

**Global Privacy Pledge**

**For**

**Amkey Inc.**

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## 1. **AdBarter Commitment to Privacy**

At Amkey Inc., hereinafter referred to as “Amkey”, we are fully committed to ensure the confidentiality of personal information as part of our commitment to better serve our clients and business partners on trust. We consider privacy as vital to our business undertaking and we maintain high standards to safeguard personal information.

As part of our commitment, we shall be vigilant in guarding and protecting private and personal information and in handling this in a fair and lawful manner.

This Pledge explains Amkey’s privacy commitment. It identifies the personal information that we collect and hold, and describes how we use, disclose and secure it. This will also give you information on how to contact us if you have any questions regarding this Pledge or our privacy practices.

## 2. **Who is making this Pledge to you?**

This Pledge is being made by Amkey and its global affiliate companies, including Amkey, and Amkey Inc., to reflect our consistent treatment of personal information.

Amkey complies with the laws and regulations of all the countries where we do business. If specific laws, rules or regulations in any location require an Amkey company to provide you with additional or different privacy related rights beyond what is set forth in this Pledge, then that Amkey Company must comply with those specific laws, rules or regulations.

## 3. **To whom and what does this Pledge apply?**

This Pledge covers the personal information of **identifiable individuals** with whom Amkey has an existing or prospective relationship, such as distributor\*, subscribers, clients and business partners around the world.

NOTE: A Distributor is an independent contractor who has a business relationship with the Amkey of companies in different countries under a mutual agreement.

Further, this Pledge covers the personal information of other individuals where either (1) such protection is required by applicable laws, rules and

regulations; or (2) an Amkey Company has made a separate and specific commitment to that effect.

In this Pledge, “personal information” includes any factual or subjective information, recorded or not, about an identifiable individual. In the business of Amkey, this includes information in any form, including but not limited to:

- Your full name;
- Mailing address and telephone numbers (day and night) and e-mail address;
- Sponsor’s name (person who recommended you);
- Age, name, ID numbers, income and ethnic origin;
- Distributor’s files, credit records, loan records, intentions.

#### 4. **What personal information do we collect and how do we collect it?**

Based on our relationship with you, you directly provide us the majority of information we collect. You do this by completing the appropriate application forms with related documentation. We collect personal information from and about you that is adequate, relevant and appropriate to our business. For example, we may collect or verify personal information from or about you in the following ways:

- From application forms, communications, correspondence and other communication, information including your name, age, address, e-mail address, telephone number, Social Security or Social Insurance Numbers or other identification number, income, financial goals, interests, payment method and financial objectives; information on your favorite topics, opinions, evaluations, comments and social status; and information on your lifestyles, habits and health foods preferences;
- From payments, and other commercial transactions made with or by an Amkey Company, information including your financial transactions, credit card and cheque transactions and electronic fund transfers;

NOTE: You may consider some information, *i.e* lifestyle choices and credit card information as confidential or proprietary information, which you may provide with the expectation of privacy. Amkey shall only collect, use and/or disclose this information with express consent of the individual owner of the information.

From your visits to our Web sites, we may use a browser feature called a ‘cookie’ to collect information anonymously and track user patterns on our web sites. The information we collect may include certain technical

- information about your computer and operating systems, and which pages of our sites you visited.

## 5. **How do we use personal information?**

To foster the trust of our clients and business partners, which is our most valued business asset, Amkey shall always use personal information to operate our business in a discreet and professional manner.

Depending on the nature of your relationship with us, we shall use the information you have provided to us **only** for the following purposes:

- to establish and maintain responsible business relations with you, deliver our products and provide ongoing service;
- to evaluate your needs, interests and preferences;
- to conduct marketing and product research, including statistics generation and assessing transaction patterns;

NOTE: These research initiatives will never include personally identifiable information without authorized consent.

- to process transactions, verify your identity, contact information and where applicable, verify obligation information;
- to respond to inquiries and requests;
- to help us design, enhance, market and develop our product and service offerings and improve customer support; and
- to resolve disputes, prevent fraud and to comply with legal and regulatory requirements worldwide.

The Amkey may not seek consent for use of personal information where required under law.

The Amkey shall take all the necessary precautions to ensure the protection of your personal information, whether it is stored electronically or in paper format. In all cases, information shall be kept in secure facilities, protected from unauthorized access and retained only for as long it is required.

## 6. **What personal information do we share internally between Amkey Group of Companies and why do we share it?**

In connection with the uses described above, we may transfer and share some or all of your personal information to and among any Amkey affiliate offices, companies, affiliates and partners including managers, consultants and coaches. Where personal information is to be used in a way not previously identified, Amkey shall obtain the owner's consent prior to the new use.

In some instances, you may decide that you prefer Amkey not to share your personal information among the Amkey companies, consultants, affiliates and partners to promote products and services. If this is the case, you may instruct us in writing not to share certain personal information with any other Amkey companies, consultants, affiliates or partners.

7. **What personal information do we disclose externally with non-affiliated third parties and why do we share it?**

While it is the general policy of Amkey not to sell, license, lease or otherwise disclose your personal information to any third party for any reason, there are certain limited circumstances, as noted earlier and as described below, in which it is necessary to do so. When we do provide personal information to third parties, we provide only that which is required under the circumstances, and is subject to strict terms of confidentiality.

Some of these nonaffiliated third parties are:

- financial service providers (such as credit card payment gateway or banks);
- non-financial companies (such as consumer reporting agencies or technology companies); or
- others (such as professional service organizations or other service providers).

The purposes of disclosure to these nonaffiliated third parties include:

- (1) help us carry out and finalize transactions;
- (2) mail cheques or products to you and other information for us;
- (3) help us verify information, including identity;
- (4) provide us with consulting, accounting, legal and other services;
- (5) help us develop, operate and maintain our services and systems; and
- (6) where permitted and appropriate, perform marketing services for us or participate in joint marketing with us.

These nonaffiliated third parties are required to protect the confidentiality and security of this information and to use it only in accordance with our instructions for the purposes agreed upon.

We may also transfer personal information: (1) to government agencies, exchanges and other self-regulatory organizations and regulatory and law enforcement authorities as necessary or required, (2) as part of the acquisition or merger of Amkey and (3) to other nonaffiliated third parties as requested by you or your authorized representative or as permitted or required by law, rule and/or regulation.

**8. How do we protect the confidentiality and security of personal information?**

- **People.** Amkey staff and employees are trained and educated to handle personal information with care and work to limit access to this information to individuals who need it for the purposes stated in this Pledge.
- **Policies and Procedures.** Amkey shall maintain and monitor our physical, electronic and procedural safeguards to comply with applicable regulations, updating them as needed so that we may safeguard personal information. To institutionalize the safeguarding of privacy within the Amkey global organization, the privacy policy, as summarized in this Pledge, is incorporated in our Corporate Guidelines for implementation by and guidance of Amkey offices and affiliates worldwide. It shall also be part of the basis for quality and performance audits in the organization.

**Security.** Amkey shall take such technical and organizational security measures, as we deem appropriate to keep personal information confidential and secure against unauthorized or unlawful processing, and to prevent loss, destruction or damage.

**9. How can you verify that your personal information is accurate?**

Amkey shall keep personal information only for so long as is necessary for business purposes, as described in Section 5 of this Pledge, or to meet legal and regulatory requirements. Regular reviews shall be conducted to determine whether the information is still required, and a retention schedule shall be established.

Your records of personal information shall be stay current and complete.

If you become aware of any discrepancies in your personal information, please notify us and we will make the necessary corrections.

In certain locations, applicable law may give you the right to request a copy of the personal information that we have about you. Any such

request should be directed in writing as set forth below, and should be prominently labeled.

**10. Will I be able to review, change or correct my information?**

Yes. Personal identifying information may be reviewed, changed or corrected at any time. The owner is responsible for maintaining the accuracy and completeness of his/her personal and other information. We urge you to review your information regularly to ensure that it is correct and complete. If you would like to review your personal information or if you believe that any of your information is incorrect, simply contact us:

- by email at [memberservices@Amkey.net](mailto:memberservices@Amkey.net); or
- by writing to: Amkey's Privacy Officer  
*Local Amkey address*

**11. What if you have questions regarding this Pledge or our privacy practices?**

The Amkey affiliate offices that collect personal information about you is responsible for ensuring that it is handled in accordance with this Pledge and applicable laws, rules and regulations. In the event of any disagreement that cannot be resolved between you and that Amkey office, or if you are unable to contact that company, our mother company will ensure that your legal rights have been protected and respected, and will address your concerns in a fair and timely manner.

If you have any questions regarding this Pledge or our privacy-related practices, please visit our website at [www.Amkey.net](http://www.Amkey.net) or by phone (+1) 323.780.3668. You can also contact us by mail at: Amkey Inc., 1111 Corporate Centre Dr., Suite 105, Monterey Park, CA 91754 USA