

# Anjuli Global, Inc Privacy Policy

Effective Date: April 1, 2023

**Introduction.** Anjuli Global, Inc is committed to respecting and protecting your privacy and your Personal Data in compliance with the various privacy and data protection laws in the United States of America and any other markets we may enter. This Consumer Privacy Policy (“Policy”) explains how we collect, use, and share Personal Data. This Policy details how we use that Personal Data and what choices you can make about how this information is used. This Policy governs information we collect from our customers, Xplorers, job applicants, visitors to our website and other related websites, and users of our software as service application and other associated technology platforms (collectively, “you” and “your”). This Policy applies to you if you publish information on the Internet (e.g., publicly available websites, blogs, social media platforms, etc.) that we may either directly or indirectly collect data from through third parties. Please read this Policy carefully before you use our Site or Services and or providing us your Personal Data. By using the Site or Services (whether or not you register for an account with us), you agree to the practices and policies outlined in this Privacy Policy and consent to the collection, use, storage and disclosure of your Personal Data.

**IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, YOU CANNOT USE THE SITE OR ANY SERVICES AND MUST STOP USING THE SITE OR ANY SERVICES IMMEDIATELY.**

If you use the Site or Services on behalf of someone else (such as your minor child) or any entity (such as your company), you represent and warrant that you are authorized by such individual or entity to accept this Privacy Policy on behalf of that individual or entity. This Privacy Policy may change from time to time. By continuing to use the Site or Services, you accept and agree to the changes we make to this Privacy Policy, so please check the Privacy Policy periodically for updates.

## Scope

This Privacy Policy covers the following:

- Information we collect and store
- How we use Personal Data
- Information sharing and disclosures
- Cookies and Do Not Track (“DNT”) signals

- Security
- Mobile Application
- Third party links
- Children's privacy
- Individual rights to Personal Data
- State privacy rights (including California residents)
- Changes to this Privacy Policy
- Terms of Use

You can print out a copy of this Privacy Policy for your records. You can also contact us if you would like to request that we send you a copy of this Privacy Policy.

### **Information We Collect and Storage of Your Personal Data**

For a better experience while using our Site and Services, we may require you to provide us with certain personally identifiable information ("Personal Data"). We may collect the following types of Personal Data:

- Your IP address(es) and device identifier(s) and your URLs including your social medial accounts;
- Your contact information including your name, title, address, email address, and telephone number;
- Your biographical information including your gender, birthdate, nationality, photograph or videos containing your image or likeness, occupation, and information about family life (excluding special categories of data) including family, children, hobbies and interests;
- Your identification information including your passport number, permanent resident identification number, social security number, to the extent permissible under applicable laws;
- You registration data including newsletter requests, event/incentive trips registrations, subscriptions, downloads, and username/passwords, data requested to be provided in a sign-up or registration form, and related information such as feedback and survey responses;
- Your billing and financial information including your bank account details, credit/debit cards details, tax identified numbers/tax type, +copy of bank account statements and any information or data required to verify and/or process payment transactions;
- Information related to your purchase history, details of our products you have purchased including returns and preferred products; CCTV footage that allows us to identify you when you visit our offices;

- Details regarding your use of our systems and equipment when you are a Xplorer;
- Any other Personal Data you voluntarily provide to us. For instance, when you choose to provide us with Personal Data of your family members when completing our online form that contains a dedicated field for this purpose, or when you contact our customer service;
- Data that is made publicly available on the Internet, that could include:
  - o Identification Information such as: your name, username, handle, or other identifier;
  - o Content Information such as: the content you have published via that name, username, handle, or other identifier, (e.g. comments, expressions, opinions, posts, etc.);
  - o Audio/Visual Information such as: your profile picture or other images or videos that you post or interact with;
  - o Employment Information such: your job title or profession (including category of profession, for example “journalist”);
  - o Demographic Information such as: your interests and gender; and
  - o Geolocation Information such as: your location.

Your Personal Data does **not** include aggregated, de-identified or anonymized information. Aggregated, de-identified or anonymized information is information that cannot reasonably be used to identify you.

You always have the option to not provide us with Personal Data by choosing not to use the Site or Service. If you decide not to provide the required Personal Data, if any, some functions of the Site or Services may not be available to you. By deciding to provide the Personal Data to us, you agree to our methods of collection and use, as well to other terms and provisions of this Privacy Policy.

Once you agree to provide us with Personal Data, you will not be anonymous to us.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Sites, we may collect and retain such information in a file specific to you.

**Payment Data and Purchase History.** When you make a payment through our Site, your payment card information is collected and stored by our payment processing partner.

Our payment processing partner collects your voluntarily provided payment card information necessary to process your payment. Such partner's use and storage of your payment information is governed by its applicable terms of service and privacy policy.

The payment information we collect, and store includes your payment card type (such as VISA or MASTERCARD), last four digits of the payment card and expiration date, what and how much you purchased, and when you purchased it. We collect and store this payment information to provide the Services to you and so that you can monitor your payment history, request a refund, and alert us of any potential fraud or misuse of your payment information. We may also use this payment information to process your request for a refund, to monitor for fraud and misuse, for data analytic purposes, and for the other purposes described below in the Section on How we use Personal Information.

Other Information. Some information is automatically collected from you when you use our Site or Services and is stored in log files, which are used on the Site and in links to the Site from an email. The types of information that may be automatically collected from your use of the Site include (without limitation):

- Information about your search queries;
- Information about your computer and its operating system, Internet connection, and the equipment you use to access the Site;
- Information about your geolocation and the statistics and information associated with the interaction between your browser or device and the Site;
- Some commercial information, such as what you purchased on the Site; and
- Information from Cookies (defined below) or other source through which you accessed the Site, the pages you visit, and the time spent on these pages, and other usage details regarding your activities on the Site.

The automatically collected information is generally statistical, but may include Personal Information, and we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties.

We use this information to analyze trends, administer the Site, track users' movements around the Sites, and gather demographic information about our user base as a whole. We do so in an effort to create a more efficient and usable Site, and to determine areas of the Sites or Services that could be improved to enhance the user experience.

Sources. We may collect Personal Data and other information for a variety of sources, including the following categories of sources:

- Directly or indirectly from you and your agent's through use of the Site or Services; and
- From third parties that may interact with us in connection with the Site or Services.

Storage. We retain your Personal Data for as long as you have an open account with us or as otherwise necessary for you to use the Site or Services, resolve disputes, prevent fraud, enforce any agreement between you and Anjuli Global, or as otherwise permitted or required by applicable law. Afterwards, we may choose to retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

## **How We Use Personal Data**

We use Personal Data and other information we collect about you so that we can provide the Site and Services to you. The Personal Data that we collect will be used to contact or identify you. Please see the "User Communications" Section in our Terms of Use for more information about how, when, by whom and for what purposes you may be contacted. We also use Personal Data to do any of the following:

- Provide, maintain, administer, improve and/or expand our Services;
- Provide customer support, resolve disputes or troubleshoot problems, including debugging to identify and repair errors that impair functionality of the Site and our Services;
- Inform you about updates, advertise our Services to you, or customize your experience on the Site (including its content or layout);
- Detect security incidents and protect against error, fraud, or other illegal/criminal activity and prosecuting those responsible for such activities;
- Provide you with notices about certain resources you may be interested in learning about and notices regarding your account (including expiration and renewal notices);
- Carry out our obligations and enforce our rights under any contract or agreement between you and Anjuli Global (including our Terms of Use and License Agreement);
- As part of our internal auditing related to interactions with our customers;
- Perform internal research on your demographics, interests, traffic patterns, usage, and behavior;

- Run data analytics (such as Google analytics) to understand how our users use the Site;
- Improve our internal marketing, promotional efforts, or enhance our business and Services; and
- For such other purposes as described to you at the time we collect Personal Data. We may (but have no obligation to) compare and review Personal Data for errors, omissions, and accuracy.

## **Information Sharing and Disclosures**

We may share (disclose) your Personal Data and other information we collect and store about you to:

- Any third party if the disclosure is to fulfill the purpose for which you provide it to us, including in order to provide you with access to the Site or Services or to assist us in how we use Personal Data. For example, if you are an Xplorer or VIP Guest, the person who enrolled you will have access to your name, the Anjuli Global identification number associated with your account, and the date of your last purchase order.
- Our contractors who help us with the Site and in providing the Services, such as those who host our website and data, assist with order fulfillment, process credit card payments, and help us with data analytics. We could not provide the Site or Services without their help. We require our contractors to protect the confidentiality and security of Personal Data.
- We may disclose Personal Data to a buyer or other successor of Anjuli Global in the event of a merger, divestiture, restructuring, reorganization, dissolution, change of control, or other sale or transfer of some or all of Anjuli Global's assets.
- Third parties pursuant to a legal request. We also may disclose Personal Data or any other information we collect about you if we determine in good faith that such disclosure is needed to:

(1) comply with or fulfill our obligations under applicable law, regulation, court order or other legal process;

(2) protect the rights, property, or safety of you, Anjuli Global, or another party;  
or

(3) enforce any agreement between with you and Anjuli Global.

If we receive a law enforcement or other government official request to disclose your Personal Data in connection with your involvement in an alleged crime or other illegal activity, we can (and you hereby authorize us to) disclose your name, city, state, telephone number, email address, username history, and fraud complaints without a subpoena.

- We may also disclose your Personal Data for any other purpose with your consent.

We do not, and will not, sell your Personal Data to any third party for marketing purposes without your explicit consent.

WE MAY DISCLOSE AGGREGATED, DE-IDENTIFIED AND/OR ANONYMIZED INFORMATION ABOUT OUR USERS, AND INFORMATION THAT DOES NOT REASONABLY IDENTIFY ANY INDIVIDUAL, WITHOUT RESTRICTION, INCLUDING TO BETTER UNDERSTAND THE USERS OF OUR SITE AND EVALUATE HOW WE CAN DELIVER A BETTER EXPERIENCE FOR OUR USERS.

We cannot assure you that your Personal Data will never be disclosed in ways not otherwise described here. For example (and without limitation), third parties may unlawfully intercept or access transmissions, or users may abuse or misuse Personal Data they collect from Anjuli Global. Although we use commercially reasonable practices to protect your privacy, we do not guarantee (and you should neither rely upon nor expect) that Personal Data will always remain private.

### **Cookies and Do Not Track (DNT) Signals**

When you use the Site, we may collect certain information automatically by electronic means, which may include:

- **Browser Cookies.** A cookie is a small file placed on the hard drive of your computer or mobile device and are stored on your device after you exit your browser. Temporary cookies, also known as “Session Cookies,” are used for various reasons, such as managing page views and are usually erased by your browser when you exit it. Cookies that are stored on your device after you exit your browser, also known as, “Persistent Cookies” are used for a number of reasons, such as storing your preferences and retrieving certain information, you have previously provided.
- **Flash Cookies.** A locally stored object, also known as “flash cookies,” is a feature from our Site that collects and stores information about your preferences and navigation to, from, and on our Sites, but is not managed by the same browser settings as are used for session cookies, persistent cookies, or other types of browser cookies.
- **Web Beacons.** A web beacon is a small electronic file, sometimes referred to as clear gifs, pixel tags, and single-pixel gifs (collectively, “Web Beacons”), that permits us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

- **Web Analytic Service.** A web analytic service, such as Google Analytics, can be used to evaluate your use of the Site, such as mouse clicks, mouse movements, scrolling activity, and text typed into the Site (“Web Analytics”). We use Web Analytics to help us understand how we can make our Services easier to use.
- **Mobile Device Identifiers.** Mobile device identifiers are data stored on mobile devices that may track mobile device and data and activities occurring on and through it, as well as the applications installed on it (“Mobile Device Identifiers”). Mobile Device Identifiers enable collection of Personal Data (such as media access control, address and location) and your traffic data, and allow us to learn more about your demographics and internet behaviors in order to personalize and improve the Services.

We use the term “Cookies” to refer to all of the above. Cookies help us to improve our Site and Services. Some web browsers allow you to reject Cookies or alert you when a Cookie is placed on your computer or other device. Although you are not required to accept our Cookies, if you refuse them, you may not be able to use some portions of our Site or Services.

**Third Party Cookies.** Some Cookies are placed by a third party on your computer or device and provide information to us and third parties about your browsing habits, such as links you have clicked (“Third Party Cookies”). These Third Party Cookies can be used to determine whether certain third party services are being used, to identify your interests, and to serve advertisements relevant to you. **WE DO NOT CONTROL THIRD PARTY COOKIES.**

**DNT Signals.** Some website browsers also have a “do not track” or DNT feature that lets you tell websites that you do not want to have your online activities tracked. No uniform technology standard for recognizing and implementing DNT signals has been finalized. We do not currently respond to a browser’s DNT signal. We do not knowingly permit third parties to track your activity over time on our website.

You may manage how your browser handles Cookies and related technologies by adjusting its privacy and security settings. Refer to your browser’s instructions to learn about Cookie-related and other privacy and security settings that may be available. You can opt-out of being targeted by certain third-party advertising companies online t <http://www.networkadvertising.org/choices/>.

## **Security**

We are committed to protecting your Personal Data. We follow commercially reasonable standards to protect Personal Data, both during transmission and once we receive it. However, no method of transmission over the Internet, or



method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Any transmission or storage of your Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site or for our Services, you are responsible for keeping this password (and any other Security Information) confidential. We ask you not to share your password (or other Security Information) with anyone. Please contact us immediately if you think your password has been compromised or there has been an unauthorized use of your account.

### **Mobile Application**

We may offer access to the Site through a mobile application (the “App”). With your permission, the App may request access to other data or applications on your device, such as your contacts or your text messaging application (“Short Message Service” or “SMS”). You can take back your permission through your accessing your device’s privacy setting. For more instructions on how to access these permissions in your device’s settings, go to:

- iPhone: <https://support.apple.com/en-us/HT203033>
- Android: <https://support.google.com/googleplay/answer/6270602?hl=en>

You may use the App to send or receive text messages through your SMS. We may also communicate with you through the App or the text messaging application on your device, including SMS. These communications may not be secure. There are risks associated with unsecured communications that you should consider. These risks include without limitation that an unauthorized person may get access to and read these communications. By using the App you are agreeing to accept these risks and consent to receive and be responsible for unsecured communications. Please see our Terms of Use for more information about how we may communicate with you.

### **Third Party Links**

Our Site may contain links to other sites. If you click on a third-party link, you will be directed to that site. These external sites are not operated by us. We are not responsible for the privacy practices of such third parties, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services. This Privacy Policy applies only to your information that we collect. We strongly encourage you to review the privacy statements of each and every third-party website.

## Children's Privacy

Our Site and Services are intended for and directed toward adults (age eighteen (18) or older). Minors are prohibited from using the Site and Services. Our Services are not directed to minors, and we do not knowingly collect Personal Data from minors without parental consent.

If you are a parent or legal guardian of a minor child, you may—in compliance with the Terms of Use— use the Site or Services on behalf of such minor child. If you elect to use the Site or Services on behalf of your minor child, this election will be construed as your express consent to the collection of your minor child's information. Any information that you provide us while using the services on behalf of your minor child will be treated as Personal Data as otherwise provided in this Privacy Policy. If we learn we collected or received Personal Data from a minor child under the age of eighteen (18) without parental consent, or without reasons to believe the person under eighteen (18) is legally allowed to provide their own consent, we will delete that information.

If you believe we might have any information from or about a minor child, please contact us at [compliance@anjuliglobal.com](mailto:compliance@anjuliglobal.com).

## Individual Rights to Personal Data

You have the right to request access to and control of your Personal Data. For example:

- **Deletion.** You may request that we delete your Personal Data. In some cases, we may not be able to delete Personal Data without also deleting your account. You may not be able to use the Site or Services if we delete your Personal Data.
- **Correction or Change.** You can ask us to correct, change or update Personal Data. You can review and change your Personal Data by logging into the Site and visiting your account profile page.
- **Use Limitations or Restrictions.** You can request in writing that we not use or disclose your Personal Data, but keep in mind that this direction might terminate our ability to provide any of our Services to you.
- **Access.** You can ask us for a copy of your Personal Data.
- **Report Misuse.** You can also report misuse or unauthorized disclosures of Personal Data to us.

You can make any of these requests by contacting us at [www.anjuliglobal.com](http://www.anjuliglobal.com), or [compliance@anjuliglobal.com](mailto:compliance@anjuliglobal.com). We reserve the right to deny a request if we reasonably believe the action would violate any law or legal requirement or cause the information to be incorrect.

## State Privacy Rights (Including California Residents)

You may have additional rights under the law of the state where you reside, including if you are a California resident. These rights are in addition to your rights under other parts of this Privacy Policy. For example, if you are a California resident (or resident in a state with privacy laws similar to California), your state law may provide you with the right to:

- Request that we disclose certain information to you about our collection and use of your Personal Data over the past 12 months (a “Right to Know Request”). Once we receive and confirm your request, we will disclose to you:
  - o The categories of Personal Data we collected about you;
  - o The categories of sources for the Personal Data we collected about you;
  - o The categories of third parties with whom we share that Personal Data;
  - o The specific pieces of Personal Data we collected about you (in California, it is called a “data portability request”);
  - o Our business or commercial purpose for collecting or selling\* that Personal Data.
  - o The categories of Personal Data about you we have disclosed for a business purpose in the past 12 months; and
  - o The categories of third parties to whom we have disclosed your Personal Data for a business purpose in the past 12 months.

\*Please note: In the past 12 months, we have not sold any Personal Data about consumers. We do not, and will not, sell personal information without your explicit consent.
- To request that we delete any of your Personal Data that we collected from you and retained, subject to certain exceptions (a “Deletion Request”). Once we receive and confirm your consumer request, we will delete your Personal Data from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our contractors to:
  - o Complete the transaction for which we collected the Personal Data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
  - o Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
  - o Debug products to identify and repair errors that impair existing intended functionality;
  - o Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
  - o Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.) or other required state laws, if applicable;
  - o Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously

impair the research's achievement, if you previously provided informed consent; o Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us; o Comply with a legal obligation; or o Make other internal and lawful uses of that information that are compatible with the context in which you provided it. You can make any of these requests by contacting us toll free at [www.anjuliglobal.com](http://www.anjuliglobal.com), or [compliance@anjuliglobal.com](mailto:compliance@anjuliglobal.com).

Please note that depending on your state, only you or an authorized person may make such requests related to your Personal Data.

Additionally, your state may limit the number of consumer requests you can make and what information you must provide for us to process such requests. For example, if you are a California resident you may only make a consumer request for access or Right to Know Request twice within a twelve (12)-month period. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data or an authorized representative;
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it; and
- We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you.

We respond to such consumer requests within the time periods and manner required by applicable law.

We will not discriminate against you for exercising any of your state rights. Unless permitted by state law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **Complaints**

If you have any questions, concerns, or complaints regarding this Privacy Policy or the collection and management of your Personal Data, please contact us directly at [www.anjuliglobal.com](http://www.anjuliglobal.com) or [compliance@anjuliglobal.com](mailto:compliance@anjuliglobal.com)

## **Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our Site. Please review it frequently for any changes. Changes are effective immediately upon posting.

## **Terms of Use**

Your use of the Site and Services is also subject to Anjuli Global's Terms of Use. Any disputes related to this Privacy Policy will be governed by the applicable provisions of the Terms of Use, which are incorporated into this Privacy Policy by reference.

For more information or if you have any questions about this Consumer Privacy Policy, please contact us at [compliance@anjuliglobal.com](mailto:compliance@anjuliglobal.com).