

## N21Mobile.com PRIVACY POLICY

Network TwentyOne International (“N21,” “we,” “our,” or “us”) have the following Privacy Policy with respect to your access to and use of the [www.n21mobile.com](http://www.n21mobile.com) website, including use of any products or services offered through our website(s) (collectively, the “[www.n21mobile.com](http://www.n21mobile.com) website”). This Privacy Policy describes how we collect, use and disclose your personal information in the course of providing products and services through any website owned and operated by N21 and in connection with your use of our mobile applications, whether accessed via computer, mobile device or other technology (collectively, the “Sites”). By clicking the “I agree” box at the bottom of the Privacy Policy during registration, you indicate your assent to all of the terms of this Privacy Policy and to the latest version of the privacy policy and applicable terms and conditions of use governing the Sites. If you do not agree with the terms of this Privacy Policy or the applicable terms and conditions of use, do not use the Sites or submit any personal information to us.

Network TwentyOne International complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union members countries. Network TwentyOne International has certified that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

**Information We Collect** - “Personal Information” is data that can be used to uniquely identify or contact a person. If you wish to participate in some of the features and services the Sites may offer, we may ask you to provide certain Personal Information. We do not collect Personal Information unless you voluntarily provide it to us. When you visit, use or register on our Sites, request information, submit comments, videos, messages, photographs, content, surveys or feedback forms, participate in webcasts, chat rooms, forums, message boards, blogs or other interactive features of the Sites, or otherwise communicate or interact with us, we may collect certain Personal Information from you. How we collect this information will depend on how you choose to use our Sites and interact with us. We may collect Personal Information that you provide to us directly when you conduct business with us, including via telephone, fax, email, or through your use of and interaction with us on the Sites. Specifically, the personal information requested is Name(s), email address, mobile phone number, your IBO/ABO number, your Sponsor or Upline and payment and credit card information. When we

collect payment information directly from you, like credit card numbers and expiration dates, we transmit this data directly from you to the credit card processing company and it is not stored by N21. All personal information gathered is used specifically for product/service fulfillment, marketing by N21 and generation of sales and activity reports for you and your upline. As you interact with the Sites, we may also collect information automatically about your visit to our Sites. We use analytics services that provide us with certain information when you use the Sites for the purposes of giving us operational and marketing data about our online visitors' usage. The type of information gathered in monitoring use of the Sites could include, but will not be limited to, browser and operating system information, dates and times of a particular user's visit and/or click path taken through the Sites, lookup information, Internet Protocol (IP) address, Media Access Control (MAC) address, and information that may be publicly available (collectively, the "Usage Data"). The Usage Data may be used in aggregate form that does not identify you to us or in a form that may identify you to us. The Usage Data may let us know, anonymously or in a manner whereby your identity is known to us, which services and features you are using or accessing within our Sites (including, for example but without limitation, whether you may have accessed or downloaded audiovisual material from the Sites), as well as the device type and hardware features, country and language of download.

**Information We Receive from Third Parties** - We may receive information about you from third parties. For example, if you are browsing another website and you opt-in to receive information from us, then that website may forward to us your email address and other information about you so that we may contact you as requested. In those cases, we will apply this Privacy Policy to any Personal Information received, unless we have disclosed otherwise.

**Cookies, Web Beacons and Analytics Services** - When you view the Sites, whether from your computer, tablet or mobile device, we may store some information on the device you use to access the Sites in the form of a "cookie." Cookies are used by many websites to give users access to certain functions (e.g., for security purposes, to tailor communications with you, and to facilitate and personalize your experience while navigating the Sites). The information stored in the cookie can also be used to monitor a user's behavior on the Sites. You can configure your browser to reject cookies by modifying your browser settings, but if your browser settings do not accept cookies from us, then some functions of our Sites may not operate as intended and you may not have access to all the services, features and/or promotions we may offer. Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of

web users or to access cookies. Unlike cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on web pages (or in email). Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns. Web beacons may be used to measure the effectiveness of our Sites and advertising in certain ways, such as by counting the number of individuals who visit our Sites or open and act upon an email message. You can make some web beacons unusable by rejecting cookies. As we mentioned above, we may also use certain analytics services and visit recognition software to improve the use and functionality of our Sites and to build a demographic profile. If third parties provide such analytics services and software, the third parties may also receive the information collected and their use of such information is governed by their privacy policies.

**Do Not Track Requests** - Unless your browser settings are configured to make your online activities and publicly available information about your online activities (such as traffic data, including unique device identifier of the device used to access our Sites, device type used to access the Sites and its capabilities, operating system version, browser type and its capabilities, length of visits to the Sites and click path taken, lookup information and time spent on certain Sites) invisible to usages analytics tools, we do not presently have the technological capability to omit you from usage analytics to the extent your browser only sends us a "do not track" message and does not otherwise screen you from tracking without any action on our part.

**How We Use Your Personal Information** - We collect and use your Personal Information for a variety of business purposes, including: To provide the services, products and offerings that you request, and to communicate with you regarding such services, products and offerings; to do all things necessary to administer those services; to complete your purchase transactions; to research, develop, manage, protect and improve our Sites, products and services; to maintain and develop our service-oriented software and other business systems; to provide you with information on products, services, special deals, promotions and contest announcements, surveys or newsletters in connection with a product or service about which you previously inquired, or about a product or service that we think you might be interested in; to notify the winners and award prizes in connection with promotions; and to analyze data, or to have a third party do so on our behalf. We also use Non-Personal Data to help diagnose problems with our Sites and servers; to build up marketing profiles; to aid strategic development; to help administer and audit usage of the Sites; and to improve the Sites, and our products and services.

**Your Choices** - You may choose not to provide certain Personal Information requested by us, but please be aware that you may be prevented from making full use of the features, services and/or promotions we offer. For example, we may require your name and email address to add you to an email newsletter list or to allow you to comment on our blog. We may require a home address, cell phone or telephone number to deliver physical products or notify you of special offers. You may opt-out of having your Personal Information used for commercial purposes. Users who no longer wish to receive our promotional communications may contact us by email to be removed from our lists. Be sure to include any contact information that you want removed from our promotional contacts list, including physical addresses, phone numbers, and email addresses (If you use more than one email address, send your opt-out email from each of your email addresses.) If you receive any online newsletter or similar promotional email communication from us, you will be given the option to “unsubscribe” from receiving further email communications from us at any time. In some cases, you may also visit our Sites which allow you to choose whether you wish to receive certain online newsletters and savings updates and to update your contact information. Your option not to receive promotional and marketing material will not preclude us from corresponding with you, by email or otherwise, regarding your existing or past business relationships with us (e.g., any purchase of our products or use of our services or responses to requests for information you pose to us either through use of the Sites or by other means), and will not preclude us from accessing and viewing your Personal Information in the course of maintaining and improving our Sites and our services.

Under the terms of the Privacy Shield Policy, If you want to opt-out of receiving any communications from us or if your Personal Information changes (such as zip code, phone, email or postal address), you may correct, update or delete/deactivate your Personal Information at any time by sending an email to [DPofficer@N21.com](mailto:DPofficer@N21.com). In accordance with our routine record keeping, we delete records that contain Personal Information you have submitted through the Sites after 24 months of inactivity or expiration of services. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information.

**Protecting Your Privacy** - To prevent unauthorized access to, maintain integrity of, and promote use of, your Personal Information for its intended purpose, we have put in place physical, electronic, and managerial controls. Although guaranteed security does not exist on the Internet or offline, we make commercially reasonable efforts to protect such information consistent with this Privacy Policy and applicable laws.

**Uploading Content** - You are solely responsible for the information and other content you post on or through our Sites. You understand that personal and other information that you post on or through public areas of our Sites are generally accessible to, and may be collected, viewed and used by, others (including other account holders), and may result in solicited or unsolicited messages or other contact from others. Users of our Sites are encouraged to exercise caution when posting Personal Information about themselves in public areas. You warrant that you have permission to use and share any third-party information you post and you agree to indemnify, defend and hold harmless N21 from and against any claim, liability, cost and expense arising in connection with your posting of such information.

**Information We Share with Others** - We may use your Personal Information and Non-Personal Data or disclose your Personal Information and Non-Personal Data to third parties to protect the security and integrity of our Sites, to correct technical problems and malfunctions on our Sites, to technically process your information, to report potential violations of this Privacy Policy and our terms and conditions of use, to provide services essential to your mobile user experience or to take precautions against liability. We also may provide your Personal Information and Non-Personal Data to third parties who provide services and functions on our behalf (or on behalf of our partners), such as to companies or individuals that jointly offer products and services. We may provide your Personal Information to your credit card issuer, credit reporting and fraud checking agencies as necessary, to a third party for purposes of processing payments for services and products that you elect to purchase, and to debt collection agencies if you fail to pay monies owed to us. If you request services via a mobile device, your request will be transmitted via your mobile carrier's network and your carrier may have access to it. Consult your carrier's privacy policy for additional information. We do not knowingly permit third parties, except for those third parties operating analytics services at our request or authorized by law (i.e., law enforcement), to collect Personal Information from, or track you (i.e., to obtain traffic data through usage analytics tools) through, the Sites, but your Personal Information may nonetheless be visible to third parties through the Sites to the extent you make it public (for example, by posting content to public areas). Your Personal Information and Non-Personal Data may also be used by us or shared with our subsidiaries, affiliates, and other entities controlled by or under common control with N21 for internal reasons, primarily for business and operational purposes. We reserve the right to transfer any information we have about you in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of our business. We reserve the right to disclose any Personal Information and Non-Personal Data as needed if that information is requested by law enforcement agencies or if we are required to do so by law, treaty, regulation,

subpoena, court order, or by a government entity. We also may disclose your Personal Information and Non-Personal Data to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating the terms of use of our Sites.

**Transfer of Data** - N21's parent Network TwentyOne International, Ltd. is headquartered in **Suwanee, Georgia, USA**. Personal Information may be accessed by us or transferred to us in the United States. You acknowledge that any information you provide to us may be transferred to and stored in the United States. By using the Sites, or providing us with any information, you consent to the collection, processing, maintenance and transfer of such information in and to the United States or other locations. We will protect the privacy and security of Personal Information according to our Privacy Policy regardless of where we process or store it.

**Links** - Our Sites may contain links to other sites on the Internet which are not under the control of N21. You acknowledge that we are not responsible for the accuracy or any other aspect of the content of sites we do not operate or control. Your accessing the links to any other sites is at your own risk and subject to the applicable privacy policies and terms and conditions of such websites. We encourage our users to be aware when they leave our Sites and to read the privacy statements of each website to which we may link that may collect Personal Information.

**Children** - The Sites are not intended for use by children under the age of 18, and N21 does not knowingly solicit or collect Personal Information from children under the age of 18. If we learn that we have collected the Personal Information of a child under 18 we will take steps to delete the information as soon as possible. If you are under the age of 18, please do not submit your email address or any other Personal Information to us through the Sites.

**Data Protection Officer** – Any and all issues and concerns about your personal data with respect to [www.n21mobile.com](http://www.n21mobile.com) should be directed to N21's Data Protection Officer. N21's Data Protection Officer can be reached via email at [DPOfficer@n21.com](mailto:DPOfficer@n21.com) or via mail at Network TwentyOne International, Attention DP Officer, 7320 Mcginnis Ferry Rd., Suwanee, GA 30024, USA.

**Pseudonymisation** - pseudonymisation as a process that transforms personal data in such a way that the resulting data cannot be attributed to a specific data subject without

the use of additional information. An example of pseudonymisation is encryption, which renders the original data unintelligible and the process cannot be reversed without access to the right decryption key. Personal data collected and stored on [www.n21mobile.com](http://www.n21mobile.com) is duly encrypted.

**Data breaches** - In the unlikely event that unencrypted personal data collected and/or stored on [www.n21mobile.com](http://www.n21mobile.com), you will be notified by the Data Protection Officer as to the time and extent of said data breach.

**Right to erasure** – We respect your privacy and should you terminate services with N21 and request your personal data be destroyed, we will comply unless prohibited by law.

In compliance with the Privacy Shield Principles, N21 commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact N21 at: [dpofficer@n21.com](mailto:dpofficer@n21.com) or via mail at Network TwentyOne International, Attention DP Officer, 7320 Mcginnis Ferry Rd., Suwanee, GA 30024, USA.

All requests for personal data deletion should be directed to N21's Data Protection Officer. N21's Data Protection Officer can be reached via email at [DPOfficer@n21.com](mailto:DPOfficer@n21.com) or via mail at Network TwentyOne International, Attention DP Officer, 7320 Mcginnis Ferry Rd., Suwanee, GA 30024, USA.

N21 has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a complaint.

The United States Federal Trade Commission is the enforcement authority over our compliance with the Privacy Shield. There exists a possibility under certain conditions for individuals to invoke binding arbitration for a dispute before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

**Notification of Changes** - We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Such changes, modifications, additions, or deletions shall be effective immediately upon posting unless otherwise indicated. Your continued use of any of our Sites after changes are posted will be deemed to constitute your agreement to and acceptance of such changes.

**Questions** - We welcome your questions and comments about our Privacy Policy. To report a known or suspected privacy or security breach or to submit privacy or security-related questions or complaints, please contact us: N21's Data Protection Officer can be reached via email at [DPOfficer@n21.com](mailto:DPOfficer@n21.com) or via mail at Network TwentyOne International, Attention DP Officer, 7320 McGinnis Ferry Rd., Suwanee, GA 30024, USA.

**Updated January 11, 2018**