

Privacy Policy

Effective Date: December, 2020

The following Privacy Policy governs the online information collection practices of Soulect Enterprises Inc. and its associated global entities (“**Company**,” “**we**” or “**us**”). Specifically, it outlines the types of information that we gather about you while you are using soulect.co and other websites, Facebook pages and other social media pages operated by Company (collectively, the “**Site**” or “**Sites**”), and the ways in which we use this information. This Privacy Policy, applies to information we collect online. In addition, the portion of this Privacy Policy that relates to the European Union’s General Data Privacy Regulation may apply to some of the data that you provide to us offline and/or through other means, as well (for example, at a live event, via telephone, or through the mail).

This Privacy Policy is a result of our commitment to privacy and security. This Privacy Policy describes how we collect information from all users of our Internet services, course content and other educational and non-educational materials (the “**Services**”), including those who access some of our Services but do not have accounts (“**Visitors**”) and those who may purchase Products and/or pay a monthly service fee to subscribe to the Service (“**Members**”).

Please read this Privacy Policy carefully. By visiting and using the Site, you agree that your use of our Site, and any dispute over privacy, is governed by this Privacy Policy, including any changes to this Privacy Policy as posted on this website and as may be updated from time to time. By continuing to use the Site after any such changes, you explicitly and unconditionally accept the Privacy Policy as modified.

Introduction

We may collect and store personal or other information that you provide us while using the Site (e.g., while on the Site or in responding via email to a feature provided on the Site). The Site collects personal and identifying information from users during online registration and online purchasing. Generally, this information may include name and email address for registration or opt-in purposes and name, postal address, and credit card information when registering for events or purchasing products.

We may also collect and store information that is generated automatically as you navigate through the Site. For example, we may collect information about your computer, your IP address, or other information in order to improve the delivery of our web pages to you and to measure traffic on the Site. If you have accessed our site via a social media platform, such as Facebook,

we may collect information related to your social media account, such as your handle or identifier on that platform. We also may use cookies to enhance your experience with the Site, and web beacons, to access cookies, count users who visit the Site, or open HTML-formatted email messages.

We may use the information we collect in a variety of ways, including using the information to customize features, advertising, making other offers to you via email, direct mail or otherwise. We also may provide your information to third parties, such as service providers, contractors and third-party publishers and advertisers for a variety of purposes. Unless you inform us in accordance with the process described below, we reserve the right to use, and to disclose to third parties, all of the information collected from and about you while you are using the Site in any way and for any purpose, such as to enable us or a third party to provide you with information about products and services.

Third-party advertisers and ad servers that place and present advertising on the Site may also collect information from you via cookies, web beacons or similar technologies. These third-party advertisers and ad servers may use the information they collect to help present their advertisements, to help measure and research the advertisements' effectiveness, or for other purposes. The use and collection of your information by these third-party advertisers and ad servers is governed by the relevant third-party's privacy policy and is not covered by our Privacy Policy. If you have any concerns about a third party's use of cookies or web beacons or use of your information, you should visit that party's website and review its privacy policy.

The Site also includes links to other websites and provides access to products and services offered by third parties, whose privacy policies we do not control. When you access another website or purchase third-party products or services through the Site, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting or the provider of such products or services.

We may also buy or sell various assets in the course of our business. In the event that we sell some or all of our assets, or one or more of our websites is acquired by another company, information about users may be transferred as well.

Personal Information

Introduction

Members may be asked to provide certain personal information when they sign up for our Products or Services including name, address, telephone number, billing information (such as a credit card number), and the type of personal computer being used to access the Services. The personal information collected from Members during the registration process (or at any other time) is used primarily to provide a customized experience while using our Products and Services. We may make limited disclosure of personal information under the specific circumstances described below.

The Types of Information We Collect:

Some of the information we may collect about you in connection with the provision and fulfillment of our services to you may include:

- Name
- Email Address
- Mailing Address
- Billing Address
- PayPal Email Address
- Masked Credit Card Information (for refunds)
- Age
- Gender
- Marital Status
- Religion
- Income Range
- Education
- Profession
- Parent Status
- Other responses to surveys and questionnaires
- Sign-up source
- Date of account creation
- Date of account updates
- IP address
- Time stamp
- Device type
- Operating system
- Browser
- Email open clicks
- User ID
- User behavior
- Login history
- Order details
- Location

- Facebook ID
- Photo
- Language
- Country
- Timezone
- Birthday
- NPS score
- Your rating of our support
- Telephone number
- Telephone call recordings
- Testimonials, with your authorization
- Anonymized Facebook and Instagram comments

When you use our Platform, we automatically collect information about you, including: Date of account creation, Date of account updates, IP address, Device type, Time stamp, Operating system, Browser, Email open clicks, Login history, Order details, Location, Language, Country, Timezone, Sign-up source.

When you subscribe to any of our services or newsletters, some of the information we may collect about you and store in connection with the provision and fulfillment of our services to you may include: Age, Gender, Marital Status, Religion, Income Range, Education, Profession, Parent Status, Birthday, Telephone number.

How We Use Your Personal Information:

The above personal information may be used for the following purposes:

- To operate, improve, or promote our Service
- To contact you
 - When you have opted in to receive email messaging
 - To respond to your email inquiries. Specifically, when Visitors or Members send email inquiries to us, the return email address is used to answer the email inquiry we receive. We do not use the return email address for any other purpose, or share it with third parties.
- To monitor and analyze trends such as:
 - Behavior on the Site
 - Email clicks and opens
- To market our products and services through:
 - Email marketing
 - Advertising, including retargeting via Google and Facebook
 - Notifications
- Perform accounting, administrative and legal tasks

Who Has Access to Your Data Within Our Organization:

Within our organization, access to your data is limited to those persons who require access in order to provide you with the Products and Services you purchase from us, to contact you, and to respond to your inquiries, including requests for refund. Those staff members may be on teams such as: marketing, events, development, executive, customer support. Employees only have access to data that is relevant to their team, on a “need to know” basis.

Who We Share Your Data With Outside of Our Organization and Why:

Processors

We may use service providers in connection with operating and improving the Site, to assist with certain functions, such as payment processing, email transmission, conducting surveys or contests, data hosting, managing our ads, and some aspects of our technical and customer support. We take measures to ensure that these service providers access, process, and store information about you only for the purposes we authorize, subject to confidentiality obligations, as applicable.

We use 3rd-party solutions for marketing and analytics. This processing occurs on third party platforms on accounts owned by Company, including, but not limited to, Google Analytics and various email services. This processing is subject to their respective privacy policies.

Authorities

We may access, preserve, and disclose information about you to third parties, including the content of messages, if we believe disclosure is in accordance with, or required by, applicable law, regulation, legal process, or audits. We may also disclose information about you if we believe that your actions are inconsistent with our Terms of Use or related guidelines and policies, or if necessary to protect the rights, property, or safety of, or prevent fraud or abuse of, Company or others.

Why We Store Information We Collect From You:

We retain certain information that we collect from you while you are a member on the Site, and in certain cases where you have deleted your account, for the following reasons:

- So you can use our Site;
- To ensure that we do not communicate with you if you have asked us not to;
- To provide you with a refund, if entitled;
- To better understand the traffic to our Site so that we can provide all members with the best possible experience;
- To detect and prevent abuse of our Site, illegal activities and breaches of our Terms of Service; and
- To comply with applicable legal, tax or accounting requirements.

When we have no ongoing legitimate business need to process your information, we will either delete or anonymize it.

Third Party Data:

Login From Integrations

For ease of use, you have the option to link your Soulect account on the Site with your account on a third-party site such as, for example, Facebook. The third party site will authenticate your identity, will allow you to log into our platforms using the single social login buttons, and will share certain personal information that you allow us to collect. By signing-in using your third party identity provider account (“**Third Party IdP**”), you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information that you have authorized the Third Party IdP to provide to us. Such information may include your first and last name, gender, location, username, e-mail address, picture or phone number.

You will be given the option to link your Soulect account with your social media account e.g. Facebook. When you choose to login with your social media account the social media site will: authenticate your identity, allow you to log into your Soulect account using the single social login button, and provide personal information that you agree to share with us.

Logging in this way means that you give us authorization to collect, store, and use your information in accordance with this Privacy Policy. Such information may include your first and last name, gender, location, username, email address, picture, or phone number.

Third Party Integration

If you do login through a third party account like Facebook, we share some information with them and they share some information with us but only for purposes of accessing your account. What is shared with us by the third party sites depends on their Privacy Policy. We would advise

that you familiarize yourself with the privacy policy of the third party site to know what information is being shared by them.

When you login to your Soulect account with your social media account we also share some basic account information with your social media provider. What we share with the social media provider depends on their Privacy Policy. We advise you to check the Privacy Policy of the social media site to familiarize yourself with the information they request from us.

Affiliate links

Occasionally you may have clicked on one of our affiliate links and signed up or bought something via that link. In this case, the person or organization in charge of the affiliate link will have the information that you have submitted. This may be your email address, name, address, or whatever else they asked you. If you have signed up for or bought something from us via an affiliate link, please check the privacy policy on their site.

Online shopping

If you order services or products directly from us, we will use the personal information you provide only to process that order. We do not share this information with outside parties except to the extent necessary to complete that order.

If you complete an order for some other company(ies) that may be linked to our Site, such as an online gift order sent directly to a recipient, you may be asked to provide information about the recipient, such as the recipient's name, address, and phone number. Our company has no control over the third parties' use of any personal information you provide when placing such an order. Please exercise care when doing so. We recommend that you familiarize yourself with the Privacy and Terms of Use policies of any other company(ies) whose web sites you may access from our site.

Cookies and Tracking Tools

We use cookies to help you make using our website easier, such as:

- To remember your country and language preferences
- To deliver information that matches your interests
- To help us understand our audience and traffic patterns
- To let you automatically log into programs and parts of our site that require membership

- To manage and present site info displayed on our website that will be specific to you

We also use Web Beacons to collect personal and non-personal data on how you use our site, such as how long did you visit our page, what web browser you're using, what's your operating system, and who's your Internet service provider. In addition we also use Google Analytics data and the DoubleClick cookie to serve ads based on a user's prior visits to our website. This data is collected from thousands of site visits and analyzed as a whole. This helps us build a better website to match our visitors' needs.

We may also place small "tracker gifs" or "beacons" on many of the pages on our website, in online advertising with third parties, and in our emails. We use these beacons, in connection with Cookies, to collect non-personal data on the usage of our site including but not limited to the date and time of the visit, the pages visited, the referring web page, the type of browser (e.g., Google Chrome, Internet Explorer, Firefox, etc.), the type of operating system (e.g., Windows, Linux, or Mac), and the domain name of the visitor's Internet service provider. This information is collected about thousands of site visits and analyzed as a whole. This information is useful in, for example, tracking the performance of our online advertising such as online banner ads and to determine where to place future advertising on other websites.

Disabling Cookies and Beacons: If you are uncomfortable with the collection of such information through the use of Cookies and Beacons, we recommend disabling these features through your browser preferences, though please understand this will limit the performance and functionality of our Company's website. Your browser documentation should provide specific procedures for disabling cookie and beacon support.

You may also opt out of the DoubleClick cookie by visiting the Google advertising opt-out page: <http://www.google.com/policies/privacy/ads/>

Or you may opt out of Google Analytics by visiting the Google Analytics Opt-out page: <http://tools.google.com/dlpage/gaoptout>

Advertiser Disclosures

Google Analytics

We may use Google Analytics Advertiser Features to optimize our business. Advertiser features include:

- Remarketing with Google Analytics
- Google Display Network Impression Reporting

- DoubleClick Platform integrations
- Google Analytics Demographics and Interest Reporting

By enabling these Google Analytics Display features, we are required to notify our visitors by disclosing the use of these features and that we and third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to gather data about your activities on our Site. Among other uses, this allows us to contact you if you begin to fill out our check-out form but abandon it before completion with an email reminding you to complete your order. The “Remarketing” feature allows us to reach people who previously visited our Site, and match the right audience with the right advertising message.

You can opt out of Google’s use of cookies by visiting Google’s ad settings and/or you may opt out of a third-party vendor’s use of cookies by visiting the [Network Advertising Initiative opt-out page](#)

Facebook

As advertisers on Facebook and through our Facebook page, we, (not Facebook) may collect content or information from a Facebook user and such information may be used in the same manner specified in this Privacy Policy. You consent to our collection of such information. We abide by Facebook’s Data Use Restrictions.

- Any ad data collected, received or derived from our Facebook ad (“Facebook advertising data”) is only shared with someone acting on our behalf, such as our service provider. We are responsible for ensuring that our service providers protect any Facebook advertising data or any other information obtained from us, limit our use of all of that information, and keep it confidential and secure.
- We do not use Facebook advertising data for any purpose (including retargeting, commingling data across multiple advertisers’ campaigns, or allowing piggybacking or redirecting with tags), except on an aggregate and anonymous basis (unless authorized by Facebook) and only to assess the performance and effectiveness of our Facebook advertising campaigns.
- We do not use Facebook advertising data, including the targeting criteria for a Facebook ad, to build, append to, edit, influence, or augment user profiles, including profiles associated with any mobile device identifier or other unique identifier that identifies any particular user, browser, computer or device.
- We do not transfer any Facebook advertising data (including anonymous, aggregate, or derived data) to any ad network, ad exchange, data broker or other advertising or monetization related service.

Data Security and Data Privacy Regulation

Our company's commitment to data security:

We implement a variety of administrative, managerial, and technical security measures to help protect your personal information. Our Company has various internal control standards which relate specifically to the handling of personal information. These include certain controls to help safeguard the information we collect online. Our employees are trained to understand and comply with these controls and we communicate our Privacy Policy, practices and guidelines to our employees. However, while we strive to protect your personal information, you must also take steps to protect your information. We urge you to take every precaution to protect your personal information while you are on the Internet.

Services and websites we sponsor have security measures in place to protect the loss, misuse, and alteration of the information under our control. While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information. If we do discover a security breach affecting your data, every effort will be made to provide a notification within 72 hours of our team learning of the occurrence.

General Data Privacy Regulation (GDPR)

The GDPR took effect on May 25, 2018, and is intended to protect the data of European Union (EU) citizens.

If you are a resident of the European Economic Area (EEA), or are accessing this Site from within the EEA, you have certain rights with respect to your data. We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us by sending an email to soulectteam@gmail.com with the subject "EEA privacy"

Rights that you may have, depending on the country in which you live, include:

- Accessing, correcting, updating, or requesting deletion of your information.
 - If you request that your account be deleted, you will lose access to all of our programs in which you are actively registered.
- Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information.

- Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the “unsubscribe” or “opt-out” link in the marketing emails we send you. We will not send you additional e-mails after receiving an “opt-out” confirmation from you. Additionally, you may update your email preferences by changing the settings in your account.
- Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.
- Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available here.

Data Controller and Data Protection Officer

If you reside in a country in the European Economic Area or in Switzerland, then your personal data collected by us is controlled by us. Our EU Data Protection Officer is located at the same address and can also be reached by email at soulectteam@gmail.com with the subject “EEA privacy.”

If you reside outside of the European Economic Area and Switzerland, the personal data collected by us is still controlled by us, and you can also contact us by email at soulectteam@gmail.com with the subject “EEA privacy.”

Children’s Privacy Statement

With respect to the online collection and use of personal information for children under the age of thirteen, we provide some important information regarding their rights under applicable law with respect to such information.

- This Site is not directed to children under the age of thirteen and we do NOT knowingly collect personally identifiable information from children under the age of thirteen as part of the Site. We screen users who wish to provide personal information in order to prevent users under the age of thirteen from providing such information. If we become aware that we have inadvertently received personally identifiable information from a user under the age of thirteen as part of the Site, we will delete such information from our records. If we change our practices in the future, we will obtain prior, verifiable parental consent before

collecting any personally identifiable information from children under the age of thirteen as part of the Site.

- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the Site, we also do NOT knowingly distribute such information to third parties. We do NOT knowingly allow children under the age of thirteen to publicly post or otherwise distribute personally identifiable contact information through the Site.
- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the Site, we do NOT condition the participation of a child under thirteen in the Site's online activities on providing personally identifiable information.

Revisions to this policy

Our Company reserves the right to revise, amend, or modify this policy, our Terms of Use and our other policies and agreements at any time and in any manner, by updating this posting.

Where to direct questions about our privacy policy

If you have any questions about this Privacy Policy or the practices described herein, you may contact us through the contact information provided on this website or by emailing us at soulectteam@gmail.com with the subject "privacy."