

## **Kannaway**

### **Privacy Policy**

Your privacy is very important to us. We want to make your experience on the Internet as enjoyable and rewarding as possible, and we want you to use the Internet's vast array of information, tools, and opportunities with complete confidence.

We have created this Kannaway Privacy Policy to demonstrate our firm commitment to privacy and security. This Privacy Policy describes how Kannaway collects information from all end users of our Internet services (the "Services") such as the Kannaway sales force often referred to as Sales Persons, Brand Ambassadors or Entrepreneurs (collectively referred to in this Privacy Policy as "Members") and those who access some of our Services but do not have accounts ("Visitors").

This policy also describes what we do with the information we collect, and the choices Visitors and Members have concerning the collection and use of such information. We request that you read this Privacy Policy carefully.

### **Personal Information Kannaway Collects and How It Is Used**

#### **Introduction:**

Kannaway collects information in different ways from Visitors and Members who access the various parts of our Services and the network of Web sites accessible through our Service. We use this information primarily to provide a customized experience as you use our Products and Services, and generally do not share this information with third parties. However, we may disclose personal information collected if we have received your permission beforehand or in certain circumstances, such as when we believe that such disclosure is required by law or other special cases described below.

#### **Registration:**

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 is used to manage each Member's account (such as for billing purposes). This information is not shared with third parties, unless specifically stated otherwise or in special circumstances.

However, in instances where Kannaway and a partner jointly promote our Services, we may provide the partner certain personal information, such as the name, address, email address, and username of persons who subscribed to the Services as a result of the joint promotion for the sole purpose of allowing us and the partner to assess the results of the promotion. In this instance, personal information may not be used by the partner for any other purpose. We may also generate non-identifying and aggregate profiles from

personal information Members provide during registration (such as the total number, but not the names, of Members). As explained in more detail below, we may use this aggregated and non-identifying information to sell advertisements that appear on the Services.

### **Kannaway Partners and Sponsors:**

Some products and services may be offered to Visitors and Members in conjunction with an affiliate, independent contractor seller or non-affiliated partner. To provide Visitors and Members some of these products and services, the partner may need to collect and maintain personal information. In these instances, you will be notified before any such data is collected or transferred and may decide not to use that particular service or feature.

Additionally, our partners may have advertisements or co-branded Web Pages that are cosponsored by an affiliate, independent contractor seller, or non-affiliated partner. Kannaway may share nonidentifying and aggregate information (except as described above), but not personal information, with such partners in order to administer the co-branded products or services offered.

### **Online Advertisements:**

Kannaway may display our online advertisements. In those cases, we share aggregated and nonidentifying information about our Visitors and Members collected through the registration process as well as through online surveys and promotions with these advertisers.

Additionally, in some instances, we use this aggregated and non-identifying information to deliver tailored advertisements or joint ventures. For instance, an advertiser or joint venture company tells us the audience they want to reach and provides us an advertisement tailored to the audience. Based upon the aggregated and non-identifying information we have collected, we may then display or send the advertisement to the intended audience. Kannaway does not share personal information about its Visitors or Members with these advertisers or joint venture companies.

### **Responses to Email Inquiries:**

When Visitors or Members send email inquiries to Kannaway, the return email address is used to answer the email inquiry we receive. Kannaway does not use the return email address for any other purpose and does not share the return email address with any third party.

### **Voluntary Customer Surveys:**

We may periodically conduct both business and individual customer surveys. We encourage our customers to participate in these surveys because they provide us with

important information that helps us to improve the types of products and services we offer and how we provide them to you. Your personal information and responses will remain strictly confidential, even if the survey is conducted by a third party. Participation in our customer surveys is voluntary.

We may take the information we receive from individuals responding to our Customer Surveys and combine (or aggregate) it with the responses of other customers we may have to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our services to you and to develop new services and products. This aggregated, non-personally identifying information may be shared with third parties.

### **Special Cases:**

It is Kannaway's policy not to use or share the personal information about Visitors or Members in ways unrelated to the ones described above without also providing you an opportunity to opt out or otherwise prohibit such unrelated uses.

However, we may disclose personal information about Visitors or Members or information regarding your use of the Services or Web sites accessible through our Services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: credit agencies; collection agencies; merchant database agencies; law enforcement, or to satisfy laws, such as the Electronic Communications Privacy Act, the Child Online Privacy Act, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact, or bring legal action against someone who may be violating our Acceptable Use Policy or Terms Of Service, or other user policies; to operate the Services properly; or to protect Kannaway and our Members.

In addition, as Kannaway continues to develop its business, we may sell or purchase assets or affiliate of partner with other businesses. In the event that another entity acquires us or all or substantially all of our assets, Personal and Non-Personal Information, genealogy, and or any other information that we have collected about the Member or Visitor users of our Site may be transferred to such entity as a transferred asset or as information necessary to establish the affiliation or partnership. Also, if any bankruptcy or reorganization proceeding is brought by or against Kannaway, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

### **“Cookies” and How Kannaway Uses Them:**

A “cookie” is a small data file that can be placed on your hard drive when you visit certain Web sites. Kannaway may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and services we provide and to manage our telecommunications networks.

If you are a Visitor or Member we may use a cookie to save your settings and to provide customizable and personalized services. These cookies do not enable third parties to access any of your customer information. Additionally, be aware that if you visit other Web sites where you are prompted to log in or that are customizable, you may be required to accept cookies.

Advertisers and partners may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

### **Kannaway Commitment to Children's Privacy:**

Protecting children's privacy is especially important to us. It is our policy to comply with the Children's Online Privacy Protection Act of 1998 and all other applicable laws. Therefore, we restrict our Web site to persons eighteen years or older.

The following warning appears on the Kannaway website:

YOU MUST BE EIGHTEEN (18) YEARS OR OLDER TO ACCESS THIS WEB SITE. IF YOU ARE UNDER EIGHTEEN YEARS OF AGE, YOU ARE NOT PERMITTED TO ACCESS THIS WEB SITE FOR ANY REASON. DUE TO THE AGE RESTRICTIONS FOR USE OF THIS WEB SITE, NO INFORMATION OBTAINED BY THIS WEB SITE FALLS WITHIN THE CHILD ONLINE PRIVACY ACT (COPA) AND IS NOT MONITORED AS DOING SO.

### **Online Shopping:**

At some Web sites, you can purchase products and services or register to receive materials, such as a newsletter, catalog or new product and service updates. In many cases, you may be asked to provide contact information, such as your name, address, email address, phone number, and credit/debit card information.

If you complete an order for someone else, 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. Kannaway 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.

If you order services or products directly from Kannaway 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.

### **Public Forums:**

Please remember that any information you may disclose in any Member Directory or other public areas of our Web sites or the Internet becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

### **Kannaway's Commitment to Data Security:**

Services and websites that 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.

### **Data Protection and Removal of Your Personal Data:**

You may request details of personal information which we hold about you. A small fee may be payable. If you would like a copy of the information we keep on our systems about you please write to our Corporate Offices at: 2384 La Mirada Drive, Vista, CA 92081. If you believe that any information we are holding is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect. You can ask us at any time to delete the information we hold on you by emailing or writing to us or by calling Customer Support at (858) 500-3144.

### **Changes to Personal Data:**

Members of Kannaway are obliged to inform Kannaway about any change concerning his/her data, in particular about changes of place of residence, changes of surname, and changes of email address. Kannaway shall not be liable for the consequences resulting from providing mistaken data.

### **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 Web site.

### **Revisions to This Policy:**

Kannaway reserves the right to revise, amend, or modify this policy, our Terms of Use Agreement, our Policies & Procedures, and our other policies and agreements at any time and in any manner without prior notice, by updating this posting.