

Updated January 2020

GENERAL

In this privacy & cookies policy (“Policy”), we describe:

1. i) the information that we collect and process about you (that you provide directly to us or is provided to us by third parties);
2. ii) the purposes for which we collect and process information about you; and
iii) the basis on which we collect and process information about you, when you use this website (our “Website”) and the services available through this Website, our mobile website, or our Mobile Application provided to our registered users (collectively, our “Services”).

We recommend that you read this policy carefully in order to understand what Business Startup & Marketing LLC. and its subsidiaries, including JWG Publishing House do with your personal information. Your use of our Website and Services and any dispute over privacy, is subject to this Policy and any of our applicable Terms and Conditions for use of our Services, including their applicable limitations on damages and the resolution of disputes. Our Terms and Conditions for our Services are incorporated by reference into this Policy. [By visiting www.businessstartupacademy.live you are accepting and consenting to the practices described in this Policy. Regardless of the applicable law set forth in the Business Startup & Marketing LLC Terms and Conditions for use of our Services, however, please note that any disputes arising under this Policy will be interpreted in accordance with the Governing Law provision set forth below.

US CUSTOMERS ONLY:

HOW, WHEN AND WHAT WE COLLECT?

How does Business Startup & Marketing LLC collect my information?

We collect information directly from you, about you from third parties such as our marketing affiliates and service providers used to verify your identity and prevent fraudulent activity, other Business Startup & Marketing LLC users and other JWG Publishing House clients or customers for the purpose of providing the Business Startup & Marketing LLC Services to you or as part of a customer referral program, and automatically as you use our Website and the Services. At this time, use of our Services through our Mobile Application is only available to users who register for our Services.

When does Business Startup & Marketing LLC collect my information?

- When you apply for and use our Services, you contact us with questions, and you otherwise choose to provide information to us.
- We receive information about you from banking references, credit reporting agencies, affiliates, [other Business Startup & Marketing LLC users (including as part of our referral programs)], and other third parties (e.g., entities that assist us in validating your identity, among others). We may combine this with other information that we collect about you.
- We, and our third party service providers (, automatically collect the following information about your use of our Website and our online Services through cookies, web beacons, log files and other technologies (subject to your consent when required by applicable law): your domain name, your browser type and operating system, web pages you view, links you click, your IP address, the length of time you visit our Website or use our Services, your activities on our

Website, and the referring URL or the webpage that led you to our Website. If you are a registered user, we also may collect the following information about your use of our Mobile Application: mobile device ID; device name and model; operating system type, name, and version; your activities within the Mobile Application, the length of time that you are logged into our Mobile Application, and, with your permission, your precise geo-location information. Please see the section “Our Use of Cookies and other Tracking Mechanisms “below for more information.

What information does Business Startup & Marketing LLC collect?

The types of information we collect about you depends on your particular interaction with our Website and our Services, and includes, where permitted by applicable law:

Categories of Personal Information Collected

Specific Personal Information

Source of Personal Information

Categories of Personal Information Collected	Specific Personal Information	Source of Personal Information
Identifiers	Name, email address, phone number, billing or mailing address, IP address, date of birth, national identification numbers and documents	Directly from you, third parties on your behalf and as instructed by you, other Business Startup & Marketing LLC users and customers, our service providers and affiliates.
Financial Information	Bank and credit account information, Credit history as applicable, Details of any transactions carried out using any of the Services	Directly from you, third parties on your behalf and as instructed by you, other Business Startup & Marketing LLC users and customers, our service providers and affiliates.
Internet or Other Similiar Network Activity	Your interaction with our website. Other information collected through Cookies and other tracking technologies as listed above and as described in the section below entitled “Our Use of Cookies and other Tracking Mechanisms”	From you directly and our third party analytic tools and cookies usage (See below –“Our Use of Cookies and other Tracking Mechanisms”).
Commercial Information	Information about your business	Directly from you, third parties on your behalf and as instructed by you, other Business Startup &

		Marketing LLC users and customers, our service providers and affiliates.
Geolocation Data	Geolocation	Directly from you and/or through your use of the mobile application and/or our third party analytic tools and cookies usage (See below –“Our Use of Cookies and other Tracking Mechanisms”)
Other categories	<ul style="list-style-type: none"> • Any other information that you choose to provide to us (e.g., when you send us an email/otherwise contact us) • Calls/emails/other correspondence 	Directly from you, third parties on your behalf and as instructed by you.

You are responsible for providing accurate and up-to-date information. If you choose to participate in our Refer a Friend program, you acknowledge that you have the right to provide us with your friend’s information.

HOW AND WHY WE USE YOUR INFORMATION

- To validate your identity (including via SMS as applicable).
- To provide our Services to you, to communicate with you about your use of our Services or any changes in our Terms and Conditions that apply to you.
- For the purpose for which you specifically provide the information to us, including, to respond to your inquiries, to provide any information that you request, and to provide customer support.
- To tailor the content and information that we may send or display to you, to offer location customization (where permitted by applicable law), personalized help and instructions, and to otherwise personalize your experiences while using our Website and our Services, such as developing and offering you new and/or additional services or new and/or additional features to existing services.

- For marketing and promotional purposes, for example, where permitted by law (other than if (where applicable) you opted out by unsubscribing from marketing emails , and/or by contacting us as noted in the table below), we may use your information, such as your email address, phone number, or mailing address to send you newsletters, special offers and promotions, or to otherwise contact you about services or information we think may interest you, or to conduct draws for campaigns and the like and deliver prizes and rewards .
- As permitted by applicable law (other than if (where applicable) you opted out), to assist us in advertising our products and services in various mediums including, without limitation, sending you promotional emails, advertising our services on third party sites and social media platforms, sending you direct mail, and by telemarketing.
- To better understand how users, access and use our Website and our Services, both on an aggregated and individualized basis, to administer, monitor, and improve our Website and Services, for our internal purposes, and for other research and analytical purposes. Please see the information below regarding [Third Party Analytics](#).
- To protect us, our customers, employees or property — for instance, to investigate fraud and prevent fraudulent activity, abuse of the Services, harassment or other types of unlawful activities involving us or other companies that we do business with, to enforce this Policy, as well as our Terms and Conditions.

WHEN DO WE SHARE YOUR INFORMATION?

We share your information with third parties, including service providers, regulated institutions (e.g., financial institutions), affiliated entities, and business partners as set out in the table below. In the section below, we also list the reasons why we share information.

How and Why We Share Your Information

Does Business Startup & Marketing LLC Share?

With our service providers and affiliates – to assist us with the provision of the Services and our everyday business purposes, such as to verify your identity, prevent fraudulent activity, abuse of the Services, conduct internal research and analytical assessments, process your transactions, maintain your account(s) and provide you with customer care services.

Yes

With fraud prevention and detection service providers - for the purpose of detecting and preventing fraudulent activity. [Such service providers may keep records of information provided and use it when providing fraud detection and prevention services to other users of their databases.]

Yes

For marketing purposes: 1. With our service providers and our affiliates – to market our own products and services; and 2. With non-affiliated third parties for joint marketing purposes.

Yes*

With other Business Startup & Marketing LLC clients, customers or third parties using our services - to perform the Services, assist in carrying out your transactions with such clients, customers or third parties or for purposes of our refer-a-friend program(s).

Yes

In response to legal process – to comply with the law, a judicial proceeding, subpoena, court order, or other legal process.

Yes

In connection with business transfers – to another entity if we are acquired by or merged with such other entity, if substantially all of our assets are transferred to such other entity, or as part of a bankruptcy proceeding.

Yes

To protect us and others – we may disclose your information when we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms and Conditions or this Policy, or as evidence in litigation in which we are involved.

Yes

Aggregated and de-identified information – we may disclose aggregate or de-identified information about users for marketing, advertising, research, or similar purposes.

Yes

With consumer reporting agencies, as permitted by law, with respect to users from the United States.

Yes

* If you do not want us to use your details for us to market to you, and/or to pass your details on to third parties for marketing purposes, please contact us through the phone

number or email address listed in the Section titled “[Contact Us, Questions, Updating Your Info, Opting Out](#)” below. You will also be able to unsubscribe from any marketing emails sent to you by Business Startup & Marketing LLC using a link provided in the email. We do **not** sell your personal information.

WHERE WE STORE YOUR DATA

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent un-authorized access.

OUR USE OF COOKIES AND OTHER TRACKING MECHANISMS

We and our third-party service providers use cookies and other tracking mechanisms (including tracking technologies designed for mobile applications) to track information about your use of our Website and Services. We may combine this information with other personal information we collect from you (and our third-party service providers may do so on our behalf).

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Website and Services, while others are used to enable a faster log-in process or to allow us to track your activities at our Website and Service. There are four types of cookie:

- **Strictly necessary cookie** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable users to log into secure areas of our Website.
- **Analytical/performance cookies.** These types of cookies allow us to recognize, count the number of visitors, and see how visitors move around our Website when they are using it. This assists us to improve the way in which our Website works, for example, by ensuring that you can find what you are looking for easily.
- **Functionality cookie** These cookies are used to recognize you when you return to our Website. They enable the personalization of content, recognition of users, and also remember your user preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our Website, the individual pages visited, and the links followed. If the cookie is set by a third party (for example, an advertising network) which also monitors traffic on other websites, this type of cookie may also be used to track your movements across different websites and to create profiles of your general online behavior. Information collected by tracking cookies is commonly used to target online advertising.

The four types of cookies above will be either session cookies or persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your

computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Website or Services. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Website or Services.

- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to remember your user information, preferences and activity, to enable us to provide our services to you when you next return to our Website or Services. We also use persistent cookies to track aggregate and statistical information about user activity, which may be combined with other user information.

• CONTACT US, QUESTIONS, UPDATING YOUR INFO, OPTING OUT

If you are a Business Startup & Marketing LLC Services customer and would like to update your information, please log into your “My Account” in order to update certain information or contact us through the contact information below. If you are not a Business Startup & Marketing LLC Services customer, but have provided us with information or if your information was provided to us by third parties, and you would like to update your information, you may contact us through the phone number or email address listed below. From time to time, we may email you or send you with special offers; you may opt-out of those offers by using a link provided in the email, or by contacting us as noted below.

Business Startup & Marketing LLC Customer Care,

Phone: 1-561-412-7772 (within the USA)

Email: obsiconsultants@gmail.com

Web: www.businessstartupacademy.com

GOVERNING LAW & JURISDICTION

This Policy shall be governed by and interpreted in accordance with the laws of the State of Florida, and any dispute hereunder shall be brought exclusively in the courts of the State of Florida except where prohibited by US law.

DISCLAIMER

Any and all content provided on this Website or the Services, including links to other websites is provided for information purposes only and does not constitute advice, recommendation or support of such content or website. Business Startup & Marketing LLC makes every effort to provide true and accurate content on its Website. However, Business Startup & Marketing LLC provides no warranty, express or implied, of the accuracy, completeness, timeliness, or applicability of such content. Business Startup & Marketing LLC accepts no responsibility for and excludes all liability in connection with information provided on the Business Startup & Marketing LLC website, including but not limited to any liability for errors, inaccuracies or omissions.

LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA

We process your information based on the following legal bases, as recognized by and in compliance with the applicable data protection laws:

- the processing is necessary to perform our contract with you (i.e. the Terms and Conditions that apply as applicable with respect to Business Startup & Marketing LLC Services, for the provision of our Services), or to take steps requested by you before entering into said contract;
 - you are obliged to provide us with personal data as it is necessary to enter into and perform our contractual agreements. In the event that you do not wish to provide us with your personal data for the purposes outlined above in the “How and why we use your information” section, we will not be able to perform our contractual agreement with you;
- the processing is in Business Startup & Marketing LLC’s or someone else’s legitimate interests, and these interests are not overridden by your interests or rights in the protection of your personal data. This may include processing your data for prevention of fraudulent activity, internal research and analytics assessments, for purposes of communication with you, and informing you about new products and services we are offering or to promote new products and services of other parties which we think may be of interest to you, etc. ;
 - before we process your personal data to pursue our legitimate interests for the purposes outlined above in the “How and why we use your information” section, we determine if such processing is necessary and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms.
- you have given your consent to the processing of your data;
- the processing is necessary to meet a legal obligation which applies to Business Startup & Marketing LLC.

Sometimes we process data about you which the law considers to fall within special categories (see section “What data do we process about you?” for more details), in which case, we use one of the following grounds:

- the processing is necessary for the establishment, exercise or defense of legal claims;
- you have freely given your informed, specific consent to the processing; or
- the processing is necessary for reasons of substantial public interest, based on applicable law.

If you would like more information about the legal grounds used to process your information, or about the legitimate interests referred to above, please contact us.