

Effective/Last Updated: May 25, 2018

## CORPORATE CONNECTIONS PRIVACY POLICY

Corporate Connections Worldwide Development Ltd controls data related to Corporate Connections' operating management system known as Corporate Connections BNI Connect® for and on behalf of Corporate Connections Global, LLC, together with its related affiliates Corporate Connections Franchising, LLC and CorpConnect Enterprises India Pvt Ltd ("CC", "our" or "we") prioritizes the privacy of our users, and has developed this privacy policy to show our commitment to that and to explain how we use certain information ("**Privacy Policy**"). This Privacy Policy is intended to explain to you, as a user of CC or our services, what information we collect, how we use that information, with whom it may be shared, and your options about such uses and disclosures. If you have any questions or suggestions regarding this Privacy Policy, please email our Data Protection Officer ("DPO") at [dpo@corporateconnections.com](mailto:dpo@corporateconnections.com). We encourage you to read this Privacy Policy carefully when using our Sites or services or transacting business with us. By using our Sites and associated products and/or services, you are accepting the practices described in this Privacy Policy and the data collection and use practice described in this policy. As with CC's ToS, the mere act of visiting our Sites or web-accessed or mobile applications (our "Sites"), even without reading the subject legal document, will be viewed as acceptance of the terms contained in the Privacy Policy.

In the event of inconsistency between any terms of this contract and any translation into another language, the English version will control and prevail on any question of interpretation or otherwise.

### **Privacy Philosophies**

Although our business and social network community have unique services and offerings, they share a similar privacy philosophy. CC follows these privacy principles in our conduct in the collection, use, release and security of Information both online and offline:

- Providing you with **NOTICE** of our information practices.
- Giving you with **CHOICES** about how your data will be used.
- Providing you with the opportunity to **UPDATE or CORRECT** your personal information.
- Using information **SECURITY** safeguards.
- Limiting the **SHARING** of your information.
- Committing to **COMPLYING** with applicable privacy requirements.
- Providing you with means to **CONTACT US** about privacy-related issues.

### **Information We Collect About You**

A. *General.* In order to better provide you with the products and services offered on the Site, we collect two types of information about our users: personally identifiable information and aggregate information.

Personally identifiable information refers to information that lets us know the specifics of who you are. When you engage in certain activities on our Sites, such as registering for an account, purchasing a product, submitting content and/or posting content on any of our blogs, or sending us feedback, we may ask you to provide certain information about yourself. Examples of personally identifiable information may include your first and last name, email address, mailing address, telephone numbers, age group, gender and other identifying information. When setting up your profile on our Sites, you may be asked to provide an e-mail address, phone number, and address.

Aggregate information refers to information that does not by itself identify a specific individual. We gather certain information about you based upon where you visit on our Sites, and what other sites may have directed you to us. This information, which is collected in a variety of different ways, is compiled and analyzed on both a personal and an aggregated basis. This technology enables us to determine (i) your IP Address of your computer and its geographic location from installing the Applications onto your computer, mobile device or through your GPS of your mobile device; (ii) your search terms or interactive behavior via CC's websites; (iii) your purchasing behavior; (iv) source of the information sought by you during your search; and (v) the age of your results data (collectively, "**Shared Information**"). We may use the information you provide in aggregate form for internal business purposes, such as generating statistics and developing marketing plans.

B. *Other Information You Provide.* We may also collect and store any personal information you enter on our Sites or provide to us in some other manner, including personal information that may be contained in any comment you post to our Sites. This includes identifying information, such as your name, address, e-mail address, and telephone number (if provided and applicable); your likeness (both still and moving); and, if you transact business with us or our partner, limited financial information such as your payment method (valid credit card number, type, expiration date or other financial information).

C. *Information About Others.* We may also collect and store personal information about other people provided to us by members, including their businesses, contact details including email addresses and/or IP addresses. This data is used in the legitimate interests of members, for the purposes of generating their invitations to non-members to Chapter meetings and other CC events, and for business-to-business referrals between members for the potential purchase of goods or services from non-members.

D. *Sweepstakes and Contests.* When CC offers sweepstakes or contests, personal information is collected with the sole purpose of notifying you if you win the sweepstakes or contest.

E. *Automatic Collection of Data.* Information concerning your computer hardware and software are automatically collected and may be shared with other CC or affiliated websites. This information may include: your IP address, browser type and language, domain names, access times, referring website addresses and the content of any undeleted cookies that your browser previously accepted from us (see "**Cookies**" below). CC uses this information to maintain the quality of its service and to provide general statistics about website visitors.

*Cookies.* When you visit our Sites, we may use one or more "Cookies" to make our Sites easier for you to use and to personalize your online experience. Through the use of a cookie, we also may automatically collect information about your online activity on our Sites, such as the web pages you visit, the links you click, and the amount of time you spend on the website. You can remove or block cookies using your settings in most browsers, but if you choose to decline cookies, you may not be able to sign in or use some of the features offered on our Sites.

*Other Technologies.* We may use the ever-evolving Internet technology, such as web beacons and other similar technologies, to track your use of our Sites. We also may include web beacons in company e-mail messages, newsletters, or notifications to determine whether messages have been opened and/or acted upon. This enables us to customize the services we offer our Sites visitors to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities.

*Information Collected By Third Parties.* We may allow third parties, including advertising companies, and ad networks, to display advertisements on our Sites. These companies may use tracking technologies, such as cookies, to collect information about users who view or interact with their advertisements. Unless expressly stated otherwise, our Sites do not provide any personal information to these third parties. This information may allow them to deliver targeted advertisements and gauge their effectiveness. If you have questions or concerns about this, please email our DPO at [dpo@corporateconnections.com](mailto:dpo@corporateconnections.com).

*Information From Other Sources.* We sometimes supplement the information that we receive that has been outlined in this Privacy Policy with information from other sources and companies. Such outside information includes updated delivery and address information from carriers or third parties, which enables us to correct our records and deliver, for example, future communications more easily; account information, purchase or redemption information, and page-view information from some merchants with which we operate co-branded businesses or for which we provide technical, fulfilment, advertising, or other services; search term and search result information from some searches conducted through the Web search features; search results and links, including paid listings (such as Sponsored Links from Google); and credit history information from credit bureaus, which we use to help prevent and detect fraud and to offer certain credit or financial services to some customers.

F. *Storage and Transfer of Personally Identifiable Information.* CC may store and process in the United States or any other country in which CC or its affiliates, subsidiaries, or agents maintain data facilities.

## **How We Use the Information We Collect**

A. *General.* We will primarily use your personally identifiable information to fulfil our contract to provide support or service offerings to you. Specifically, CC collects and uses your personal information in order to:

1. operate the Sites and to deliver the services that you have requested;

2. manage your account and provide you with customer support;
3. perform research and analysis about your use of (personal and aggregate), or interest in, our products, services, or content, or products, services or content offered by others; this information may be used, by way of example only, to help us understand the demographics of our members, identify chapters with openings for certain professions, inform future marketing campaigns, and judge the success of members and identify coaching strategies.
4. cross market your services/products with our services and our affiliates' services
5. verify your eligibility and deliver online and/or offline in connection with contests and sweepstakes;
6. enforce our terms and conditions;
7. manage our business;
8. enable and leverage applications such as Corporate Connections BNI Connect® to provide user functionality; and
9. perform functions as otherwise described to you at the time of collection.

When you join CC or visit a CC-related website, we will not collect any personally identifiable information about you unless you choose to provide such information to us. You agree that when you provide your personal identifiable information to us, CC and its affiliated CC franchisees may use your information to promote you and CC. We want your information and preferences to be accurate and complete. You may request access to any personal information and preferences that you have provided to us and correct, modify or update such information and/or preferences by sending an email with your request to [dpo@corporateconnections.com](mailto:dpo@corporateconnections.com).

The collection of your e-mail address and name if and when requested during account registration enables CC and its affiliates to send you any requested newsletter(s) or to send you any requested mailings or offers. If applicable, you will be allowed to indicate upon registration that you are or are not interested in receiving offers or information from our partners and/or us and we may occasionally send you e-mails regarding product and event information or promotions. Only CC and its affiliates will send you these solicitations, and only if you have previously not indicated that you do not wish to receive them. If applicable and you prefer not to receive such e-mails, please opt out or otherwise do not opt-in to receive these e-mails. You may opt-out of receiving e-mails from CC when you register within your account settings at our Sites within or otherwise provide contact information to CC.

Information concerning your geographical location is used to determine if CC should provide regionalized information to its site users. When you voluntarily enter a sweepstakes or contest, we request your e-mail address and other contact information in order to be able to contact you in the event you are a winner of the sweepstakes or contest. Except as otherwise stated in this Privacy Policy, the personal information you

provide on our Sites will not be shared with any third-parties, although CC reserves the right to share such information with its affiliates and subsidiaries without your permission.

CC provides links to send e-mail messages to our Sites for your convenience and your e-mail address is used so that our Sites may reply to your inquiry. CC tracks the pages on our Sites that our users visit in order to determine which areas of the website are the most popular. This data is used to deliver customized content and advertising within our Sites to customers whose behavior indicates that they are interested in a particular subject area.

The vast majority of data collection from our visitors is used to assess the type of people visiting that website and to determine what content is most frequently accessed by those visitors. This information helps CC improve its websites by offering content that more specifically meets the interests of our Site visitors.

B. *Financial Information.* If CC collects your financial information, it may use your financial information or payment method to process payment for any purchases, subscriptions or sales made on our Sites, to protect against or identify possible fraudulent transactions, and otherwise as needed to manage our business.

## **Data Retention**

Your data will only be retained for as long as necessary to fulfil the purposes for which it was obtained. For members, at a minimum this will be for the duration of your membership and likely longer depending upon applicable laws, rules and regulations. For non-members, this will be for the duration needed to align with your engagement with us, such as, by way of example only, to enable us to send invitations to Chapter meetings, for maintaining subscriptions to email newsletters, or for the duration of your participation in one of our core groups prior to Chapter launch. Please see our Data Retention Policy, accessible at <http://bnitos.com/retention.html> for more information.

## **With Whom We Share Your Information**

A. *General.* We want you to understand when and with whom we may share personal or other information we have collected about you or your activities on our Sites or while using our services.

B. *Personally Identifiable Information.* We do not share your personal information with others except as indicated below or when we inform you and give you an opportunity to opt out of having your personal information shared.

1. We may share your personal information with:

a. *Authorized Service Providers:* We may share your personal information with our authorized service providers that perform certain services on our behalf. These services may include processing credit card payments, delivering products and services, providing customer service and marketing assistance, performing business and sales analysis, supporting our Sites' functionality, and supporting other features and

promotions offered through our Sites. We will only provide these service providers with the limited information that they need to provide us with such services, including limited access to personal information needed to perform their functions. However, they are not permitted to share or use such information for any other purposes. When you enter into transactions with others or make payments on our Sites, we will either (a) link you to a third party who handles the transaction outside of our Sites, or (b) share transaction information with only those third parties necessary to complete the transaction. We will require those third parties to agree to respect the privacy of your information.

b. *Business partners:* From time to time, we may offer promotions, sweepstakes or third-party offerings on our Sites. If and when you make purchases, engage in these services and/or products, offered through our Sites or our services, we may share personal information with the businesses with which we partner to offer you those products, services, promotions, contests and/or sweepstakes. When you elect to engage in a particular merchant's offer or program, you consent to us to providing your email address and other information to that merchant. You have the right to withdraw your consent at any time by emailing us at [legal@corporateconnections.com](mailto:legal@corporateconnections.com).

2. Based on the contractual necessity given the nature of our networking business, you acknowledge that in connection with your membership we may share your personal information with:

a. *Franchisees:* If you are a CC member or a non-member, we may share your personal information with CC Master Franchisees or (Sub)franchisees of CC, who are joint controllers of data ("Data Controller") with CC Worldwide Development Limited. As joint Data Controllers, Master Franchisees and (Sub)franchisees have separate obligations for implementing appropriate technical and organizational measures to ensure and to demonstrate that their processing activities are compliant with the requirements of the European Union's General Data Protection Regulation ("GDPR" or the "Regulation").

b. *Members:* We and our authorized third-party agents may share your personal information and member performance data with other members, chapters, and the entire CC System. This includes (a) displaying your personal information as a way of marketing your business on Corporate Connections BNI Connect®, and (b) sharing your performance data via Corporate Connections BNI Connect® and any other web platforms or techniques we may, separately or through authorized third-party agents, choose to utilize or develop in the future related to the core business of networking and passing referrals.

3. Other Situations. We also may disclose your information:

a. In response to a subpoena, court order, or other requests for cooperation from a law enforcement or other government agency (including civil and criminal matters); to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion. This may include respecting requests from jurisdictions outside of the United States if we have a good faith belief that response is required by law under the local laws in that jurisdiction, apply to users from that jurisdiction, and are consistent with generally accepted international standards. We may also share

information when we have a good faith belief it is necessary to prevent illegal activity, to prevent imminent bodily harm, or to protect ourselves and you from people violating our Terms of Service, accessible at [http://bnitos.com/tos\\_google.html](http://bnitos.com/tos_google.html). This may include sharing information with other companies, lawyers, courts or other government entities where applicable.

b. In connection with a substantial corporate transaction, such as the sale of our business, a merger, divestiture, consolidation, or asset sale; though in any event, any acquiring entity or other third-party assignee will be bound by the terms of this Privacy Policy.

c. To protect and defend the rights or property of CC or one of CC's referral networks; and, act under exigent circumstances to protect the personal safety of members and users of CC, its websites, or the public.

Any third parties to whom we may disclose personal information may have their own privacy policies, which describe how they use and disclose personal information. Those policies will govern use, handling and disclosure of your personal information once we have shared it with those third parties as described in this Privacy Policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties. These entities or their servers may be located either inside or outside the United States.

C. Aggregated and non-personal information. We may share aggregated and non-personal information we collect. We may also share it with third parties to develop and deliver targeted advertising on our Sites and on websites of third parties. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. This information does not contain any personal information and may be used to develop services that we hope you and other users will enjoy using.

### **About User-Generated-Content**

We do not screen, filter or monitor user submissions to our Sites, nor do we scrape or glean personal information from any such submissions to the extent that any comment or other user submission contains personal information (including name, likeness, email address, whether such information pertains to the submitter or someone else), such personal information may be viewed by authorized users of our Sites with whom you have shared that information, subject to our Terms of Service. We do not gain access to any of your personal content, and only use "meta" information to enable the successful operation of our service. (See "**User Submissions**" below).

### **Third-Party Websites**

There are a number of places on our Sites or through our services where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an advertisement or a search result on our Sites, you may be taken to a website that we do not control. These third-party websites may independently solicit

and collect information, including personal information, from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the "privacy" link typically located at the bottom of the webpage you are visiting.

## **Your Data Protection Rights and Accessing Your Information under GDPR**

Because Corporate Connections Worldwide Development Limited is established in Ireland, we will be governed by the GDPR. This means that we are going to be working continuously to ensure that we are satisfying our obligations under the Regulation.

If you have an online account with us, you have the ability to review and update your personal information online by logging into your account. You can also review and update your personal information and exercise your other rights by contacting us. More information about how to contact us is provided below.

- You have the right to be provided on request with a copy of your personal data.
- You have the right to rectification of inaccurate data we may have recorded about you.
- You have the right to the erasure of your data ("Right to be Forgotten") which we no longer have justification for recording.
- You have the right to object to processing of your data which is being done on the basis of our legitimate interests.
- You have the right to refuse to be contacted for direct marketing purposes.
- You have the right to restrict the processing of your personal data when:
  - the basis for its processing is in dispute;
  - its accuracy is in dispute;
  - we cannot establish a lawful basis for its processing, but you do not wish it to be erased;
  - we no longer need your data, but you need it for the establishment, exercise, or defense of legal claims;
  - you object, where applicable, to our processing your data on the basis of our legitimate interests, pending verification of whether our interests override.
- You have the right to be provided with a copy of your data in machine readable format, or to have it transferred directly to another data controller ("Data Portability"). In connection with GDPR, Corporate Connections BNI Connect® provides this functionality.

If you have an online account with us, you also may choose to close your account at any time by emailing us at [legal@corporateconnections.com](mailto:legal@corporateconnections.com). If you close your account, we may still retain certain information associated with your account for analytical purposes and record keeping requirements per our Data Retention section above as well as to prevent fraud, collect any fees owed, enforce our Terms of Service, or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.

## **Your Choices About Collection and Use of Your Information**

1. You can choose not to provide us with certain information, but that may result in you being unable to use certain features of our Sites because such information may be required in order for you to register as a member; purchase products or services; participate in a contest, promotion, survey, or sweepstakes; ask a question; or initiate other transactions on our Sites.

2. When you register on our Sites you may be given a choice or otherwise allowed to indicate whether you want to receive email notifications and/or newsletters. At any time you can choose to stop receiving notification emails by accessing your account settings or through the link at the bottom of the notification emails; and commercial or promotional emails or newsletters from us by clicking on the link at the bottom of any of our emails. You will be given the opportunity, in any commercial e-mail that we send to you, to opt out of receiving such messages in the future. It may take up to 10 days for us to process an opt-out request. We may send you other types of transactional and relationship e-mail communications, such as service announcements, administrative notices, and surveys, without offering you the opportunity to opt out of receiving them as long as your account is active. Please note that, changing information in your account, or otherwise opting out of receipt of promotional email communications will only affect future activities or communications from us. If we have already provided your information to a third party (such as a credit card processing partner or an event provider) before you have changed your preferences or updated your information, you may have to change your preferences directly with that third party.

### **Protecting Your Personal Information**

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorized access and disclosure. For example, only authorized CC employees, contractors and certain third-party service providers are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of your sensitive personal information between your system and ours. If you choose to create a profile on our Sites or if you choose to register for an account, you will be required to select a password. This password can be changed at any time after you first log into the service by using your current password. You must keep your password confidential and you must not share this information with anyone. If you share a computer with anyone, you should always log out of our Sites before leaving it to prevent access to your information from subsequent users of that computer. There are, however, risks inherent in sharing information, and though we provide privacy settings for whom you share your videos with, please be aware that no security measures are perfect or impenetrable. We cannot control the actions of any person with whom you share your information, and cannot guarantee that only authorized recipients will view your videos. We cannot control the actions of other users with whom you share your information. We cannot guarantee that only authorized persons will view your information. Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information, searches, or other communications will always remain secure. Users should also take care with how they handle and disclose their personal information and should avoid sending personal information through insecure email. We are not responsible for third party circumvention of any of our privacy settings or security measures. Please be careful and conscientious with whom you share

your videos and choose a strong password that you do not use for other services. For information about how to protect yourself against identity theft, please refer to the Federal Trade Commission's website at [www.ftc.gov/bcp/menus/consumer/data.shtml](http://www.ftc.gov/bcp/menus/consumer/data.shtml).

### **Communities and Forums Offered on our Sites**

Any personally identifiable information or personally sensitive data that you disclose through our Sites, or other online forums hosted on our Sites, may be collected and used by others. We recommend caution when giving out personal information to others in these online forums. We encourage you to review the privacy statements of websites you choose to visit via hyper-links posted on our Sites so that you can understand how those websites collect, use and share your information. CC is not responsible for the privacy policies or other content on third-party websites accessed through its websites.

### **User Submissions**

We may provide areas on our Sites where you can post information about yourself, including your name and email address, communicate with others; upload content; and post comments. Such postings are governed by our Terms of Service. Also, whenever you voluntarily disclose personal information on our site, that information will be available and can be collected and used by others who have authorized access to your content. We encourage you to exercise discretion and caution with respect to your personal information. Once you have posted information, you may not be able to edit or delete such information.

### **Children's Privacy**

Our Site is a general audience site, and we do not knowingly collect personal information from children under the age of 13. Our Sites are not intended for use by children. You may access our Sites only if you are of legal age to lawfully form a binding contract. If you are under the age of 18 and do not have a parent's or legal guardian's permission to use our Sites, you may not access our Sites or use any services. If you are 13 years of age or older, then you can only use our Sites and services with the consent of your parent or legal guardian.

### **Transfers of Personal Data Outside of Europe**

The global extent of Corporate Connections' business necessitates the transfer of data to its franchisees and times members on a worldwide basis. Some countries to which we transfer your data have not been designated by the European Commission as having at a national level an adequate level of data protection. In these cases, we rely on (a) Privacy Shield, and (b) Commission-approved standard contractual clauses ("SCC") with our franchisees to safeguard your data.

### **Privacy Shield**

For transfers out of the EU and Switzerland and to the United States of America, CC, as an affiliate of BNI Global, LLC, has self-certified that it complies with the EU-US and Swiss-US Privacy Shield Framework as prescribed by the US Department of Commerce regarding the

retention, use, collection, and notice principles. CC additionally adheres to the Privacy Shield Framework recommendations pertaining to the transfer of information to third parties, access, security, data integrity and purpose limitation and enforcement. Additional information on the Privacy Shield Program can be viewed at <https://www.privacyshield.gov>. The Federal Trade Commission (FTC) has jurisdiction over CC's compliance with the Privacy Shield. CC will annually renew its Privacy Shield certification to help ensure the treatment of all personal data continues to be accurate and processed in accordance with the Privacy Shield Framework and applicable Principles. In cases of onward transfer to third parties of EU and Swiss Personal Data received pursuant to the EU-US and Swiss-US Privacy Shield Framework, CC is potentially liable. All questions or complaints regarding the processing and use of personal data should be directed to [legal@corporateconnections.com](mailto:legal@corporateconnections.com).

CC has elected JAMS as its independent dispute resolution mechanism in accordance with requirements set forth by Privacy Shield. If questions or complaints are not resolved satisfactorily through contacting CC, users can file a complaint with JAMS at <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>.

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with CC and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority (DPA) and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see US Department of Commerce's Privacy Shield Framework: Annex I (Binding Arbitration).

### **No Rights of Third Parties**

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of our Sites.

### **Changes to This Privacy Policy**

We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this Privacy Policy, we will revise the "Last Updated" date at the top of this Privacy Policy. If we make any material changes in the way we collect, use, and/or share your personal information, we will notify you by sending an email to the email address you most recently provided us in your account, profile or registration (unless we do not have such an email address), and/or by prominently posting notice of the changes on our Sites. We recommend that you check our Sites from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.

### **How to Contact Us**

If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us by email, telephone, or postal mail as follows:

Corporate Connections Worldwide Development Ltd  
Ballinrobe Road  
Castlebar  
Co. Mayo  
F23 FT28  
IRELAND  
Phone: +353 94 902 1553

Corporate Connections' Data Protection Officer can be contacted at the above address or phone number, or by email at [dpo@corporateconnections.com](mailto:dpo@corporateconnections.com).

If you are not satisfied with our responses or are otherwise concerned with how we process your personal data, you have the right to make a complaint to our supervisory authority, Ireland's Data Protection Commissioner – [www.dataprotection.ie](http://www.dataprotection.ie).