### PRIVACY POLICY

### **Our Commitment to Privacy**

Your privacy is important to us. We are committed to protecting your personal information and Privacy. This document governs our Privacy Policy and describes our online information collection practices and explains the choices you can make about the way your personal information is collected and used.

The terms "we", "us" and "our" refer to any website under Success Road Academy. The term "user" "you" and "your" refers to website visitors, customers and any user of this website. Our Privacy Policy applies to all information collected through our website, mobile application, and/or any related services, sales, marketing or events (we refer to all these platforms collectively in this privacy policy as "Site").

Our Privacy Policy describes (1) The type of information that we collect (2) how we collect, use, protect, share and transfer your personal information and (3) your rights and choices respecting your personal information such as how you can access, modify and/or delete such information.

## **Topics Covered in Our Privacy Policy**

- I. Information We Collect and How We Collect It
- II. How We Use Your Information
- III. Our Use of Cookies
- IV. Retaining and Deleting Your Personal Data
- V. Updating Your Personal Data
- VI. How to Withdraw Your Permission for Use of Your Personal Data
- VII. Protecting the Privacy Rights of Third Parties
- VIII. Tracking
- IX. Links to Other Websites
- X. How We Protect Your Personal Data
- XI. Children's Privacy
- XII. Anti-Spam Policy
- XIII. Use of Your Credit Card
- XIV. Submissions, Storage and International Data Transfer of Personal Data
- XV. Disclosure and Confidentiality
- XVI. Changes to Our Privacy Policy
- XVII. Contact Information for the Data Controller and GDRP Representative
- XVIII. Governing Law

Use of this Site, including all materials presented and all online services provided by any website under Success Road Academy is subject to this Privacy Policy. This Privacy Policy applies to all Site visitors, customers and all other users of this Site. By using this Site, you agree that you have read this Privacy Policy, understand the practices stated, and you agree to all terms and conditions. We have the right to change this Privacy Policy on the Site at any time without notice. In the event

of a material change, we will let you know via email and/or a prominent notice on our Site.

## **Scope of this Privacy Statement**

This Privacy Statement applies to personal information we collect when you visit our Site. We may also collect information from you in other ways, including information collected during technical support contacts, on registration and check out forms, in person e.g. business cards), and from third parties. If we provide a separate or supplemental notice when we collect personal data from you, that notice will control the extent of any conflict.

## **Our Legal Basis for Collecting and Processing Your Information**

Our legal basis for collecting and processing your personal information ("Personal Data") is based on the necessity for the performance of a contract, to take the necessary steps to enter into a contract, to provide you with information that you may have a legitimate business interest in based on the information you have voluntarily provided.

# I. Information We May Collect and How We Collect It

We collect personal information from you when you visit our Site and voluntarily provide your Personal Data. When you voluntarily give us your Personal Data you are giving us your consent to use, collect and process this Personal Data. You have the right to opt out or request to have your Personal Data deleted by contacting support@successroadacademy.com. We collect the following Personal Data that you disclose to us such as:

- 1. Your name and email address so we can send you our newsletter, marketing material and information you request regarding our services. Upon providing us with your email address, you are affirmatively consenting to us collecting this Personal Data.
- 2. Your billing information such as your name, address and credit card information to that we can process purchases you make, collect payment from you and deliver our products and services to you pursuant to our contractual obligation.
- 3. Your name, email and telephone number if you complete our contact us form. You authorize us to send you marketing emails in response to your completing the contact us form or if we believe we have a legitimate interest to contact you based on your inquiry, question or request.
- 4. Information from you from a co-branded offer. We shall supply our Privacy Policy link and make it known to you as to who is collecting your Personal Data such as your contact information, passwords, security data, payment information and social media login data.
- 5. We collect Personal Data that you voluntarily provide when registering on this Site, using this Site, subscribing to newsletters, downloading free gifts and information, downloading podcast and blogs, providing your name and email address, submitting your credit card or other payment information when ordering and purchasing products and services on our Site, and in connection with other activities, services and features. All Personal Data that you provide must be true, complete and accurate, and you must

notify us of any changes to such Personal Data and if you decide to opt —out of our list or have your Personal Data deleted.

# Other Information We May Collect

## **Automatically Collected Anonymous Data and Use**

Information about your computer hardware and software may be automatically collected by this Site. This information includes: your IP address (the number assigned to computers connected to the Internet), browser type, browser version, domain names, and access times, the pages of our Site you visit, referring website addresses and other statistics. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of this Site. If you access the Site with your mobile device, we may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address. This information is primarily needed to maintain the security and operation of our Site, and for our internal analytics and reporting purposes. This data cannot personally identify you but is useful for us for marketing purposes and for improving our services. Anonymous Data may also be shared with business partners, affiliates and advertisers.

## II. How we Use Information We Collect From You

#### 1. Contact you

## a. Consent or Contract

We may contact your if you give us consent to contact you or under out contractual obligation to deliver goods or services you purchase from us.

# b. Legitimate Interest

When you sign up for our Products or Services, you'll begin receiving relevant information about our company, affiliate companies, invites to our online events, as well as information about our related programs and products in relevant fields like business growth, education and marketing. We will use your Personal Information to communicate with you regarding our products, services, questions and concerns.

# 2. Marketing and Advertising

We may contact you to offer you products and services and to provide information that we believe may be of interest to you.

# 3. Resolve Problems and Disputes

We may contact you to resolve problems, handle disputes and to enforce our terms and conditions.

**4. Process Payments** – We will use the Personal Data you provide to process your payment for purchases you have made with us under contract, to deliver the products and services that you have requested, to manage your account and provide you with customer support.

## 5. Social Media Advertising

We may use your Personal Data to advertise on social media and to create look alike audiences.

## **6.** Collected Financial Information

We may use financial information or payment method information to process payment for

any purchases, subscriptions or sales made on our Site, to protect or identify fraudulent transactions and as otherwise necessary to manage our business and resolve chargebacks.

# 7. Sharing Your Personal Information

We do not sell, rent trade or lease personal user information. We may share your personal information with trusted third parties, business partners, affiliates, direct mail, our merchant accounts to process payments and Google/social media accounts in order to run advertisements or in response to a subpoena or investigative demand.

### Communication

We may communicate with you by using the email you provide when you register as a member or user on our Site. We may send you promotional emails about our Site, services and products. We may also send you offers from our affiliates.

### **Online Viewing and Community Discussion Groups**

When you voluntarily share your Personal Data by making it available for others to view online through our Site or its content, your Personal Data may be seen, collected and used by others. You assume full responsibility for any unauthorized or improper use of your information that you voluntarily shared in a comment, on a blog post in a Facebook Group that we manage, in group coaching calls and other online platforms such as Zoom or Webinars. We shall not be responsible for any such unauthorized use or resulting harm resulting from your voluntary disclosure in such forum.

### **Disclosure to Successors**

If our business is sold, merges or there is a transfer of ownership, either in whole or in part or as a result of bankruptcy, with another business that would become responsible for providing the services on our Site, we retain the right to use your Personal Data in accordance with the terms of this Privacy Policy.

### III. Our Use of Cookies Web Browser

We may use Cookies information, files with small amount of data which may include an anonymous unique identifier, to collect information and enhance user experience. We do not set any personally identifiable information in cookies nor do we use any data-capture mechanisms on our Site other than cookies. We use cookies for several reasons. Some cookies are required for technical reasons for our Websites to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Site. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept the "essential" cookies, you may not be able to use some portions of our Site.

## We may also use cookies for:

- Identifying the areas of our Site that you have visited
- Personalizing content that you see on our website