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PRIVACY POLICY

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BACKGROUND:

IMFLAWLESS LLC understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone whose personal data we hold or who visits any of our websites (“Our Sites”) or applications (“Our Apps”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when signing up for an Account, opting in for or buying any of our products or services or using Our Sites or Our Apps. If you do not accept and agree with this Privacy Policy, you must stop using Our Sites, Our Apps, products or services immediately.



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1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account” means an account required to access and/or use certain areas and features of Our Sites or Our Apps.

2. Information About Us

Our Sites, Our Apps, our products and our services are owned and operated by IMFLAWLESS LLC, a limited liability company registered in the United State of America, under Employer Identification Number (EIN) 33-1337258.

Our registered office address is 11340 Nancy Ann Way, Fairfax VA 22030.

3. What Does This Policy Cover?

This Privacy Policy applies to your use of Our Sites, Our Apps, our products, and our services, and to our management of your personal data generally. Our Sites, Our Apps, our products and our services may contain/provide links to other websites and apps. Please note that we have



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no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites and apps before providing any data to them.

4. What is Personal Data?

Personal data is defined by the American Privacy Rights Act (APRA) in the US. According to the law, personal data means, *“any information relating to an identified or identifiable individual; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number (e.g. social security number) or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity (e.g. name and first name, date of birth, biometrics data, fingerprints, DNA...).”*

In simpler terms, personal data is any information about you that enables you to be identified. Personal data covers



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obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the American Privacy Rights Act (APRA), you have the following rights, which we will always work to uphold:

Individuals reserve the right to request their records, request a change to their records if they are inaccurate or incomplete, and to be protected against unwarranted invasion of their privacy.

a) The right to be informed about how we collect and use your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.

b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.



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c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.

d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.

e) The right to restrict (i.e. prevent) the processing of your personal data.

f) The right to object to us using your personal data for a particular purpose or purposes.

g) Rights relating to automated decision-making and profiling.



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For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

6. What Data Do We Collect?

We may collect some or all of the following personal data depending on which type of interaction you have with us, Our Sites, Our Apps, our products or services. Please also see Part 14 on our use of Cookies and similar technologies.

- name;
- email address;
- telephone number;
- date of birth;
- gender;
- address;
- business name;
- job title;
- profession;
- payment information;
- information about your business activities;



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- information about your lifestyle and financial position;
- information about personal preferences and interests;
- your IP address;
- your web browser type and version;
- what operating system you use;
- what devices you use;
- a list of URLs starting with a referring site, your activity on Our Sites or Our Apps, and the site you exit to.

Please note that we will also process any personal data that you choose to share with us or other users when you use the interactive features of Our Site.

7. How Do We Collect Your Personal Data?

We collect personal data about you

- from information you provide in writing or verbally over the phone or any other (video) call or in person when you book a place at one of our events, opt in for or buy any our products, services or Our Apps;



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- from information you provide when you book a place at one of our events online, opt in for or buy any our products, services or Our Apps;
- from information you provide on Our Sites or Our Apps;
- from your responses to surveys and questionnaires which we may ask you to complete;
- from friends and associates of yours who introduce you to us;
- from the Cookies we use on Our Sites or Our Apps (see Part 15 below);

8. How Do You Use My Personal Data?

Under the American Privacy Rights Act (APRA), we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data for a specific purpose, or because it is in our legitimate business interests to use it.

Your personal data may be used for the following purposes:



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- providing and managing your Account;
- providing and managing your access to Our Sites, Our Apps, our products and our services;
- personalising and tailoring your experience on Our Sites, Our Apps, our products and our services to make it as user-friendly as possible;
- enabling you to join in the interactive features of Our Sites and Our Apps;
- supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- personalising and tailoring our products and services for you;
- communicating with you. This may include responding to emails, calls, post or other forms of (online) communication from you.
- to help us analyse what sort of people use our products and services and help us identify and target other possible customers and partners
- We also use your personal data for marketing purposes. With your permission, this may include contacting you by



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email, phone, text message, social media or other (online) communication or post with information, news, and offers on our products, services, Our Apps and/or Our Sites. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the American Privacy Rights Act (APRA), and you will always have the opportunity to opt-out.

9. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Personal data which we use for managing your Account or your access to Our Sites, or Our Apps will be kept only for so long as your Account is open or you continue to use Our Sites or Our Apps;



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To comply with legal obligations, personal data which we use to supply products and services to you will be kept for 6 years after we supply the product or service;

Personal data which we use to keep in touch with you will be kept for as long as you have an Account with us or for as long as you have access to Our Sites, Our Apps, our products and our services;

Personal data which we use for marketing purposes will be kept until you ask us not to send you any further marketing material.

10. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some or all of your personal data in countries that are not part of the US. These are known as “third countries” and may not have data protection laws that are as strong as those in the US.



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We may share some or all of your data with external third parties, as detailed below in Part 11 in these third countries. If we share personal data with these external third parties in third countries, we take additional steps in order to ensure that your personal data is treated as safely and securely as it would be within the American Privacy Rights Act (APRA).

We use specific contracts with the external third parties that are approved by the American Privacy Rights Act (APRA) for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the American Privacy Rights Act (APRA).

Please contact us using the details below in Part 16 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.



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11. Do You Share My Personal Data?

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group, including subsidiaries, and/or our holding company and its subsidiaries.

If someone has introduced you to us, we will notify them that you have booked on an event.

We sometimes contract with the third parties to supply certain products or services. These may include organising events, payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.



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If any of your personal data is required by a third party, as described above, we take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 10. We do not allow third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

If any personal data is transferred outside of the US, we take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the US and under the American Privacy Rights Act (APRA), as explained above in Part 10.

12. How Can I Control My Personal Data?

In addition to your rights under the American Privacy Rights Act (APRA), set out in Part 5, when you provide us with personal data, you may be given options to restrict our use of your personal data. In particular, we aim to give you



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strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails or other electronic communications from us, which you may do at the point of providing your details, by managing your Account settings or by unsubscribing using the links provided in our emails or other means of communicating with you).

13. Can I Withhold Information?

Where we are holding your data to manage your account or so that we can supply you with products, services or apps, there is some data which we will need to hold in order to be able to do that.

In relation to using Our Sites and Our Apps, you may access certain areas of Our Sites and Our Apps without providing any personal data at all, but to have the benefit of all the features and functions available on Our Sites and Our Apps you may be required to submit or allow for the collection of certain data.



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You may restrict our use of Cookies. For more information, see Part 15.

14. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of what personal data we hold about you and for a copy of any data we do hold. This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 16.

There is not normally any charge for a subject access request. If your request is what the American Privacy Rights Act (APRA) describes as ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request as soon as possible and in any event within one month after receiving it. Normally, we aim to provide a complete response,



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including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

15. How Do You Use Cookies?

A cookie is a small text file placed on your computer or device by Our Sites or Our Apps when you visit certain parts of Our Sites or Our Apps and/or when you use certain features of Our Sites or Our Apps.

All Cookies used by and on Our Sites and Our Apps are used in accordance with the Privacy and Electronic Communications (EC Directive) Regulations 2003 Details of the cookies used by our Sites or our Apps are set out separately in our cookie policy.



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16. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: asmajan@imflawless.net

Telephone number: 413-539-3539

Postal Address: 11340 Nancy Ann Way, Fairfax VA 22030

17. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Sites and you will be deemed to have checked the terms of the Privacy Policy on your first use of Our Sites following the alterations. We recommend that you check the page



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regularly to keep up-to-date.