

GCOOP USA Privacy Policy

Any communication or material you provide to us, whether received online, electronically, otherwise collected by or submitted to us, including any data, questions, comments, suggestions or the like is, and will be treated as, non-confidential and non-proprietary except as set forth in this Privacy Policy. Anything you transmit or post becomes our property and may be used for any GCOOP USA business purpose, including, but not limited to, reproduction, disclosure, transmission, publication, market, research, development of prospect lists, project planning, broadcast, posting and marketing, among other things.

GCOOP USA is committed to respecting your privacy. We have structured our Website so that, in general, you can visit GCOOP USA on the Web without identifying yourself or revealing any personal information. Once you choose to provide us Personally Identifiable Information (any information by which you can be identified), you can be assured that it will only be used to support your business relationship with GCOOP USA and GCOOP USA's business. This Privacy Policy covers five main areas: Awareness, Choice, Accuracy and Access, Security, and Future Developments.

Awareness. GCOOP USA provides this Privacy Policy to make you aware of our privacy policies and practices and of the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our homepage and from the bottom of every page on our Website.

What we collect. Upon logging onto our Web server, our Web server automatically recognizes your domain name, but not your email address (where possible). We will collect the domain name from which you log on, aggregate information on what pages you access or visit, user-specific information on what pages you access or visit, and information volunteered by you (such as survey information and/or site registrations).

To help us tailor the Website to the needs and interests of its visitors, we may collect various types of information from you that do not identify you personally, such as the products you purchase, the services you use, the frequency of such purchase and uses, the type of browser you are using (e.g., Firefox, Internet Explorer), the type of operating system you are using (e.g., Windows XP or Mac OS X), the domain name of your Internet service provider (e.g., Comcast, Earthlink), the length of time you spend on the Website, which pages you visited within the Website, which site you visited before coming to the Website, and which site you accessed when you left the Website (collectively, "Non-Personally Identifiable Information"). "Collected Information" means Personally Identifiable Information and Non-Personally Identifiable Information collectively.

We do collect "cookies" to store your preferences and record session information. On parts of the GCOOP USA Website, you can become a member/customer and/or distributor, order products or services, make requests, and register to receive materials. The types of Personally Identifiable Information that may be collected on these pages include name, customer number, contact and billing information, and transaction and credit card information. In order to tailor our subsequent communications to you and continuously improve our products and services, we may also ask you to voluntarily provide us with information regarding your personal or professional interests, demographics, experience with our products, and contact preferences.

How we use it. GCOOP USA uses your information to better understand your needs and provide you with better service. Specifically, we use your information to help you complete a transaction, to communicate back to you, to update you on services and benefits, and to personalize our Website for you. Credit card numbers are used only for payment processing and are not retained for other purposes.

We may use the Personally Identifiable Information (a) to protect and defend its rights or properties, (b) to protect your personal safety and the personal safety of its users and the public in

general (whether in emergency situations or otherwise), (c) to provide to third parties to maintain and/or operate the Website, (d) to give to its business partners and third party vendors that provide services or products selected by you, (e) to fulfill your requests and product or service orders, (f) to provide you with information on products, specials, newsletters, and other services we provide, (g) for marketing research, (h) to enforce the terms and conditions of this Privacy Policy or the Terms of Use, (i) if you are a distributor of the Company, to enforce the terms of your GCOOP Agreement and the Policies & Procedures in connection with our business relationship as set forth in such documents, and (j) as otherwise permitted by law.

We aggregate the Non-Personally Identifiable Information with information collected from other visitors of the Website to track overall visitor traffic patterns. This aggregated information allows us to develop statistics that are helpful to understanding how its visitors use the Website. We use this aggregated information to monitor, maintain, and improve the functionality and content of the Website, making it more responsive to the needs of our visitors. We may also use the Non-Personally Identifiable Information for the enhancement, operation, management or maintenance of the Website, in connection with developing and operating new websites and for historical, statistical, scientific, or other purposes. We reserve the right to use, sell, and assign for any and all purposes all Non-Personally Identifiable Information; and you authorize us to use, sell, and assign, for any and all purposes, all Non-Personally Identifiable Information.

We may disclose Collected Information in response to legal process, for example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request or where we believe it is necessary to investigate, prevent, or take action regarding suspected illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use, or as otherwise required by law.

From time to time we may also use your information to contact you for market research or to provide you with marketing information we think would be of particular interest. At a minimum we will always give you the opportunity to opt out of receiving such direct marketing or market research contact. We will also follow local requirements, such as allowing you to opt in before receiving unsolicited contact, where applicable. Data collected online may also be combined with information you provide when you enroll with GCOOP USA. **Whom we share it with.** We will only share Personally Identifiable Information with other GCOOP USA entities and/or business partners who are acting on our behalf for the uses described above. Such GCOOP USA entities and/or business partners, including those in the United States and/or any other countries, are governed by our privacy policies with respect to the use of this data and are bound by appropriate confidentiality agreements. **Choice.** GCOOP USA will not use or share the Personally Identifiable Information provided to us online, in ways unrelated to the ones described above without first letting you know and offering you a choice. As previously stated, we will also provide you the opportunity to let us know if you do not wish to receive unsolicited Multi level marketing materials from us and we will do everything we can to honor such requests.

Your permission is always secured first should we ever share your information with third parties that are not acting on our behalf and governed by our privacy policy. **Accuracy & Access.** GCOOP USA strives to keep your Personally Identifiable Information accurate and secure. In order to update or correct your information with GCOOP USA, it will be necessary for you to contact GCOOP USA directly through the methods listed below. To protect your privacy and security, upon contacting us we will also take reasonable steps to verify your identity before granting you access or enabling you to make corrections. **Security.** GCOOP USA is committed to ensuring the security of your information. To prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. We place a priority on protecting your Personally Identifiable Information and take commercially reasonable measures to secure and protect such information. However, we cannot

guarantee that any electronic commerce is totally secure. For example, we have no control over the information collected by your Internet service provider or your employer (if the Website is made available to you through your employer or if you send us Personally Identifiable Information through your employer-provided email account) or information that you disclose in a public forum. Any such third party that collects your Personally Identifiable Information may use the information in accordance with its terms and conditions of use (and related privacy policies), which may be different from this Privacy Policy. We are not responsible for any information collected by such third parties and/or how such information is used or maintained. Neither any third party nor we have the authority to make any representations or commitments on behalf of the other.

Future Developments. From time to time, we may use customer and/or GCOOP USA information for new, unanticipated uses not previously disclosed in our Privacy Policy. If our information practices change at some time in the future, we will post the Policy changes to our Website to notify you of these changes and provide you with the ability to opt out of these new uses. If you are concerned about how your information is used, you should check back at our Website periodically. We will only use data collected after a policy has changed for the new purposes.

Collection of Information by Third Party Sites

The Website may contain links to other Internet sites. These other sites may have different privacy policies and this Privacy Policy does not apply to such other sites.

Children's Policy

The Website is not intended for use by children, and children under the age of 18 are not authorized to use the Website and should not submit any personal information to us. We do not knowingly market to or solicit information from children under the age of 18.

Business Transactions

We reserve the right to transfer any and all information that we collect from visitors, or that we otherwise collect concerning or in connection with the Website, including Collected Information, to a third party in the event of a sale or other transfer of assets or of any portion of our business. In the event we enter a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Collected Information may be among the assets transferred.

By using the Website you acknowledge acceptance of this Privacy Policy in effect at the time of use. This Privacy Policy was last revised on March 1st 2017.

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