

PRIVACY POLICY

Your privacy is very important to us. Accordingly, we have developed this Policy in order for you to understand how we collect, use, communicate and disclose and make use of personal information. We are taking a global approach to data protection to help ensure that you benefit from control and clarity. We are committed to putting you first and working every day to maintain the trust you put in us. The following outlines our privacy policy.

1. GENERAL TERMS

"Agreement" or **"contract"** means all of the documents which you and the Company have signed and the Credit Card Authorization Form you have signed.

"Client" or **"you"** means any purchaser, client and/or user of any of our Products and Services.

"Company", **"we"** or **"us"** means **GG HOLISTIC ACNE SOLUTION INC. doing business as GET GLOW METHOD**

The platform we offer at our website (<https://getglowto.com>) is referred to as the **"Site"**.

"Terms of Use" means our Terms of Use, which can be found here:

This **Privacy Policy** is incorporated into, and considered a part of, the Terms of Use.

2. PERSONAL INFORMATION

When we use the term "personal information" in this Privacy Policy, we mean information that identifies, or can be used to identify, an individual. This may take the form of an identification number, name, title, e-mail address, payment information, telephone number(s), photo, or home address. Personal information does not include information that has been appropriately anonymized or deidentified or information that is publicly available from government records. Note that, under this Privacy Policy, personal information does not include any information you post online that is viewable to the public.

3. INFORMATION WE COLLECT

We Collect Personal Information You Voluntarily Provide.

Certain users of the Site choose to interact with us in ways that require us to gather personally-identifying information. The amount and type of information gathered depends on the nature of the interaction. In each case, we collect such information only insofar as is necessary or appropriate to fulfil the purpose of your interaction with us. Examples of the information we collect include:

- **Contact Information.** This may include your first and last name, postal address, telephone number, and email address when you sign up for an account.
- **Billing Data,** including your payment instrument number (such as a credit or debit card number), expiration date, and security code as necessary to process your payments.
- **Financial Information.** To help users of our Programs, Products and Services set up a payment account and pay fees, we may collect financial information, including debit card or credit card number, and other payment information, as applicable. We use Financial Information in order to operate the Site and the Services that we provide and to ensure that you are billed for the Services you choose to receive from us. We do this as necessary for our legitimate interests in providing our Sites and Services and to fulfil our contracts with users.

- **Promotional Information.** Certain offerings of the Site are optional and so you are not required to enter them or to give us your data in connection with them. Where you do consent to take advantage of our offerings, we will use your data to (as applicable) send you newsletters and other communications that are tailored based on information we have about you, or to operate and manage the survey, contest or similar offering in connection with our legitimate interest in promoting our business and the Site.
- **Content Information.** You also may choose to send us Personal Information in an email or chat message containing inquiries about the Site, Programs, Products and Services. We use this Information in order to help us respond to your inquiry. We require that you furnish your Contact Information and Financial Information when you register a paid account with us in order to provide Services through the Site. We require you to furnish your name and e-mail when you register a free account with us. For example, we collect your first and last name, email address, and your zip or postal code in order to create and administer your account. Further, if you are a Client who purchases one of our Services, we collect your first and last name, e-mail address, zip or postal code, address and your Financial Information to facilitate your payment. We also collect additional information in order to facilitate your technical support request, such as information about the technical support issue you are seeking to fix, the time, and the date.
- **Program Information.** When you enrol in one of our Programs, we may collect information relating to your health and wellness history, nutritional and eating habits and allergies. This information will help us customize your plans and program.
- **Order Information.** When you make a purchase or attempt to make a purchase through the Site, we, or the sites that we use to process payments or process and fulfill orders, including by not limited to PayPal and Stripe, collect certain information from you, including your name, billing address, shipping address, payment information (including credit card numbers and/or PayPal information), email address, and phone number.

Information We May Automatically Collect

We also collect potentially personally-identifying information like Internet Protocol (IP) addresses for logged in users and for users leaving comments on the Site. We only disclose logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally-identifying information as described below, except that commenter IP addresses and email addresses are visible and disclosed to the administrators of the blog/site where the comment was left.

We also collect non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each user request. Our purpose in collecting non-personally identifying information is to better understand how you use our Site. From time to time, we may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

4. USE OF YOUR INFORMATION

We collect and use information for business and commercial purposes in accordance with the practice described in this Privacy Policy. Our business purposes for collecting and using information include:

- To create and customize your plans in order to fulfill our contracts with you;
- To enable payment for Programs, Products and Services, in order to fulfill our contracts with you;

- For billing and fraud prevention, on the basis of our legitimate interests in ensuring a safe and secure environment in which you can use our Programs, Products, Services and the Site, and in order to comply with our legal obligations;
- To analyze the Site usage as necessary for our legitimate interest in improving the Site to grow our business;
- To contact you and deliver (via email, push notifications or otherwise) transactional information, administrative notices, marketing notifications, offers and communications relevant to your use of Site, Programs, Products and Services, with your consent when required under applicable law, as necessary for our legitimate interests in proper communication and engagement with you and in promoting our business;
- To provide you with customer support in order to fulfill our obligations to you;
- For internal market research for our legitimate interest in improving the Site, Programs, Products and Services to grow our business;
- For troubleshooting problems for our legitimate interests in ensuring a safe and secure environment in which you and other users can receive the Programs, Products and Services they opt to use;
- To assist you in the resolution of complaints and disputes, as necessary for our legitimate interests in facilitating good customer service to all users;
- To enforce our Terms of Use and our legitimate interests in ensuring our Agreement is complied with.

5. COOKIES

A cookie is a string of information that a website stores on a user's computer, and that the user's browser provides to the user each time the visitor returns. We use cookies to help us identify and track users, their usage of the Site and their website access preferences. Users who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Site, with the drawback that certain features of the Site may not function properly without the aid of cookies.

We may use the standard "cookies" feature of major web browsers. We do not set any Confidential Information in cookies, nor do we employ any data capture mechanisms on our website other than cookies. You may choose to disable cookies through your own web browsers settings. However, disabling this function may diminish your experience on the website and some features of our Programs, Products and Services or Program Materials may not work as intended. We have no access to or control over any information collected by other individuals, companies or entities whose website or materials may be linked to our Programs, Products and Services, or Program Materials.

6. ADS

Ads appearing on any of our websites may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by the Site and does not cover the use of cookies by any advertisers.

You can opt-out of targeted advertising by using the links below:

- Facebook: <https://www.facebook.com/settings/?tab=ads>
- Google: <https://www.google.com/settings/ads/anonymous>
- Bing: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>
- Pinterest: <https://help.pinterest.com/en/business/article/stop-ads>

- Instagram: <https://help.instagram.com/615366948510230>

Additionally, you can opt-out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at <http://optout.aboutads.info/>.

7. EMBEDDED CONTENT

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

8. SHARING YOUR DATA

We only share the information we collect about you as described in this Privacy Policy. We do not share your data with any third party services or individuals directly. We only share data for the purposes of our own access and we do not authorize any third party services to access your information except with our express permission for the purposes of assisting us in accessing your information. We will not rent or sell potentially personally-identifying and personally-identifying information to anyone.

- (a) **Third Party Agents.** We share information, including Identity Information, with entities that process information on our behalf for our business purposes. Third Party Agents assist us with services such as payment processing, data analytics, marketing and advertising, website hosting, fraud prevention and detection, communication services, and technical support. We contractually prohibit our Third Party Agents from retaining, using, or disclosing information about you for any purposes other than performing the services for us, although we may permit them to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

To operate the Get Glow platform, including processing your transactions, we may share your information with our agents, representatives, vendors and service providers ("**Third Party Agents**") including Active Campaign, Click Funnels, Stripe, Kartra and Gmail so they can provide us with support services as follows:

- Email origination;
 - Identity checks;
 - Receipt, invoice, or support services;
 - Customer relationship management services; and
 - To otherwise help us provide the Site.
- (b) **Legal Obligations.** Get Glow and our Third-Party Agents may disclose potentially personally-identifying and personally-identifying information only in response to a subpoena, court order or other governmental request, or when we believe in good faith that disclosure is reasonably necessary to protect our property or rights, third parties or the public at large.
- (c) **Merger or Acquisition.** We reserve the right to share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale, or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

9. RETAINING YOUR DATA

When you place an order through the Site, we will store your information indefinitely to allow us to keep accurate records of any data we are obliged to keep for administrative, legal, or security purposes. You may, at any time, ask us to delete this information by writing to us at the address provided at the end of this policy.

10. PROTECTING YOUR DATA

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. However, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

While we will use commercially reasonable efforts to ensure the security of all information, including Financial Information and Personal Information, we expressly disclaim any liability for unauthorized access to or use of our secure servers and/or any all Personal Information and/or Financial Information stored therein, and you agree to hold us harmless for any damages that may result therefrom. If you have any further questions on this issue, please refer to the Terms of Use.

The third party services that we use to store data are equipped to monitor unauthorized access and share with us any known system breaches. Additionally, if, at any point, we become aware of a data breach through one of the third parties listed above, or by our own measures, we will immediately contact all affected parties and also take immediate action in accordance with the rules and regulations of the authority having jurisdiction.

11. EU USERS

If you are a resident of the European Economic Area ("EEA") please note:

We may need to collect and process the types of Personal Information listed above in order to provide the Services to you or because we are legally required to do so. If you do not provide the information that we request, we may not be able to provide you with the Services. We may use the Personal Information for our legitimate business interests, including those listed above.

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

If you would like to receive an electronic copy of your Personal Information, you may contact us at getglowto@gmail.com.

We keep your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include (i) for as long as we have an ongoing relationship with you and provide the Services to you; (ii) as required by a legal obligation to which we are subject; (iii) as advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

You may lodge a complaint with a supervisory authority competent for your country or region.

If you wish to inquire about your privacy rights please email us at getglowto@gmail.com.

12. CHANGES TO THE PRIVACY POLICY

Although most changes are likely to be minor, we may change this Privacy Policy from time to time, and in our sole discretion. We encourage users to frequently check this page for any changes to the Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

13. CONTACTING US

If you have any questions or concerns about your privacy or anything in this policy, we encourage you to contact us by e-mail at getglowto@gmail.com.