionally, in some instances, we use this aggregated and non-identifying information to deliver tailored advertisements or joint ventures. For instance, an advertiser or joint venture company tells us the audience they want to reach and provides us an advertisement tailored to the audience. Based upon the aggregated and non-identifying information we have collected, we may then display or send the advertisement to the intended audience. Kannaway does not share personal information about its

## **Responses to Email Inquiries**

When Visitors or Members send email inquiries to Kannaway, the return email address is used to answer

the email inquiry we receive. Kannaway does not use the return email address for any other purpose and does not share the return email address with any third party.

## Voluntary Customer Surveys

We may periodically conduct both business and individual customer surveys. We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve the types of products and services we offer and how we provide them to you. Your personal information and responses will remain strictly confidential, even if the survey is conducted by a third party. Participation in our customer surveys is voluntary.

We may take the information we receive from individuals responding to our Customer Surveys and combine (or aggregate) it with the responses of other customers we may have to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our services to you and to develop new services and products. This aggregated, non-personally identifying information may be shared with third parties.

## Special Cases

It is Kannaway's policy not to use or share the personal information about Visitors of Members in ways unrelated to the ones described above without also providing you an opportunity to opt out or otherwise prohibit such unrelated uses.

However, we may disclose personal information about Visitors or Members or information regarding your use of the Services or Web sites accessible through our Services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: credit agencies; collection agencies; merchant database agencies; law enforcement, or to satisfy laws, such as the Electronic Communications Privacy Act, the Child Online Privacy Act, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact, or bring legal action against someone who may be violating our Acceptable Use Policy or Terms Of Service, or other user policies; to operate the Services properly; or to protect Kannaway and our Members.

## “Cookies” and How Kannaway Uses Them

A “cookie” is a small data file that can be placed on your hard drive when you visit certain Web sites. Kannaway may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and services we provide and to manage our telecommunications networks.

If you are a Visitor or Member we may use a cookie to save your settings and to provide customizable and personalized services. These cookies do not enable third parties to access any of your customer information. Additionally, be aware that if you visit other Web sites where you are prompted to log in or that are customizable, you may be required to accept cookies. You can delete existing cookies by using your browser's configuration interface.

Advertisers and partners may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

## Analytical Information

Analytical information is an integral part of decision making. It puts together all the information readily available to an organization to make important decisions. The raw data is manipulated through analysis so that it is useful to an organization in a specific way. Analytical information can be the first step to becoming one of the many analyzing tools that an organization use to make decisions. Some of these analyzing tools that use analytical information are:

- **Cluster Analysis:** This type of analysis is typically used in marketing. It takes the information, such as about customers, and analyzes it so that it can divide up and group together the ones that are similar and keeps them as close as possible. Conversely, it keeps the ones that are different as far apart as possible.
- **Market Basket Analysis:** This analyzes information from websites and checkouts and manipulates it so that it can be used to figure out customers buying trends and behavior so that it can try and predict what future behavior may be. This can be useful because it may be used to forecast how much inventory the organization may or may not need.
- **Personalization:** This can be a little similar to Market Basket Analysis however it mainly deals online and uses the information obtained from a customer online to find out what the customer likes and further offer similar products to possibly cross-sell or up-sell more of the company or organization's products. This can be useful because it obviously creates more revenue for the company or organization if it can sell more products.

## Kannaway Commitment to Children's Privacy

Protecting children's privacy is especially important to us. It is our policy to comply with the Children's Online Privacy Protection Act of 1998 and all other applicable laws. Therefore, we restrict our Web site to persons eighteen years or older.

## Online Shopping

At some Web sites, you can purchase products and services or register to receive materials, such as a newsletter, catalog or new product and service updates. In many cases, you may be asked to provide contact information, such as your name, address, email address, phone number, and credit/debit card information.

If you complete an order for someone else, such as an online gift order sent directly to a recipient, you may be asked to provide information about the recipient, such as the recipient's name, address, and phone number. Kannaway has no control over the third parties' use of any personal information you provide when placing such an order. Please exercise care when doing so.

If you order services or products directly from Kannaway we will use the personal information you provide only to process that order. We do not share this information with outside parties except to the extent necessary to complete that order.

YOU MUST BE EIGHTEEN (18) YEARS OR OLDER TO ACCESS THIS WEB SITE. IF YOU ARE UNDER EIGHTEEN YEARS OF AGE, YOU ARE NOT PERMITTED TO ACCESS THIS WEB SITE FOR ANY REASON. DUE TO THE AGE RESTRICTIONS FOR USE OF THIS WEB SITE, NO INFORMATION OBTAINED BY THIS WEB SITE FALLS WITHIN THE CHILD ONLINE PRIVACY ACT (COPA) AND IS NOT MONITORED AS DOING SO.

## Public Forums

Please remember that any information you may disclose in any Member Directory or other public areas of our Web sites or the Internet becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

## Kannaway's Commitment to Data Security

Services and websites that we sponsor have security measures in place to protect the loss, misuse, and alteration of the information under our control. 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.

## Data Protection and Removal of Your Personal Data

You may request details of personal information which we hold about you. The Entrepreneur are entitled at any time to demand information about their data free of charge, as well as the amendment, blocking or deletion of their data (again free of charge), unless this endangers the fulfillment of the contract by KANNAWAY. If the Entrepreneur would like more information about the storage of their personal data or the deletion, blocking or amendment of the data of the interested party, support can be obtained via the email address or postal address given in this section.

Personal data will only be collected if the Entrepreneur communicate such data voluntarily in the context of the order or registration process. KANNAWAY uses the transmitted personal data (e.g. title, name, address, email address, telephone number, fax number, transfer details), solely for the purpose of fulfilling the contract. If you would like a copy of the information we keep on our systems about you please email: [Compliance@kannaway.com](mailto:Compliance@kannaway.com) or write to our Corporate Offices at: Kannaway Europe B.V., Singel 250, 1016 AB Amsterdam, Netherlands. If you believe that any information we are holding is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect. You can ask us at any time to delete the information we hold on you by emailing or writing to us or by calling Customer Support at +48 22 299 82 00.

## Changes to Personal Data

Members of Kannaway are obliged to inform Kannaway about any change concerning his/her data, in particular about changes of place of residence, changes of surname, and changes of email address. Kannaway shall not be liable for the consequences resulting from providing mistaken data.

## 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 Web site.

## Revisions to This Policy

Kannaway reserves the right to revise, amend, or modify this policy, our Terms of Use Agreement, our Policies & Procedures, and our other policies and agreements at any time and in any manner, by updating this posting.

## Language Translation Disclaimer

Foreign language translations of this Privacy Policy are prepared by third party translators. Kannaway has made reasonable efforts in order to provide accurate translations, however, no translation is perfect and is not intended to replace the official English text version. Any discrepancies or differences created in the translation are not binding and have no legal effect for compliance or enforcement purposes. If any questions arise concerning the accuracy of the information presented by the translated version, please refer to the English version which is the official version.

## Transfer of Information

We do not sell or share any personal information about you except as described in this Kannaway Privacy Policy. Some products and services may be related to visitors and members are offered with an affiliated company, an independent contractual partner or a non-affiliated partner. In order to provide some of these products and services to visitors and members, the affiliate may need to collect and manage personal information. In these cases, you will be notified before such data is collected or transmitted. You cannot use that particular service or feature.

In addition, our partners may have co-branded advertisements or websites that are endorsed by an affiliate, independent contractor, or unaffiliated partner. Kannaway may share non-identifying and aggregated information (other than as described above), but not personally identifiable information, with these partners in order to administer the co-branded products or services offered. We do not authorize our service providers to use or disclose the information unless this is necessary to provide services on our behalf or to comply with legal requirements.

If you are a Kannaway account holder, we will also share your personal information with the account sales organization (including upline and downline brand ambassadors) to manage sales, facilitate the distribution of Kannaway products, and the other Kannaway owners -Accounts to provide reports on activity.