

Privacy and Communications Policy

This Privacy and Communications Policy ("Policy") is effective as of May 22nd, 2019.

This Policy sets forth how Grace Love Well Foundation, Inc., a Florida not for profit corporation, in operation of www.gracelovewell.org ("Website") collects and uses the information you provide to us and certain other information that we automatically collect through your use of our Website or through any communications with us.

If you have any general questions or concerns about this Policy, you may contact us by sending an email with your questions, comments or concerns to overtakenbygrace@gmail.com.

MODIFICATIONS TO THIS POLICY

If we decide at any time to change this Policy, we will revise the effective revision date posted at the top of this Policy and we will also notify you by posting a notice of the change prominently on our home page and/or upon the next time you access our Website. **Failure to opt-out after receiving notice and following the opt-out instructions contained in the notice shall be deemed to be your assent to any such changes.**

HOW WE COLLECT PERSONAL INFORMATION

There are a variety of ways in which you may submit certain personal data (personally identifiable information) on our Website. We collect the following specific items of personally identifying information (collectively "**Identity Information**") that you submit through your use of our Website: your first and last name and email address.

Forms

When you provide any Identity Information through any form contained on our Website in order to contact us or send us a message, we collect and store this information. We may use your email or any other Identity Information you provide as expressly set forth in this Policy.

Log-In/Product Use

When you register to access any of our courses as a group user, we collect the Identity Information you provide during sign-up and use it as set forth in the remainder of this Policy.

Facebook Comments

We allow users to post comments on our forum using their Facebook account. We use the Facebook Comments Plugin to facilitate this feature. Facebook collects any screen name/user name you use and display. The manner in

which we use, share or disclose any Identity Information is expressly stated in this Policy.

Personal Information from Children Under 13

Children under the age of 13 are expressly prohibited from submitting or posting any Identity Information on our Website. If it does come to our attention that any child under the age of 13 has submitted any personal information to our Website, we will delete all such information that we have collected immediately. If you are a parent or guardian and you discover that your child under the age of 13 has submitted any of his or her Identity Information without your permission or consent, we will remove the information immediately upon your request. **All requests should be made by email and sent to: overtakenbygrace@gmail.com.** Please include your child's name and a description of the type of information you think he or she may have submitted via our Website.

HOW WE AUTOMATICALLY COLLECT NON-PERSONAL INFORMATION

When you access our Website, we collect and store through our host provider certain non-personally identifying information sent automatically by your browser using standard web server logs and automatic data collection tools such as cookies and web beacons. This information may include your IP address, which may tell us your general location information such as your country and sometimes your city, state and/or zip code, the domain name from which you access our Website, your browser type and language, the pages you access, the date and time you access pages on our Website and your operating system version. We also may determine what technology is available through your browser in order to provide you with the most appropriate version of any of our web pages. For example, we may determine that you have installed a version of Flash, and we will then send you the appropriate Flash version of the web page rather than an HTML page. We may also use this information to redirect you to a different version of our Website if you are accessing our Website through a mobile or similar device.

Device-Specific Information

We may automatically collect device-specific information about your mobile and other devices such as the type of device you are using, mobile network information including phone numbers, device model, manufacturer, screen resolution, device capabilities, service provider, preferred user language and your page views. We do this to help us determine which aspects of the Website work best for mobile traffic and which mobile marketing campaigns work best for the business, including mobile advertising, mobile search marketing, text campaigns, and desktop promotion of mobile sites and services. This information does not identify your device uniquely.

Cookies & Tracking Use Policy

We along with third parties that assist us to operate our and Website may monitor your use of our Website through cookies, web beacons and other “au-

automatic data collection tools." Unless you have adjusted your browser setting to refuse all cookies, some cookies are placed on your browser immediately as soon as you visit our site. Cookies and similar collection tools are files with a small amount of data, which may include an a unique identifier. Cookies are sent to your browser from a Website and transferred to your device. **We reserve the right to monitor your use of our Website and track you as described in this Cookies policy by the use of any automatic data collection tools at all times and you consent to the use of these tools when you use and access our Website.**

Our Website uses both "**first-party cookies**" and "**third-party cookies.**" First-party cookies are those used each time you visit our Website. Third-party cookies are cookies that are set by a third-party source other than by us. We do not have access or control over these cookies. We also use both "persistent cookies" that remain on your device for the period of time specified in the cookie (these cookies are activated each time you visit our Website), and "session cookies," which allows us to track your actions on our Website during a browser session. Each time you open up a browser window and close the browser window represents a single browser session. All session cookies are created temporarily and are deleted once you close your browser window.

Both the first-party and third-party cookies and tracking technologies used on our Website can be broadly divided into the following categories:

-Necessary cookies help make our Website usable by enabling basic functions like page navigation and access to secure areas of the Website. Our Website cannot function properly without these cookies.

-Statistic cookies helps us understand how visitors interact with our Website by collecting and reporting information anonymously.

-Marketing cookies are used on our Website by our email marketing third-party partner to track visitors across the web to display ads to them on other websites that are relevant and engaging.

First-Party Cookies Use

Website Use: We use automatic data collection tools to track and record your Website use and activity data, including the pages you view and how long you spend on each page or portion of our Website the links you click on, the features of our Website you access, whether you are a new vs. repeat visitor or in order to monitor your interactions with any video or other content that you access on our Website ("**Use Information**"). This is done primarily for Website traffic and general user analysis purposes. We also do this to help measure and research the effectiveness of the features contained on our Website.

Analytics Services: We may use third party web analytics services, such as Google Analytics, in order to collect information about your use of our Website. We pass a "first party cookie" onto your browser directly from our Website when we use Google Analytics. You may opt-out of Google Analytics by using Google's Browser Add-on at <https://tools.google.com/dlpage/gaoptout>.

User Preferences: We use automatic data collection tools to identify and recognize your browser as a previous visitor to our Website and save and remember any user preferences that may have been set during a previous visit. We also store specific user preferences and settings on our Website using cookies and/or similar session identifiers to help you navigate and access certain features on our Website.

Third-Party Cookies/Tracking Use

Here are the specific third-party cookies we use on our Website and the purpose for such use:

COOKIE NAME	PROVIDER	TYPE	EXPIRY
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Category: Preferences (7)

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

mailmunch_second_pageview	gracelovewell.org	HTTP	1 year
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Cookie purpose description: The cookie is used to manage the mailing list, if the visitor has subscribed to any newsletters or blog posts.

Source: <http://a.mailmunch.co/app/v1/site.js>

yt-remote-cast-installed	youtube.com	HTML	Session
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Cookie purpose description: Stores the user's video player preferences using embedded YouTube video.

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

yt-remote-connected-devices	youtube.com	HTML	Persistent
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Cookie purpose description: Stores the user's video player preferences using embedded YouTube video.

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

yt-remote-device-id	youtube.com	HTML	Persistent
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Cookie purpose description: Stores the user's video player preferences using embedded YouTube video.

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

yt-remote-fast-check-period	youtube.com	HTML	Session
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Cookie purpose description: Stores the user's video player preferences using embedded YouTube video.

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

yt-remote-session-app youtube.com HTML Session

Cookie purpose description: Stores the user's video player preferences using embedded YouTube video

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

yt-remote-session-name youtube.com HTML Session

Cookie purpose description: Stores the user's video player preferences using embedded YouTube video

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

Category: Marketing (4)

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

_mailmunch_visitor_id gracelovewell.org HTTP 1 year

Cookie purpose description: The cookie is used to manage the mailing list, if the visitor has subscribed to any newsletters or blog posts.

Source: <http://a.mailmunch.co/app/v1/site.js>

Data is sent to: United States

PREF youtube.com HTTP 8 months

Cookie purpose description: Registers a unique ID that is used by Google to keep statistics of how the visitor uses YouTube videos across different websites.

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

VISITOR_INFO1_LIVE youtube.com HTTP 179 days

Cookie purpose description: Tries to estimate the users' bandwidth on pages with integrated YouTube videos.

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

YSC youtube.com HTTP Session

Cookie purpose description: Registers a unique ID to keep statistics of what videos from YouTube the user has seen.

Source: <https://www.youtube.com/embed/j-pu7rsiokg>

Category: Unclassified (1)

event analytics.mailmunch.co Pixel Session

Cookie purpose description: email user session preferences use.

Source: <http://a.mailmunch.co/app/v1/site.js>

How To Manage Cookies

You can block our cookies or third-party cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to use all or parts of our site in the manner intended.

Your Internet browser allows you to change your cookie settings in the 'options' or 'preferences' menu of your browser. Please visit the following link for more information on these settings in various browsers:

<https://www.thewindowsclub.com/disable-enable-cookies-internet-explorer>

For even more information about deleting or blocking cookies, please visit: <http://www.aboutcookies.org/Default.aspx?page=2>

Our Data Processors & Subprocessors

A data processor is any third-party that we use to operate our Website to you who has or potentially will have access to or process any personal data you provide to us. These data processors may engage different types of subprocessors to perform various functions. This limited access is incidental to the services being provided by such third parties to us to operate our Website and no permission or consent is granted by us to use or disclose this information in any manner other than as necessary to provide the applicable services to us or to facilitate any transactions with you.

In addition, we require all of our data processors and subprocessors to:

- Process personal data in accordance with our documented instructions;
- Use only personnel who are reliable and subject to a contractually binding obligation to observe data privacy and security, to the extent applicable, pursuant to applicable data protection laws including the General Data Privacy Regulation (GDPR), in connection with their subprocessing activities;
- Provide regular training in security and data protection to personnel to whom they grant access to any personal data;

- Implement and maintain appropriate technical and organizational measures (including measures consistent with those to which we may be contractually committed to adhere to insofar as they are equally relevant to the subprocessor's processing of personal data on our behalf);
- Promptly inform us about any actual or potential data breaches; and
- Cooperate with us in order to deal with requests from data controllers, data subjects or data protection authorities, as applicable.

We use the following data processors:

A. Infrastructure & Data Storage

Hosting/Data Storage. We use GoDaddy to host our Website and to store your data on their servers.

B. Specific Services.

-PayPal Payment Processing. When you purchase any Product and/or Course access through this Website, You also share the Identity Information you provide and your credit/debit card or bank account information with PayPal Payment Solutions, our third party payment processor. Any disclosure of this information is necessary to facilitate the specific transaction and will only be used by us for that strict purpose, unless otherwise stated in this Policy. This limited access is incidental to the services being provided by PayPal and no permission or consent is granted by us to use or disclose your information in any manner other than as necessary to process any payment(s) you initiate.

-MailMunch Email Marketing. We use MailMunch to store and manage all email addresses you provide. We send emails to you about our products from time to time or important announcements about our products. We also use your email to send you a newsletter when you sign-up. Please visit <https://legal.mailmunch.com/privacy/> to learn more about how MailMunch may use any Identity Information collected from You through your use of this Website.

-Administrative/Customer Service Support. We reserve the right and may share our files and some Identity Information we collect through this Website directly with third party independent contractors that provide customer support and other administrative services on our behalf. We will only contract such third parties for the limited purpose of assisting us to operate this Website and/or provide support or administrative services in conjunction with any products or services that we may offer through this Website from time to time. This limited access would be incidental to the services being provided by such third party contractors and no permission or consent shall be granted by us to use or disclose this information in any manner whatsoever, other than as necessary to provide the applicable services to us. We will require that our independent contractors commit to uphold the privacy of any Identity Information or other information regarding our Website visitors or customers that we may share with them. We will require that each of our contractors agree not to use or disclose any Identity Information, which may be disclosed to or

shared with these parties during the course of their duties to us, except as absolutely necessary to perform their duties to us.

Social Media Features and Widgets

We may also provide access to services or features on our Website that enables you to share information with certain social networks and interact with us on our social media fan pages or other social media platforms that we may utilize. This includes the Facebook "Like" or share buttons and the Facebook Comments Plugin feature and social media "follow-us" buttons, all of which are administered via third party applications or scripts (plugins). For example, Facebook will attempt to track your use on our Website by placing Javascript code through the "like" button and that piece of code then allows Facebook to run a script on your browser which can set cookies and make more tracking requests. Your use of these features may result in the collection or sharing of information about you by these third party social media apps. This may include collecting your IP address, tracking your use on our Website and other third party websites containing the same social media features, including the pages you visit, duration, time, etc., through the use of a cookie or other unique identifier placed on your browser by such third parties. Your interactions with these social media features are governed by the privacy policy of the party that provides the specific feature or application. You should carefully review the privacy policies and settings on those specific social media sites. We shall, under no circumstances, have any liability to you whatsoever for the information collection and use/disclosure practices of any such third party that has provided or made available any social media feature or application that you use on our Website.

HOW WE USE/SHARE YOUR INFORMATION

Informational Use of Emails

We use the e-mail address provided by users who sign-up for our newsletter to send our newsletter and important notifications to you related to your use of our Website. **You can opt-out of receiving any promotional emails or newsletters at any time by either clicking "unsubscribe" in the body of the email communication and following the opt-out procedure contained in the email or by sending an email to: overtakenbygrace@gmail.com and requesting to opt-out of receiving such communications.**

Do We Sell Your Identity Information?

We make every effort to respect your privacy and **we will never sell, license or disclose any of your Identity Information**, by itself or bundled with any Use Information or other information you provide or that we collect to any third parties for any purpose not expressly set forth in this Policy without your express written consent. We only share or disclose any Identity Information or other information collected from You as expressly set forth in this Policy.

Required Disclosures

We may disclose certain Identity information if: i) requested via a subpoena, court order, or local, state, federal or international law enforcement request to release any such information; or ii) in order to investigate and help prevent security threats, fraud or other malicious activity; or iii) to protect our rights or protect our property, or any or the rights of our customers or other third parties.

Communications

When you visit our Website or send e-mails to us, you are communicating with us electronically. You consent to receive communications from us electronically. You agree that all agreements, notices and other communications that we provide to you electronically satisfy any legal requirement that such communications be in writing. If you send us an email communication, call us or send a written correspondence for any reason, we may create a file and store your email and other Identity Information specific to you. We generally will maintain a record and keep notes of all communications with you. All messages transmitted by you on our Website or to us shall not be treated as confidential and shall be deemed to be accessible to the general public. You should not transmit any communications or correspondences to us that you intend only the intended recipient(s) read. **Notice is hereby given that all messages or electronic data transmitted onto our Website can and may be read by us, regardless of whether we are the intended recipient of any such message(s).**

Your California Resident Privacy Rights

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of their personal information to third parties for their direct marketing purposes. California law also allows California residents to opt-out of having this information disclosed. **If You are a California resident and desire to make such a request, please contact overtakenbygrace@gmail.com. Please include the words "California Privacy Disclosure Request" in the subject line.**

HOW WE PROTECT YOUR INFORMATION

We use industry standard and customary firewalls and data encryption to protect your data. We make no guarantee, warranty or representation that your any information you provide through our Website or on our Website will remain secure at all times from any illegal or unauthorized access of the information by third parties. We shall not, under any circumstances, be held responsible or liable for information or transmissions that are accessed by third parties illegally or without authorization through our Website and/or network. We will report any unauthorized access of your information promptly upon discovery, and we will use our best efforts to remedy any security vulnerability that contributed to the unauthorized access.

GENERAL INFORMATION

Information Storage And International Transfer

Any Identity information and all other information which we collect on our Website will be stored and processed in our servers located in the United States. If you reside outside the United States, you consent to the collection, transfer, storage and processing of any information from your country to the United States.

How to Update, Change or View Your Identity Information

If you would like to request any changes or updates to any Identity Information you have provided to us, or if you would like to view any information we have collected from your use of our Website, please contact us and request the same by sending an email to: overtakenbygrace@gmail.com. Please include the words "Personal Information Request." If you make any information requests, we will require that you provide proof of your identity, which may include providing us with a copy of a driver's license, social security card and/or birth certificate. We also reserve the right to require that you sign and provide us with a notarized affidavit verifying your identity before we update or release any information to you.

Successors

Upon any acquisition, merger, sale or other change of control of our business/organization, we reserve the right to transfer any Identity information you have submitted on our Website as part of the property owned by us to our successor resulting from such merger, acquisition, sale, etc. In the event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, We reserve the right to transfer your Identity Information to protect any of the our rights or as required by law.