

## Privacy Policy

**Effective Date: Nov 9, 2018**

Elgo Life Inc is a Delaware based corporation that operates the world of clubs (“Application”) including website (“worldofclubs.com”), subdomains, mobile applications and online services hosted thereon (“Services”). This Privacy Policy informs you of our policies regarding the collection, use and disclosure of Personal Information (as defined below) when you use our Services and our application.

This Privacy Policy covers Elgo Life Inc’s collection and use of information when you access our application and when you use our Services, or when you provide information to us through or regarding support and delivery of the Services.

### 1. INFORMATION WE COLLECT

When you use the application and the Services, Elgo Life Inc collects certain information that can be used to contact or identify you including, but not limited to, your email address, name, phone number, postal address, or other information (“Personal Information”). We also collect technical or non-personal information, which independent of your Personal Information cannot identify you.

#### **Personal Information includes:**

- **Contact information:** When you submit a form to download resources, request information, attend a webinar, respond to a survey, apply to a job opening, or otherwise contact us electronically.
- **Account information:** You may register to create an account and provide Personal Information in order to be able to save your profile and the data associated with it.
- **Identity Provider Information:** If you authenticate on the Services using an identity provider such as GitHub or Google (the “Identity Provider”), the Identity Provider may send us your registration or profile information on that service and other information that you authorize. This information enables us to authenticate you and improve the Services.

#### **Other information includes:**

- **Log and Analytics Data:** We may also collect information that your browser sends whenever you visit our Services (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, approximate location, browser type, browser version, the pages of our Services that you visit, the time and date of your visit, the time spent on those pages and other statistics.

### 2. HOW WE USE THIS INFORMATION

We collect Personal Information and other information for these purposes:

- To deliver, monitor and enhance the Services
- To identify and communicate with you, respond to your requests/inquiries, provide customer service and fulfill orders
- To process payments where applicable

- To control unauthorized use or abuse of the Services, and detect, investigate or prevent activities that may violate our policies or be illegal
- To analyze trends, administer or optimize the Services, monitor usage or traffic patterns (including to track users' movements around the Services) and gather demographic information about our user base
- To market our Services to you, including by sending you newsletters, promotions and special offers or information about new products and services. Your opt-out options for promotional communications are described in Section 8: Your Controls and Choices
- To deliver advertising, including by managing ads on third party sites and to tailor ads based on your interests and browsing history.

### 3. SHARING YOUR INFORMATION WITH THIRD PARTIES

We do not sell, trade, share or transfer your personal information to third parties except in the following limited circumstances:

1. With our parent/subsidiary companies;
2. With contracted third-party service providers to help us deliver, maintain and improve the Services, or to help us with communications, marketing, advertising, payment processing, or other usual business activities, in compliance with our Privacy Policy and appropriate confidentiality and security measures. Third party service providers are provided your Personal Information only to perform specific tasks on our behalf and are obligated not to disclose or use your information for any other purpose.
3. With legal authorities or our legal advisors when we have a good faith belief that it is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, including as required by the Privacy Shield principles; (b) enforce contractual obligations, including investigation of potential violations thereof, or (c) protect against imminent harm to our rights, property or safety, or that of our users or the public as required or permitted by law;
4. With business partners who offer a service to you jointly with us, for example when running a cross-promotion.
5. In connection with a merger, acquisition, or any form of sale of some or all of our assets; and
6. With a third party if we have your consent to do so.

We may also share aggregated or anonymized information with third parties for other purposes. Such information does not identify you individually, but may include usage, viewing and technical information including coarse geolocation, device configurations, and performance metrics related to the use of the Services which we collected through our technology. If we are required under applicable law to treat such information as personal information, then we will only disclose it as described above. Otherwise we may disclose such information for any reason.

### 4. USE OF COOKIES, TRACKING, ANALYTICS AND BEHAVIORAL MARKETING

We use cookies and other tracking technologies in order to deliver our Services, and also to target our marketing. A cookie is a small text file that is stored in your web browser that allows Elgo Life Inc or a third party to recognize you and store small amounts of data. Cookies can either be session cookies, which expire when you close your browser, or persistent cookies, which remain until expiration date or until deleted. Cookies may be delivered directly by Elgo Life Inc (first party cookies) or by service providers (third party cookies).

Our Services employ the following types of cookies:

- **Essential Cookies.** First party cookies that are necessary to provide the functionality of the Services. Essential cookies help remember your login, settings, and session state information.
- **Functionality Cookies.** First party and third party cookies used to remember information you have entered or choices you make, which may not be essential but help tailor the Services to you.
- **Analytics Cookies.** First party and third party cookies that track information about how the Services are being used so that we can assess performance and make improvements. They collect information about how visitors use the Services, which site the user came from, the number of each user's visits, and how long a user stays on the Services.
- **Advertising Cookies.** Third party cookies are placed by third party advertising platforms or networks in order to deliver ads, track ad performance, and enable advertising networks to deliver ads that may be relevant to you based upon your activities (this is sometimes called "behavioral" "tracking" or "targeted" advertising). More information about how cookies are used for advertising purposes is explained below in Marketing and Ad Personalization.

Elgo Life Inc uses cookies to uniquely identify you, display appropriate content, process your transactions and requests, gather aggregate and statistical information about user activity, track users' navigation around the Services, and display advertising on third-party sites. These technologies may provide us with personal data, information about devices and networks you utilize to access our Services, and other information regarding your interactions with our Services.

**Web beacons.** These are tiny graphics (clear GIFs or pixel tags) with a unique identifier, similar in function to cookies. Unlike cookies, beacons are not stored on your computer. We use beacons to track activities of users on the Services, manage content, and to compile statistics about usage. We (and our third party service providers) also use beacons in HTML emails to track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

**Third-Party Analytics.** We use automated devices and applications, such as Google Analytics (more info here) and Optimizely (more info here) to evaluate use of our Services. We use these tools to gather non-personal data about users to help us improve our Services and user experiences. These analytics providers may use cookies and other technologies to perform their services, and may combine the information they collect about you on our Sites with other information they have collected for their own purposes. This Policy does not cover such uses of data by third parties.

**Marketing and Ad Personalization.** We use advertising platforms to display ads as part of our marketing campaigns. As a result, our ads may be displayed to you on other websites after visiting our site. Our advertising partners use cookies and other technologies to collect information about your activities on our Services and other sites to provide you personalized advertising based upon your interests.

**Opting Out of Ad Networks.** If you wish to not have cross-site information used for the purpose of serving you personalized ads, you may opt-out of many ad networks by visiting <http://optout.aboutads.info/>, or if you are located in the European Union, by visiting <http://www.youronlinechoices.eu/>. You will continue to see ads on the sites you visit, but

the ad networks from which you have opted out will no longer personalize ads to you based upon your activities on other sites. These opt-out mechanisms are cookie based, so if you delete cookies, block cookies or use another device, your opt-out will no longer be effective. For more information, go to [www.aboutads.info](http://www.aboutads.info).

**Do Not Track.** Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Currently, our systems do not recognize browser “do-not-track” requests. You can use your browser to prevent your computer from accepting cookies, or only block third party cookies, as described in the following section. If you disable cookies, be aware that some features of our Services may not function.

**How to Disable Cookies.** The “Help” feature on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you disable cookies, be aware that some features of our Services may not function. To learn more about how to control cookie settings through your browser:

- [Click here](#) to learn more about the “Private Browsing” setting and managing cookie settings in Firefox.
- [Click here](#) to learn more about “Incognito” and managing cookie settings in Chrome.
- [Click here](#) to learn more about “InPrivate” and managing cookie settings in Internet Explorer.
- [Click here](#) to learn more about “Private Browsing” and managing cookie settings in Safari.

## 5. OUR SERVICE PROVIDERS

**Google Analytics:** We use Google Analytics to collect, monitor and analyze Log and Analytics Data in order to monitor and improve the Services. You can learn more about the privacy practices and policies of Google by visiting their Privacy Policy page: <http://www.google.com/intl/en/policies/privacy/>

**Marketo:** We use Marketo to collect and process contact requests, sign-ups, event registrations and similar online communications. Marketo is registered with Privacy Shield and you can read their privacy policy here: <http://legal.marketo.com/privacy/>

**Intercom:** We use Intercom’s service to communicate with and support users, and help understand their usage of the Services. If you register and log in, we provide a limited amount of your information (such as your email address and sign-up date) to Intercom, Inc. (“Intercom”) and utilize Intercom’s system to collect data for analytics purposes when you use the Services. Intercom collects publicly available contact and social information related to you, such as your email address, gender, company, job title, photos, website URLs, social network handles and physical addresses, to enhance your user experience. For more information on the privacy practices of Intercom, please visit <https://www.intercom.com/terms-and-policies#privacy>. Intercom’s services are governed by Intercom’s terms of use which can be found at <https://www.intercom.com/terms-and-policies#terms>. If you would like to opt out of having this information collected by or submitted to Intercom, please contact us using the information specified below.

**Google:** We use Google advertising (Adwords, Doubleclick) for marketing and ad personalization. You can opt out of AdWords personalization

here: <http://www.google.com/settings/ads/onweb/optout> and review the privacy policy  
here: <http://www.google.com/intl/en/policies/privacy/>

**Twitter:** We use Twitter to enable social sharing and for marketing and ad personalization. You can opt out of ad personalization as described here: <https://help.twitter.com/en/safety-and-security/privacy-controls-for-tailored-ads> and review the privacy policy here: <https://twitter.com/privacy>

**AdRoll:** We use AdRoll for marketing and personalization. You can opt out of ad personalization via preferences page here: <https://app.adroll.com/optout/safari> and review the privacy policy here: <http://www.adroll.com/about/privacy>

**LinkedIn:** We use LinkedIn for marketing and ad personalization. You can opt out of ad personalization via preferences here: <https://www.linkedin.com/help/linkedin/answer/62931/manage-advertising-preferences?lang=en> and review the privacy policy here: <https://www.linkedin.com/legal/privacy-policy>

## 6. PRIVACY SHIELD FRAMEWORK

Elgo Life Inc does not encourage E.U. or Swiss residents to use its Application and Services. Elgo Life Inc does not comply with the U.S. – E.U. and U.S. – Swiss Privacy Shield Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the E.U. or Switzerland to the United States.

The Federal Trade Commission (FTC) has jurisdiction over Elgo Life Inc's compliance with the Privacy Shield. To learn more about the Privacy Shield program please visit <https://www.privacyshield.gov>.

If there is any conflict between this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. Our accountability for personal information that we receive under the Privacy Shield and subsequently transfer to a third party is described in the Privacy Shield Principles.

If you have a dispute with us about our adherence to the Privacy Shield Principles, we will seek to resolve it through our internal complaint resolution process, or if necessary through an independent dispute resolution body.

In certain circumstances, the Privacy Shield Framework provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in [Annex I to the Privacy Shield Principles](#).

## 7. USERS IN THE EUROPEAN ECONOMIC AREA (EEA)

Elgo Life Inc does not encourage E.U. or Swiss residents to use its Application and Services. Elgo Life Inc does not comply with the U.S. – E.U. and U.S. – Swiss Privacy Shield Principles of notice.

## 8. YOUR CONTROLS AND CHOICES

**Promotional Email:** We may use your Personal Information to contact you with newsletters, marketing and promotional materials and other information that may be of interest to you. If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by following the instructions included on such communications or in the Services. (Please note that you may be unable to opt-out of certain service-related communications while you have an active account.)

**Blocking Cookies:** You can view and receive notifications on cookie activity, and remove or block certain cookies, using the settings in your internet browser (see Section 4 for more information). Be advised that the Services may cease to function properly if you block cookies.

**Do Not Track:** Do Not Track is a preference you can set in your web browser. Our Services do not change behavior based on a web browser's Do Not Track signal.

**Access Your Data:** We do not provide any mechanism for individuals to request access to any related information that we may have gathered.

## 9. DATA RETENTION

We keep your personal data for as long as reasonably necessary for the purposes set out in Section 2 above. Except as noted below, we will retain your account profile data as necessary for our legitimate business purposes or to comply with our legal obligations (such as record keeping, accounting, fraud prevention and other business administrative purposes). We try our best to maintain user and his account information to provide services and for legitimate purposes including (a) accounting purposes, (b) to be able to defend or raise a claim, (c) direct communications regarding past business transactions, (d) marketing (where you have not opted-out), and (e) maintaining complete business records of services rendered. Any data so retained is controlled and protected per this Policy. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

## 10. PROTECTING YOUR INFORMATION

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure. Be advised that no system of transmission over the internet, or method of electronic storage is perfectly secure, and we are unable to guarantee the absolute security of any Personal Information we have collected from you.

## 11. INTERNATIONAL TRANSFER

Your information, including Personal Information, may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside United States and choose to provide information to us, be advised that we transfer the information, including Personal Information, to the United States and process it there.

## 12. CHILDREN'S PRIVACY

Our services are not intended for use by anyone under the age of 13 ("Child" or "Children"). We do not knowingly collect personally identifiable information from Children. If you are a parent or guardian and you learn that your Child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a Child

without verification of parental consent, we take steps to remove that information from our servers.

### 13. CHANGES TO THIS PRIVACY POLICY

We may change this policy by posting a new version of this policy on this Application. When we do change the policy, we will also revise the “Last updated” date at the top of this page and may notify you of any material changes or post a message on the Application. Your continued use of this Application and the Services following such changes constitutes your acceptance of the revised policy.

### 14. CONTACT US

If you have any questions about this Privacy Policy, please contact us by email to [privacy \[at\] elgoinc.com](mailto:privacy@elgoinc.com)