

# REGEN VILLAGES HOLDING, B.V. PRIVACY POLICY

Last updated [September 25, 2019]

## INTRODUCTION

Thank you for choosing to be part of our community at ReGen Villages (“company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com)

When you visit our website <http://www.ReGenVillages.com> (“Site”) and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our site and our services.

This privacy policy applies to all information collected through our websites (such as [<http://www.ReGenVillages.com>]), our mobile website, or, our Facebook page (“**Apps**”), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “**Sites**”).

This privacy policy was created following strict EU GDPR standards and rules.

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

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## WHAT INFORMATION DO WE COLLECT?

### ***Personal information you disclose to us***

***In Short:*** We *ONLY* collect personal information that *YOU* provide to us such as your name and email address in the case of our newsletter subscription, and in the case of registration to reserve a place in ReGen Villages communities, your name, address, contact information, and relevant information pertaining to you and your family's interests.

We collect personal information that you voluntarily provide to us when [registering at the Sites or Apps,] expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites, or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and features you use. The personal information we COLLECT can include the following:

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

**Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.

**Payment Data.** We collect data necessary to process your payment if you make a contribution as a PATRON of ReGen Villages, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### ***Absolutely NO Information is automatically collected***

***In Short:*** We do *NOT* collect IP address and/or browser and device characteristics when you visit our website.

We do NOT collect information when you visit, use or navigate the Sites. IF you email ReGenVillages information, the mail system does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

**ReGen Villages webstie DOES NOT USE COOKIES.**

***Information collected through our Apps***

***In Short:*** We DO NOT collect information regarding your geo-location, mobile device, push notifications, and Facebook permissions when you use our apps.

***Information collected from other Sources***

***In Short:*** We DO NOT collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

## **HOW DO WE USE YOUR INFORMATION?**

***In Short:*** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process** [with your Consent]. If you choose to link your account with us to a third party account \*(such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process. See the section below headed "Social Logins" for further information.
- **To send you marketing and promotional communications** [for Business Purposes and/or with your Consent]. We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "Your Privacy Rights" below).
- **To send administrative information to you** [for Business Purposes, Legal Reasons and/or possibly Contractual]. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **Fulfill and manage your orders** [for Contractual reasons]. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Sites.
- **Request Feedback** [for our Business Purposes and/or with your Consent]. We may use your information to request feedback and to contact you about your use of our Sites.

- **To protect our Sites** [for Business Purposes and/or Legal Reasons]. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- **To enable user-to-user communications** [with your consent]. We may use your information in order to enable user-to-user communications with each user's consent.
- **To enforce our terms, conditions and policies** [for Business Purposes, Legal Reasons and/or possibly Contractual].
- **To respond to legal requests and prevent harm** [for Legal Reasons]. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

## **WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

***In Short:** We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.*

We only share and disclose your information in the following situations:

- **Compliance with Laws.** *We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).*
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things,

analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.
- **With your Consent.** We may disclose your personal information for any other purpose with your consent.
- **Other Users.** When you share personal information (for example, by posting comments, contributions or other content to the Sites) or otherwise interact with public areas of the Site [or App], such personal information may be viewed by all users and may be publicly distributed outside the Site [and our App] in perpetuity. [If you interact with other users of our Sites and register through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity.] Similarly, other users will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile.

## **DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

*In Short:* We DO NOT use cookies and other tracking technologies to collect and store your information.

## **HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

*In Short:* We DO NOT use social media logins.

## **HOW LONG DO WE KEEP YOUR INFORMATION?**

*In Short:* We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 2 years/the period of time in which you have an account with us, 90 days past the termination of your account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

## **DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Sites, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site [and App]. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com).

## **WHAT ARE YOUR PRIVACY RIGHTS?**

***In Short:** In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions like the European Economic Area, you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a

request, please use the contact details provided below [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com). We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

### ***Account Information***

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account
- Contacting us using the contact information provided: [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com)

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

**Cookies and similar technologies:** We DO NOT use cookies for our website.

**Opting out of email newsletters:** You can unsubscribe from our newsletter email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided in the newsletter. You will then be removed from the newsletter email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. You can also opt-out by:

- Noting your preferences at the time you register your account with the Sites.
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com)

## **DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

***In Short:*** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com)

If you are under 18 years of age, reside in California, and have a registered account with the [Sites/ Mobile Application/ Facebook Application], you have the right to request removal of unwanted data that you publicly post on the [Sites/ Mobile Application/ Facebook Application]. To request removal of such data, please contact us using the contact information [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com) and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the [Sites/ Mobile Application/ Facebook Application], but please be aware that the data may not be completely or comprehensively removed from our systems.

## **DO WE MAKE UPDATES TO THIS POLICY?**

*In Short:* Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, email us [admin@ReGenVillages.com](mailto:admin@ReGenVillages.com) [CONTACT EMAIL] or by post to:

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