

PROYECTO LIBERTAD, INC. PRIVACY POLICY

Last updated/effective date: March 18, 2024

This Proyecto Libertad Privacy Policy (this “**Privacy Policy**”) describes how Proyecto Libertad, Inc. and its affiliates (“**we**,” “**our**,” or “**us**”) collect, use and share your Personal Information (as defined below) in the course of providing products and services through any website or mobile application owned or operated by us, in each case whether accessed via computer, mobile device or other technology (each, a “**Site**” and collectively, the “**Sites**”) or otherwise through your use of any of the Sites. By using the Sites, you indicate your assent to all of the terms of this Privacy Policy and to the then-current terms and conditions of use governing the Sites. If you do not agree with the terms of this Privacy Policy or the applicable terms and conditions of use governing the Sites, do not use the Sites or submit any of your Personal Information to us.

Information We Collect

“**Personal Information**” is information that can be used to identify an individual, including, without limitation, such individual’s name, postal address, telephone number(s), e-mail address, date of birth, user ID and password, Site usage data (including, without limitation, device browser and operating system information, device Internet Protocol (IP) and Media Access Control (MAC) addresses, browsing history (including browsing dates, times and click-paths), device lookup information, and device geolocation data (collectively, “**Usage Data**”), and payment and billing-related information. Personal Information does not include publicly available information. When you visit, use or register on the Sites, place orders for products or services through any of the Sites, share any of your Personal Information with your upline through any of the Sites, participate in surveys, questionnaires, polls and promotions, request information, submit comments, feedback forms, videos, messages, photographs or other content on or through any of the Sites, and/or participate in webcasts, chat rooms, forums, message boards, blogs or other interactive features of or through any of the Sites, or otherwise communicate or interact with us through any of the Sites, we collect certain Personal Information from you. How we collect your Personal Information will depend on how you use the Sites and interact with us. We may also collect demographic information, such as your age, gender and ethnicity. When you provide your payment -related information through any of the Sites for purchasing anything through the Sites such as subscriptions, business support materials, content, or similar materials, including your credit card numbers and expiration dates, that payment -related information is immediately transmitted directly to our third-party payment processing provider for processing your payments and it is not stored or otherwise used by us in any other manner.

We utilize Usage Data through analytics services on the Sites for the purposes of giving us operational and marketing data about your usage of the Sites, including in an aggregate manner that does not identify you to us or in a manner that may identify you to us, and that shows us which services and features you are using or accessing within the Sites (including, without limitation, whether you may have accessed or downloaded audiovisual material or other content from the Sites), as well as the device type and hardware features, country and language of download relating to your usage of the Sites.

Information We Receive From Third Parties

We may receive information about you from third parties. For example, if you are browsing another website or mobile app and you opt in at that other website or mobile app to receive information from us, then that third party website or mobile app may forward to us your e-mail address and certain other information about you so that we may contact you as requested. You may also choose to participate in a third-party app or feature via the Sites through which you allow us to collect (or the third party to share) information about you, including Personal Information.

We may supplement or combine the Personal Information we collect about you through the Sites with records received by us from third parties in order to enhance our ability to serve you, to tailor our content to you, and to offer you opportunities to purchase products or services that we believe may be of interest to you.

Cookies, Web Beacons and Analytics Services

When you visit the Sites through any device, we may place some information on that device in the form of cookies. Cookies are small text files used by many websites to uniquely identify a user’s browser, to store information or settings in a user’s browser to enable the website to recognize the user when he or she returns, or to monitor the user’s website browsing behavior. Cookies also help us to provide a customized experience and may enable us to detect certain kinds of fraud. In many cases, you can manage cookie preferences and opt out of having cookies and other data collection technologies used by configure your particular browser’s privacy or other settings. Note, however, that if you configure your browser to not accept cookies from us, then some functions of our Sites may not operate as intended and you may not have access to all the services, features and/or promotions we may offer through the Sites.

Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphic images with a unique identifier, similar in function to cookies, that are placed on website pages and in e-mails and which are used to allow us to determine whether you have performed a specific action. Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages, and to understand usage patterns. Web beacons may be used to measure the effectiveness of the Sites and advertising in certain ways, such as by counting the number of individuals who visit the Sites or open and act upon an e-mail message we have sent. You can make some web beacons unusable by rejecting cookies.

As we mentioned above, we may also use certain analytics services and website visit recognition software to improve the use and functionality of the Sites and to build a demographic profile. If third parties provide such analytics services and software, the third parties

may also receive the information collected, including Personal Information, in which case such third parties' use of such information is governed by their respective privacy policies.

Do Not Track Requests

Unless your browser settings are configured to make your online activities and publicly available information about your online activities invisible to website usage analytics tools, we do not presently have the technological capability to omit you from our collection of usage analytics through the Sites to the extent your browser only sends us a "do not track" message and does not otherwise screen you from tracking without any action on our part.

How We Use Your Personal Information

We collect and use your Personal Information for a variety of business purposes. We may use your Personal Information and personal Usage Data in accordance with this Privacy Policy to:

- register you as a member;
- provide the services, products and offerings that you request or otherwise place orders for, and to communicate with you regarding such services, products and offerings, including the status of your order;
- do all things necessary to administer those services;
- complete your purchase transactions;
- research, develop, manage, protect and improve our Sites, products and services;
- protect the security and integrity of our Sites and correct technical problems and malfunctions on our Sites;
- technically process your information;
- report potential violations of this Privacy Policy and our terms and conditions of use;
- provide services essential to your experience visiting the Sites;
- take precautions against liability;
- maintain and develop our service-oriented software and other business systems;
- provide information to you about products, services, or special deals, as well as inform you about promotions or surveys;
- provide to you newsletters and other marketing materials and information that coincide with your preferences;
- notify you if you are a winner and award you prizes in connection with certain promotions we may sponsor or administer;
- send you "push" notifications through your mobile device(s) if you have opted in to do so; and
- analyze data, or to have a third party do so on our behalf.

We also use non-personal Usage Data for various purposes, including to:

- help diagnose problems with our Sites and servers;
- build up marketing profiles;
- aid strategic development;
- help administer and audit general usage of the Sites; and
- generally improve the Sites and our products and services.

How We Share Your Personal Information with Third Parties, Including IBOs

In addition to how we may use your Personal Information and Usage Data as described above, we may also share your Personal Information and Usage Data with certain third parties. If you are an Independent Business Owner ("IBO") with a business powered by Amway, as one of our registered members, you'll receive advice and information from your own personal business advisory team, a support network consisting of your sponsoring IBO and your upline organization. We may share your Personal Information and Usage Data with our affiliates and third party trusted business partners with whom we collaborate and who provide services and functions on our or their own behalf, such as to companies or individuals that jointly offer products and services, and including, without limitation, Amway, your sponsoring IBO, and your immediate upline. To enable certain communications with you, and to enable us and Amway to work with you and for us to provide high quality support, products and services to you in order for you to, among other things, build your Amway business, *you expressly consent and agree that we may share, and authorize us to share, your following Personal Information and other information with Amway, and with your sponsoring IBO and your immediate upline organization, in the ordinary course of our supporting your business: (a) your contact information (e.g., your name, your postal and/or e-mail address, your phone number(s) and your fax number(s), if and as applicable, (b) your gender, age, nationality, and date and place of birth, (c) your marital status, (d) your IBO organizational information (e.g., your IBO company name and ownership and management details) and your IBO registration number, (e) your registration number with us, and (f) your communications preferences.* Such information provided to Amway will also enable Amway to track your activity through the Sites and with us, including whether, when, and to what extent you have purchased certain business support materials from us or an IBO affiliated with us. Such consent will remain valid until you notify us that it is revoked. We may also provide your Personal Information as necessary to your credit card issuer, credit reporting and fraud checking agencies, to any third party we contract with for purposes of processing payments for services and products you purchase from us through the Sites, and to debt collection agencies if you fail to pay monies owed to us. If you use the Sites and provide Personal Information via a mobile device, your Personal Information will be transmitted via your mobile carrier's network, and thus your carrier may have access to it. Consult your carrier's privacy policy for additional information.

We do not knowingly permit third parties, except for those third parties operating analytics services at our request or authorized by law (i.e., law enforcement), to collect Personal Information from you or track you (i.e., to obtain traffic data through usage analytics tools) through the Sites, but your Personal Information may nonetheless be visible to third parties through the Sites to the extent you make it public (for example, by posting content to public areas as described above). We will not sell your Personal Information.

Your Personal Information and Usage Data may also be used by us or shared with our subsidiaries, affiliates, and other entities controlled by or under common control with us, as well as with Amway, for business, operational and related purposes in accordance with this Privacy Policy. We reserve the right to transfer any information we have about you (including your Personal Information and your Usage Data) in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization, or liquidation of our business. We reserve the right to disclose any Personal Information and Usage Data as needed if that information is requested by law enforcement agencies or if we are required to do so by law, treaty, regulation, subpoena, court order, or a governmental entity. We also may disclose your Personal Information and Usage Data to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating the terms of use of our Sites.

Your Choices, Including Accessing and Correcting Your Personal Information

We will always obtain your permission before collecting your Personal Information through the Sites. We will not use or share your Personal Information collected through the Sites in ways unrelated to the purposes for which you provided such Personal Information to us, including as described in this Privacy Policy, without providing you with a choice whether to permit any such unrelated uses. If you choose not to provide certain Personal Information to us, please be aware that you may be prevented from making full use of the features, services and/or promotions offered through the Sites, or otherwise from maximizing your membership benefits with us. For example, we may require your name and e-mail address in order to register you as a member, complete your orders, add you to e-mail newsletter lists or allow you to comment on our blogs or other content, and we may require your home address, e-mail address and/or telephone number if you would like to enter a contest or sweepstakes we may sponsor or administer, and so that we can send prize notifications, deliver rewards or prizes or notify you of special offers.

You may opt out of having your Personal Information used for commercial purposes. If you no longer wish to receive our marketing and promotional communications, you may contact us by e-mail at questions@audite.app to be removed from our lists or otherwise change your personal settings within the membership area of the Sites. Be sure to include any contact information that you want removed from our promotional contacts list, including physical addresses, telephone numbers, and e-mail addresses (note that if you use more than one e-mail address, you will need to send your opt-out email from each of the e-mail addresses you use). If you receive any online newsletter or similar promotional e-mail communication from us, you will be given the option to “unsubscribe” from receiving further e-mail communications from us at any time. In some cases, when you may visit our Sites, they may allow you to choose whether you wish to receive certain online newsletters and promotional updates and to update your contact information. Your option not to receive promotional and marketing material will not preclude us from corresponding with you, by e-mail or otherwise, regarding your existing or past business relationship(s) with us (e.g., any purchase of our products or services or responses to requests for information you request from us either through use of the Sites or by other means), and will not preclude us from accessing and viewing your Personal Information in the course of maintaining and improving the Sites and our products and services.

We take reasonable measures to ensure that any Personal Information we collect on our Sites is accurate, current, complete, and reliable for its intended use. If you wish to update or otherwise correct Personal Information you have provided to us, you may edit your Personal Information through the applicable Site after completing registration, or contact us at questions@audite.app and we will assist you in doing so. In accordance with our routine recordkeeping, we may delete certain records that contain Personal Information you have submitted through the Sites. We are under no obligation to store such Personal Information indefinitely and we disclaim any liability arising out of, or related to, the destruction of such Personal Information. In addition, by calling us at {Insert phone number}, contacting us through applicable “contact” links on the Sites, or sending an e-mail to questions@audite.app, you may request that we delete or return your Personal Information, and we will then do so, retaining any copies as necessary under applicable law. You should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data remaining due to backups and other reasons. Further, we will not be required to comply with your request to delete your Personal Information if it is necessary for us to maintain your Personal Information for certain valid business reasons pursuant to applicable law.

Protecting Your Privacy

We acknowledge your trust and are committed to taking reasonable measures to protect Personal Information you provide to us through the Sites from loss, misuse, and unauthorized access. To safeguard and prevent unauthorized access to, and to maintain the integrity of, your Personal Information, we employ physical, technological, and managerial controls. Although guaranteed security does not exist on the Internet or offline, we make commercially reasonable efforts to protect such information consistent with this Privacy Policy and applicable laws.

Please note, however, that it is your responsibility to safeguard the password you use to access the Sites. You must promptly advise us at questions@audite.app if you ever suspect that your password has been compromised. We strongly encourage you to change your password regularly to prevent unauthorized access. Because your user identification number, username and password are specific to you, you acknowledge your sole responsibility for any and all use of our Sites conducted with your user identification number, user name and password.

Uploading Content

You are solely responsible for the information and other content you post on or through the Sites. You understand that Personal Information, content and other information that you post on or through the public areas of the Sites are generally accessible to, viewed, used and collected by, others (including other members), and may result in solicited or unsolicited messages or other contact from others. You are encouraged to exercise caution when posting your Personal Information about yourself in public areas of the Sites. You represent and warrant that you own or otherwise have permission to use and share any content and any third-party information you may post on or through the Sites, and you agree to indemnify, defend and hold us and our affiliates, subsidiaries, business partners, agents or service providers harmless from and against any claims, liabilities, costs and expenses arising in connection with your provision of such information.

Storing and Transfer of Your Personal Information

We are headquartered in the United States. Your Personal Information will be stored on databases in the United States, and may be accessed by us or transferred to us in the United States or to our affiliates, subsidiaries, business partners, agents or service providers elsewhere in the world. You acknowledge that any information you provide to us may be transferred to and stored in the United States. By using the Sites, or providing us with any information, you consent to the collection, processing, maintenance and transfer of such information in and to the United States. We will protect the privacy and security of Personal Information according to this Privacy Policy regardless of where it is processed or stored.

Notice to Residents of the State of California

This section supplements the remainder of this Privacy Policy and (a) applies solely to residents of the State of California (“**California Residents**”) to the extent the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act, the “**CCPA**”) applies to our processing of the Personal Information of such California Residents, and (b) serves as the “Notice at Collection” required by the CCPA. When used in this Privacy Policy, the term “Personal Information” has the same meaning as the term “personal information” under the CCPA. Personal Information does not include aggregated or de-identified information, or any other information the CCPA excludes from its scope. Our statement above that “We will not sell your Personal Information” includes any actions that meet the definition of a “sale” of personal information under the CCPA with respect to California Residents. Likewise, we also will not “share” California Residents’ Personal Information, as that term is defined under the CCPA. Under the CCPA, and as further described below, each with respect to the immediately previous 12 months, California Residents have the right to request from a business with whom they have an established business relationship certain information with respect to the types and categories of personal information such business collects, the categories of sources from which such personal information is collected, the purpose for which such personal information is collected, the categories and identities of third parties with whom such business shares such personal information for direct marketing purposes by such third party, and the specific pieces of personal information collected.

- **Rights of California Residents Under the CCPA**

We will honor verified requests to exercise the rights the CCPA provides to California Residents regarding their personal information, and we will not discriminate against California Residents in any manner prohibited by applicable law for exercising such rights. Upon request, we will provide California Residents with information about our collection and use of their personal information over the last 12 months, including categories and specific pieces of personal information we have collected about them, our business purpose(s) for collecting it, and the categories of third parties with whom we share it. California Residents may request that we delete any personal information we have collected about them. This right is not absolute, however, and under some circumstances we may decline to delete such personal information as permitted by the CCPA. We do not sell personal information to third parties in exchange for money. However, as set forth above, we share certain personal information with certain third parties, including Amway and IBOs. Under the CCPA, this exchange may be considered a “sale” or “sharing,” and as such, California Residents have the right to opt out of any such “sale” or “sharing” of personal information.

- **California Residents’ Exercise of Their Rights Under the CCPA**

California Residents can exercise their rights under the CCPA as described above by writing to us at Proyecto Libertad, Inc., 1536 Preserve Ln., Houston, Texas 77089, USA, calling us at {Insert Phone Number}, or e-mailing us at questions@audite.app. Please provide sufficient detail to us in any such communication in order for us to properly assess and respond. We may be unable to respond to incomplete or vague requests, and we reserve the right to not respond to requests generated through third party applications or automated processes without direct validation of such requests by individual California Residents.

- **Identity Verification Regarding Requests for Personal Information under the CCPA**

We will require a California Resident to verify their identity before proceeding with a request as described above. Further, any requests made by an individual acting on a California Resident’s behalf will require verification of the subject California Resident, the individual acting on such California Resident’s behalf, and a valid power of attorney under which the subject California Resident granted agency status to the representative making the request. Any such verification may require the subject California Resident or their representative to provide one or more forms of valid government identification.

Links

The Sites may contain links to third party websites which are not under our control. You acknowledge that we are not responsible for the accuracy or any other aspect of the content of any websites we do not own, operate or control. You expressly acknowledge and agree that you’re accessing the links to any such third-party websites is at your own risk and subject to the applicable privacy policies and terms and conditions of such third-party websites. We encourage you to be aware whenever you leave the Sites and to read the privacy statements of each third-party website to which we may link and that may collect your information.

Children

The Sites are not intended for use by children under the age of 13, and we do not knowingly solicit or collect Personal Information from children under the age of 13. If we learn that we have collected the Personal Information of a child under the age of 13, we will take steps to delete such Personal Information as soon as possible. If you are under the age of 13, please do not submit your e-mail address or any other Personal Information to us through the Sites.

Notification of Changes

We reserve the right to change or replace this Privacy Policy at our sole discretion, and at any time. Such changes, which may include additions or deletions, shall be effective immediately upon posting on the Sites. Your continued use of any of the Sites after any such changes are posted will be deemed to constitute your agreement to and acceptance of such changes and the revised Privacy Policy. We will clearly include the date that this Privacy Policy was last updated and is effective.

Questions and Comments

We welcome your questions and comments about this Privacy Policy. To report a known or suspected privacy or security breach or to submit privacy or security-related questions or complaints to us, please contact us by e-mail at questions@audite.app or in writing at Proyecto Libertad, Inc., 1536 Preserve Ln., Houston, Texas 77089, USA.