

This privacy policy complies with the laws laid out in the General Data Protection Regulations (GDPR), effective May 25<sup>th</sup>, 2018.

This Privacy Policy ("Privacy Policy") explains how Green Rain Media, ("GRM," "we" or "us") collect, use and share personally identifiable information of visitors to our web site (the "Site") and users of our products and services (the "Services"). Please note that the primary purpose of our Site and the Services is to find information, use resources, attend events, take courses in and be educated in the sector ("Services").

By using the Site or Services you consent to the collection, use and disclosure of your personally identifiable Site Information and Course Information and Services, as applicable, in accordance with this Privacy Policy. You also confirm that you are over 18 years of age at the time of agreeing to these terms and conditions.

We consider ourselves an ethical and morally responsible company and agree to treat you and your data fairly and with respect.

#### 1. Your Personally Identifiable Information - How We Collect and How We Use It.

You can generally visit the external areas of the site without revealing any personally identifiable information about yourself. We do not collect identifiable personal information from our Site visitors without the Site visitor providing us with this information as set forth in this Privacy Policy.

If you request to receive company or product information, or request information about specific Services, or provide comments about Services, you will be asked to provide contact information so that we can complete your request. We use this Site Information to fulfil your request. We may also use this Site Information to send you additional information about our Services or Courses on the Site that you may be interested in.

Some of the Services require that you become a registered user and create a user account. This will require that you provide certain personally identifiable information, that may include (but not be limited to) your name, e-mail address, and telephone and address information.

You allow us to use this personally identifiable Site Information to register you to use the Services, and otherwise provide you with the Services; verify your authority to enter the Site and access the Services; notify you of updates; improve the content and general administration of the Site and the Services; provide you with notices regarding the Services and other services that you have purchased or may wish to purchase in the future.

We will not store any data in our systems relating to your identifiable personal information that is not directly relevant, or needed for the general use of the Site, the Services.

Any data that you submit to GRM will be held as private and confidential and will not be shown or made available to any third parties, the public or other members at any time. The only exception to this data is any public data you upload, which is detailed in section 12.

Your data will be accessible by GRM employees, contractors and temporary workers if that data is required to assist in managing your account or, assist in providing the Services. However, this data will never be removed from or copied out of any of the GRM platforms.

We may also employ third party services or applications (data processors) to assist in providing Services and again this data will only be made available to them for the purposes of providing those Services. With these third-party services or applications, adequate contracts will be employed to ensure confidentiality and the privacy of your data.

You agree that you are free, and/or have adequate license, and/or have adequate permission to use any data that you provide or upload to the Site and the Services. You also agree to indemnify GRM against any breaches of copyright law or license or permissions of data, or any litigation that may arise from your data and its permissible use that you have uploaded.

## 2. Your Personally Identifiable Information - How Long we Retain the Information

2.1 - Data we have collected relating to you over time that may be required to be kept for legal or financial regulatory reasons will be kept for the statutory 7-year retention period, after which the data will be removed. Examples of this could be (but not limited to) financial invoices and order history, course information that proves we have delivered the required service to you and so on.

2.2 Any data that does not need to be kept for legal or financial regulatory reasons will be deleted after 2 years of your last account login period, or your last interaction with us, whichever is greater.

2.3 Any data that we require to fulfil any current contracts or agreed services with you will be kept until the contract is terminated, for example (but not limited to), account data allowing you to access the Services, after which point, point 2.2 applies.

2.4 In cases where you have requested a service from us to display data publicly, for example, but not limited to the Career Profile Website, we will continue to hold and display that data (and any data that is necessary to support that service) until you request that we remove it.

## 3. Your Personally Identifiable Information - Your Right to Be Forgotten

You have the right to be forgotten under the laws of the General Data Protection Regulation. If at any time you wish for your data to be deleted, contact our support team using the Contact Us page

As long as the deletion of data does not break the terms in section 2, we will delete all of your identifiable personal information.

## 4. Your Personally Identifiable Information - Your Right to See What Data We Hold

If you are an existing subscriber or, have previously been a subscriber then at any time you can log into the Site, navigate to the My Account section and click the "Show Personal Information Held on Me" link at the bottom of the page. This will automatically provide an exhaustive list of all your identifiable data held at GRM and its websites.

If you are not an existing subscriber and wish to see what information is stored about you, contact our support team using the Contact Us page and we will respond with the information we store relating to you.

Note that in both cases you will be asked for your email address to locate your account, but this will not be additionally stored.

## 5. Your Personally Identifiable Information - Your Right to Portability of your Data

At any time, you may request that we send your data to a third party. To initiate this process, contact our support team using the Contact Us page and we action this request for you.

Please note that we take no responsibility for the use of this data by any third party and are not liable for this data being in any specified format that the third party may request.

#### 6. Your Personally Identifiable Information - Data Breaches

To comply with the GDPR regulations, if any breaches of any data occur, we are obligated to inform the ICO (Information Commissioner's Office) within 72 hours of the breach. For any breaches that are considered critical, for example, any breaches that have released financial information, we are obligated to inform you immediately. We will do this using the contact information that we store on you.

#### 7. Other Information We Collect and How We Use It.

GRM may also automatically collect and analyze Site Information about your general usage of the Site and Services. We might track your usage patterns to see what features of the Site and Services you commonly use, Site traffic volume, frequency of visits, type and time of transactions, type of browser, browser language, IP address and operating system, and statistical information about how you use the Services and Services.

We only collect, track and analyze such Site Information in an aggregate manner that does not personally identify you. This aggregate data may be used to assist us in operating the Site and the Services and be provided to other third parties to enable them to better understand the operation of the Services and improve their Course offerings, but such information will be in aggregate form only and it will not contain personally identifiable data.

#### 8. Children/Minors.

We recognize the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. We do not knowingly collect personal information from children under 13. If we learn that we have collected personal information from a child under 13, we will delete such information. Children under the age of 18 may not register for an account or register for or purchase Courses.

Individuals over the age of 13 but under the age of 18 may only use the Services with the involvement, supervision, and approval of a parent or legal guardian - in such cases the parent or legal guardian must register for their account or purchase the product or services, and it is the parent or guardian that accepts the terms of this policy.

It should also be noted that there are elements of profanity in some of our course and resource material which should be monitored by parents or guardians as to appropriateness for persons aged between 13 and 18, and in such cases, parents should exercise parental guidance.

#### 9. Disclosure of Information.

We will share your personally identifiable Site Information with third parties only in the ways that are described in this privacy policy. These include, but are not limited to, sharing Site Information with service providers (our contracted Data Processors) to allow them to fulfil your requests. We do not sell or disclose your personal information to third parties.

We may also disclose your personally identifiable information: (a) if we are required to do so by law, regulation or other government authority or otherwise in cooperation with an investigation of a governmental authority, (b) to enforce these Terms of Use, or (c) to protect the safety of Users of our Site and Services. In addition, we may transfer your personally identifiable information to a successor entity upon a merger, consolidation or other corporate reorganization.

#### 10. Updating, Correcting and Redaction of Your Information

You have the right to have your data updated or amended.

If you are an existing subscriber or, have previously been a subscriber, then at any time you can log into utilize the link in every email to update, revise or remove your personal data.

If you are not an existing subscriber and wish to have your data amended or redacted contact our support team using the Contact Us page and we will respond to your request.

#### 11. Data Security.

The security of your personal information is important to us. GRM employs procedural and technological measures to protect your personally identifiable information. These measures are reasonably designed to help protect your personally identifiable information from loss, unauthorized access, disclosure, alteration or destruction.

We use software, secure socket layer technology (SSL) encryption, password protection, firewalls, internal restrictions and other security measures to help prevent unauthorized access to your personally identifiable information.

#### 12. Your Public Data - Limitation of Our Liability

You should be aware that when you voluntarily display or distribute personally identifiable information, that information could be collected and used by others. GRM is not responsible for the unauthorized use by third parties of information you post or otherwise make available publicly.

In cases where you upload data that is displayed publicly, you agree to grant GRM a non-exclusive license to display the data, globally and in all regions, without any fee incurred, and for the duration that you wish to display the data, and on all platforms that the Site and the Services may be available on now and in the future.

In cases where you upload data that is not displayed publicly, you agree to grant GRM a non-exclusive license to display the data on our website for your own use, and with private and confidential but visible access to our support staff only, without any fee incurred, and for the duration that you wish to display the data, and on all platforms that the Site and the Services may be available on now and in the future.

#### 13. Links to Other Websites.

The Site and Services may provide links to third party web sites or resources not associated with us and over which we do not have control ("External Web Sites").

Such links do not constitute an endorsement by GRM of the External Web Sites, the content displayed therein, or the persons or entities associated therewith. You acknowledge that GRM is only providing

these links as a convenience and is not in any way responsible for the content of such External Web Sites.

#### 14. Use of Cookies

The website, and subsequent sub-domains of the website (including, but not limited to freebirthday.com, mikeaboutmoney.com, greenrainmedia.com, and any of the subsites or subdomains) use cookies to store information about visits in order to improve your experience and to allow the website to provide content that is more relevant to the visitor.

The website also uses Google Analytics to record visitor data. We use this data solely for our own purposes of improving the website. The data is not shared or sold to any third parties. We do not use any data for the purpose of providing advertising or promoting third parties nor "remarketing".

We do not use any cookies that track your use of the internet on websites other than our own. By using this Web site, you agree to our use of cookies.

#### 15. Mailings & Marketing

Newsletters and occasional marketing and forum mailings are made to our users, members and third parties.

GRM complies with the laws laid out in the General Data Protection Regulations (GDPR).

We will never give or sell your details to third parties - your data will remain solely with us and our group of companies. You have the right to opt-out of any marketing: If you have already opted in to receive email from us but do not wish to continue to receive such mailings you can simply opt-out using the unsubscribe link provided at the bottom of every email.

With the purchase of some products, the user is also added automatically to a relevant support forum. These support forums also provide regular updates via email - again, if you do not wish to receive forum emails you can simply opt-out using the unsubscribe link provided at the bottom of each email. Please note that the forum emails and the newsletter/marketing emails both require separate unsubscribes for users who do not wish to receive them - this is due to our right to retain your data to be able to fulfil a contract with you while you are paying for that service.

From time to time we may also advertise our products to you using the Facebook, Google Adwords, Twitter, and Linked In platforms. For more information on the terms and conditions and privacy policies of these companies, please see the relevant terms and conditions and privacy policies of these companies as these are out of the control of GRM. However, these advertisements will not appear on or within the GRM websites. To remove your data or if you have questions or concerns about your personal data on these platforms, please contact the company in question.

With some of our products and services, for example (but not limited to) some webinars we run on certain platforms, we may collect your telephone data and use SMS marketing to assist with two-factor authentication, or to inform you of start times, changes to event details, or to illustrate or advertise products or services. If you wish at any time to opt-out of these SMS marketing communications contact our support team using the Contact Us page and we will respond to your request.

#### 16. Material Changes.

GRM reserves the right to change this Privacy Policy from time to time. We will post the revised Privacy Policy on this page and will either send a notice to the e-mail address that you specified in your registration and/or post notice of the change, so it is visible when users log-on for the first time prior to said changes taking effect so that you are always aware of what personal information we may collect and how we may use this information.

We encourage you to review this Privacy Policy regularly for any changes. Your continued use of the Site and/or Services will be subject to the then-current Privacy Policy.

#### 17. Financial Information.

GRM does not store any financial information such as users credit card details, passwords, or Paypal passwords. Any payment information that is collected at the time of purchase is defined above. Paypal may store information but they are a separate company so please refer to their terms and conditions, and privacy policy.

The exception to this rule is if you choose to use the CRM tool and in which case you may choose to add your invoice payment details to the settings, quotations or invoices. You may also choose to create quotations and invoices using the system which would also be stored. As with the rest of this policy, this information is treated as private and confidential and not shown to any other parties or members.

#### 18. Contact Us.

We welcome your comments or questions concerning our Privacy Policy. If you would like to contact GRM regarding this Privacy Policy, contact our support team using the Contact Us page

This Privacy Policy was last updated in May 2018 V1.0.0