

# **Kawiwi International. dba kawiwi.com**

## **Privacy Policy**

### **Last revised: June 30, 2020**

Your privacy is very important to us. We want to make your experience with us as enjoyable and rewarding as possible, and we want you to use Kawiwi.com and our mobile site (collectively referred to as the "Website") and all of our services with complete confidence.

We are sensitive to the issue of confidentiality in online dealings and committed to transparency regarding our protection of individual privacy. This Privacy Policy is intended to inform users about the general approach we use in collecting, using and disseminating user information via the Website and demonstrate our commitment to privacy and security and supplement our [Terms of Use](#).

Additionally, as the Website may be of interest to children under the age of 13 years old, we are committed to complying fully with the Children's Online Privacy Protection Act ("COPPA"). Parents of children who are under the age of 13 should ensure that they understand our policies regarding personal information before entering any personally identifiable information on or through the Website.

We request that you read this Privacy Policy carefully. Taken together, the provisions set forth in this Privacy Policy, the Terms of Use for the Website, and any additional conditions presented to you upon registration detail the applicable conditions governing the use of information provided during registration or use of the Website.

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## **Information We Collect and How It Is Used**

### **Introduction**

This Privacy Policy describes how we collect information from users of our Website, those who use our products and services (the "Services") but do not have accounts ("Visitors"), and those who register and subscribe to our services ("Members"). It 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 take special precautions and have implemented additional privacy safeguards when we collect personally identifiable information from children under the age of 13. For more information about how we handle children's information, please see the "Children's Privacy" section below.

### **Types Of Information We Collect**

1. We collect information from Visitors and Members who access various parts of our Website and use different Services in a variety of ways, including through a mobile device. As a result, the type of information we collect depends on the ways Visitors and Members interact with us, our Website and/or our Service(s). We may offer websites, services or applications that permit browsing and do not require registration. We may also offer Members the ability to access their accounts online and offline, which may result in collection of different data.
2. Information that we may collect about you through interactions includes information that you give us (such as your name, address, email address, telephone number, date of birth, other contact information, surveys and other information input into the Website); automatic information (data resulting from your activity, such as transaction information, IP address, log in, email, passwords and browsing activity); mobile information (location services); and information from other sources, such as social security numbers for contractors and instructors. We may also gather additional information such as the type of device and browser you are using, the IP address of your device, information about your device's operating system, and additional information

associated with your device and browsing activity. We may also gather information collected through cookies, tags, tracers, tracking scripts, web beacons, and other technologies, as described further below. We may supplement the personal information you provide with publicly available information about you as well as information from other sources.

3. When we do collect personally identifiable information, we will use it for the purposes indicated in this policy.

4. Our Website may provide links to other websites that may have their own information collection practices. To the extent that you provide personally identifiable information to websites that link to or from our Website, different rules may apply to the use and disclosure of your personally identifiable information. To the extent that the Website includes third-party advertisements, the privacy policy of the advertiser providing the advertisement will govern the use of your personally identifiable information collected during your access to the advertisement. We do not control linking practices of advertisers or sponsors and do not monitor or claim responsibility for any content or privacy practices of such websites. Once you have left our Website, you must read the privacy policy of the advertiser or sponsor to see how your personally identifiable information will be handled.

5. On occasion, we may use an advertising server developed by a third party to display ads on our Website. Some of these ads may contain cookies that are set by third parties (advertisers, sponsors). We do not have access to these cookies or any information that they contain. This Privacy Policy does not cover any use of information that a third-party ad server may have collected from you.

6. We may use the Website as an entry into other networked web pages and websites operated by us and our subsidiaries and affiliates (together, the "Transaction Sites"), such as for credit card processing. Please note that individual Transaction Sites may adopt privacy terms particular to the purpose of such Transaction Site or the transaction(s) taking place on such Transaction Site. As Transaction Sites are generally affiliated with commercial transactions that you or your business may have with us, particularly those which are password-protected or are subject to subscriptions, the privacy terms for such sites may differ through terms in separate agreements which may supplement or supersede these terms.

## **Use of Registration and Visitor Information**

1. Registration may be allowed or required on the Website. Members are asked to provide certain personal information when they sign up for our Services including name, address, telephone number, email address and billing information (such as a credit card number and expiration date). The personal information collected from Members during the registration process is used to manage each Member's account (such as for billing purposes) and may be shared with other Members to coordinate Services. This information is not normally shared with unaffiliated third parties, unless specifically stated otherwise or in special circumstances.

2. We employ other companies and individuals to perform functions on our behalf. They have access to personal information gathered through the Services needed to perform their functions, but may not use it for other purposes.

3. We may promote the Website, Services or a new service to members. You may manage your communication preferences within your account.

4. 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.

5. While we make reasonable effort to prevent third party, non-affiliate access to personally identifiable information, you should keep in mind that data transmission over the Internet is not 100% secure and any information disclosed online can potentially be collected and used other than by the intended recipient. In view of the foregoing, we cannot warrant that your personally identifiable information will not be disclosed to or accessed by parties other than those authorized under this Privacy Policy.

## **Email Marketing From Third Party Sponsors**

We may send, on behalf of third parties, promotions via mail or email to some or all of our Members. However, in no event do we sell or otherwise transfer to third parties the email addresses of our subscribers. We strictly maintain the confidentiality of our subscribers' email addresses, except as stated in this Privacy Policy. In addition, users are always given the opportunity of opting-out of these promotions.

## **Voluntary Customer Surveys**

1. 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 services we offer and how we provide them to you. Your personal information and responses will remain strictly confidential (except where required by law), even if a third party conducts the survey. Participation in our customer surveys is voluntary.

2. We take the information we receive from individuals responding to our Customer Surveys and aggregate it with the responses from other customers 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.

## **"Cookies" and How We Use Them**

A "cookie" is a small data file that can be placed on your hard drive when you visit certain websites. We 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 Member, we will use a cookie to save your settings (which saves you time) and to provide customizable and personalized services. These cookies do not enable third parties to access any of your customer information. Advertisers and partners may also use their own cookies. We do not control the use of these cookies and expressly disclaim responsibility for information collected through them. We may also provide certain widgets or tools on our sites, such as tools that allow web surfers to easily share information on another platform, such as a social media platform. At other times, information from a third party may be embedded on our site, such as a map or information streaming from another site, including communications streaming from a third party social media platform. These widgets, tools, and informational items often function through the use of third party cookies utilized by the third party site, such as the social media platform. You may wish to review information at third party sites, such as social media platforms where you have an account, to determine how these third parties treat data that they obtain through the use of cookies.

## **Additional Technologies**

We may also use additional technologies such as pixel tags, web beacons, tracers, tracking scripts, clear GIFs and other technologies, and may permit our third party service providers to use these technologies. We use these technologies for purposes such as measuring the effectiveness of our advertisements or other communications, determining viewing and response rates, and determining which offers to present to you on our own or on third party sites.

## **In the Event of a Change in Ownership**

1. As we continue to develop our business, we might sell or buy websites, subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise).

2. In the event of a change in ownership, or a merger or an acquisition, all (or select aspects) of our customer information may be transferred. All of our subscribers and registered users will be notified of any change in ownership, merger or an acquisition of our assets by a third party. Subscribers and users may choose to access and modify any of their registration and subscription information at that time.

## **Special Cases**

While using our Service and/or website, you will have opportunities to post reviews or other personal information in public areas. Please understand that when you post such information, it is made public and is not subject to this policy. We are not responsible for any third party's use of personal information you publicly disclose through our Service.

It is our policy not to use or share 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: to satisfy laws, such as the Electronic Communications 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 [Terms of Use](#) or other policies; to operate the Services properly; or to protect us and our Members. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

## Children's Privacy

1. We encourage parents and guardians to spend time online with their children. We urge parents to instruct their children never to give out their real names, addresses, or phone numbers without the permission of a parent or guardian, when using the Internet. We recognize a special obligation to protect personally identifiable information obtained from children, as may be collected on the Website. We fully comply with the Children's Online Privacy Protection Act ("COPPA"), which requires us take special precautions when collecting personally identifiable information from children under the age of 13.

2. In compliance with COPPA, we have adopted the following policies to keep children safe.

- a. Personally identifiable information we collect from children under the age of 13 will be used solely by us or our agents for internal purposes only and will not be sold or otherwise distributed to third parties.
- b. We will not knowingly allow children under the age of 13 to access any social media site that may exist on the Website, email accounts, or other services we provide that would allow them to publicly post or otherwise distribute personally identifiable information.
- c. We will not knowingly ask a child under the age of 13 to divulge more information than is needed to participate in any activity, game, or service.
- d. We will not knowingly keep any personally identifiable information that is inadvertently included in a child's email submission, help inquiry, or other one-time request, if we know that the child is under the age of 13. Information will be automatically purged or purged immediately after the issue has been resolved.
- e. We will not knowingly post any personally identifiable information that is inadvertently included in a child's submission to a general audience contribution area if we know that the child is under the age of 13. These submissions will be deleted and handled anonymously thereafter.
- f. We will not knowingly provide any direct link to websites that are unsuitable for children or teens.
- g. Upon request, we will provide a parent or guardian with a description of the information that may have been provided about their child during a registration process for a program, service or contest on the Website.

3. Consistent with COPPA, there are few instances where we will collect information from children, such as:

- a. Requesting the contact information of a parent or guardian for the sole purpose of providing notification to the parent or guardian;
- b. Collecting children's contact information on a one-time basis, such as when they enter a contest or ask us a question using the "contact us" link on our Website. We will use this information on a one-time basis solely to directly respond to the child's request.

- c. Collecting a child's contact information and the contact information of his/her parent or guardian solely to directly respond more than once to a specific request from the child (for example, to satisfy the request for a newsletter subscription). The parent or guardian will have an opportunity at any time to revoke the child's request (i.e., unsubscribe). We will not use the child's personal information to re-contact the child for any other purpose; and
- d. Using cookies to collect non-personally-identifiable information on our Website for analytics and internal operations purposes.

## **Your California Privacy Rights**

California's "Shine the Light" law permits California residents to annually request and obtain information free of charge about what personal information is disclosed to third parties for direct marketing purposes in the preceding calendar year.

## **Sharing Information with Our Services**

### **Profile**

Your profile is fully visible to all Members, users and customers of our Services. It may also be visible to others on or off of our Services (e.g., users of third-party search engines). Excerpts from your profile may appear on the services of others (e.g., search engine results, mail and calendar applications that show a user a "mini" Kawiwi profile of the person they are meeting or messaging, social media aggregators). "Old" profile information may remain on these services until they update their data cache with changes you made to your profile. Your settings, the degree of connection or interests you have with the viewing Member, the subscriptions they may have, their usage, and other variables impact the availability of your profile and whether they can view certain fields in your profile.

### **Posts, Likes, Follows, Comments, Messages**

Our Services allow viewing and sharing information including through posts, likes, follows and comments.

- When you share an article or a post (e.g., an update, image, video or article) publicly it can be viewed by everyone and re-shared anywhere. Members, Visitors and others will be able to find and see your publicly-shared content, including your name (and photo if you have provided one).
- In a group, posts are visible to others in the group. Your membership in groups is public and part of your profile.
- When you follow a person or skill, you are visible to others as a follower.
- We let senders know when you act on their message.
- We let a Member know when you view their profile.
- When you like or re-share or comment on another's content (including ads), others will be able to view these "social actions" and associate it with you (e.g., your name, profile and photo if you provided it).

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## **Credit Card Information**

### **A. Credit Card Information**

We are committed to handling your customer information with high standards of information security. Your credit card information is stored only in encrypted form and processed using a secured order server with Secure Socket Layer (SSL) technology through use of a third party payment processor. We restrict access to your personally identifiable information only to employees or agents who need to know that information in order to provide products or services to you. While we make every effort to ensure the integrity and security of our network and

systems, and those of our affiliates and agents, but we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

If you to prefer to place your order by telephone, you can call us during normal business hours at +260965208410 with your credit card and billing information.

## **B. What is your Credit Card Fraud Policy?**

In the unlikely event that you experience unauthorized use of your credit card, promptly report the fraudulent activity to your credit card company. Under the Fair Credit Billing Act, your liability may be limited for fraudulent charges. Please check with your credit card company to verify specific terms and conditions.

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## **Communication to Members and Visitors**

We use personal information to communicate important information with our Members. Important information includes, but not limited to, client newsletters, consulting newsletters, consulting reminders, consulting journal entries, payment information, credit card update notifications, account status, legal updates, and other important account information. Members and, where applicable Visitors, agree to accept this communication from us. Please note that you cannot unsubscribe from certain correspondence from us, including messages relating to your account transactions.

### **A. Online Advertisements**

We occasionally display online advertisements on our Website and in our newsletters and alerts. We share aggregated and non-identifying 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. For instance, an advertiser might tell us the audience they want to reach (for example, males between 25 and 55 years of age) and provide us with an advertisement tailored to that audience. Based upon the aggregated and non-identifying information we have collected, we may then display the advertisement to the intended audience. However, we do not share personal information about its Visitors or Members with these advertisers to be used for other purposes.

### **B. Responses to Email Inquiries**

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

### **C. Our Commitment to Data Security**

Services and websites 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.

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## **Miscellaneous**

### **A. 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:

Attn: The Compliance Manager, Kawiwi International Limited, 400 Rella Blvd, Suite 123, Montebello, NY 10901, USA.

## **B. Changes to This Policy**

As we update and expand our services, we may make changes to this policy. You should check back for updates to this policy from time to time. If the changes result in less protection for your personal information than those provided in this policy, we will make reasonable efforts to contact you to let you know. You acknowledge that your assent to the Terms of Use (which includes this Privacy Policy) subsequent to any changes made following your initial consent will satisfy the foregoing obligation. Similarly, your use of the Kawiwi website or continued use of our Service after our posting of changes to this policy, or efforts to contact you, means that you agree to be bound by such changes. The most current version of this Privacy Policy can be reviewed by visiting our website and clicking on "Privacy Policy" located at the Kawiwi website. The most current version of the Privacy Policy will supersede all previous versions.

## **Terms of Use, Arbitration and Governing Law**

If you choose to visit our Website or use our Services, your visit and any dispute over privacy is subject to this Privacy Policy and our [Terms of Use](#), including limitations on damages, resolution of disputes through binding arbitration on an individual basis, and application of the law of the state of California. If you have any concern about privacy at our Website or from our Services, please contact us with a thorough written description, and we will try to resolve it. Our business changes constantly, and our Privacy Policy and the [Terms of Use](#) will change also. We may e-mail periodic reminders of our notices, terms and conditions, but you should check our Website frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

**USE OF THIS WEBSITE SIGNIFIES YOUR AGREEMENT TO THE PRIVACY POLICY.**

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