

Privacy Policy

Effective Date: January 4, 2019

Start With Why, Inc. and its affiliates, Ignite Leadership LLC, Start With Why Digital LLC, and Ignite Books LLC (collectively “SWW”, “we”, “our”, or “us”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive via our website (the “Site”) from users of our Service. This Privacy Policy may be updated from time to time. We will notify you of any material changes by posting the new Privacy Policy on the Site. Your use of the Site following any such notice will signify and constitute your assent to and acceptance of such revised Privacy Policy. Unless otherwise defined in this Privacy Policy, capitalized terms used herein have the same meanings as in our Terms of Service.

- 1. Information We Collect.** Our primary goals in collecting information are to provide and improve our Service, to administer your orders, to communicate with you, and to enable users of the Site to enjoy and easily navigate the Site. When you wish to contact us, create an account on the Site, edit account details, purchase products or services via the Site, or when you join our mailing lists, we will ask you for personally identifiable information. This refers to information about you that can be used to contact or identify you (“Personal Information”). We directly collect the following types of Personal Information:
 - your name;
 - e-mail address;
 - shipping address;
 - billing address;
 - credit card account number;
 - IP address; and
 - and telephone number.
- 2. Information from Social Networking Sites.** Our Service may include interfaces that allow you to connect with social networking sites (each an “SNS”). If you connect to a SNS through the Site, you authorize us to access, use and store the information that you agreed the SNS could provide to us based on your settings on that SNS. We will access, use and store that information in accordance with this Policy. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account settings on the applicable SNS.
- 3. Information Automatically Collected.** When you visit our Site, some information is automatically collected. For example, when you visit our Site your computer’s operating system, Internet Protocol (IP) address, access times, browser type and language, and the Site you visited before our Site are logged automatically (“Usage Information”). We also collect information about your usage and activity on our Site.

- A. Cookies.** We may automatically collect information using “cookies.” Cookies are small data files stored on your hard drive by a Site. Among other things, cookies help us improve our Site and your experience. We use cookies to see which areas and features are popular and to count visits to our Site. We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which are used only by us to recognize your computer or mobile device when it revisits our Services; and (2) third party cookies, which are served by service providers on our Services, and can be used by such service providers to recognize your computer or mobile device when it visits other sites.
- B. Web Beacons.** We may collect information using Web beacons. Web beacons are electronic images that may be used on our Site or in our emails. We use Web beacons to deliver cookies, count visits, understand usage and to tell if an email has been opened and acted upon.
- C. Local Shared Objects.** We may use local shared objects, also known as Flash cookies, to store your preferences such as volume control or to display content based upon what you view on our Site to personalize your visit. Third party partners provide certain features on our Site and display advertising based upon your Web browsing activity using Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and way in which data is stored. Cookie management tools provided by your browser usually will not remove Flash cookies. Learn how to manage privacy and storage settings for certain Flash cookies.
- D. Google Analytics.** We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”), to better assist SWW in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for SWW’s use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that by doing so, you may not be able to use the full functionality of the Site. The use of cookies by Google Analytics is covered by Google’s Privacy Policy, available at: <https://policies.google.com/privacy>.
- E.** Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.com.uk if you are in the UK or European Union (EU).

- 4. Use of Information.** We use your Personal Information collected for the purposes described in this Policy. Specifically, we may use your Personal Information to:
- operate and improve our Site, Products, and the Site;
 - understand you and your preferences to enhance your experience;
 - track, collate, and analyze your use of our Site, Products, and the Site;
 - process and deliver contest entries and rewards;
 - respond to your comments and questions and provide customer service;
 - provide and deliver products and services you request;
 - to send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
 - facilitate your participation in participate in surveys, promotional offers, contests or sweepstakes;
 - communicate with you about new contests, promotions, rewards, upcoming events, and other news about products and services offered by us and our selected partners; and
 - link or combine it with other Personal Information we get from third parties, to help understand your needs and provide you with better service.
- 5. Sharing of Information.** We do not share your Personal Information with third parties except in the following circumstances:
- Affiliates and Subsidiaries. We may share your Personal Information with our affiliates and subsidiaries with the understanding that they will treat such information consistent with this Privacy Policy.
 - Third Party Service Providers. We may share your Personal Information with our third party vendors, consultants and other service providers who work for us and need access to your information provide you with products, services, or information that you request. For example, we use Mailchimp (<https://mailchimp.com/legal/privacy/>) to facilitate our email communications and ZenDesk (<https://www.zendesk.com/company/customers-partners/privacy-policy/>) to provide customer support.
 - Other Third Parties. We may share your Personal Information with appropriate third parties if we believe it is necessary, in our reasonable discretion, to (i) comply with laws or to respond to lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (ii) protect the rights and property of us, our agents, customers, members, and others including to enforce our agreements, policies and terms of use; or (iii) in an emergency to protect the personal safety of SWW, its customers, or any person.
 - Corporate Restructuring. We may share your Personal Information in connection with or during negotiation of any merger, financing, acquisition, or dissolution,

transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets to another entity.

We may also share aggregated anonymous or de-identified information. When we use the term “anonymous data”, we are referring to data and information that does not permit you to be identified or identifiable, either alone or when combined with any other information available to a third party. We may create anonymous data from the Personal Information we receive about you and other individuals whose Personal Information we collect. Anonymous data might include analytics information and information collected by us using cookies. We make Personal Information into anonymous data by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze usage patterns in order to make improvements to our Services.

6. **Payment Card Information.** We do not collect, store, or process any payment card information. Instead, we rely on Stripe to facilitate any payment card transactions. For more information about Stripe’s privacy practices, please see: <https://stripe.com/us/privacy>.
7. **Email Opt-Out and Disabling Cookies.** You may opt out of receiving promotional emails from us by following the instructions in those emails or sending a message with your request and the subject line “EMAIL OPT OUT REQUEST” to inspireme@startwithwhy.com. If you opt out, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations.

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Site.

8. **Third Party Sites and Links.** Our Services may contain links to third party sites and features. This Policy does not cover the privacy practices of such third parties. These third parties have their own privacy policies and we do not accept any responsibility or liability for their sites, features or policies. Please read their privacy policies before you submit any data to them.
9. **Children’s Information.** The Site is not directed at and does not knowingly collect, process, or store Personal Information of children under the age of 13. If you believe a child has provided us with information, contact us at inspireme@startwithwhy.com.
10. **Information Security.** We take reasonable organizational, technical and administrative steps to help protect Personal Information against loss, misuse, unauthorized access or disclosure. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure.

11. Your California Privacy Rights. If you are a California resident, you have the right to request information from us regarding the manner in which SWW shares certain categories of personal information with third parties for their direct marketing purposes, in addition to the rights set forth above. Under California law, you have the right to send us a request at the designated address listed below to receive the following information:

- The categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year;
- the names and addresses of the third parties that received the information; and
- if the nature of the third party’s business cannot be determined from their name, examples of the products or services marketed.

Also, please note that we have not yet developed a response to browser “Do Not Track” signals, and do not change any of our data collection practices when we receive such signals. We will continue to evaluate potential responses to “Do Not Track” signals in light of industry developments or legal changes.

This information may be provided in a standardized format that is not specific to you. The designated email address for these requests can be found at:
inspireme@startwithwhy.com.

12. European Users’ Rights

A. Legal Basis for Processing Information

If you are located in the EU or Switzerland, we rely on several legal bases to process your Personal Information. These legal bases include where:

- The processing is necessary to perform our contractual obligations, such as to provide you with our services;
- You have given your prior consent, which you may withdraw at any time (such as for marketing purposes or other purposes we obtain your consent for from time to time);
- The processing is necessary to comply with a legal obligation, a court order or to exercise or defend legal claims;
- The processing is necessary for the purposes of our legitimate interests, such as in improving, personalizing, and developing our services, marketing new features or products that may be of interest, and promoting safety and security as described above.

If you have any questions about or would like further information concerning the legal basis on which we collect and use your Personal Information, please contact us by emailing inspireme@startwithwhy.com.

B. Rights Under the General Data Protection Regulation

If you are located in the EU or Switzerland, you have the following rights in respect of your Personal Information that we hold:

- Right of access. The right to obtain access to your Personal Information.
- Right to rectification. The right to obtain rectification of your Personal Information without undue delay where that Personal Information is inaccurate or incomplete.
- Right to erasure. The right to obtain the erasure of your Personal Information without undue delay in certain circumstances, such as where the Personal Information is no longer necessary in relation to the purposes for which it was collected or processed.
- Right to restriction. The right to obtain the restriction of the processing undertaken by us on your Personal Information in certain circumstances, such as where the accuracy of the Personal Information is contested by you, for a period enabling us to verify the accuracy of that Personal Information.
- Right to portability. The right to portability allows you to move, copy or transfer Personal Information easily from one organization to another.
- Right to object. You have a right to object to processing based on legitimate interests and direct marketing.

If you wish to exercise one of these rights, please email us at inspireme@startwithwhy.com. You also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

C. Obligations to Data Protection Officers (DPAs)

We will respond diligently and appropriately to requests from DPAs about this policy or compliance with applicable data protection privacy laws and regulations. We will, upon request, provide DPAs with names and contact details of the individuals designated to handle this process. With regard to transfers of Personal Information, we will (1) cooperate with inquiries from the DPA responsible for the entity exporting the data and (2) respect its decisions, consistent with applicable law and due process rights. With regard to transfers of data to third parties, we will comply with DPAs' decisions relating to it and cooperate with all DPAs in accordance with applicable legislation.

D. Contacting Our Data Protection Officer

To contact our designated Data Protection Officer, please send an email to: inspireme@startwithwhy.com

13. EU-U.S. and Swiss-U.S. Privacy Shield.

If you are providing your information from the European Union or Switzerland, SWW (including its affiliates Ignite Leadership LLC, Start With Why Digital LLC, and Ignite Books LLC) complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data transferred from the EU and Switzerland to the United States. SWW has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, the Privacy Shield Principles and to view our certification, please visit <https://www.privacyshield.gov/>. Our participation in the Privacy Shield applies to all Personal Information that is received from the European Union, European Economic Area, and Switzerland.

SWW remains responsible and liable under the Privacy Shield Principles for onward transfers if third-party agents that we engage to process Personal Information on our behalf do so in a manner inconsistent with the Principles, unless we can prove that we are not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, SWW commits to resolve complaints about our collection or use of your Personal Information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact SWW at: inspireme@startwithwhy.com.

We have further committed to refer unresolved Privacy Shield complaints to JAMS (Judicial Arbitration and Mediation Services, Inc.), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please or visit <https://www.jamsadr.com/eu-us-privacy-shield> for more information or to file a complaint. The services of JAMS are provided at no cost to you.

In certain circumstances, the Privacy Shield Framework provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in Annex I to the Privacy Shield Principles. For details, please see: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

SWW is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

14. Changes to This Policy. We may change this Policy from time to time. If we make any changes to this Policy, we will change the “Last Updated” date above. If we make any material change(s) to the Policy, we will post a notice on our Site prior to such changes(s) taking effect.

15. Contacting Us. If you have any questions about this Privacy Policy, please contact us at inspireme@startwithwhy.com.