

PRIVACY STATEMENT

Your privacy is very important to us, and we will treat all of your data and information with care and respect. This Privacy Statement describes our privacy policy and details how we collect, use, and/or disseminate the information you provide, including your Personal Data. We reserve the right to change this Statement at any time and urge you to review our Statement regularly to familiarize yourself with any changes.

By visiting our website, using our online products/services, downloading/installing and/or using our application on a mobile phone, and/or by voluntarily submitting Personal Data to us via online forms, advertisement responses, mobile applications, and/or electronic mail, you are accepting the practices described in this Privacy Statement. If you do not wish us to use your Personal Data, please opt-out as described below.

If you have any questions or concerns about our use of your Personal Data, please contact us using the contact details provided below.

Who We Are

We develop and license an online marketing system that allows its users to manage and promote client programs and opportunities of their choice (the "System"). The System is operated and managed by Networx Online, Inc., located in the State of California in the United States.

Because each account is controlled by an independent representative, we cannot guarantee how the System and your Personal Data will be managed by these representatives.

Key Terms

An individual who subscribes to the System is referred to as a "Member" of the System. The Member's targeted audience is the "Customer." "Users" or "you" include Members and Customers, as well as anyone visiting this site.

"Personal Data" means any information that identifies or can be used to identify a user directly or indirectly. Examples of Personal Data include, but are not limited to, first and last name, email address, phone number, or other demographic information.

To cater to Users of our site, we may be required to collect, use, and share certain information, including Personal Data. The type of information we collect, together with a description of how we use and/or share it, is described below.

Information Collection and Use

Information You Provide to Us

Personal Data about you may be collected when you register for our service, contact our customer service representatives, send us an email, integrate with another service or website, or communicate with us in any way.

We act as the controller of Personal Data about Members provided to us by Members in order to provide the System to them as well as Personal Data that we may collect about visitors to our site. We also act as the processors of Personal Data about Customers, which is stored and processed by and on behalf of our Members. We only process Personal Data where such processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, and enhancing our technology, products, and System, ensuring the security of the System, and to support our marketing activities.

Registration

In order to use the system, a Member may first complete the registration form. During registration, the Member will be required to give contact information (such as name and email address). We may use this information to contact the Member about services on our site for which the Member has expressed interest. The Member may also be asked for demographic information (such as information about the Member's industry, gender, or the company they represent), so we can provide a more personalized experience on our site. If a Member chooses to enroll in our service, in certain circumstances the law may require us to collect the Members social security number or if a company, their EIN number. These numbers will be collected only if they are required to comply with IRS requirements.

A Member registering for a paid account will also be required to provide financial information (such as a credit card number and expiration date). This information is used for billing purposes and to fill the Member's order. If we have trouble processing an order, the information is used to contact the Member.

Order

If you are placing an order on our system, we will request information from you on our order form. You must provide contact information (such as name, email, and shipping address) and financial information (such as credit card number and expiration date). This information is used for billing purposes to fill your order and, if we have trouble processing your order, to contact you.

Information We Process on a Member's Behalf

If you are a Member, we will use Personal Data that we gather about you to provide the requested services. In addition, if you have a free trial account, then we will use the Personal Data gathered about you to share more information about our business in an attempt to convince you to make a purchase from us or our associated companies. If you have a paid account, we will use your Personal Data to bill and collect money owed to us by you.

If You are a Customer, this site and the person/affiliate who sent you to this site will be granted access to your contact information (name, phone number, and email) so that they can communicate with you in an attempt to "sell" various products, services, and memberships to you.

We may also use your Personal Data to send you system alert messages, communicate with you about your account and provide customer support, enforce compliance with ours Terms and Conditions of Service, to protect the rights and safety of our Members and third parties, to meet legal requirements, and to otherwise carry out legitimate business purposes necessary to operate the System.

Information We Collect Automatically

We store information that we automatically collect through cookies, log files, clear gifs, and/or third parties to create a profile of our users. A profile is stored information that we keep on individual users that details their viewing preferences. Consequently, collected information such as device information and applications you use to access the System is tied to the your Personal Data to provide offers and improve the content of the site for the user. This profile is used to tailor a users visit to our site, and to direct pertinent marketing promotions to them. We may share your profile with other third parties as detailed in this policy. Your profile is shared together with your Personal Data. YOUR CREDIT CARD, SOCIAL SECURITY NUMBER OR EIN, AND OTHER PRIVATE FINANCIAL INFORMATION IS NEVER SHARED WITH ANY OUTSIDE THIRD PARTY UNLESS REQUIRED BY LAW OR FOR BILLING PURPOSES.

Cookies

A cookie is a piece of data stored on the users computer (defined to include all computing devices, including tablets, pcs, smartphones, smartwatches, and any other device that can be used to operate our software) tied to information about the user. We use both session ID cookies and persistent cookies. For the session ID cookie, once users close the browser, the cookie simply terminates. A persistent cookie is a small text file stored on the users hard drive for an extended period of time. Persistent cookies can be removed by following internet browser help file directions.

If users reject the cookie, they may still use our site. The only drawback to this is that the user will be limited in some areas of our site. Persistent cookies enable us to track and target the interests of our users to enhance the experience on our site. See the Profile section.

Some of our business partners use cookies on our site (for example, advertisers). However, we have no access to or control over these cookies, once we have given permission for them to set cookies for advertising.

Log Files

Like most standard Web site servers we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track users movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses are only tied to Personal Data provided by a user when necessary to enable our Web-based service.

Clear Gifs (Web Beacons, Web Bugs, CSS, and similar functionality)

We may employ or our third party advertising company(ies) may employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. The main difference between the two is that clear gifs are invisible on the page and are much smaller, about the size of the period at the end of this sentence. Clear gifs are tied to users Personal Data. Clear Gifs can "work with" existing cookies on a computer if they are both from the same Web site or advertising company. That means, for example, that if a person visited www.companyX.com, which uses an advertising companys clear gif, the Web site or advertising company would match the clear gifs identifier and the advertising companys cookie ID number, to show the past online behavior for that computer. This collected information would then be given to the advertising company or Web site.

In addition, we may use clear gifs in our HTML-based emails to let us know which emails have been opened by the recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If users would like to opt-out of these emails, please see the Opt-out section.

Retargeting

This site and/or its Members may also use 3rd party vendor remarketing tracking pixels, or cookies. This means we may continue to show ads to you across the internet. The techniques our partners employ do not collect Personal Data such as your name, email address, postal address, or telephone number.

We are able to do this by placing advertising cookies on your computer as you browse our site, so that we can understand what you are interested in. One of our advertising partners may then use this information to present you with retargeting advertising on other sites based on your previous interaction with this site.

You may be able to opt out of targeted advertising through your browser's "settings" tab or by visiting the sites of the various remarketing vendors. You will still receive just as many advertisements, just not those relevant to you.

Usage Data

We may collect usage data about you whenever you interact with the System, which may include the dates and times that you access the System and your browsing activities (such as what portions of the System are used). We also collect information regarding the performance of the System, including metrics related to the deliverability of emails and other communications you send through the System. This information allows us to improve the content and operation of the System, and facilitate research and analysis of the System.

Additional Limits on Use of Your Google User Data

Notwithstanding anything else in this Policy, if you provide us access to the following types of Your Google data, our use of that data will be subject to these additional restrictions:

We will only use access to read, write, modify, or control Gmail message bodies (including attachments), metadata, headers, and settings to provide a web email client that allows You to compose, send, read, and process emails and will not transfer this Gmail data to others unless doing so is necessary to provide and improve these features, comply with applicable law, or as part of a merger, acquisition, or sale of assets.

We will not use Your Gmail data for serving advertisements.

We will not allow humans to read this data unless We have Your affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating abuse, to comply with applicable law, or for the System's internal operations and even then only when the data has been aggregated and anonymized.

Communications from the Site

Special Offers and Updates

We send all new Members a welcome email. Established Members may occasionally receive information on products, services, special deals, and a newsletter.

Service Announcements

On rare occasions it is necessary to send out a strictly service-related announcement. For instance, if our service is temporarily suspended for maintenance we might send Members an email. Members might not be able to opt-out of these communications, although they can deactivate their account. However, these communications are not promotional in nature.

Customer Service

We also communicate with Members and others who contact us with questions and concerns on a regular basis to provide requested services, in regard to issues relating to their account, and to otherwise respond to inquiries. We reply via email or phone, in accordance with your wishes.

Sharing With Third Parties

Aggregate Information (non-personally identifiable)

We may share aggregated demographic information with our partners and advertisers. This is not linked to any Personal Data.

Advertising

We may use the Personal Data a Member has voluntarily provided to us to cause information, offers, products, and/or services that appear to us to be consistent with the Member's expressed interests to be directed to a Member. This is accomplished by using your information to direct to you information, offers, products, and/or services from us. A Member's Personal Data may, therefore, ultimately be used by us for marketing purposes.

You may choose to opt-out of receiving such marketing by following the unsubscribe instructions sent with every email or by contacting us as set forth below.

We will not sell your Personal Data to a third-party.

Third Party Intermediaries

We may use a credit card processing company to bill users for services. These companies only use your information for billing purposes and, to the extent they store your credit card or other private financial information, do so in a secure industry-standard fashion.

Service Providers

We partner with other third parties to provide specific services. When the user signs up for these particular services, we share names and Personal Data only to the extent that it is necessary for the third party to provide these services. These third parties are not allowed to use your Personal Data except for the purpose of providing these services and for purposes referenced in their privacy policies.

Approved Lead Vendors

We may allow carefully-screened Approved Lead Vendors to be listed in a Member's back office. Under certain circumstances, we may share a Member's contact information with one or more of these Approved Lead Vendors. They may use this information to contact a Member via telephone, email or direct mail to inform a Member about an upcoming lead special, conference call or other promotional opportunity which could potentially benefit a Member.

Business Transitions

In the event we go through a significant business transition, such as a merger, being acquired by another company, or selling a major portion of its assets, your Personal Data will, in most instances, be part of the assets transferred. We will strive to notify you via email prior to a change of ownership or control of their Personal Data, consistent with our notification of changes section.

Legal Proceedings

We may be required by law to disclose your Personal Data to the government or third parties under certain circumstances. We can (and you authorize us to) disclose any information about you to law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate.

Data Protection Rights

Choice/Opt-out

Users who no longer wish to have their Personal Data collected or processed may opt-out of receiving further communications by following the unsubscribe instructions sent with every email, by contacting the Member who is the

controller of their Personal Data, or by contacting us as set forth below. Members who no longer wish to have their Personal Data collected or processed must unsubscribe from our service.

Users who wish to remove cookies may do so by following directions provided in their internet browser's "help" directory. If you reject cookies, you may still use our site, but your ability to use some areas of the site may be limited.

Correction of Personal Data

We take all reasonable steps to ensure that the information we collect is reliable for its intended use, accurate, complete and up-to-date. As a Member, you can manage your individual account and profile settings in your back office or you may contact us directly by emailing us the address below . If a Customer or visitor to the site wishes to exercise any of these rights, they should contact you directly or contact us as described below.

Additional Rights

You may object to the processing of Personal Data, ask to restrict processing of your Personal Data, ask us to delete your Personal Data or request portability of your Personal Data. Members may do so by contacting us using the contact details provided below. If your Customers wish to exercise any of these rights, they should contact you directly or contact us as described below.

Links

This site contains links to other sites. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every site that collects Personal Data. This privacy statement applies solely to information collected by this site.

Add-A-Contact

If a Member elects to use our referral service for informing a contact about our site, we ask them for the contact's name and email address. The site will automatically send the contact a one-time email inviting them to visit the site. We store this information for the sole purpose of sending this one-time email. The contact may request the removal of this information from our database by following the directions in the email sent to them.

Childrens Privacy

Protecting the privacy of the young is important to us. If you are not 18 years old you are not permitted to access this site for any reason. Because of this, we never knowingly collect or maintain information at our site from those we actually know are under 18, and no part of our site is structured to attract anyone under the age of 18.

Telecommunications Privacy

Protecting the privacy of your telecommunications information is important to us. When users make phone calls to or from telecommunication services provided by us, we may track information about the name, phone number, and other information about the call. We do not share this information, unless required to do so by law. We may use this information in the aggregate to analyze trends or to improve the service. By contacting us via telephone you are allowing us to contact you even if your phone number is on any legal DNC (do not call) lists.

Security

We use industry-standard good practices to protect our users Personal Data. When users submit Personal Data via the site, we strive to ensure that Personal Data is protected both online and off-line. However, please be aware that no data transmission over the Internet or information storage technology can be guaranteed to be 100% secure.

When our registration/order form asks users to enter financial or other sensitive Personal Data (such as a credit card number and/or a social security number), that information is encrypted and is protected with industry-standard technology.

While we use industry-standard technology to protect sensitive information online, we also work to protect user-information off-line. All of our users information, not just the Personal Data mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to Personal Data. All employees are kept up-to-date on our security and privacy practices. Finally, the servers that store Personal Data are in a secure environment, in a secure facility.

Supplementation of Information

In order for this site to properly fulfill its obligation to users, it may be necessary for us to supplement the Personal Data we receive with information from 3rd party sources.

Privacy Notice for California Residents

This Privacy Notice for California residents supplements the privacy information herein and applies solely to visitors, users, and others who reside in California ("consumers"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other California privacy laws, without regard to whether they may be applicable to Networx Online. Any terms defined in the CCPA have the same meaning when used in this section. For information about how we extend core rights to control personal information to all of our users, please read our entire privacy policy.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the past twelve (12) months:

- Identifiers, including names, postal addresses, Internet Protocol addresses, email addresses, unique personal identifier, account name, etc.
- Personal information categories listed in the California Consumer Records statute (Cal. Civ. Code sec. 1798.80I), such as name, signature, telephone number, bank account number, credit card number, debit card number, any other financial information. Some personal information in this category may overlap with other categories.
- Protected classification information, such as age, race, color, ancestry, national origin, gender, etc.
- Commercial information, including records of services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.
- Internet or other similar network activity, including information on a consumer's interaction with a website, application, or advertisement.
- Audio/Video data, such as voicemail messages.

Personal information does not include publicly available information from government records, de-identified or aggregated consumer information, information excluded from CCPA's scope, such as health or medical information and other personal information covered by specific privacy laws.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly and indirectly from our clients or their agents. For example, from information provided by or collected from our users related to the services for which they engage us.
- Directly and indirectly from your activity on our website (www.themightygiant.com). For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform. For example, from lead services that provide data to our customers.

Use of Personal Information

Networkx Online will not sell your personal information. However, we may use or disclose personal information we collect for one or more of the following business reasons:

- To fulfill or meet the reason you or our clients or their agents provided the information.
- To provide you with information, products, or services that you request from us, including support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To provide you with email or text alerts or other notices concerning our products or services, events, or news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- For debugging, testing, research, analysis, and product development.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you in collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as party of bankruptcy, liquidation, or similar proceeding, in which persona information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

In the preceding twelve (12) months, Networkx Online has not sold any personal information.

In the preceding twelve (12) months, Networkx Online has disclosed the following categories of personal information for a business or commercial purpose as defined by the CCPA: Identifiers, California Customer Records personal information categories, Commercial Information, internet/electronic activity, and audio/video data. We only disclose your personal information to a third-party for a business or commercial purpose. When we disclose personal information for a business or commercial purpose, we are disclosing that information to service providers, applicable customers, and/or law enforcement.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information.

Access to Specific Information and Data Portability Rights

You have the right to request access to specific information about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (a data portability request);
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing,
 - Sales, identifying the personal information categories that each category of recipient purchased; and
 - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

You also have the right to request deletion of your personal information, subject to the exceptions set forth in CCPA sec. 1798.105, including but not limited to, retaining the information is necessary to complete the transaction for which we collected the personal information, detecting security interests, or complying with a legal obligation. Once we receive and confirm your verifiable consumer request, we will delete and direct our service providers to delete your personal information from our records unless an exception applies.

Exercising Access, Data Portability, and Deletion Rights

To exercise your access, data portability, and deletion rights, please submit a verifiable consumer request to us either by: Emailing us at top@businesscenterteam.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. A request can only be made twice in any twelve (12)-month period.

Making a verifiable consumer request does not require you to create an account with us; however, Networx Online will need to collect information from you in order to verify your identity. We will consider request made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will respond within 45 days of receiving your verified request.

Non-Discrimination

We will not discriminate against you for exercising your rights under the CCPA. Unless permitted by the CCPA, we will not

- Deny you goods and 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.
- Suggest that you might receive a different price or rate for goods or services or a different level or quality of goods or services.

Notification of Changes

We will post any changes to this privacy statement in places that we deem appropriate. We will use Personal Data in accordance with the privacy policy under which the Personal Data was collected.

If, however, we are going to use users Personal Data in a manner different from that stated at the time of collection we will notify users via email. Users will have a choice as to whether we use their Personal Data in this different manner. However, if users have opted out of all communication with the site, or deleted/deactivated their account, then they will not be contacted, nor will their Personal Data be used in this new manner. If we make any material changes in our privacy practices that do not affect Personal Data already stored in our database, we will post a prominent notice on our Web site notifying users of the change. In some cases where we post a notice, we will also email users, who have opted to receive communications from us, notifying them of the changes in our privacy practices.

Contact Information

If users have any questions or suggestions regarding our privacy policy, or wish to exercise their rights regarding their Personal Data please contact us at: top@businesscenterteam.com

This policy is effective Jan 1, 2020