

## PRIVACY POLICY

**PLEASE NOTE: THE UNAUTHORIZED USE OR COPYING OF THIS DOCUMENT IS IN DIRECT VIOLATION OF INTELLECTUAL PROPERTY LAWS AND IS STRICTLY PROHIBITED!**

**PLEASE CAREFULLY READ THIS PRIVACY POLICY PRIOR TO VIEWING AND USE OF THIS WEBSITE**

### PRIVACY POLICY CONSENT

The website <https://www.poppygrovellc.com/> ("Website") and its content is owned by **Poppy Grove LLC** ("Company", "we", or "us"). The term "you" refers to the user and/or viewer of this Website, agree to and acknowledge to be bound by the following terms of this Privacy Policy, and any information that you contribute or provide to Company is subject to the terms of this Privacy Policy.

The purpose of this Privacy Policy is to inform you how we collect, use, process and distribute your personal information as defined within the terms of this Privacy Policy. We will not use or share your information with anyone except as described in this Privacy Policy. The use of information collected through our Website shall be limited to the purposes under this Privacy Policy, and also our Terms of Use, if applicable.

Use of any personal information or contribution that you provide to us, or which is collected by us on or through our Website or its content is governed by this Privacy Policy. By using our Website or its content, you consent to this Privacy Policy, whether or not you have read it.

### INFORMATION WE COLLECT

Personal information collected includes that which you provide voluntarily by "opting in" to receive a free resource, subscribing to our email list or newsletter, purchasing a product or service, or contacting us via our website, as well as all information automatically collected from you based upon your activity on our Website.

Personal information we collect may include, but is not limited to, the following: Name(s), email address(es), telephone number, billing information, physical address(es), PO Box information, credit card information ("Personal information" and "Personal data").

This information may be collected through the following or for the following, but is not limited to: submitting personal information in order to receive a free resource ("freebie") or newsletter, to purchase an eBook, course(s) and/or program(s) for billing information so that we can maintain our contractual obligation to our payment processing software, through our contact form in order to ask a question, receive marketing emails or request a return email from a member of the Company, or information received in order to gain information on a co-branded offer, program or course.

Personal information collected is given to us voluntarily and, as such, you are giving us consent to use, collect and process such personal information. If you choose not to provide us with certain Personal Data, you may not be able to participate in or access certain aspects of our Website or content.

You acknowledge that whenever you voluntarily make your personal information available for viewing by others online through, but not limited to, this Website, its content, blog, commenting on such blog, posting or commenting on social media, within programs, coaching calls, it may be seen, collected and used by others. Company shall not be responsible for any unauthorized or improper use of the information you voluntarily share.

## **HOW WE COLLECT & USE YOUR PERSONAL INFORMATION**

You understand that your decision to provide any information to us is voluntary and constitutes your clear consent to allow us to collect, process, and retain it.

Should you elect to “opt-in” to receive and should you wish to receive any freebies or other information, Company shall ask for your personal information, you shall provide us with your personal information, we may collect such information that you provide, which may include, but is not limited to, your name, email address and phone number.

Should you elect to fill out our contact form (such as our “contact us” form/page) on our Website, or provide us with any other communication, including, but not limited to information provided via email, contact form, social media messaging, posts, text messages or social media comments, we may collect such information that you provide, which may include, but is not limited to, your name, email address, phone number and any other information that is contained on your social media platform. It is Company's policy that this data is retained and processed simply as a means to communicate with you, answer any questions/concerns and in order to keep a record of such communication.

Should you elect to purchase any eBooks, courses, programs (group or one-on-one) or work privately with any members, employees or coaches of the Company in order to carry out and complete such purchase or sale of goods or services, Company shall collect personal information including but not limited to your name, email address, billing address, credit card or payment information, and any other information necessary in order to complete purchase of the product or service you elect to buy. We will collect and process this data in order to fulfill our contractual obligation to complete your order and will not retain the information any longer than necessary. We use third party data processors to take and complete payment, and we will not retain nor have access to your payment information.

By voluntarily providing Company personal information on our blogs, social media pages or any other online forum, we may use that personal information for any future marketing materials, promotional materials, targeted advertisements or testimonials. Company assures you that use of such personal information for testimonials shall require a separate document to be signed by Company and yourself.

Should you elect to be added to our email list or newsletter, we may use your data to send you targeted social media advertisements or use/upload your personal information into our social media account to create lookalike audiences. In order to ensure compliance with the CAN-SPAM act, all emails from us will clearly state the sender of the email, as well as provide instructions on how to unsubscribe from our list or contact us with any questions or concerns.

Company may track your future interactions with our content, and use your personal information to keep you informed about the products and services you have elected to receive, as well as any linked or similar products or services we think you may be interested in. The information will be collected by us following your choice to manually enter it in and click to be added to our list. No

such information will be collected without your taking action to be added to our list, or in exchange for a free resource.

### **USE OF PERSONAL INFORMATION COLLECTED THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGY (“COOKIES”)**

Company may also collect personal information through Automatic Data Collection Technology such as use through the standard “cookies” feature of available web browsers. Company does not set any personally identifiable information in cookies, nor do we employ any data-capture mechanisms on our Website other than cookies. We may use both session cookies and persistent cookies.

It is your election to choose whether to accept, decline or disable cookies through your own web browser’s settings. However, disabling this function may diminish your experience on our Website and some features may not work as intended. Our Website does not respond to Do Not Track signals sent by your browser.

We may also collect data about how you use Website, your browsing actions or patterns, computer equipment, IP address, internet connection, and other similar choices you make, including via Google Analytics and Facebook Pixels, in order to obtain statistical data, improve our website and offerings, and ensure you receive information relevant to you. If we utilize this technology, we will use them in compliance with all policies of these third-party companies. We may receive personal data from third parties including Google, social media platforms, search engines, Paypal, Stripe, and other third-party payment processing companies.

We may also receive data from third parties like Google Analytics, Facebook and other advertising platforms, providers of technical or payment services as needed, and other similar third parties. We do our best to only utilize third parties who have been deemed GDPR and LGPD-compliant, and whom we have either completed a data processing agreement with, or have reviewed and confirmed their policies regarding data processing to ensure compliance.

Company may share your personal information with trusted third parties in order to contact you via email, process payments, run advertisements and to our affiliates. Company agrees not to share your personal information with third parties for a profit.

### **ANONYMOUS DATA COLLECTED AND USE**

In order to maintain our Website’s quality, we may use your IP address to diagnose issues with our server and/or issues with our Website’s pages or content. Your IP address shall not be used by Company to personally identify you but may be used for marketing purposes and for improving our services and Website performance. Traffic data collection does not follow a user’s activities on any other websites in any way. Anonymous traffic data may also be shared with business partners and advertisers on an aggregate basis.

### **GENERAL DATA PROTECTION REGULATION (“GDPR”)**

Company ensures compliance with the European Union’s General Data Protection Regulation (“GDPR”) and confirms that we have lawful grounds for processing the information we collect from you. Should you provide personal information via our “contact us” page or send any other form of electronic communication, we will process your data based upon our legitimate interest to respond to user or customer inquiries. If you elect to receive communication from us by “opting in” and provide us with your name and email address in exchange for a free resource, training, eBook, webinar or electronic deliverable, or if you purchase from us any courses, programs, eBooks or coaching packages, we will process your data for the purpose it was collected based on your

affirmative consent to do so, and may periodically send you additional email marketing based upon our legitimate interest in marketing to those that have shown an interest in our products or services. We may also give you the option to be added to our email list, in order to receive our newsletter, information about our products and services, and other information we believe may be of interest to you based upon your decision to opt-in to one or more of our free resources, and will obtain your consent to do so. You may withdraw consent at any time by contacting us at [support@poppygrovelc.com](mailto:support@poppygrovelc.com) and requesting your information be edited, updated, or deleted. We do not collect any sensitive data, nor any information regarding criminal offenses or convictions.

### **GENERAL LAW FOR THE PROTECTION OF PERSONAL DATA (“LGPD”)**

Company ensures compliance with the Brazil's Lei Geral de Proteção de Dados Pessoais (“LGPD”) and confirms that we have lawful grounds for processing the information we collect from you. Company has an assigned Controller, Operator and Officer who over sees Company's data processing. Should you provide personal information via our “contact us” page or send any other form of electronic communication, we will process your data based upon our legitimate interest to respond to user or customer inquiries. If you elect to receive communication from us by “opting in” and provide us with your name and email address in exchange for a free resource, training, eBook, webinar or electronic deliverable, or if you purchase from us any courses, programs, eBooks or coaching packages, we will process your data for the purpose it was collected based on your affirmative consent to do so, and may periodically send you additional email marketing based upon our legitimate interest in marketing to those that have shown an interest in our products or services. We may also give you the option to be added to our email list, in order to receive our newsletter, information about our products and services, and other information we believe may be of interest to you based upon your decision to opt-in to one or more of our free resources, and will obtain your consent to do so. We do not collect any sensitive data, nor any information regarding criminal offenses or convictions. Should you request confirmation of the existence of your personal data in our database, you may send a request to [support@poppygrovelc.com](mailto:support@poppygrovelc.com) to do the following:

1. Confirm of the existence of data;
2. Access to such data;
3. Correct incomplete, inaccurate or outdated data;
4. Anonymize, block or eliminate unnecessary, excessive or treated data in discrepancy with the provisions of this law;
5. Data portability to another service provider or product, upon express request and observance of commercial and industrial secrets, in accordance with the regulations of the controlling body and the national authority regulations;
6. Eliminate personal data processed with the consent of the holder, except in the cases provided for in Article 16 of the law;
7. Information of any public and private entities with which the Company's Controller has made shared use of data;
8. Information on the possibility of not providing consent and on the consequences of refusal;
9. Revoke or withdraw consent at any time

### **HOW INFORMATION IS STORED AND SHARED**

Company stores and processes personal information through a data management system. Company takes important and appropriate measures to ensure that all personal information collected is kept confidential. Company maintains that there are limited purposes which it shall share personal and confidential information including, but not limited to, processing any billing, or for providing technical support for our website, to members of our team/employees/management/personnel for legal or accounting purposes only. Any parties who

will have access to your information will keep such information confidential and will never share with any unrelated parties to the best of our abilities. Information provided by you will never be shared, sold, or given to any other company or person without your consent, other than what is required to complete a purchase or request you have made, unless required to do so by law, or any governmental requirements. We require all such third parties to treat your personal information in accordance with the law, and only allow them to process your personal data for specific, necessary purposes.

Company utilizes a third-party company to act as a data processor, which stores information such as names and email addresses that make up our email list. To the best of our ability, we have researched and concluded that all third-party data processors we use have advised us they are compliant with the General Data Protection Regulations as well.

Should Company be required to disclose such personal information as provided by law, or should there be a good faith belief that such disclosure is necessary to protect the rights of Company, this Website, any member of our Company or our property, the property of our users or licensees, should any portion of this Privacy Policy, our Terms and Conditions, Terms of Use or Website Disclosure are being violated, in order to prevent or mitigate a crime that is or may be committed, or to protect that safety or rights of our other users or the public.

Website, and the servers and parties which made this website available on a global scale, are located within and operate within the United States. The laws of the United States and **California** which govern any and all matters relating to the internet and this Website, including content, as well as the principles of the General Data Protection Regulation (GDPR) and the General Law for the Protection of Personal Data (LGPD) as they apply to residents of the European Union. Any information you choose to provide through this website, including subscribing to a newsletter, opting-in to receive a free gift, or purchasing something will be transferred to the United States for processing. That information may then be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information, and how it is stored by us. If transferred to another country, it may not have data protection laws that are as comprehensive or protective as those in your country of residence; however, our collection, storage, and use of your Personal Information will at all times be governed by this Privacy Policy. By visiting our Website, you acknowledge this information, and by submitting any personal information onto our Website, you hereby authorize this transfer and processing of information.

Company also retains the right to share such personal information as a result of a sale of Company, or any branch of the company, as well as with any joint venture partners or affiliate marketers, should we deem it necessary to share such information. We will always take all reasonable measures to protect and safeguard your information.

We retain the minimum amount of Personal information required for the minimum amount of time necessary to provide you with the information and / or services that you requested from us. We may include certain Personal Data for longer periods of time if necessary for legal, contractual and accounting obligations. Such information includes name, email address, and behavior tracking, as long as you elect to remain on our mailing list, and any additional Personal information as long as it is needed in order to fulfill the purpose for which it was initially collected, such as completing a purchase. We will also retain and use collected information as necessary in order to comply with any legal obligations, resolve any disputes, or as otherwise reasonably determined. If at any point you elect to be removed from our database, your information will be deleted, and no longer retained.

## **PASSWORD PROTECTION AND USE**

Company may require you to create a username and password in order to use certain features of the Website or its content. Company is not responsible for maintaining the confidentiality of the username and password you create. You are solely responsible for all activities, whether by you or by others, that occur under your username or password and within your account. We cannot and will not be liable for any loss or damage arising from your failure to protect your username, password or account information. If you share your username or password with others, they may be able to obtain access to your Personal Data at your own risk.

You shall agree to immediately notify Company of any unauthorized or improper use of your username or password, or of any breach of security by immediately sending an email to **support@poppygrovellc.com** immediately after recognizing such breach or improper use. Company suggests logging out of each session in order to protect against unauthorized or improper use.

Company shall use its best efforts to maintain the confidentiality and privacy of your username(s) and password(s) and shall not share such information without your consent, except as necessary when the law requires it or in the good faith belief that such action is necessary, particularly when disclosure is necessary to identify, contact or bring legal action against someone who may be causing injury to others or interfering with our rights or property.

## **CONFIDENTIALITY, SECURITY & INFORMATION PROTECTION**

Company uses commercially responsible methods to safeguard all personal information, including information voluntarily provided to us, automatically collected, by using reasonable online security measures, and sharing your data with reputable third-party vendors that are compliant with generally accepted security and safety measures. We utilize a Secure Sockets Layer (SSL) on our website in order to assist in the secure transfer of information. Company cannot guarantee the complete safeguard of all personal information, however, should we become aware that a data breach has occurred, We will timely notify the necessary parties with as much information as we have available

While our team does our best to protect the information we collect, and prevent any misuse, unauthorized access, or disclosure, you understand that we cannot be responsible should an unauthorized third party obtain access to our information, without our consent. Should our website be tampered with, you understand that your personal information may be accessed by these unauthorized parties. You agree that we are not responsible for any such actions, and acknowledge you will hold us harmless should your information become intercepted in this way without our knowledge, permission, or consent, which includes a release of any and all claims related to use of such information by such an unauthorized party.

## **YOUR RIGHTS TO ACCESS, CONTROL RESTRICT, DELETE, UPDATE PERSONAL INFORMATION AND UNSUBSCRIBE**

Company does not participate in spam and shall always provide to you an option to opt-out of our communications. We have taken the necessary steps to ensure that we are compliant with the CAN-SPAM Act of 2003 by never sending out misleading information. We will not sell, rent or share your email address.

At all times, Company acknowledges that you have the right to edit, update or delete your personal information from our database. You may click "unsubscribe" at the bottom of any email Company sends to you or by contacting Company at **support@poppygrovellc.com**

You have the right to request information concerning how your data is being used, request which personal information and data we currently have and use, correct or edit any data which is no longer accurate, unlawful or no longer needed, withdraw consent to the processing of your personal information, lodge a complaint should you feel your personal information is being used unlawfully or restrict or object to how the data is being used. Should you wish to receive such information, please contact Company at [support@poppygrovellc.com](mailto:support@poppygrovellc.com)

### **THIRD-PARTY WEBSITES**

Website may provide links to third-party websites. Company is not responsible or liable for the content and activities of other individuals, companies or entities whose website or materials may be linked to Company's Website or its content. Company is also not liable for the privacy of the information which is voluntarily shared on any third-party website. Company urges you to review the privacy policies of any third-party website in order to ensure the use and protection of your personal information is to your satisfaction.

You further understand that should you click on a link and be taken to another website, this Privacy Policy does not attach, and we have no control, responsibility, or liability for content, activities, or policies of any other company, website, or individual. You acknowledge and agree that we are not responsible for the privacy policies or practices of third parties, and that you understand you will need to review the privacy policy of each individual website to confirm their specific policies.

### **CHILDREN'S ONLINE PRIVACY PROTECTION ACT COMPLIANCE (COPPA)**

You must be at least 18 years old or older to gain access to our Website and its contents. This Website is not intended for those who are under 18 years old.

Company does not knowingly collect any information from anyone who is under 18 years of age and does so in compliance with the Children's Online Privacy Protection Act as well as the General Data Protection Regulation of the European Union. This Website, as well as its contents, is directed solely to individuals who are at least 18 years old and older.

If we learn we have collected or received personal information from a minor under 18, we will delete this information, and/or attempt to obtain parental consent. If you have any reason to believe we may have unknowingly collected data from a minor, please immediately send us an email at [support@poppygrovellc.com](mailto:support@poppygrovellc.com)

### **NOTIFICATION OF CHANGES**

We may use your Personal information, such as email addresses, to inform you of any changes made to the Website, its contents or for request for any additional information. We reserve the right, at our sole discretion, to change, modify or otherwise alter our Website, its content and this Privacy Policy at any time. Such changes and/or modifications shall become effective immediately upon posting our updated Privacy Policy. Company highly suggests that you review this Privacy Policy periodically. Continued use of any of information obtained through or on the Website or its content following the posting of changes and/or modifications constituted acceptance of the revised Privacy Policy. Should there be a material change to our Privacy Policy, we will contact you via email or by a prominent note on our Website.

You agree that you have read this Privacy Policy carefully. We reserve the right to change this Privacy Policy on the Website 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 Website. Should you have any

questions regarding this Privacy Policy, your rights contained herein, or would like to review, update or remove your personal information, please contact us at [support@poppygrovellc.com](mailto:support@poppygrovellc.com).

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