

Privacy Policy

Privacy Policy Last Updated February 17, 2021

Create Abundant Life, LLC (“Create Abundant Life,” “we,” “us,” or “our”) has created this Privacy Policy to inform you about how information that you provide us is used and shared. This Privacy Policy applies to our information collection and use practices: (i) online when you visit any of our websites, including without limitation, createabundantlife.com and any Facebook pages or other social media communities maintained by us (the “Websites”); and (ii) offline when you provide information to us.

Capitalized items not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

Acceptance of Terms

By visiting the Websites, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use, both of which govern your use of the Websites. By providing us information offline, you are also agreeing to the terms of this Privacy Policy.

The Information We Collect

In the course of operating the Websites and/or interacting with you, we will collect (and/or receive) the following types of information.

1. Personally Identifiable Information.

We do not collect, or require individuals to transmit, any personally identifiable financial information (as defined under Federal Regulation P), social security numbers (SSNs), or driver’s license numbers in connection with your use of the Websites. We do not collect other personally identifiable information through the Websites unless you affirmatively and voluntarily provide this information to us through the features of the Websites. For example, when you sign up to receive any of our newsletters, respond to a survey, register for a program or service, or purchase any product or service, you may be required to provide us with personal information about yourself, such as your name, address, email address, and phone number. We do not collect any personal information from Visitors when they use the Websites unless they provide such information voluntarily, such as registering or sending us an email or signing up for a newsletter. All information we collect and/or receive under this section is collectively called “Personal Information.”

2. Order Information.

When you place an order to purchase a product or service through the Websites hereinafter referred to as “Orders,” you must provide us with certain information about the products and services you are seeking to purchase. Such information is collectively called the “Order Information.”

3. Billing Information.

When you wish to purchase a product or service, you will be required to provide certain information in addition to the Personal Information and Order Information noted above. Such information may include a debit card number, credit card number, expiration date of any such credit or debit cards, billing address, activation codes, and similar information. Such information is collectively called the “Billing Information.” Although we will have access to the Billing Information, it will also be collected and processed by our third party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use.

4. Other Information.

In addition to the information noted above, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

- a. **From You.** Additional information about yourself that you voluntarily provide to us (e.g., via a survey), such as household income range, gender, product and service preferences, and other information that does not identify you personally.
- b. **From Your Activity.** Information that we may collect when you use the Websites, including, without limitation:
 - IP addresses, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; browser type and language; referring and exit pages and URLs; date and time; amount of time spent on particular pages; what sections of the Websites you visit; and similar data; and
 - Information about your device, including the type of device; universally unique ID (“UUID”); advertising identifier (“IDFA”); MAC address; operating system and version (e.g. iOS, Android, Windows); carrier and country location; hardware and processor information (e.g. storage, chip speed, camera resolution, NFC enabled); network type (WiFi, 3G, 4G, LTE); and similar data.
- c. **From Cookies.** Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us to collect Other Information and to enhance your experience using the Websites. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your internet

browser's documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Websites may not function properly.

- d. **Third-Party Analytics.** We use third-party analytics services (such as Google Analytics) to evaluate your use of the Websites, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Websites and mobile and internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Websites, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Websites.
- e. **From Other Sources.** We may offer you the ability to use Facebook or other social media services (collectively, "social media") in conjunction with certain services offered by the Company. When you access the Websites or other Company services through your Facebook or other social media account, we may, depending on your privacy settings, have access to information that you have provided to the social media platform. We may use this information for the purposes described in this Privacy Policy. When you associate your social media account with the company's services and authorize us to have access to this information, you agree that we may collect, use and store the information provided by social media services as described in this Privacy Policy.

5. Information Collected by or Through Third-Party Advertising Companies

We may share Other Information about your activity on the Websites with third parties for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see on the Websites and elsewhere. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such Other Information for such purposes. Pixel tags enable us, and these third-party advertisers, to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site.

6. Accessing and Modifying Personal Information and Communication Preferences

If you are a Registered User, you may access, review and make changes to your Personal Information, Billing Information, and certain Other Information. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any Create Abundant Life marketing email. Customers cannot opt out of receiving transactional emails related to their account or their Orders. We will use commercially reasonable efforts to process

such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

7. How We Use and Share the Information

We use the Personal Information, the Order Information, the Billing Information, and the Other Information (collectively, called the “Information”) in any way that is legally permissible, including without limitation, the following:

- Create Abundant Life and its affiliates will access, use, and share the Information as required to process your Orders, solicit your feedback, inform you about our products and services, and provide support to you.
- In order to provide our services, we may share the Information (excluding Billing Information) with any third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.
- With your permission, third-party applications or services access your Personal Information. We use standard OAuth (open authorization) to enable you to allow us to share information with other websites and services, such as Facebook and Twitter (e.g., when you agree to a pop-up requesting you to allow another application to access your account information). We also use OAuth to allow us to share information about you that is stored by us without sharing your security credentials.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, order fulfillment, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- In an ongoing effort to better understand our Visitors, customers, and our products and services, we may analyze the Order Information and Other Information in aggregate form in order to operate, maintain, manage, and improve the Websites and/or our products and services. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products or services to current and prospective business partners and to other third parties for other lawful purposes.
- We may share some or all of your Information with any of our affiliates (i.e. parent companies, subsidiaries, joint ventures, or other companies under common control with us).
- As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.

- To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Information is necessary and advisable, for example to protect the rights, property, or safety of Create Abundant Life or others.

8. Information You Share

Please keep in mind that whenever you voluntarily make your Personal Information available to third parties—for example message boards or web logs; through email; during webinars, classes, telephone conferences, or coaching calls; or in comment or chat areas—that information can be seen, collected, heard, and/or used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

9. How We Protect the Information

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction, and may rely on third parties to protect Information provided in connection with a purchase or the Websites. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the Information that you supply will not be intercepted while being transmitted to and from us over the internet. Therefore, we make no warranties or representations regarding the security of your information. In particular, email sent to or from the Websites may not be secure, and you should therefore take special care in deciding what information you send to us via email.

10. Important Notice to Non-U.S. Residents

It is important to note that createabundantlife.com (the “CAL Website”) and its servers are operated in the United States. The CAL Website is not directed to anyone located outside of the United States, and the CAL Website is controlled, operated, and administered by us from our offices within the United States of America. We do not knowingly offer goods or services to data subjects outside of the United States or monitor the behavior of persons (data subjects) located outside of the United States. By using or continuing to use the Websites, you are confirming that you are located within the United States, and agree that you will not provide personal information, or otherwise use the Websites, if you are located outside of the United States. By using the Websites and by providing us Information when using our services, you hereby consent to the transfer of this Information to the United States and you irrevocably consent to our use of the Information and data provided by you in accordance with this Privacy Policy.

We make no claims concerning whether the Content may be downloaded, viewed, or be appropriate for use outside the United States. If you access the Websites or Content from outside the United States, you do so at your own risk. Whether inside or outside the United States, you are solely responsible for ensuring compliance with the laws of your specific jurisdiction.

While the CAL Website does not knowingly solicit, collect or store the personal information of international users, through fraud, deceit, or other unauthorized or inadvertent disclosure, we may receive personal information pertaining to individuals located outside of the United States. If a person located outside of the United States becomes aware that he or she has provided us personal information, as defined in Article 4 of the General Data Protection Regulation (GDPR), please contact us at: support@createabundantlife.com and upon verifying the information, we will immediately delete the unauthorized information from our servers and records.

11. Children

We do not knowingly collect Personal Information from children under the age of 13 through the Websites. If you are under 13, please do not give us any Personal Information. The Websites are not directed to anyone under the age of 13, and by using the Websites, you are confirming that you are 13 years of age or older and are using the Websites with the consent and supervision of a parent or guardian unless you are 18 years of age or older and have reached the age of majority in your state. Parents and guardians must monitor their children's internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the Websites without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

12. California Residents

Create Abundant Life does not monitor, recognize, or honor any behavioral advertising opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals. Create Abundant Life does not meet or exceed the thresholds established for applicability under the California Consumer Privacy Act ("CCPA") and as such, is not required to abide by the CCPA.

13. External Websites

The Websites may contain links to third-party websites. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting other websites.

14. Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing the Websites and/or using our services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

15. How to Contact Us

If you have questions about this Privacy Policy, please contact us via email at support@CreateAbundantLife.com with “Privacy Policy” in the subject line.