

## PRIVACY POLICY

Last Updated: 6 June 2018

Tooliers Inc. is serious about protecting your online privacy. Therefore, we take outmost care to process your personal data in accordance with the principles set forth in the data protection legislation applicable in the European Union, including Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR"). Personal data represents any information relating to an identified or identifiable natural person, and an identifiable person is that person that may be identified directly or indirectly, particularly by reference to an identification number or to one or more factors specific to its physical, psychological, mental, economic, cultural or social identity.

This Privacy Statement explains our views and practices concerning privacy, and how they may pertain to you, as a user of our website, as a client or someone doing business with us, and it applies to data collected through our website, social media, as well as to all other personal data we collect through e-mail or other off-line contacts. The privacy policy describes:

- the purposes for which we collect and use your personal data
- the processing grounds for such purposes
- the categories of personal data we collect from you and process
- the duration of processing of such data
- your rights as data subjects and the manner in which you may exercise them
- to whom we may disclose your personal data

You or Your means you as a participant in or as a user of the any of the following two websites: Tooliers.com and OzanaGiusca.com or any of the products listed on these sites. We or Our or Us means Tooliers.com and OzanaGiusca.com. Our site means any of the following: Tooliers.com and OzanaGiusca.com.

Solution means any product, service, event, program that we provide to our clients.

### 1. WHAT DO WE DO WITH YOUR INFORMATION?

In the context of your interaction with us, you, as a natural person, may be subject to the data processing activities that we perform. Thus, we use your personal data in the following cases:

#### 1.1. If you are a client or potential client of ours

##### i) Providing the solutions you requested from us

We use your relevant personal data in order to deliver the products or provide the services requested from us. For instance, in giving you access to a digital product, we need to have your name and email address; in providing you with the right strategy, we need to understand your business so we will ask you some questions; for us to provide you with the best experience at one of our events, we may ask you to fill in a form; for us to remind you of an event you signed up for, we use your phone number to either call you or send you a text reminder, or your email address to send you a reminder email.

##### ii) Communicating with you

We use your contact details in order to communicate with you with respect to your requests and any other relevant matters.

##### iii) Sending personal and business growth newsletters

We may also use your contact details in order to provide to you in electronic form our specialized newsletters on tips and strategies to grow your Smarter Business, updates with tactics that work now, invitations to events, relevant developments and updates, and any other relevant information, but only if you have subscribed and, hence, given your express

consent to such processing. You can always withdraw your consent expressing thereby your option of not receiving our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail or by writing to [privacy@tooliers.com](mailto:privacy@tooliers.com).

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, address, as well as other personal data you may provide directly to us. We are also making a note of your interests, so we can tailor our communication to you so you only receive relevant emails from us.

#### **1.2. If you are an employee or other collaborator of one of our clients or potential clients**

##### **i) Providing solutions requested from us**

We use your relevant personal data in order to deliver the products or provide the services requested from us.

##### **ii) Communicating with you**

We use your contact details in order to communicate with you with respect to your requests and any other relevant matters.

##### **iii) Sending personal and business growth newsletters**

We may also use your contact details in order to provide to you in electronic form our specialized newsletters on tips and strategies to grow your Smarter Business, updates with tactics that work now, invitations to events, relevant developments and updates, and any other relevant information, but only if you have subscribed and, hence, given your express consent to such processing. You can always withdraw your consent expressing thereby your option of not receiving our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail or by writing to [privacy@tooliers.com](mailto:privacy@tooliers.com).

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, address, as well as other personal data you may provide directly to us.

We are also making a note of your interests, so we can tailor our communication to you so you only receive relevant emails from us.

#### **1.3. If you are a business partner of ours**

##### **i) Maintaining our contractual relationship with you**

We use your relevant personal data in order to maintain our contractual relationship with you.

##### **ii) Communicating with you**

We use your contact details in order to communicate with you with respect to any relevant matter. We also rely in this case on the performance of our agreement as grounds for processing.

##### **iii) Sending personal and business growth newsletters**

We may also use your contact details in order to provide to you in electronic form our specialized newsletters on tips and strategies to grow your Smarter Business, updates with tactics that work now, invitations to events, relevant developments and updates, and any other relevant information, but only if you have subscribed and, hence, given your express consent to such processing. You can always withdraw your consent expressing thereby your option of not receiving our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail or by writing to [privacy@tooliers.com](mailto:privacy@tooliers.com).

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, address, as well as other personal data you may provide directly to us.

We are also making a note of your interests, so we can tailor our communication to you so you only receive relevant emails from us.

#### **1.4. If you are a representative, contact person, employee or other collaborator of a our business partners**

##### **i) Maintaining our contractual relationship with our business partner**

We use your relevant personal data in order to maintain our contractual relationship with our business partner.

##### **ii) Communicating with you**

We use your contact details in order to communicate with you with respect to any relevant business-related matters.

##### **iii) Sending personal and business growth newsletters**

We may also use your contact details in order to provide to you in electronic form our specialized newsletters on tips and strategies to grow your Smarter Business, updates with tactics that work now, invitations to events, relevant developments and updates, and any other relevant information, but only if you have subscribed and, hence, given your express consent to such processing. You can always withdraw your consent expressing thereby your option of not receiving our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail or by writing to [privacy@tooliers.com](mailto:privacy@tooliers.com).

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, address, as well as other personal data you may provide directly to us.

We are also making a note of your interests, so we can tailor our communication to you so you only receive relevant emails from us.

#### **1.5. If you are a job/internship applicant**

We use the personal data contained in the CVs we receive in order to assess the applicants' qualifications for a position within our company, including in relation to our internship program. We base our processing on the grounds of entering into and performing of the agreement.

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, address, personal data included in CVs, education and training details, professional qualifications, as well as other personal data you may provide directly to us.

#### **1.6. If you are a visitor of our premises**

We use your personal data in order to ensure the security of our premises, assets and personnel. In this case, we base our data processing on the legitimate interest of our company, namely the protection of such premises, assets and personnel.

The categories of data processed in this context are your name as well as other personal data you may provide directly to us.

#### **1.7. If you are a user of our website**

We use the personal data we collect from you when you visit our Internet site, in order to monitor the traffic and improve the content of the website. We base this data processing activity on our legitimate interest in ensuring the proper functioning of our website, as well as its improvement.

The categories of data processed in this context are the hour and date of accessing the website and the IP address from which our website was accessed.

For all above categories of data subjects, we may also process your data in the context of changes in structure or similar transactions involving any of our entities. In this case, the grounds for processing may be represented by the legal obligation (in case we are legally obliged to disclose certain personal data to public authorities), the performance of the agreement concluded by us in the context delivering our products and services (if you are a party to such agreement) or our legitimate interest to carry out the work we do in the most effective manner (in the rest of the cases).

In summary, when you purchase something from our site, as part of the buying and selling process, we collect the personal information you give us such as your name, address and email address. In certain cases your phone number. This enables us to both fulfill and support the products you purchase.

When you browse our site, we also automatically receive your computer's internet protocol (IP) address in order to provide us with information that helps us learn about your browser and operating system so we can better improve the experience for all our users.

Email marketing: By submitting your email address to us, you give us your permission so we send you emails about new products, free and premium content (i.e. blog posts, YouTube videos, guides, etc.), and special events. You can of course unsubscribe from receiving such communication any time you choose to, as mentioned in the article below.

When we offer you reports and other items of value which are offered for free, we are relying on legitimate interest to send you such communication.

## **2. CONSENT**

When you provide us with personal information to download a document, access content, complete a transaction, verify your credit card, place an order, arrange for a delivery or return a purchase, we understand that you consent to our collecting it and using it for that specific reason and for receiving relevant information from us.

If we ask for your personal information for a secondary reason (i.e. newsletter subscription and marketing messages), and you provide it, you consent to receive our communication. You may withdraw your consent at any time by clicking on an “unsubscribe” link which is offered at the bottom of every email we send.

You may also withdraw your consent anytime, by contacting us at the address below.

When the data is required directly from you, we kindly ask you to provide all categories of personal data we request in the aforementioned purposes, as otherwise we shall not be able to carry out our activity (including, among others, to provide you with our solutions).

If you provide us with personal data of other natural persons, we kindly ask you to communicate to them before such disclosure the modality in which we intend to process their personal data, as described in this Privacy Policy.

### **3. DISCLOSURE**

We may disclose your personal information if we are required by law to do so or if you violate our Terms of Service. Also, if our site is acquired or merged with another company, your information may be transferred to the new owners so that they may continue to sell and support our products and services.

We do not sell, rent or otherwise disclose your personal information to any third parties, including but not limited to advertisers, strategic partners or vendors, unless you specifically ask us to.

We take your privacy very seriously.

### **4. DATA STORAGE**

Our CRM and e-commerce software is hosted and managed by Infusionsoft. They provide us with the online e-commerce platform that allows us to sell our products and services to you. Your data is stored through Infusionsoft’s data storage, databases and the general Infusionsoft application. They store your data on a secure server behind a firewall. For more information please visit their site: <http://www.infusionsoft.com/legal>.

We process our payments using the online shopping card solution SamCart Inc. <https://samcart.com> and Stripe as merchant account and payment gateway <https://stripe.com>. If you choose a direct payment gateway to complete your purchase, then SamCart Inc stores your credit card data. It is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted.

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover.

PCI-DSS requirements help ensure the secure handling of credit card information by our platform and its service providers.

Occasionally, we use PayPal to process payments – find more information on their site: <https://www.paypal.com>.

Tooliers Inc. does not take custody or store your credit card information. This process is monitored and managed by SamCart Inc, and you can read their terms of service, privacy policy and PCI Compliance information by visiting their site.

### **5. THIRD-PARTY SERVICES**

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

When you click on links on our website, they may direct you away from our site. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

## **6. SECURITY**

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

## **7. COOKIES**

Tooliers and OzanaGiusca.com utilize cookies to create a more customized experience for our users and customers.

We also use tracking pixels (i.e. Google Analytics) to aid in measuring and tracking where our website traffic is coming from and to track the performance of our site.

We use remarketing pixels from Facebook and Google to aid in customized, targeted follow-up advertising.

From time to time we use other tools to track our traffic and to understand our users' behavior so we improve our users' experience.

## **8. AGE OF CONSENT**

By using our site, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this site.

## **9. MEDIA RIGHTS & MEDIA RIGHTS RELEASE FOR EVENT PARTICIPANTS**

By participating to any event organized by us you automatically grant permission to Ozana Giusca and Tooliers to license your name, image and voice. This permission includes the right to publish, reproduce and / or use in any way the media representing you, without any restriction, for any promotion purposes allowed by law. Ozana Giusca and Tooliers may digitally edit, combine, and add creative effects to all photos, videos, or other media containing participant's likeness and is made during the event. As participant, you agree to hold Ozana Giusca and Tooliers harmless for any processing, editing or change in the limits of goodwill / common sense and the law. The rights to use the image, name and voice are given free of charge. You will not ask for any compensation or make any other claims now or in future from Ozana Giusca, her team or Tooliers. You have no rights to the media created during the events. You understand that Ozana Giusca and her team has no duty to grant access to any media produced. The agreement may be granted upon request and can be requested at [office@tooliers.com](mailto:office@tooliers.com). When the venue permits, participants who do not want to be featured in our media and marketing materials can be seated, upon their explicit request, in a special "no camera" area of the room.

## **10. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

#### **11. QUESTIONS AND CONTACT INFORMATION**

If you would like to access, correct, amend or delete any personal information we have about you, register a complaint to the address below.

If you simply want more information, contact our Privacy Compliance Officer at [office@tooliers.com](mailto:office@tooliers.com) or by mail at Tooliers Inc.

#### **12. OTHER PRIVACY OPTIONS**

Here are some other privacy options that are available to you:

Opt out from Google Analytics: <https://tools.google.com/dlpage/gaoptout>

Control the information Google uses to show you ads: <https://adssettings.google.com>

Control your Facebook Ads Preferences: <https://www.facebook.com/ads/preferences>

Opt out from interest-based ads from Google, Facebook and other participating companies:

- through the Digital Advertising Alliance in the US,
- the Digital Advertising Alliance of Canada in Canada,
- the European Interactive Digital Advertising Alliance in Europe

#### **13. CONTACT**

Tooliers Inc.  
1811 Silverside Road Wilmington,  
Delaware 19810, United States

Phone: +1 (302) 261-2616  
[office@tooliers.com](mailto:office@tooliers.com)  
[www.tooliers.com](http://www.tooliers.com)