



Updated May 25, 2018 to be compliant with the Global Data Protection Regulation (GDPR) as established by the EU

OUR PRIVACY POLICY

The short version: We use the data you give us for the sole intention of enhancing your experience with us. That means, among other things that it will never be sold or shared with others, that you have the right to know how exactly it's used, and that you can request that we delete it whenever you want. Our goal is to treat your data with the same love and respect as we feel for you.

The longer version: All the domains of GirlFriendCircles LLC, referenced herein as "GirlFriendCircles" (including, but not limited to: GirlFriendCircles.com, ShastaNelson.com, TheFriendshipUniversity.com) respects the privacy of our users and has created this statement to demonstrate that commitment. This Privacy Policy describes the information we collect, how that information may be used and with whom it may be shared. It is our hope that you feel safe and respected by the choices we make in our information gathering and dissemination practices.

By using any of our site's, you acknowledge that you have read, understand, and agree to our Privacy Policy.

Getting Your Consent

<u>We only want to send you what you want.</u> When you provide us with personal information to join our community, make a purchase, sign up for a list, or participate in a program, you imply that you consent to our collecting it and using it for that specific reason.

If we ask for your personal information for a secondary reason, like marketing, we will either ask you directly for your expressed consent, or provide you with an opportunity to say no.

You have the right to change your mind and withdraw your consent. If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at service@girlfriendcircles.com.

Storing your Information

We have chosen service providers and vendors who live up to our standards. To that end, we only use third-party platforms where we have the highest trust in their policies, practices, and reputation. In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. They are all GDPR-compliant which means that they are functioning at the highest level when it comes to collecting, string, and processing your personal data.

If you'd like to read the privacy policies for the platforms we use:

- Mighty Networks serves our as our online community hub (i.e. GirlFriendCircles.com)
- <u>Thinkific</u> serves as our online course platform (i.e. TheFriendshipUniversity.com)
- <u>Stripe</u> serves as our payment processing platform
- InfusionSoft serves as our "email marketing" platform

We occasionally use other providers (i.e. like <u>SurveyMonkey</u> when we send out surveys) but will always ensure that they meet the high requirements of protecting your data.

Unfortunately, no system can be completely secure so users should also take care with how they handle and disclose their personal information and should avoid sending personal information through insecure email. Please refer to the Federal Trade Commission's website at http://www.ftc.gov/bcp/menus/consumer/data.shtm for information about how to protect yourself against identity theft.

Credit Card Information

We place an especially high degree of importance on the privacy of your financial information. To that end, all confidential credit card information required by the site is processed only by Stripe—a leading e-commerce company. All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. For more information on Stripes policies, please visit https://stripe.com/us/privacy.

GirlFriendCircles.com does not store, and cannot access, your credit card numbers. Financial information that is collected is used only to bill or credit the user for products and services.

Sharing of collected information

We promise that your information will not be shared with anyone, at any time. We will never sell or share your information with anyone. We gather it only to communicate with you and offer you the best experience. To be clear, when you submit information to GirlFriendCircles—whether that be through joining Mighty Networks, filling out a survey on Survey Monkey, or signing up to be on a mailing list that goes into InfusionSoft—it is collected, processed, and maintained by those websites, and others that we might choose to use. Since we don't own these partner companies, we cannot be liable for their privacy policies or breaches thereto, but we can attest that we did due diligence to ensure that they live up to the highest standards as set out by the General Data Protection Regulation (GDPR)

Overall, please be advised that we intend to be as responsible as possible with your private information and treat it as we would those of friends. It will not be shared or sold.

Editing Your Information

GirlFriendCircles wants you to have the ability to access and edit your personal

<u>information</u>. Depending on what site you're on, you may be able to directly change or delete your account. But should you run into any difficulty in making profile changes or want to request to see what data we have on file for you, we can be reached at service@girlfriendcircles.com.

GirlFriendCircles Members

For those who join our membership at www.GirlFriendCircles.com

<u>GirlFriendCircles is intended for women 21 and over</u>. If it comes to our attention that a member has revealed that they are under 21 or a male, a member of GirlFriendCircles' staff will close their account immediately. In compliance with the Children's Online Privacy Protection Act, any information we may receive from users we believe to be under the age of 16 will be purged from our database.

<u>collected in ways that enhance our relationship.</u> To that end, we use collected information primarily to deliver the products and services that you have requested and to manage your account and provide you with customer support. Other uses could include, but are not limited to: Performing research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others; communicating with you by e-mail about products or services that may interest you; developing and displaying content and programs tailored to your interests on our site, enforcing our terms and conditions; and other aspects of managing our business.

<u>Everything you share within the member network is optional.</u> The intention is to share your stories and experiences with each other, however, how much you share and what, whether it be in your profile, as posts, or as comments is completely optional and voluntary.

Everything you share on GirlFriendCircles.com (hosted by Mighty Networks) is private to members only and for the purpose of learning, encouraging, and sharing. While we will all learn from each other based on what we share and read, the information is intended to never be shared or used beyond the purpose of connecting and learning within that context. If GirlFriendCircles becomes aware that anyone, for any purpose, is sharing that private information outside of that community—they will be immediately banned.

Please remember that you should always exercise caution when deciding to disclose your personal information. GirlFriendCircles expressly disclaims any liability that may arise from the provision of any User of any information whatsoever to these forums. You, the User, do hereby agree to hold GirlFriendCircles harmless from any liability that may arise from the provision of any information to these forums.

Please see the Mighty Networks Privacy Policy for more details.

Updating the Privacy Policy

<u>We expect to continue to improve this policy</u> and have the right to modify it at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

Contacting Us

<u>We want to be helpful!</u> If you have technical problems, questions or other issues related to your use of GirlFriendCircles, please click the link "Contact Us" on the home page of the site. You can also contact us via email at service@GirlFriendCircles.com. Our staff will respond to all requests sent through email from members interested in knowing more about what personal information is stored on the GirlFriendCircles database, or if they want their personal information purged, or have additional questions regarding privacy.

Acceptance of Privacy Statement

By using the site, you do hereby represent and warrant that you have read, understand, and agree to all terms of this Privacy Policy.