

## **POINTNORTH INTERNATIONAL PRIVACY POLICY**

This privacy policy applies to pointnorth.biz and academypointnorth.com owned and operated by PointNorth

International Sàrl. This privacy policy tells you how we collect, use, and protect your personal information.

By visiting our websites <http://pointnorth.biz/> and <http://academypointnorth.com> you accept and agree to the terms and conditions of this privacy policy. In particular, you consent to our collection and use of your personal information as described in this privacy policy.

Please read this Privacy Policy carefully. By visiting and using the Site, you agree that your use of our Site, and any dispute over privacy, is governed by this Privacy Policy. Because the Web is an evolving medium, we may need to change our Privacy Policy at some point in the future, in which case we'll post the changes to this Privacy Policy on the website and update the Effective Date of the policy to reflect the date of the changes. By continuing to use the Site after we post any such changes, you accept the Privacy Policy as modified.

### **MINORS**

We do not provide services or sell products to children. If you are below the age of 18, you may use our website only with the permission and active involvement of a parent or legal guardian. If you are a minor under 13, please do not provide us or other website visitors with any personal information.

### **THE TYPE OF INFORMATION WE COLLECT FROM YOU**

Like most places on the Internet, simply by visiting our website you automatically tell us certain information. This includes basic information such as your IP address, when you visited, the website from where you came prior to visiting us, the website where you go when you leave our websites, your computer's operating system, and the type of web browser that you are using. Our websites automatically records this basic information about you and store it in log files.

We combine this automatically collected log information with other information we collect about you. We do this to offer special discounts and to improve marketing, analytics, and site functionality.

Technologies such as: cookies, beacons, tags and scripts are used by PointNorth International Sàrl and our marketing, advertising and support partners. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies for our shopping cart, for user authentication and for user settings. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

## **BEHAVIORAL TARGETING / RE-TARGETING**

We may collect any data that you provide us by posting it at our websites (through our contact us page) or by e-mail (such as your name and email address). You can always choose not to provide us with information. However, if you do withhold information, we may deny you access to some or all of our website's services and features.

Any information provided on our website order forms is collected by our payment processing service providers on their servers from Customers who access our site. That information is then shared with PointNorth International Sàrl. This information includes ordering information such as billing names and addresses, phone numbers, email address, and credit card information (See "Orders" below). We use this information primarily to fulfill customer orders and requests. We do not share this information with any third parties. However, we may disclose personal information collected if we have received your permission beforehand or in very special circumstances, such as when we believe that such disclosure is required by law or other special cases described below.

## **ORDERS AND USE OF PERSONAL INFORMATION**

If you purchase a product or service from us, we request certain personal information from you on our order form. You must provide contact information (such as name, email, and shipping address) and financial information (such as credit card information and expiration date). We use this information for billing purposes and to fill your orders. If we have trouble processing an order, we will use this information to contact you.

You may also provide personal information about other people, such as their name and email address. This information is only used for the sole purpose of completing your request or for whatever reason it may have been provided.

We may also make some content, products and services available through our Site or by emailing messages to you through cooperative relationships with third-party providers, where the brands of our provider partner appear on the Site in connection with such content, products and/or services. We may share with our provider partner any information you provide, or that is collected, in the course of visiting any pages that are made available in cooperation with our provider partner. In some cases, the provider partner may collect information from you directly, in which cases the privacy policy of our provider partner may apply to the provider partner's use of your information. The privacy policy of our provider partners may differ from ours. If you have any questions regarding the privacy policy of one of our provider partners, you should contact the provider partner directly for more information.

Be aware that we may occasionally release information about our visitors when release is appropriate to comply with law or to protect the rights, property or safety of users of the Site or the public.

## **WHAT WE DO WITH YOUR INFORMATION**

We use your information to operate our website's business activities. For example, we may use this data to contact you about changes to our websites, new services, or special offers, resolve disputes,

troubleshoot issues, bill you for services, and enforce our website's terms and conditions.

As a general rule, we will not share, sell, rent or trade your data with third parties without your permission. However, there are some important exceptions to this rule that are described in the following paragraphs.

We may, in our sole discretion, provide information about you as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site or other government officials for purposes of fraud investigations, alleged intellectual property infringement, or any other suspected illegal activity or matters that may expose us to legal liability.

From time to time, we may use third party suppliers to provide services on our website such as credit card processing to bill you for services or programs. We restrict the way third party suppliers can use your information. They are not allowed to sell or give your information to others. We will share personal information as necessary for that third party to provide that service.

## **COOKIES**

To help you experience our website <http://pointnorth.biz/> and <http://academypointnorth.com> we use so-called cookies. Cookies are small pieces of information needed for the use of our website <http://pointnorth.biz/> and <http://academypointnorth.com> that your browser stores on the hard disk of your computer. The information contained in the cookies help us control your visiting session, in particular in order to improve your navigation and make our website highly user-friendly. The cookies we use do not record any personal information whatsoever. In most web browsers cookies are accepted automatically. You can prevent it by configuring your browser. You can at any time delete cookies stored on your computer by clearing the temporary Internet data (Tools/Internet Options bar).

If you disable the cookies, you may be unable to use all the functionalities of our portal.

Here you will find the instructions on how to delete the cookies in [Internet Explorer](#) and [Mozilla](#)

## **ACCESS TO PERSONAL INFORMATION**

If your personal information changes, or if you no longer desire our service, you may correct, amend, delete inaccuracies or deactivate it by contacting us at [dominique@pointnorth.biz](mailto:dominique@pointnorth.biz).

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at above e-mail. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **EU 2016/679 – GENERAL DATA PROTECTION REGULATION (GDPR) COMPLIANCE**

We strive to fully comply with the new regulations set forth in the GDPR established by the EU. By accessing this Site and our products, you hereby acknowledge that we may process personal data (information relating to an identified or identifiable natural person), including but not limited to: names, addresses, telephone numbers, email addresses, credit card details, financial information, posts on social media websites, and your and others' IP addresses. To the extent any personal data we process is governed by the GDPR, it will be treated in compliance with the GDPR.

Specifically, any personal data we process is collected for a legal and lawful reason, including, but not limited to, providing you with a tailored experience to our website, exposure and access to and our and our affiliates' products. Further, we protect any personal data collected and limit nature and scope of data collected to that which is adequate, relevant and limited to what is necessary in relation to the purposes for which it is being processed ('data minimization'). For example, if you purchase one of our programs or services, we will process the personal data necessary to execute your purchase of the program and allow you to subsequently access and use the program or service. Such personal data may include your name, mailing address, telephone number, email address, password, payment information (credit card number, bank account information), and/or IP address.

You have the absolute right to withdraw your consent, request erasure, and/or object to our processing of any of your personal data that we may process. Simply send us an email with the subject line: "I hereby [withdraw my consent, and/or request reassurance, and/or object] to my data being processed under the GDPR" and include in the body of your email your name. Upon receipt of your email we will cease processing your personal data. Should you desire to exercise your right to erasure or object to our processing of your personal data, please also include this request in the body of the email, and we will follow the procedures set forth in GDPR Art. 17, 18, and/or 21. Note, however, that notwithstanding your exercise of your right to withdraw, object and/or request erasure, we will not provide any refunds for products purchased beyond the deadline(s) established for the respective product(s) you purchased.

Upon request, pursuant to GDPR Art. 12 and 15, we agree to provide you with information regarding any of your personal data that we have processed, including the following:

1. the purposes of the processing; 2. the categories of personal data concerned; 3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; 4. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; 5. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; 6. the right to lodge a complaint with a supervisory authority; 7. where the personal data are not collected from the data subject, any available information as to their source;
8. the existence of automated decision-making, including profiling, referred to in Article 22(1) and

(4)

and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

We take the protection of personal data seriously and not only strive to process and retain it in the safest manner possible but also, we have measures in place that detect and alert us to any data breaches that may occur, and will notify you in the unlikely event that any of your personal data is affected by any breach. Unless you have provided us explicit consent and/or you have volunteered without solicitation such personal data, we do not process any personal data that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

## **AUTORESPONDERS**

We may use autoresponders to communicate with you by e-mail. To protect your privacy, we use a verified opt-in system for such communications and you can always opt-out of such communications using the links contained in each autoresponder message. If you have difficulties opting out, you may contact us by sending an e-mail.

## **OPTING-OUT**

We provide you the opportunity to opt-out from any promotional or marketing emails that we may send you. You may do so by following the instructions included in each communication or by emailing us at [dominique@pointnorth.biz](mailto:dominique@pointnorth.biz)

## **SECURITY**

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

When you enter sensitive information (such as credit card number) on order forms that are hosted by our third party service providers, the transmission of that information is encrypted using secure socket layer technology (SSL).

## **TESTIMONIALS**

We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at [dominique@pointnorth.biz](mailto:dominique@pointnorth.biz).

## **CONTACT US**

We will communicate with you in response to your inquiries, to provide services you request, and to manage your account. We will communicate with you by email or telephone, in accordance with your wishes.

## **PLUGINS**

### **Facebook Plugins**

Our website integrates plugins of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA. You will recognise them on our website by the Facebook logo or the Like or Share buttons. An overview of Facebook plugins can be found here: <http://developers.facebook.com/docs/plugins/>. Whenever you visit our site, the plugin creates a direct connection between your browser and a Facebook server. The contents of the plugin are sent by Facebook directly to your browser and are integrated into the website. Thus Facebook receives the information that you have visited our website with your IP address, even if you have no Facebook account or you are not currently logged into Facebook. Such information (including your IP address) is sent by your browser directly to a Facebook server in the USA, where it will be stored. If you click Facebook's Like button when you are logged into your Facebook account, you can embed in your Facebook profile a link to the contents of our website. Then Facebook can associate your visit to our website with your user account. Details of your interaction will also be sent directly to a Facebook server, where they will be stored. In addition, they will be published on Facebook and shown to your Facebook friends. Please note that, as a website provider, we do not know which data is transferred and how it is going to be used by Facebook.

Such information can be used by Facebook for advertising, market research and Facebook customisation purposes. To that end, Facebook creates usage, interest and relationship profiles, e.g. in order to analyse how you use our website with regard to ads shown to you by Facebook, inform other Facebook users about your activities on our website and provide you with other Facebook-related services.

More information in this respect can be found in Facebook's Privacy Statement on <https://www.facebook.com/about/privacy/>.

If you do not want Facebook to associate your visit to our website with your Facebook user account, please log off your Facebook user account before visiting our website.

### **Twitter**

Our website integrates plugins of the short message network Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA. You will recognise them (the Tweet button) on our website by the Twitter logo. An overview of Twitter buttons can be found here <https://dev.twitter.com/>.

Whenever you request a page of our website that contains such a plugin, a direct connection is created between your browser and a Twitter server in the USA. Thus Twitter receives the information that you

have visited our website with your IP address. If you click the Tweet button when you are logged into your Twitter account, you can embed in your Twitter profile a link to the contents of our website. Then Twitter can associate your visit to our website with your user account. Please note that, as a website provider, we do not know which data is transferred and how it is going to be used by Twitter. More information in this respect can be found in Twitter's Privacy Statement.

If you do not want Facebook to associate your visit to our website, please log off your Twitter user account.

## **LinkedIn**

Our website integrates plugins of the social network LinkedIn owned by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter 'LinkedIn'). You will recognise the LinkedIn plugins on our website by the LinkedIn logo or the Recommend button. Whenever you visit our website, the plugin will create a direct direction between your browser and a LinkedIn server. Thus LinkedIn receives the information that you have visited our website with your IP address. If you click LinkedIn's Recommend button when you are logged into your LinkedIn account, you can embed in your LinkedIn profile a link to the contents of our website. Then LinkedIn can associate your visit to our website with your user account. Please note that, as a website provider, we do not know which data is transferred and how it is going to be used by LinkedIn. Details regarding data collection (purpose, scope, further processing, use) and your rights and possible settings can be found in LinkedIn's Privacy Guide.

This guide is available from:

<http://www.linkedin.com/legal/privacy-policy>.

## **YouTube**

Our website contains at least one YouTube plugin owned by Google Inc. LLC, 901 Cherry Ave. San Bruno, CA 94066, USA. Whenever you visit a page of our website that is provided with a YouTube plugin, a connection with YouTube servers is created. Then the YouTube server learns which page of our website you have visited. If you are also logged into your YouTube account, you make it possible for YouTube to associate your browsing behaviour with your personal profile. You can prevent this if you first log off your account. More information on how YouTube may collect and use your data can be found in YouTube's Privacy Guide, which is available from <http://www.youtube.com/t/privacy>.

## **Google AdSense**

Where applicable, this website uses Google AdSense, a service used to incorporate Google Inc. ('Google') ads. Google AdSense uses so-called 'cookies', text files stored on the user's computer to help analyse how the website is used. Google AdSense also uses so-called web beacons (invisible graphics). Such web beacons make it possible to analyse information such as traffic across pages of this website.

Generated by cookies and web beacons, information on how this website is used (including the user's

IP address) and what ads have been displayed is sent to a Google server in the USA, where it will be stored. Such information can be forwarded by Google to its business partners. However, Google will not merge your IP address with your other data it may store.

You can disable the installation of cookies by making appropriate settings in your browser. Please note, however, that in such an event you may not be able to fully use all the functionalities of this service. By using this website, you agree to Google processing the data it collects about you in the way and using the methods described above and for the purposes specified above.

## **Google+**

Our website uses so-called social plugins ('plugins') of the social network Google+, which is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google'). The plugins are recognisable e.g. by the +1 sign on a white or colour background. An overview of Google plugins and their representations can be found on: <https://developers.google.com/+/plugins>.

Whenever you visit a page of our website that contains such a plugin, your browser creates a direct connection to Google servers. The contents of the plugin are transmitted by Google directly to your browser and incorporated into the page. Thus Google receives the information that your browser has accessed a specific page of our website, even if you have no Google+ profile or you are not currently logged into Google+. Such information (including your IP address) is sent by your browser directly to a Google server in the USA, where it will be stored.

If you are logged into Google+, Google can associate your visit to our website directly with your Google+ profile. If you interact with the plugins, e.g. you click the +1 button, the relevant information will also be sent directly to a Google server, where it will be stored. In addition, the information will be published on Google+ and shown to your contacts there.

More information on the purpose and scope of data collection, processing and use, your rights in this respect and the available settings you can make to protect your privacy can be found in Google's Privacy Guide on: <http://www.google.com/intl/de/+/policy/+1button.html>.

To prevent Google from associating your visit to our website with your Google+ profile, you have to log off Google+ before you visit our website. You can also completely disable your browser's add-ons that load Google plugins, e.g. by using the script blocker NoScript (<http://noscript.net/>).

## **Instagram**

Our website uses Instagram's so-called social plugins, which are operated by Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram"). The plugins are identified with an Instagram logo, e.g. in the form of an Instagram camera. An overview of Instagram plugins and their representations can be found here:

<http://blog.instagram.com/post/36222022872/introducing-instagram-badges>.

Whenever you request a page of our website that contains such a plugin, your browser creates a direct connection to Instagram servers. The contents of the plugin are sent by Instagram directly to your browser and incorporated into the page. Thus Instagram receives the information that that your browser has accessed a specific page of our website, even if you have no Instagram profile or you are not currently logged into Instagram. Such information (including your IP address) is sent by your browser directly to an Instagram server in the USA, where it will be stored.

If you are logged into Instagram, Instagram can associate your visit to our website directly with your Instagram account. If you interact with the plugins, e.g. you click the Instagram button, the relevant information will also be sent directly to an Instagram server, where it will be stored. In addition, the information will be published on your Instagram account and shown to your contacts there.

More information on the purpose and scope of data collection, processing and use by Instagram your rights in this respect and the available settings you can make to protect your privacy can be found in Instagram's Privacy Guide: <https://help.instagram.com/155833707900388/>.

If you do not want Instagram to associate your visit to our website with your Instagram account, you have to log off Instagram before you visit our website. You can also completely disable your browser's add-ons that load Instagram plugins, e.g. by using the script blocker NoScript (<http://noscript.net/>).

### **Google Adwords**

Our website uses Google conversion tracking. If you get to <http://pointnorth.biz/> and <http://academypointnorth.com> via an ad provided by Google, Google Adwords will place a cookie on your computer. Such cookies expire after a predefined period of time and do not serve personal identification. If you visit certain sites of our website once again and the cookie has not expired yet, Google and we can make out that you have clicked an ad that have redirected you further on. Cookies vary depending on the customer, each one receives his or her own. A conversion cookie makes it possible for us to learn how many users in total have clicked an ad and been redirected to a given page. However, we receive no personal data that might identify you as a user.

If you do not want any tracking, you can place a Do Not Track cookie or set your browser so as to disable all cookies coming from the googleleadservices.com domain.

### **Facebook Remarketing**

Our website integrates remarketing tags of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA. Whenever you visit our website, a direct connection between your browser and a Facebook server is created via remarketing tags. Thus Facebook receives the information that you have visited our website with your IP address. Then Facebook can associate your visit to our website with your user account. We can use the so received information to display Facebook ads. Please note that, as a website provider, we do not know which data is transferred and how it is going to be used by Facebook. More information in this respect can be found in Facebook's Privacy Statement

on <https://www.facebook.com/about/privacy/>. If you do not want any of your data to be recorded via Custom Audience, you can disable this function.

### **Google Remarketing**

Our website integrates remarketing tags from Google Inc. („Google“). Whenever you visit our website, a remarketing tag creates a direct connection between your browser and Google. Then we receive the information that our website has been accessed by your IP address via Google. We can use such information for specific advertising.

### **Google Tag Manager**

Our website uses Google Tag Manager. This service makes it possible to manage website tags across an area. Google Tag Manager implements tags only. This means that no cookies are used and no personal data is collected. Google Tag Manager launches other tags that may collect data, but Google Tag Manager has no access to such data. If it is disabled at domain or cookie level, all tracking tags also remain disabled provided that they have been implemented using Google Tag Manager.

### **MailChimp**

When you sign up for the PointNorth newsletter, you disclose your e-mail address and can optionally enter your name. In addition, your IP address and registration date are also stored when you sign up, the latter only the purpose of providing evidence in case of abusive registration. To send our newsletter, we use the mailing list provider MailChimp. MailChimp is a service provided by The Rocket Science Group, LLC, 512 Means Street, Suite 404, Atlanta, GA 30318 (‘Rocket’). The data recorded during the registration is encrypted and sent in encrypted form to Rocket, where it will be stored. Once you have signed up, MailChimp sends you an e-mail to confirm your registration. Furthermore, MailChimp offers various possibilities of analysing how the newsletters we sent are opened and used, e.g. to how many users an e-mail has been sent, if any e-mail was rejected and if users signed off the mailing list once they had received an e-mail. However, such analysis is done for groups only and is not used for individuals. In addition, MailChimp uses the analysis tool Google Analytics provided by Google, Inc and, where applicable, incorporates it into newsletters. More information on privacy at MailChimp on [www.mailchimp.com/legal/privacy/](http://www.mailchimp.com/legal/privacy/).

### **Google Analytics**

This website uses Google Analytics, a web analysis service from Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (‘Google’). Google Analytics uses so-called ‘cookies’, text files stored on the your computer to help analyse how you use the website. The information created by the cookie (browser type/release, operating system, referrer URL, previously visited websites, IP address, server request time) concerning the usage of this website is usually sent to a Google server in the USA, where it will be stored. However, if you enable IP anonymisation on our website, Google, in Member States of the European Union or any other states being party to the Agreement on the European Economic Area, will first truncate your IP address.

Only in exceptional cases, the full IP address will be sent to a Google server in the USA and truncated there. Google will use this information to analyse your usage of the website, generate website activity reports for website operators and provide other services related to the use of the website and the Internet. Google may also disclose such information to third parties provided that it is required to do so by applicable laws or it has outsourced data processing to a third party. The IP address sent by your browser under Google Analytics will not be merged with any other data already in Google's possession.

You can prevent the installation of cookies by setting your browser accordingly. Please note, however, that in such an event you may not be able to fully use all the functionalities of this website. By using this website, you agree to Google processing the data it collects about you in the way and using the methods described above and for the purposes specified above. More information on the web analysis service used can be found on Google Analytics website. The instructions on how you can prevent your data from being processed by the web analysis service can be found on <http://tools.google.com/dlpage/gaoptout?hl=de>.

### **Links to Other Sites**

Our Web sites may at some point contain links to other sites that are not owned or controlled by us. Please be aware, that we are not responsible for the privacy practices of such other sites.

We encourage you to be aware when you leave our site and to read the privacy policies of each and every Web site that collects personal information.

This privacy policy applies only to information collected by our Web sites.

### **POLICY CHANGES**

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Any questions or concerns about this policy should be brought to our attention by sending an e-mail to [dominique@pointnorth.biz](mailto:dominique@pointnorth.biz) and providing us with information relating to your concern.

You may also mail your concerns to us at the following address :

PointNorth International Sàrl, 35 rue des Bains, 1205 Geneva, Switzerland.