

## Online Privacy Policy

Cotton Systems Ltd. and Cotton Coach Inc. (the “Companies”) respects the privacy concerns of the users of its websites and the services provided therein (the “Sites”). The Companies thus provides this privacy statement to explain what information is gathered during a visit to the Sites and how such information may be used.

Please also review the Terms of Use at <https://cotton-coach-inc.mykajabi.com/pages/terms> which also govern use of these Sites.

**Use of Information:** As a general policy, no personally identifiable information, such as your name, address, or e-mail address, is automatically collected from your visit to the Sites. However, certain non-personal information is recorded by the standard operation of the Companies’ internet servers. Information such as the type of browser being used, its operating system, and your IP address is gathered in order to enhance your online experience.

The Site’s various mailing lists, downloads, order forms, registration forms, and surveys may request that you give us contact information such as your name, mailing and/or e-mail address, demographic information such as your age and gender, and personal preference information such as your preferred software and interests. Information submitted at the time of submission will be used by the Companies only as necessary for our legitimate business interests, including without limitation the improvement of our products, services and the contents of the Site. The Companies may also share such information with our business and vendor partners to further those interests. Personally identifiable information is never sold or leased to any third parties. With your permission, we may use your contact information to send you information about our Companies and products. You may always opt-out of receiving future mailings as provided below. The Companies do not store any credit card information it may receive in regard to a specific transaction and/or billing arrangement except as necessary to complete and satisfy its rights and obligations with regard to such transaction, billing arrangement, and/or as otherwise authorized by a user.

**Third Parties:** The Companies occasionally hire other companies to provide limited services on our behalf, including shipping products and product information to you, sending postal mail, emailing shipping confirmation details to you, and processing event registrations or payments. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

**Contact:** The Companies may contact you with information that you provide to us based on these lawful grounds for processing:

1. The Companies may contact you if you give us your clear, unambiguous, affirmative consent to contact you.
2. The Companies will contact you under our contractual obligation to deliver goods or services you purchase from us.
3. Legitimate Interest. The Companies may contact you if we feel you have a legitimate interest in hearing from us. For example, if you sign up for a webinar, The Companies may send you

marketing emails based on the content of that webinar. You will always have the option to opt out of any of our emails.

The Companies may disclose user information in special cases when we have reason to believe that disclosing this information is necessary:

- To identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with the Companies' rights or property, other users of the Sites, or anyone else that could be harmed by such activities.
- To working alliances or vendor partners required solely for the purposes of completing your purchase or request for shipment of our products or items related to service. Such distribution and fulfillment detail will include your name, address, telephone and email address as provided in the Ship To area of your account.

**Children Age 18 and Under:** The Companies recognizes the special obligation to protect personally identifiable information obtained from children age 18 and under. AS SUCH, IF YOU ARE 18 YEARS OLD OR YOUNGER, THE COMPANIES REQUESTS THAT YOU NOT SUBMIT ANY PERSONAL INFORMATION TO THE SITES OR TO THE COMPANIES. If the Companies discovers that a child age 18 or younger has signed up on the Sites or provided us with personally identifiable information, we will delete that child's identifiable information from our records.

The Companies products and services are for use by advisors, agents, managers and management teams, agencies, home office executives, and businesses in the life insurance, financial services and investment companies in the financial services industry. We would not expect to deal with children under the age of 18, nor would we expect any child under the age of 18 to provide us with any personally identifiable information.

**Use of Cookies:** Cookies are pieces of information that a website transfers to an individual's computer hard drive for record keeping purposes. Cookies make using some Sites easier by, among other things, saving your passwords and preferences for you. These cookies are restricted for use only on our Site, and do not transfer any personal information to any other party. Most browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or indicate when a cookie is being sent. Please consult the technical information relevant to your browser for instructions. If you choose to disable your cookies setting or refuse to accept a cookie, some parts of the Sites may not function properly or may be considerably slower. Disabling this function may diminish your experience on our Website and some features may not work as intended.

We may use the standard "cookies" feature of major web browsers. We do not set any personally identifiable information in cookies, nor do we employ any data-capture mechanisms on our Sites other than cookies. You may choose to disable cookies through your own web browser's settings.

**Malware/Spyware/Viruses:** Neither the Companies nor the Sites knowingly permit the use of malware, spyware, viruses, and/or other similar types of software.

**Links to External Sites:** The Companies are not responsible for the content or practices of third party websites that may be linked to the Site. The Companies are also not responsible for any information

that you might share with such linked websites. You should refer to each website's respective privacy policy and practices prior to disclosing any information.

**Email Forwarding Warning:** With any email you manually forward you may transfer personally identifiable information. The Companies are not responsible for personally identifiable information caused by the act of forwarding our material from one individual to another.

**Bulletin Boards and Chat Areas:** Guests of the Sites are solely responsible for the content of messages they post on the Companies' forums, such as chat rooms and bulletin boards. Users should be aware that when they voluntarily disclose personal information (e.g., user name, e-mail address, phone number) on the bulletin boards or in the chat areas, that information can be collected and used by others and may result in unsolicited messages from other people. You are responsible for the personal information you choose to submit in these instances. Please take care when using these features.

**Choice/Opt-Out:** The Sites may provide you the opportunity to opt-in to receive communications from us at the point where we request information about you. You always have the option of removing your name from any e-mail list in order to discontinue any such future communications. In order to ensure immediate removal from any list, please follow the specific instructions set forth within the communications you receive from the Companies which you no longer wish to receive. If you are unsuccessful in completing the instructions specified in any such communication, please e-mail us at [bcotton@cottonsystems.com](mailto:bcotton@cottonsystems.com) or [bcotton@cottoncoach.com](mailto:bcotton@cottoncoach.com), including a copy of the undesired email attached to the request, and state you wish to be removed from the mailing list.

**Surveys:** From time-to-time our Sites request information from users via surveys. Participation in these surveys is completely voluntary. Users always have a choice whether or not to disclose their answers and information. Information requested may include contact information (such as name and address), and demographic information (such as post/zip code, age level). Survey information will be used for purposes of monitoring or improving the use and satisfaction of our products and services.

**Visitors' GDPR Rights:** If you are within the European Union, you are entitled to certain information and have certain rights under the General Data Protection Regulation. Those rights include:

The Companies will retain any information you choose to provide to us until the earlier of: (a) you asking us to delete the information, (b) our decision to cease using our existing data providers, or (c) the Companies decides that the value in retaining the data is outweighed by the costs of retaining it.

You have the right to request access to your data that the Companies store and the rights to either rectify or erase your personal data.

You have the right to seek restrictions on the processing of your data.

You have the right to object to the processing of your data and the right to the portability of your data.

To exercise these rights please email us at [bcotton@cottonsistemas.com](mailto:bcotton@cottonsistemas.com) or [bcotton@cottoncoach.com](mailto:bcotton@cottoncoach.com).

To the extent that you provided consent to the Companies processing of your personal data, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based upon consent that occurred prior to your withdrawal of consent.

You have the right to lodge a complaint with a supervisory authority that has jurisdiction over issues related to the General Data Protection Regulation.

The Companies require only the information that is reasonably required to enter into a contract with you. The Companies will not require you to provide consent for any unnecessary processing as a condition of entering into a contract with us.

**Contact Information for Complaints or Concerns:** If you have any complaints or concerns about the Companies or about this privacy statement, please contact:

Via email: [bcotton@cottonsistemas.com](mailto:bcotton@cottonsistemas.com) or [bcotton@cottoncoach.com](mailto:bcotton@cottoncoach.com)

or

Via regular mail: Cotton Systems Ltd. or Cotton Coach Inc.

Suite 110, 3121 Hill Road, Lake Country, BC V4V 1G1 Canada

Information provided by you via general e-mail inquiries to the Companies such as your e-mail address is used only to respond to your inquiries in the ordinary course of business, and is never shared with third parties.

**Security:** Security for all personally identifiable information is extremely important to us. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, The Companies cannot ensure or warrant the security of any information you transmit via the internet. By transmitting any such information to the Companies, you accept that you do so at your own risk.

**Your Acceptance of These Terms:** By using the Sites, you accept the policies and restrictions set forth in this Online Privacy Policy. **If you do not agree to this policy, please do not use the Sites.** This Online Privacy Policy may be revised from time to time by updating this posting. You are bound by any such revisions and should therefore periodically visit this page to review the current Online Privacy Policy to which you are bound.

Last Updated: May 24, 2018