GDPR PRIVACY POLICY

Overview

This GDPR Privacy Policy ("Policy") relates to our website at www.TheSalesCoachNetwork.com (the "Site"), and all related downloadable software, and other services provided by us and in or on which a link to this Policy is displayed, and all other communications with individuals by written or oral means, such as email or phone (collectively, together with the Site, (our "Service")).

This Policy describes the information that The Sales Coach Network Limited ("we" or "us") gathers on or through the Service, how we use and disclose such information, and the steps we take to protect such information. By visiting the Site, or by purchasing or using any Services, you consent to the privacy practices described in this Policy.

This Policy is incorporated into, and is subject to, our Terms and Conditions of Business. Capitalised terms used but not defined in this Policy have the meaning given to them in our Terms and Conditions of Business.

Definitions

"**Client**": means a customer of ours.

"**Client Data**": means personal data, reports, addresses, and other files, folders or documents in electronic form that a User of any of our Services stores within the Service which would include but not be limited to Data uploaded by a Client to our Site.

"**Personal Data**": means information that specifically identifies an individual or that is linked to information that identifies a specific individual.

"**Public Area**": means the area of the Site that can be accessed both by Users and Visitors, without needing to use a login ID and a password.

"**Restricted Area**": means the area of the Site that can be accessed only by Users, and where access requires the use of a login ID and a password.

"**User**": means a Client or an employee, agent, or representative of a Client, who primarily uses the restricted areas of the Site for the purpose of accessing the Service in such capacity.

"**Visitor**": means an individual other than a User, who uses the public area, but has no access to the restricted areas of the Site or Service.

The Information We Collect on the Service:

We collect different types of information from or through the Service:

User-provided Information:

When you use the Service, as a User or as a Visitor, you may provide, and we may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number, and credit card or other billing information. You may provide us with Personal Data in various ways on the Service. For example, when you register for an Account, use the Service, post Client Data, interact with other users of the Service through communication or messaging capabilities, or send us customer service -related requests.

Information Collected by Clients:

A Client or User may store or upload into the Service Client Data. Each Client is responsible for providing notice to third persons concerning the purpose for which the Client collects their Personal Data and how this Personal Data is processed in or through the Service as part of Client Data.

"Automatically Collected" Information:

When a User or Visitor uses the Service, we may automatically record certain information from the User's or Visitor's device by using various types of technology, including cookies, "clear gifs" or "web beacons." This "automatically collected" information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content the User or Visitor views or interacts with on the Service, and the dates and times of the visit, access, or use of the Service. We also may use these technologies to collect information regarding a Visitor or User's interaction with email messages, such as whether the Visitor or User opens, clicks on, or forwards a message. This information is gathered from all Users and Visitors.

Integrated Services:

You may be given the option to access or register for the Service through the use of your username and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Google account, or otherwise have the option to authorise an Integrated Service to provide Personal Data or other information to us. By authorising us to connect with an Integrated Service, you authorise us to access and store your name, email address(es), date of birth, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.

How We Use the Information We Collect:

We use the information that we collect in a variety of ways in providing the Service and operating our business, including the following:

Operations:

We use the information – other than Client Data – to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service. We process Client Data solely in accordance with the directions provided by the applicable Client or User.

Improvements:

We use the information – other than Client Data – to understand and analyse the usage trends and preferences of our Visitors and Users, to improve the Service, and to develop new products, services, features, and functionality.

Communications:

We may use a Visitor's or User's email address or other information – other than Client Data – to contact that Visitor or User

(i) for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or other issues related to the Client Data or Personal Data posted on the Service or;

(ii) with updates on promotions and events, relating to services offered by us and by third parties we work with.

You have the ability to opt-out of receiving any promotional communications as described below under "Your Choices."

To Whom We Disclose Information:

Except as described in this Policy, we will not intentionally disclose the Personal Data or Client Data that we collect or store on the Service to third parties without the consent of the applicable Visitor, User or Client. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

Unrestricted Information:

Any information that you voluntarily choose to include in a Public Area of the Service, such as on a chat forum, or an advertisement, will be available to any Visitor or User who has access to that content.

Service Providers:

We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or

process Personal Data or Client Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

Non-Personally Identifiable Information:
We may make certain automatically collected, aggregated, or otherwise non personally identifiable information available to third parties for various purposes, including.

(i) compliance with various reporting obligations
(ii) for business or marketing purposes; or
(iii) to assist such parties in understanding our Clients'

Users' and Visitors' usage patterns for certain programs, content, services, and/or functionality available through the Service.

Law Enforcement, Legal Process and Compliance:
We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to

(i) take precautions against liability
(ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity
(iii) investigate and defend ourselves against any third-party claims or allegations
(iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available; or
(v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others

Transfer of Ownership
Information about Users and Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the User or Visitor Data commits to a Privacy Policy that has terms substantially consistent with this Policy.

Client Data may be physically or electronically transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar

transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, for the sole purpose of continuing the operation of the Service, and only if the recipient of the Client Data commits to a Privacy Policy that has terms substantially consistent with this Policy.

Your Options

Access, Correction, Deletion:
We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services. If you wish to access or amend any other Personal Data we hold about you, or to request that we delete any information about you that we have obtained from an Integrated Service, you may contact us as set forth in the "How to Contact Us" section. At your request, we will have any reference to you deleted or blocked in our database.

You may update, correct, or delete your Account and or Account information and preferences at any time by accessing your Account Admin settings page on the Service or by contacting us by the details described within the "How to Contact Us" section. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of the features and functionality of the Service.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law.

This provision does not apply to Personal Data that is part of Client Data. In this case, the management of the Client Data is subject to the Client's own Privacy Policy, and any request for access, correction or deletion should be made to the Client responsible for the uploading and storage of such data into the Service.

Navigation Information:
You may opt out from the collection of navigation information about your visit to the Site by Google Analytics by using the Google Analytics Opt-out feature.

Opting out from Commercial Communications:
If you receive commercial emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to admin@thesalescoachnetwork.com.

Users are able to view and modify settings relating to the nature and frequency of promotional communications that they receive from us by contacting us using the unsubscribe option link contained within the email.

Please be aware that if you opt-out of receiving commercial emails from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten (10) business days for us to process your request. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

If a Client requests us to remove any data, we will respond to its request within fifteen (15) days. We will delete, amend or block access to any Personal Data that we are storing only if we receive a written request to do so from the Client who is responsible for such Personal Data, unless we have a legal right to retain such Personal Data. We reserve the right to retain a copy of such data for archiving purposes, or to defend our rights in litigation. Any such request regarding Client Data should be addressed as indicated in the "How To Contact Us" section, and include sufficient information for us to identify the Client and the information to delete or amend.

Third-Party Services:

The Services we provide may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: http://sopro.io. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.

Your Privacy Rights:

We will not share any Personal Data with third parties for their direct marketing purposes to the extent prohibited by law. If our practices change, we will do so in accordance with applicable laws and will notify you in advance.

Interest Based Advertising:

Interest based advertising is the collection of data from different sources and across different platforms in order to predict an individual's preferences or interest and to deliver to that individual, or his/her computer, smart phone or tablet, advertising based on his/her assumed preference or interest inferred from the collection of data pertaining to that individual or others who may have a similar profile or similar interests.

We work with a variety of third parties to attempt to understand the profiles of the individuals who are most likely to be interested in our Services so that we can send them promotional emails or serve our advertisements to them on the websites and mobile apps of other entities.

These third parties include:

(i) advertising networks, which collect information about a person's interests when that person views or interacts with one of their advertisements.
(ii) attribution partners, which measure the effectiveness of certain advertisements; and
(iii) business partners, which collect information when a person views or interacts with one of their advertisements.

In collaboration with these third parties, we may collect information about our customers, prospects and other individuals over time and across different platforms when they use these platforms or interact with them.
Individuals may submit information directly on our Sites or on platforms run by third parties, or by interacting with us, our advertisements, or emails they receive from us or from third parties. We may use special tools that are commonly used for this purpose, such as cookies, beacons, pixels, tags, mobile advertising IDs, flash cookies, and similar technologies.

We may have access to databases of information collected by our business partners.

The information we or third parties collect enables us to learn what purchases the person made, what ads or content the person sees, on which ads or links the person clicks, and other actions that the person takes on our Sites, or in response to our emails, or when visiting or using third parties' platforms.

We, or the third parties with which we work, use the information collected as described above to understand the various activities and behaviours of our customers, Site visitors and others.

We, or these third parties, do this for many reasons, including:

(i) to recognise new or past visitors to our Sites
(ii) to present more personalised content
(iii) to provide more useful and relevant ads – for example, if we know what ads you are shown we can try not to show you the same ones repeatedly
(iv) to identify visitors across devices, third party websites and sites; or
(v) to display or send personalised or targeted ads and other custom content that is more focused on a person's perceived interest in products or services similar to those that we offer

Our interest-based advertisements may be served to you in emails or on third-party platforms.

We may serve these advertisements about our products or services or send commercial communications directly ourselves or through these third parties.

Visitors may opt out of receiving interest-based advertising by advertising networks that may be delivered to them on our platform and other websites by visiting the following websites:

https://tools.google.com/dlpage/gaoptout
https://www.facebook.com/help/146952742043748

These features will opt a Visitor out of many – but not all – of the interest-based advertising activities in which we or third parties engage.

Third Party Cookies

We are legally required to disclose whether other third parties may collect personally identifiable information about an individual's online activities from our Site or Service.

The information gathered by these third parties is used to make predictions about your interests or preferences so that they can display advertisements or promotional material on this Site and on other sites across the Internet tailored to your apparent interests.

The business partners and advertising networks that serve interest-based advertisements on the Services have limited access to a small amount of information about your profile and your device, which is necessary to serve your advertisements that are tailored to your

apparent interests. It is possible that they may reuse this small amount of information on other sites or services.

We do not share with these third parties any information that would readily identify you (such as email address); however, these third parties may have access to information about your device (such as IP or MAC address). We do not have access to, or control over, the technologies that these third parties may use to collect information about your interests, and the information practices of these third parties are not covered by this Privacy Notice. Other than as discussed in this document, we have no control over these third parties.

Minors' Privacy

Protecting the privacy of minors is especially important. Our Service is not directed to minors under the age of 16, and we do not knowingly collect Personal Data from persons under the age of 16 without obtaining parental consent. If you are under 18 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Data has been collected on the Service from persons under 16 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 18 years of age has obtained an Account on the Service, then you may alert us at admin@thesalescoachnetwork.com and request that we delete that child's Personal Data from our systems.

The Service is not intended to be used by minors and is not intended to be used to post content to share publicly or with friends. To the extent that a minor has posted such content on the Service, the minor has the right to have this content deleted or removed using the deletion or removal options detailed in this Policy. If you have any question regarding this topic, please contact us as indicated in the "How to Contact Us" section. Please be aware that, although we offer this deletion capability, the removal of content may not ensure complete or comprehensive removal of that content or information.

Data Security

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it.

We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. We use TLS technology to encrypt data during transmission through public internet, and we also employ application-layer security features to further anonymise Personal Data.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk.

We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the "How to Contact Us" section. If we learn of a security systems breach, we will inform you of the occurrence of the breach in accordance with applicable law.

Data Retention

We only retain the Personal Data collected from a User for as long as the User's account is active or otherwise for a limited period of time as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law. We will only retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Privacy Settings

Although we may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. We are not responsible for circumvention of any privacy settings or security measures on the Service. Additionally, we cannot control the actions of other users with whom you may choose to share your information.

Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service. We cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorised persons.

Data Transfer

We may transfer personal information outside the UK and European Economic Area (EEA) (which comprises the countries in the European Union and Iceland, Liechtenstein and Norway) to the US on the basis that the organisation receiving the information has provided adequate safeguards by way of being signatories of the EU-US privacy shield.

Foreign Visitors

The Service is hosted in the UK. If you choose to use the Service from regions of the world with laws governing data collection and use that may differ from EU and UK law, then please note that you are transferring your Client Data and Personal Data outside of those regions to the UK for storage and processing. Also, we may transfer your data to other countries or regions in connection with storage and processing of data, fulfilling your

requests, and operating the Service. By providing any information, including Client Data and Personal Data, on or to the Service, you consent to such transfer, storage, and processing.

Data Controller and Data Processor

We do not own, control or direct the use of any of the Client Data stored or processed by a Client or User via the Service. Only the Client or Users are entitled to access, retrieve and direct the use of such Client Data. We are largely unaware of what Client Data is actually being stored or made available by a Client or User to the Service and do not directly access such Client Data except as authorised by the Client, or as necessary to provide Services to the Client and its Users.

We should be considered only as a processor on behalf of our Clients and Users as to any Client Data containing Personal Data that is subject to the requirements of GDPR.

Except as provided in this Policy, we do not independently cause Client Data containing Personal Data stored in connection with the Services to be transferred or otherwise made available to third parties, except to third party subcontractors who may process such data on our behalf in connection with our provision of Services to Clients. Such actions are performed or authorised only by the applicable Client or User.

The Client or the User is the data controller under the Directive for any Client Data containing Personal Data, meaning that such party controls the manner such Personal Data is collected and used as well as the determination of the purposes and means of the processing of such Personal Data.

We are not responsible for the content of the Personal Data contained in the Client Data or other information stored on our servers (or our subcontractors' servers) at the discretion of the Client or User nor are we responsible for the manner in which the Client or User collects, handles disclosure, distributes or otherwise processes such information.

Changes and Updates to this Policy

We may update this Policy from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy. This privacy notice was published on 01/12/2022 and last updated on 01/07/2023.

How to Contact Us

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email at admin@thesalescoachnetwork.com.