

# **PRIVACY POLICY**

## **Website Privacy Policy**

**We, at Edmark have created this Privacy Policy to demonstrate our firm commitment to protecting your personal information and informing you about how we handle it. This Privacy Policy only applies to transactions and activities in which you engage, and data gathered, on the Edmark website. This Privacy Policy may be modified periodically, and was last revised on 1 April 2016. Each time you visit the Edmark website or provide us with information, by doing so you are accepting the practices described in this Privacy Policy at that time.**

## **Overview**

**As part of the normal operation of our services we collect information about you. This Privacy Policy describes what information we collect about you and what may happen to that information. By accepting this Privacy Policy and our Terms and Conditions, you expressly consent to our use and disclosure of your personal information in the manner prescribed in this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the Edmark website user agreement.**

## **Minors**

**Anyone under 18 years of age is considered a minor and is not eligible to utilize our services, and we ask that those under the age of 18, do not submit any personal, private, or financial information to us. If you are a minor, you may use Edmark's site only in conjunction with a parent or legal guardian.**

## **Your IP Address**

**Like most e-commerce Websites, each time you visit the Edmark website, we automatically collect your IP address and the web page from which you came. In order to administer and optimize the Edmark website for you and to diagnose problems with the Edmark website, we use your IP address**

only to help identify you and to gather broad demographic information about you.

## **Cookies**

Like most websites, the Edmark website uses cookies to keep track of your purchases and other activities on the Edmark website and enhance your overall experience on the Edmark website. “Cookies” are small harmless files saved on your Browser that assist us in saving your preferences. We use cookies to deliver content specific to your interests, and to help you to save your password, to save other personal and financial information so you do not have to re-enter it each time you visit the Edmark website. Cookies are also used to assist us in measuring our traffic flow, and to assess promotional effectiveness. You have the option to decline our cookies easily by disabling them in your browser, although in that case you may not be able to access certain features on the Edmark website, as well as being required to re-enter your private information more frequently during a session. Third party advertisers on the Site may also place or read cookies on your browser. We are not responsible for cookies from any third party.

## **Collection of Information**

You may browse the Edmark website without revealing any personal information about yourself, however once you wish to actually use the features available on the Edmark website, you will not be able to retain your anonymity. In order to fully meet your needs and provide you with an efficient and enjoyable experience, as well as providing access to certain features that may be of interest to you, we may require limited personal information. This may include things such as your full name, postal address, phone number, email address, billing information, shipping information, financial information (credit card numbers or passwords) or demographic information (information that you submit, or that we collect, that is neither personal information nor financial information; this may include, but is not limited to, zip code, postal code, hometown, gender, username, age, birth date, purchase history information, browsing history information, searching history information, registration history information,

**and the content of communications between you and other users over the Edmark website. Demographic information is either “non-public information”, which consists of user history information and one-on-one communications between you and other users of the Edmark website, or “public information”, which consists of all other demographic information. We ask that you do not enter personal information or financial information into a publicly viewed area (for example, don’t use your address or password as your username, or include your name or address in written communications or item descriptions), because if you do then it will then become “public information.” You always have the option to not provide specific information by choosing not to use a particular service or feature.**

**We use your financial information, including credit card information to verify the accuracy of your name, address, and other information, as well as to bill you for your use of our services.**

**If you choose to post messages in our Forum, chat rooms, message areas (this may include, but is not limited to Twitter, Facebook and similar) or leave feedback for other users, we will collect that information you have provided. This information will be reviewed by us as necessary to provide customer support, diagnose technical problems, and resolve disputes.**

**A specific file may be retained for you regarding any direct correspondence to us, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Site.**

**Your buying, selling, and browsing habits on the Edmark website are automatically tracked for the purpose of our own research on our users’ demographics, interests, and behavior in order to better understand, protect and serve you and our online community. This may include the site that you just came from, the one that you will visit next, your computer browser information, and your IP address.**

## **Information Others Collect From You**

**This Privacy Policy only applies to the use and disclosure of information that Edmark collects from you. On our website, we place links to other websites operated by other parties. Some of these other websites contain our brand names and trademarks and other intellectual property that we own; others do not. When you click on these links and visit these other websites, regardless of whether or not they contain our brand names, trademarks and other intellectual property, you need to be aware that we do not control these other websites or these other websites' business practices, and that this Privacy Policy does not apply to these other websites. Consequently, the operators of these other websites may collect different kinds of information about you, and may use and disclose that information in different ways than we would if it were collected on the Edmark website. This concept also applies to your disclosure of information to any other parties. We encourage you to review their privacy policies and remind you that we will not be responsible for their actions.**

## **How We Use Personal Information**

**We use your personal information to help us efficiently operate the Edmark website, to contact you in connection with your transactions and other activities on the Edmark website, to forward messages to you from other users, to correct problems, collect service fees, gather demographic information, analyse data to improve your experience, enforce our distributor agreement, resolve user disputes, protect against fraud or criminal activity, and inform you of offers, updates or services that might be of interest. These types of communications are known as "Operational Communications." In some cases, Operational Communications may also contain commercial messages, such as banner ads and special offers. It is our policy not to sell or rent to any to third parties, your personal information for any purpose without your expressed consent. We may however, gather personal demographic data which may be disclosed in a manner that is not personally identifiable, for the purpose third party marketing analysis. This would not include your name, financial account numbers, email, or passwords.**

**We also use personal information to send you newsletters, information, offers and other promotional materials for Edmark's or third parties' goods or services. We attempt to send you offers that are of value to you, such as discounts, or exclusive offers. The Edmark website provides you with options to decline to receive communications from the Edmark website (other than those contained in Operational Communications). Some of these options may only be for a certain category of communications; others may be more general. By accepting the Edmark Website User Agreement and Privacy Policy, you expressly agree to receive this information. If you wish to stop receiving certain communications, you have the option to do so by changing your user preferences.**

**In order to operate the Edmark website, including processing your transactions and supporting your activities, it may be necessary for us to share your personal information with our internal agents, representatives, contractors and service providers so they can provide us with support services such as authorization of credit card transactions, billing, affiliate programs, email origination, receipt or support services, customer relationship management services, order fulfilments and promotional fulfilments. We require these entities by confidentiality agreement, not to use your information for any other purpose without your expressed permission.**

**By purchasing, or registering or making reservations for, products or services offered or sponsored by third parties on the Edmark website, or electing to receive communications, or electing to participate in contests, sweepstakes or other programs, offered or sponsored by third parties on the Edmark website, you are providing some degree of your personal information specifically to those third parties. Those third parties may use your personal information in accordance with their own privacy policies. You will need to contact those third parties to instruct them directly regarding your preferences for the use of your personal information by them. You should evaluate any third party's privacy practices before using their services. Additionally, you agree that we may use and disclose all such information so submitted to such third parties in the same manner in**

**which we are entitled to use and disclose any other information you submit to us.**

**In some cases, we may enter into a promotional relationship with another company in which we prominently display their brand name or trademarks on pages of the Edmark website. These pages are known as “Co-Branded Pages” and these companies are known as “Co-Branded Companies.” If the page on which you submit information is a Co-Branded Page, or was accessed by clicking on a link on a Co-Branded Page, then we may share some of your e-mail information with the associated Co-Branded Company. Co-Branded Companies may use your personal information in accordance with their own privacy policies. You will need to contact Co-Branded Companies to instruct them directly regarding your preferences for the use of your personal information by them.**

**Any third party with whom you expressly allow us to share your personal information is authorized to use your personal information in accordance with our contractual arrangements with such third parties and in accordance with their own privacy policies, over which we have no control, and you agree that we are not responsible or liable for any of their actions or omissions. Those who contact you will need to be instructed directly by you regarding your preferences for the use of your personal information by them.**

**We cannot ensure that any of your and other personal information or private communications will never be disclosed in ways not otherwise described in this Privacy Policy. We may be forced to disclose personal information to the government or third parties under certain circumstances, transmissions or private communications may be unlawfully intercepted or accessed by third parties, or other users may abuse or misuse your personal information that they collect from the Edmark website. Therefore, although we use industry high standard practices to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.**

## **How We Use Financial Information**

**We use your financial information only to check your qualifications, verify your identity and credibility, to bill you for products and services, and to enable you to participate in discount, rebate and similar programs in which you may elect to participate. By making a purchase, or engaging in any other kind of activity or transaction that uses financial information, on the Edmark website, you consent to our providing your financial information to our internal service providers as we determine is necessary to support and process your activities and transactions, as well as to your credit card issuer for their purposes. These third parties may include the credit card companies and banking institutions used to process and support the transaction or activity. By purchasing, or registering or making reservations for, products or services of other third parties offered on the Edmark website, or by participating in prEdmarkrams offered on the Edmark website that are administered by third parties and that require you to submit financial information in order to use them, you also consent to our providing your financial information to those third parties.**

## **Special Cases in which we share Personal and Financial Information**

**We may disclose personal information or financial information when we determine that such disclosure is necessary to comply with applicable law, to cooperate with law enforcement or to protect the interests or safety of Edmark, its distributors, or other visitors to the Edmark website. Whenever personal information or financial information is disclosed under this paragraph, we may also disclose your demographic information along with it, on a non-anonymous basis.**

**Edmark will cooperate with law enforcement inquiries, as well as other third parties in the interest of enforcing laws, preventing criminal activity, protecting rights (including intellectual property), and protecting you and our Edmark community from harmful or criminal acts. Therefore, if we receive a verified request by government officials or other law enforcement agencies regarding an alleged illegal activity or investigation, you authorize us to disclose any of your personal information or history without a**

**subpoena. In an effort to respect your privacy however, we will not otherwise disclose your personal information to law enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, unless we believe that such information is necessary to prevent imminent physical harm or financial loss, or to report suspected illegal activity. You also authorize us to disclose your personal and account information under confidentiality agreement, as we in our sole discretion believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity.**

## **Our Security Precautions**

**All of Edmark's website user information is stored on secure servers within Malaysia, and protected by applicable Federal laws. Edmark has security measures in place to protect against the loss, misuse and alteration of the information under our control, and that which is exchanged on Edmark website. Our secure server software (SSL) is the industry high standard and among the best software available today for secure commerce transactions. We encrypt all of your personal and financial information as it travels over the Internet and we store your financial information on our servers in encrypted form.**

**How you may use the Information of other Users. (For independent distributors only)**

**Edmark grants its independent distributors limited access to other distributors' email, ID, and shipping information, in order to allow interaction among everyone within the Edmark community. Through the acceptance of Edmark's Website User Agreement, you agree that you have authority to use other users' personal information that you obtain through the Edmark site, through related communication, or any Edmark-facilitated transaction, only for using services offered through Edmark and communications that are not unsolicited commercial messages, or for any other purpose that a user expressly agrees to. Users must have an opportunity to have you remove any information you have collected about**

**them. In addition, under no circumstances, you can disclose personal information about another user to any third party without our consent and the consent of that user. You agree that other users may use your personal information to communicate with you regarding Edmark related matters. Note that law enforcement personnel, and other rights holders are given different rights with respect to information they access.**

**Edmark and its service providers do not tolerate “spam”. Therefore, you DO NOT have any authority or permission whatsoever to add any reference to “Edmark”, “Edmarker” or to otherwise insinuate that any electronic message you communicate to third parties has any affiliation whatsoever with the Company. Regardless of whom it is you are communicating with — be it a purchaser, fellow Distributor, or even the Company itself — AND, regardless where the message originates from — be it from another Distributor, your business organization, or even the Company itself — ABSOLUTELY NO MESSAGES SENT BY to you or your e-mail address should include any reference, or insinuation of approbation of the communication by the Company.**

**The Company has a ZERO TOLERANCE policy regarding any act which violates the above Policy. Be forewarned, if the above provision is not observed, then Edmark will take appropriate legal action.**

### **Sharing your personal information with third parties**

**Unless otherwise specified or required by law or unless it is necessary for the purposes of performing services with respect to your use of this Web Site, we will not share your personal information with third parties, except your name, identification number, contact details and the value of the purchases you have made, will be made available to your referring or sponsoring upline, or the current Edmarker servicing you. In addition, your upline will have access to your Edmark Authorisation number and the value of your purchase.**

**When necessary, your personal information may be divulged by Edmark to Edmark’s agents or contractors for the purpose of performing services for**

**Edmark. These agents or contractors will be prohibited from utilising this information in any way other than to provide the services contracted for by Edmark.**

## **How you can access and update your email preferences, personal information and public information**

**We give you the opportunity to alter or update the personal, financial, or demographic information that you have given us by manually making the modifications in the sections of the Edmark website in which you originally submitted that information.**

**These changes and deletions will not change or delete emails or information that we may have already forwarded to other users or credit card companies or any other third parties, all as provided above in this Privacy Policy.**

**Upon your request, we will deactivate your account, contact information, billing information, shipping information, and financial information from our active databases. To make this request, please email [customerservice@edmarker.com](mailto:customerservice@edmarker.com). It may be necessary for some of the personal information that you have requested to remove, to be retained by Edmark for the purpose of collecting any fees owed, diagnosing problems, assisting with any legal investigations, resolving disputes, preventing criminal activity, or enforcing our User Agreement. Therefore, you should not expect that all of your information will be completely removed from our files or databases in response to your requests. However, such personal information will only be available to select Edmark personal, and will no longer be accessible to other users or the public.**

## **Survey and questionnaires**

**Edmark may contain several optional surveys and questionnaires throughout the site asking for information. We use the information you provide to help customize your shopping experience, showing you the content we believe you might be interested in, in order of your reference, as well as to provide advice and purchase recommendations.**

**Reminder:**

**We maintain the right to alter this Policy at any time and we recommend that you review it periodically so that you will be aware of any updates. If you have any questions or concerns about this Privacy Policy, the practices of the Site, or your dealings with the Edmark website. Please contact us at [customerservice@edmarker.com](mailto:customerservice@edmarker.com)**