

PRIVACY POLICY

Last Updated on March 13, 2019

PLEASE NOTE THAT THIS PRIVACY POLICY SHALL GOVERN YOUR USE AND ACCESS TO ANY WEBSITES, MOBILE APPLICATIONS OR OTHER ELECTRONIC SERVICES MADE AVAILABLE BY BEFIT4US THAT LINK TO OR REFERENCE THIS PRIVACY POLICY (“SITES”). PLEASE READ THIS PRIVACY POLICY CAREFULLY TO ENSURE THAT YOU UNDERSTAND EACH PROVISION. DO NOT ACCESS OR USE THE SITES OR BEFIT4US SERVICES IF YOU ARE UNWILLING OR UNABLE TO BE BOUND BY THIS PRIVACY POLICY.

This Privacy Policy is incorporated by reference into the all of the other terms that reference BEFIT4US Privacy Policy (the “Terms”). The term “BEFIT4US,” “we,” and “us” includes BEFIT4US LTD., and its affiliates and subsidiaries. When you access or use the BEFIT4US Services or Sites, you agree to the terms and conditions of this Privacy Policy. The Privacy Policy explains how BEFIT4US may collect, use, and disclose information BEFIT4US may obtained from you through:

- online BEFIT4US platform;
- BEFIT4US social media pages;
- HTML-formatted email messages that we send to you that link to this Privacy Policy; and
- any other BEFIT4US products and services offered through any other venues, Sites and mobile applications that direct you to this Privacy Policy.

Collectively the “BEFIT4US Services”.

1. CATEGORIES OF COLLECTED INFORMATION.

1.1. “Personal Information” we collect or obtain includes:

- a) Contact details: email, name, address
- b) Other BEFIT4US Services related data: transactional summary, user requests, statistics;
- c) Financial Information: information collected from you as needed to process payments for BEFIT4US subscription or other products or services that you buy, or as provided by you to administer your participation in optional services and programs, such as your payment card number, bank, account number, SWIFT, expiration date, and card verification number; and
- d) Transaction Information: information you provide when you interact with us and the Sites; email and other communications

1.2. “Other Information” we collect or obtain is any information that does not reveal your specific identity.

2. HOW WE COLLECT INFORMATION.

2.1. Through the BEFIT4US Services, we collect information about you whenever you use the BEFIT4US Services:

- a) when you create an account with BEFIT4US Service, we ask for Personal Information;
- b) when you use the BEFIT4US Services, you may provide social media account ID and Other Information with use of your account; and
- c) we collect information about you when you interact with the BEFIT4US Services.

2.2. From other sources:

In addition to the information we collect from you through BEFIT4US Services, we may receive information about you from other sources, such as public databases, strategic and joint marketing partners, social media pages and platforms, people with whom you are friends or otherwise connected on social media platforms, as well as from other third parties. For example, if you elect to connect your social media account to your BEFIT4US account, certain information from your social media account may be shared with us, including information that’s part of your profile or your friends’ profiles. We need to collect Personal Information in order to provide the requested BEFIT4US Service to you. If you do not provide or enable us to collect the necessary information, we may not be able to provide the BEFIT4US Service. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the BEFIT4US Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

3. HOW PERSONAL INFORMATION MAY BE USED.

We may use your Personal Information for legitimate business purposes, including:

3.1. To provide the functionality of BEFIT4US Services and related support.

- a) To create, and administer accounts, fulfil and record transactions, and provide you with related assistance (e.g., technical help, answer inquiries relating to Personal Information, etc.).
- b) To send administrative information to you, for example, information regarding our services and changes to our terms, conditions, and policies.

We will engage in these activities to manage our contractual relationship with you, with your consent, and/or to comply with a legal obligation.

3.2. To provide you with marketing and promotional materials and opportunities and facilitate social sharing.

- a) To send you marketing communications and offer other materials that we believe may be of interest to you, such as to send you newsletters or other direct communications.
- b) To share information with other marketers (and their service providers) to permit them to send you marketing communications, consistent with your choices.
- c) To allow you to participate in sweepstakes, contests or similar promotions.
- d) To facilitate social sharing functionality if you choose to do so.

We will engage in this activity with your consent, to manage our contractual relationship with you, or where we have a legitimate interest.

3.3. For reporting and trending.

- a) To better understand you and our other users, so that we can tune and personalize our offering.
- b) For trending and statistics, and to improve our products and services

We will engage in this activity because we have a legitimate interest.

3.4. To accomplish our business purposes.

- a) For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
- b) For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.
- c) For responding to legal duties, such as requests from public and government authorities.

We will engage in these activities to comply with a legal obligation or because we have a legitimate interest.

To the extent that we process your Personal Information based on your consent, you may withdraw your consent at any time.

4. HOW PERSONAL INFORMATION MAY BE DISCLOSED.

We may disclose your Personal Information:

- a) To our affiliates for the purposes described in this Privacy Policy. BEFIT4US is the party responsible for the management of the jointly-used Personal Information.
- b) To our strategic partners and third-party service providers who provide services such as website hosting, data analysis, payment processing services, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, auditing and other similar services.
- c) To third party sponsors of sweepstakes, contests and similar promotions, consistent with your choices.
- d) To you, through message boards, chat, profile pages and blogs and other services to which you are able to post information and materials.
- e) To your friends associated with your social media account, to other website users and as well as to your social media account provider, in connection with your social sharing activity, such as if you connect your social account to BEFIT4US account or our social media pages.

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use it for all the purposes for which we use and disclose Personal Information. In some instances, we may combine Other Information with Personal Information. If we combine any Other Information with Personal Information, we will treat the combined information as Personal Information.

5. YOUR CALIFORNIA PRIVACY RIGHTS: NOTICE TO CALIFORNIA CUSTOMERS AND OPT-OUT INFORMATION.

California's "Shine the Light" law, Civil Code section 1798.83, requires certain businesses to respond to requests from California customers asking about businesses' practices related to disclosing personal information to third parties for the third parties' direct marketing purposes. Alternatively, such businesses may have in place a policy not to disclose personal information of customers to third parties for the third parties' direct marketing purposes if the customer has exercised an option to opt-out of such information-sharing. If you wish to opt-out of our sharing of your information with third parties for the third parties' direct marketing purposes offline, please follow the instructions in Section 7 below.

6. HOW TO ACCESS, CORRECT, DELETE OR EXERCISE OTHER RIGHTS REGARDING YOUR PERSONAL INFORMATION.

Where applicable law allows for such a request, if you would like to request to access, correct, object to the use, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact BEFIT4US at info@befit4us.com with the subject line "Data Subject Request." We will respond to your request consistent with applicable law.



For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. We may retain residual information, such as records to document that your request has been fulfilled.

7. YOUR CHOICES REGARDING OUR USE AND DISCLOSURE OF INFORMATION.

Information you provide may be used by BEFIT4US for marketing purposes such as one-off promotional emailing, mobile text messages, direct mail, and sales contacts. If you no longer want to receive marketing-related emails or mobile text messages from us on a going-forward basis, you may opt-out of receiving these marketing-related emails or mobile text messages by sending a request for list removal to info@befit4us.com. If you have provided your information to BEFIT4US, and opt-out, BEFIT4US will put in place processes to honor your request. This may entail keeping some information for the purpose of remembering that you have opted-out.

We will try to comply with your request(s) as soon as reasonably practicable. Please also note that if you do opt-out of receiving marketing-related emails from us, we may still send you messages for administrative or other purposes directly relating to your use of the BEFIT4US Services, and you cannot opt-out from receiving those messages.

8. TRACKING AND ADVERTISING.

We and our third-party service providers may collect Other Information in a variety of ways. We and/or our third-party partners may employ various tracking technologies, such as cookies, web beacons and analytics software, that help us better manage content on the BEFIT4US Services by informing us what content is effective. For more information on our use of cookies and similar technologies, including instructions on how to opt-out, please refer to our Cookies Policy.

9. SOCIAL MEDIA FEATURES AND WIDGETS

The BEFIT4US Services includes social media features. These features may collect your IP address, which page you are visiting on our Sites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Sites. Your interactions with these features are governed by the privacy policy of the company providing it.

10. PUBLIC FORUM

Our Sites may offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you directly disclose Personal Information through BEFIT4US public message boards, blogs, or forums, this information may be collected and used by others. To request removal of your Personal Information from our blog or community forum, contact us at info@befit4us.com. In some cases, we may not be able to remove your Personal Information or some content, in which case we will let you know if we are unable to do so and why.

11. THIRD PARTY PAYMENT PROCESSOR

We currently use third party payment processors for internet-based payment services. If you wish to make a payment through BEFIT4US Services, your Personal Information will be collected by such processors directly and will be subject to the third party's privacy policy. See Section 20 for a list of third parties and their applicable privacy policies. We have no control over, and are not responsible for, third parties' collection, use and disclosure of your Personal Information.

12. LINKS TO OTHER WEBSITES.

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties' site or other products and services used in connection with the BEFIT4US Services. The inclusion of a link does not imply endorsement of the linked site or service by us or by our affiliates.

13. DATA RETENTION.

We will retain your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- a) The length of time we have an ongoing relationship with you and provide the BEFIT4US Services to you;
- b) Whether there is a legal obligation to which we are subject; or
- c) Whether retention is advisable in light of our legal position.

14. SECURITY OF YOUR INFORMATION.

BEFIT4US has implemented an information security program that contains administrative, technical and physical controls that are designed to reasonably safeguard Personal Information. For example, we use industry-standard encryption technology to secure Financial Account Information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our web site, you can contact us at info@befit4us.com.

15. USE OF SERVICE BY MINORS.

The BEFIT4US Services are not directed or targeted at children under the age of eighteen (18), and we request that they do not provide Personal Information through the BEFIT4US Services.

16. CROSS-BORDER TRANSFER.

If you live outside the United States (including in the European Economic Area (“EE”) and Switzerland (“CH”) collectively the “EEA/CH”), and you use the Site or provide us with Personal Information directly via the Site, your information will be handled in accordance with this Privacy Statement. By using the Site or giving us your Personal Information, you are directly transferring your Personal Information and Other Information to us in the United States. You agree and consent to our collection, transfer, and processing of your Personal Information and Other Information in accordance with this Privacy Statement. You are solely responsible for compliance with any data protection or privacy obligations in your jurisdiction when you use the Site or provide us with Personal Information. Regardless of where we transfer your information, we still protect your information in the manner described in this Privacy Statement.

17. SENSITIVE INFORMATION.

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g. information related to racial or ethnic origin, political opinions, religion or other beliefs, biometrics or genetic characteristics, trade union membership or criminal background) on or through the BEFIT4US Services or otherwise to us, except where explicitly requested or consented to.

18. CHANGES TO THIS PRIVACY POLICY.

BEFIT4US may make changes to this Privacy Policy from time to time. Any changes we make will become effective when we post a modified version of the Privacy Policy. If you continue using the BEFIT4US Services after any notice of any such changes, it means you have accepted them. If you do not agree to any changes, you must stop using the BEFIT4US Services, as applicable. It is your obligation to ensure that you read, understand and agree to the latest version of The Privacy Policy. The “Last Updated” legend at the top of the Privacy Policy indicates when it was last updated.

19. CONTACT US.

If you have any questions regarding this Privacy Policy, you can contact info@befit4us.com or via postal mail at:
BEFIT4US LTD.

Attn: Legal - Privacy Policy Issues
Enterprise House, 2 Pass Street, Oldham
Manchester, OL9 6HZ
United Kingdom

20. THIRD PARTY SUB-PROCESSORS

The following is a list of current third-party vendors that may either directly or indirectly collect information from you in their capacity as a Sub-Processor. Please review the relevant privacy policies for further information on how each third party handles your Personal Information:

Third party Name	Privacy Policy
Amazon Web Services	https://aws.amazon.com/privacy/
MySQL	https://www.mysql.com/about/legal/
Stripe	https://stripe.com/us/privacy/

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