

# PRIVACY POLICY



Effective Date: May 24, 2024

Upaffluence™ and BLISS Goddess™ and our affiliated companies worldwide are committed to respecting your online privacy and recognize your need for appropriate protection and management of any personally identifiable information (“Personal Information”) you share with us.

Upaffluence™ (hereinafter referred to as “COMPANY”) has established this Online Privacy Policy so that you can understand the care with which we collect, use, process and distribute your information, including Personal Data (as defined below) used to access this Website. We will not use or share your information with anyone except as described in this Privacy Policy. The use of information collected through our Sites shall be limited to the purposes under this Privacy Policy and our Terms of Service to customers.

All references to “we”, “us”, this “website” or this “site” on moniquetoonen.com and its affiliated sites shall be construed to mean Upaffluence.

By using this web site, you accept the privacy practices contained in this Privacy Policy. You are encouraged to review the Privacy Policy whenever you visit the web site to make sure you understand how any personal information you provide will be used. By using our Website or its content, you consent to this Privacy Policy, whether or not you have read it.

## HOW WE MODIFY THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time, and without prior notice, by posting an amended Privacy Policy that is always accessible by clicking on the “Privacy Policy” link

on this site's home page. Your continued use of this site indicates your acceptance of the amended Privacy Policy.

## THE TYPES OF INFORMATION WE COLLECT

**Personal Information.** "Personal Information" includes any information that may be used directly to identify the person. Personal Information that we collect may vary with each separate purpose for which you provide it.

We collect personal information from you so that we can provide you with a positive experience when utilizing our Website or content. We will only collect the minimum amount of information necessary for us to fulfill our obligation to you. We may collect:

1. A name and an email address so we can deliver our newsletter to you – you would be affirmatively consenting to this by providing this to us in our contact forms.
2. Billing information including name, address and credit card information so that we can process payment to deliver our products or services to you under our contractual obligation.
3. A name and an email address if you complete our contact form with a question. We may send you marketing emails with either your consent or if we believe we have a legitimate interest to contact you based on your contact or question.
4. Information from you from a co-branded offer. In this case, we will make clear as to who is collecting the information and whose privacy policy applies. If both / all parties are retaining the information you provide, this will also be made clear as will links to all privacy policies.

Please note that the information above ("Personal Data") that you are giving to us is voluntarily, and by you providing this information to us you are giving consent for us to use, collect and process this Personal Data. You are welcome to opt-out or request for us to delete your Personal Data at any point by contacting us at [info@moniquetoonen.com](mailto:info@moniquetoonen.com).

If you choose not to provide us with certain Personal Data, you may not be able to participate in certain aspects of our Website or content.

**Usage Data.** We reserve the right to monitor your use of this site. As you navigate through this site, Usage Data may be passively collected (that is, gathered without your actively providing the information) using various analytics and reporting technologies, such as cookies and web beacons.

To maintain our Website's high quality, we may use your IP address to help diagnose problems with our server and to administer the Website by identifying which areas of the Website are most heavily used, and to display content according to your preferences. Your IP address is the number assigned to computers connected to the Internet. This is essentially "traffic data" which cannot personally identify you, but is helpful to us for marketing purposes and for improving our

services. Traffic data collection does not follow a user's activities on any other websites in any way. Anonymous traffic data may also be shared with business partners and advertisers on an aggregate basis.

## HOW AND WHEN WE COLLECT INFORMATION

**Personal Information.** We collect Personal Information at the time you provide it to us. We collect Personal Information through sign-up forms and as part of your registration for an account, product, or service, promotion, or contest from this website. Personal Information that we collect may vary with the each sign-up or registration. In addition, we collect personal information from all communications with site visitors including without limitation, text messages, faxes, telephone calls, and regular "snail mail", as well as from third-party outside sources including database vendors.

By submitting your email address on this web site, you agree to receive email from us. You can cancel your participation in any of these email lists at any time by clicking the opt-out link or other unsubscribe option that is included in the respective email. We only send emails to people who have authorized us to contact them, either directly, or through a third party. We do not send unsolicited commercial emails, because we hate spam as much as you do. By submitting your email address, you also agree to allow us to use your email address for custom audience targeting on sites like Facebook, where we display custom advertising to specific people who have opted-in to receive communications from us.

**Your Communications With Us.** We collect Personal Information that we receive from you as you communicate with us. If you complete a signup form subscribing to information from our site or to participate in our mailing list activities, we will receive your Personal Information from our email services and/or auto responder service.

## HOW WE USE YOUR INFORMATION

We may use your Personal Information for the performance of the services or transaction for which it was given, and in connection with other products, services, promotions, or contests we may offer, and our private, internal reporting for this site, and security assessments for this site.

We reserve the right to make full use of Usage Data. For example, we may use Usage Data to provide better service to site visitors, customize the site based on your preferences, compile and analyze statistics and trends about the use of this site, and otherwise administer and improve this site for your use. Specific uses are described below.

Contact You

We may contact you with information that you provide to us based on these lawful grounds for processing:

We may contact you if you give us your clear, unambiguous, affirmative consent to contact you.

We will contact you under our contractual obligation to deliver goods or services you purchase from us.

**Legitimate Interest.** We may contact you if we feel you have a legitimate interest in hearing from us. For example, if you sign up for a webinar, we may send you marketing emails based on the content of that webinar. You will always have the option to opt out of any of our emails.

### Process Payments

We will use the Personal Data you give to us in order to process your payment for the purchase of goods or services under a contract. We only use third party payment processors that take the utmost care in securing data and comply with the GDPR.

### Targeted Social Media Advertisements

We may use the data you provide to us to run social media advertisements and / or create look-alike audiences for advertisements.

### Share with Third Parties

We may share your information with trusted third parties such as our newsletter provider in order to contact you via email, our merchant accounts to process payments, and Google / social media accounts in order to run advertisements and our affiliates.

### Viewing by Others

Note that whenever you voluntarily make your Personal Data available for viewing by others online through this Website or its content, it may be seen, collected and used by others, and therefore, we cannot be responsible for any unauthorized or improper use of the information that you voluntarily share (i.e., sharing a comment on a blog post, posting in a Facebook group that we manage, sharing details on a group coaching call, etc.).

### Submission, Storage, Sharing and Transferring of Personal Data

Personal Data that you provide to us is stored internally or through a data management system. Your Personal Data will only be accessed by those who help to obtain, manage or store that information, or who have a legitimate need to know such Personal Data (i.e., our hosting provider, newsletter provider, payment processors or team members).

It is important to note that we may transfer data internationally. For users in the European Union, please be aware that we transfer Personal Data outside of the European Union. By using our Website and providing us with your Personal Data, you consent to these transfers in accordance with this Privacy Policy.

## INFORMATION SHARING AND DISCLOSURE

**Disclosure Policy.** We reserve the right to disclose your Personal Information to any affiliated entities we may have, including our subsidiaries. Affiliated entities are entities that we legally control (by voting rights) or that control us.

In addition, third parties provide certain services available on COMPANY's behalf. COMPANY may provide information, including Personal Information, which COMPANY collects on the Web, to third-party service providers to help us deliver programs, products, information, and services. Service providers are also an important means by which COMPANY maintains its Web site and mailing lists. COMPANY will take reasonable steps to ensure that these third-party service providers are obligated to protect Personal Information on behalf of COMPANY.

COMPANY does not intend to transfer Personal Information without your consent to third parties who are not bound to act on COMPANY behalf unless such transfer is legally required. Similarly, it is against COMPANY policy to sell Personal Information collected online without consent.

We reserve the right to disclose Usage Data without restriction.

**Successors.** If we sell or otherwise transfer part or all of our business or assets to another organization, such as in the course of an acquisition, merger, bankruptcy or liquidation, we may transfer your Personal Information and Usage Data. In such an event, we will require the buyer or transferee to agree to our commitments provided in this Privacy Policy.

**Joint Ventures With Marketing Partners.** We may participate with other companies or individuals for purposes of jointly promoting our products, services, promotions or contests or their products, services, promotions, or contests. We reserve the right to disclose your Personal Information to them for purposes of (i) compensation, transaction processing, fulfillment, and support, and (ii) for purposes of offering you other products, services, promotions, and contests. These joint venture marketing partners may also contact you regarding other products, services, promotions, or contests.

## COOKIES AND OTHER TRACKING TECHNOLOGIES

In order to provide better service for our site, we may use “Cookies” and “Web Beacons” to collect Usage Data to store your preferences and information about what pages you visit and past activity at our site. We may also employ Web Beacons from third parties in order to help us compile aggregated statistics regarding the effectiveness of our promotional campaigns or other operations of our site.

A “cookie” is a small text file that may be used, for example, to collect information about Web site activity. Some cookies and other technologies may serve to recall Personal Information previously indicated by a Web user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. Please remember, however, that cookies may be required to allow you to use certain features of our site.

Web Beacons – sometimes called single-pixel gifs or clear gifs – are used to assist in delivering cookies, and they allow us to count users who have visited pages of our site. We may include Web Beacons in promotional e-mail messages or other communications in order to determine whether messages have been opened and acted upon.

We reserve the right to participate with third party analytics partners, including Google Analytics, to monitor and analyze Web traffic and track user behavior on this site. Google Analytics is a web analysis service provided by Google Inc. (“Google”) to track and examine the use of this site, to prepare reports on its activities, and to share them with other Google services.

## ANALYTICS

We reserve the right to participate with third party analytics partners, including Google Analytics, to monitor and analyze Web traffic and track user behavior on this site. Google Analytics is a web analysis service provided by Google Inc. (“Google”) to track and examine the use of this site, to prepare reports on its activities, and to share them with other Google services.

## SOCIAL MEDIA INTERACTIONS

We invite you to socialize and share your participation with this site and purchases. If you choose to use social media platforms such as LinkedIn, Facebook, YouTube, Twitter, Pinterest, Instagram or any other social media platform, you will be allowing interaction with these platforms or other external platforms directly from this site, and in the process you may be sharing certain profile elements, including your comments. This sharing is subject to each social media program’s privacy policies.

## DO NOT TRACK REQUESTS

Some Web browsers incorporate a “Do Not Track” feature that signals to websites that you visit that you do not want to have your online activity tracked. Each browser communicates “Do Not Track” signals to websites differently, making it unworkable to honor each and every request correctly. In order to alleviate any communication error between browsers and website, we do not respond to “Do Not Track” signals at this time. As the technology and communication between browser and website improves, we will reevaluate the ability to honor “Do Not Track” signals and may make changes to our policy.

## DATA SECURITY

We will implement reasonable and appropriate security procedures consistent with prevailing industry standards to protect data from unauthorized access by physical and electronic intrusion. Unfortunately, no data transmission over the Internet or method of data storage can be guaranteed 100% secure.

While we strive to protect your Personal Information by following generally accepted industry standards, we cannot ensure or warrant the absolute security of any information you transmit to us or archive at this site. Should there be a data breach of which we are aware, we will inform you immediately.

## ANTI – SPAM POLICY

We have a no spam policy and provide you with the ability to opt-out of our communications by selecting the unsubscribe link at the footer of all e-mails. We have taken the necessary steps to ensure that we are compliant with the CAN-SPAM Act of 2003 by never sending out misleading information. We will not sell, rent or share your email address.

## LINKS TO JOINT VENTURE MARKETING PARTNER SITES

This site may contain links to other websites operated by our joint venture marketing partners. If you do click on any of the links to their websites or accept any of their promotional offers, your click-through information and any information that you provide in the process of registration or purchase will be transferred to these sites. We have no responsibility or liability for the policies and practices of these sites. You should be careful to review any privacy policies posted on any of these sites before providing information to them.

## DATA RETENTION

We retain your Personal Data for the minimum amount of time necessary to provide you with the information and / or services that you requested from us. We may include certain Personal Data for longer periods of time if necessary for legal, contractual and accounting obligations.

## CONFIDENTIALITY

We aim to keep the Personal Data that you share with us confidential. Please note that we may disclose such information if required to do so by law or in the good-faith belief that:

- (1) such action is necessary to protect and defend our rights or property or those of our users or licensees,
- (2) to act as immediately necessary in order to protect the personal safety or rights of our users or the public, or
- (3) to investigate or respond to any real or perceived violation of this Privacy Policy or of our Disclaimer, Terms and Conditions, or any other terms of use or agreement with us.

## PASSWORDS

To use certain features of the Website or its content, you may need a username and password. You are responsible for maintaining the confidentiality of the username and password, and you are responsible for all activities, whether by you or by others, that occur under your username or password and within your account. We cannot and will not be liable for any loss or damage arising from your failure to protect your username, password or account information. If you share your username or password with others, they may be able to obtain access to your Personal Data at your own risk.

You agree to notify us immediately of any unauthorized or improper use of your username or password or any other breach of security. To help protect against unauthorized or improper use, make sure that you log out at the end of each session requiring your username and password.

We will use our best efforts to keep your username and password(s) private and will not otherwise share your password(s) without your consent, except as necessary when the law requires it or in the good faith belief that such action is necessary, particularly when disclosure is necessary to identify, contact or bring legal action against someone who may be causing injury to others or interfering with our rights or property.

How You Can Access, Update or Delete Your Personal Data



You have the right to:

1. Request information about how your Personal Data is being used and request a copy of what Personal Data we use.
2. Restrict processing if you think the Personal Data is not accurate, unlawful, or no longer needed.
3. Rectify or erase Personal Data and receive confirmation of the rectification or erasure. (You have the “right to be forgotten”).
4. Withdraw your consent at any time to the processing of your Personal Data.
5. Lodge a complaint with a supervisory authority if you feel we are using your Personal Data unlawfully.
6. Receive Personal Data portability and transference to another controller without our hindrance.
7. Object to our use of your Personal Data.
8. Not be subject to an automated decision based solely on automatic processing, including profiling, which legally or significantly affects you.

You may unsubscribe from our e-newsletters or updates at any time through the unsubscribe link at the footer of all email communications. If you have questions or are experiencing problems unsubscribing, please contact us at [info@moniquetoonen.com](mailto:info@moniquetoonen.com).

## CHILDREN'S ONLINE POLICY

It is not the intention of Retreat and Grow Rich to attract children. Our Website and its content is directed to individuals who are at least 18 years old or older. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 13 years of age, although we currently do not take steps to verify the user to that extent.

## YOUR CONSENT

By using this Web site, you consent to the terms of our Online Privacy Policy, Disclaimer, and Terms of Use, and to COMPANY processing of Personal Information for the purposes given above as well as those explained where COMPANY collects Personal Information on the Web. Should the Online Privacy Policy change, we intend to take every reasonable step to ensure that

these changes are brought to your attention by posting all changes prominently on our web site for a reasonable period of time.

## DATA CONTROLLER AND PROCESSORS

We are the data controllers as we are collecting and using your Personal Data. We use trusted third parties as our data processors for technical and organizational purposes, including for payments and email marketing. We use reasonable efforts to make sure our data processors are GDPR- compliant.

## CONTACT US

If you have any questions regarding this Privacy Policy, please contact the owner and operator of this website business at:

UpAffluence™

Attn: Privacy Policy Officer

Brackenroad 51, D18CV48 Sandyford, DUBLIN Ireland

Email: [info@moniquetoonen.com](mailto:info@moniquetoonen.com)

Telephone: 0372 5412 1076

This Privacy Policy applies to all websites operated by Upaffluence™ and BLISS Goddess™.