

PPC WINNER PRIVACY POLICY

1. Preamble and Definitions.

- 1.1. The purpose of this Privacy Policy is to ensure you are fully informed and aware as to the scope and nature of Information PPC collects and/or otherwise receives from or about you while you are using the Site and/or the Services, and how is it being processed and/or otherwise used by PPC.
- 1.2. Terms which are defined in this Privacy Policy shall have the same meaning ascribed to them in the Agreement (which can be viewed at: www.ppcwinner.com), unless otherwise defined herein.
- 1.3. Following your first use of the Site and/or Services, you will be asked to indicate that you have read this Privacy Policy. Please read carefully the terms of this Privacy Policy. If you have further questions or concerns regarding this Privacy Policy, please contact us at: support@ppcwinner.com.
- 1.4. **Definitions:**
 - 1.4.1. The terms "**Use**", "**Your Account**", "**You**", "**Site**", "**Services**", "**Trial Period**" and "**Subscription Term**" shall have the meaning ascribed to them in the Agreement.
 - 1.4.2. "**Personal Information**" or "**PII**" – shall mean any information, data or content, in any format or media, which identify or can personally identify you as an individual (such as you name- e-mail address, credit card number), or as otherwise defined in applicable law. The type of PII that you provide may change when you use the Site and/or the Services.
 - 1.4.3. "**Anonymized Information**" or "**Non-PII**" - shall mean any information, data or content, in any format or media, which is anonymous and/or does not personally identify you as an individual and/or cannot be attributed to you as an individual (such as IP address, browser type, etc.). We may use some electronic tools to collect Non-PII, as detailed in Section 3 below.
 - 1.4.4. "**Information**" - shall mean Non-PII and PII, together.

2. Collection and Use of Personal Information.

- 2.1. General. The collection of PII commences on your first Use of the Site and/or the Services:
 - 2.1.1. When you Use the Site, the PII you will be required to provide us is your name, your e-mail, and your message to us (in the "contact us" text box);
 - 2.1.2. When you open Your Account in order to Use the Services – the PII that you will be required to provide us is your user name, e-mail address and password – to the extent you Use the Services for the Trial Period;
 - 2.1.3. When you purchase the Services – the PII that you will be required to provide us is your full name, credit card number and other associated information (such as expiration date, CVV etc.).

- 2.2. How We collect PII. We collect PII from the information you provide us in the Site and/or the Services. Further, we may use technological tools for "live chat platforms" in order to collect PII, for the purposes detailed in section 2.3 below.
- 2.3. How We use PII. PII shall be used by PPC for the following purposes:
 - 2.3.1. If you approach as via the Site – PPC will use your PII in order to respond to your request. Also, to the extent positively indicated by you, PPC will use your e-mail address in order to send you PPC's newsletter and/or promotional material;
 - 2.3.2. If you are interested in using the Services for a Trial Period - PPC will use your PII in order to complete your registration to the Services and open Your Account; If you purchase the Services – PPC will your PII in order to provide you with the Services and all Services related issues.
 - 2.3.3. Further, when you Use the Services (whether during the Trial Period and the Subscription Term) - PPC may use your PII in order to: (a) communicate with you, and obtain feedback from You regarding the Services; (b) to personalize your experience with the Services, and to better understand your needs both on an aggregated and individualized basis in order to improve our Services (c) to provide you with service announcements and further administrative information regarding your use of the Services, and provide you with Service support; (d) to transfer to it third party vendors, service providers, contractors who are working on our behalf for storage, hosting, process and/or back up purposes; and (e) to enforce the Agreement and this Privacy Policy, and/or as otherwise authorized by you.

3. **Anonymized Information**

- 3.1. General. The collection of Non-PII commences on the first Use of the Site and/or Services.
- 3.2. How We collect Non-PII. We may use certain tools such as "Google Analytics" (including with anonymized IP), Google Ads conversion tracking, cookies, and certain "Facebook" tools such as Facebook Ads conversion tracking and Facebook remarketing (and other tools as may be updated from time to time) both in the Site and/or Services in order to collect Non-PII about your use of the Site and/or Services (as the case may be), for the purposes detailed in section 3.4.
- 3.3. Depending on your computer settings, you may be allowed to refuse the use of such tools (whether in whole or in part). However, this may affect your ability to use the Site and/or the Services, including the access and use certain features.
- 3.4. How We use Non-PII. PPC may use the Non-PII for the following purposes: (i) monitor and analyze your Use of the Site and/or the Services for the technical administration and troubleshooting of the Site and/or Services (ii) for commercial research and further development; (iii) improving the Site and/or the Services by

creating system analytics and statistical data; (iv) transfer to third party vendors, service providers, contractors who are working on our behalf for storage, process and/or back up purposes and (v) for any other legitimate purpose. You hereby warrant and represent that you will not have claim and/or demand, from any kind, regarding the use of the Non-PII any legitimate purpose.

4. Transfer to Third Parties

4.1. You hereby acknowledge and provide your informed consent, that in connection with the purposes set forth in this Privacy Policy, PPC may make the Information available to other third party, as follows:

4.1.1. We may share and/or otherwise transfer the Information to third party's service providers which assist Us in the operation of the Site and/or Services, including (without limitations) for collection of payment, for storage or hosting of the Information and/or the process thereof, for the purposes set forth in this Privacy Policy.

Please note that the PII set forth in section 2.1.3 with respect to your credit card is not stored in PPC's systems is forthwith transferred to the clearing company: When you enter your credit card number and any associated information thereof, you are leaving PPC's Site, and are bound by the clearing company's terms of use. Please read these terms carefully. The invoice for the Services will be issued and transferred to you by the clearing company.

4.1.2. We may share and/or otherwise transfer the Information to third parties, in order to comply with any applicable law, regulations or legal requests and assist law enforcement agencies, or when we believe in good faith that disclosure of Information is necessary to prevent imminent physical harm, financial loss or to report suspected illegal activity. In all cases, such Information will only be disclosed in accordance with applicable laws and regulations;

4.1.3. We may share and/or otherwise transfer the Information to third parties to take any action in any case of dispute involving you with respect to your usage of our Site and/or Service; and

4.1.4. We may sell, transfer or otherwise share some or all of our assets, including the Information in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

4.2. Please be advised that Information may be hosted, stored, processed, maintained and transferred to various countries outside of your state (including in Europe or the USA), where the privacy laws may not be as protective as those in your jurisdiction, and by using the Site and/or Services, you hereby provide your informed consent to the use and/or process and/or hosting, storage and/or transfer of the Information to countries outside your state or country.

5. Rights regarding Personal Information.

- 5.1. You have the right to review your PII that is stored in our database(s) and provide a request for update, amendment and/or deletion by contacting us at: support@ppcwinner.com. We will act in accordance with the applicable law, in order to comply with your request. However, we may retain certain PII as deemed required by and/or as otherwise permitted by applicable law and regulations.
 - 5.2. Unless otherwise required by you and/or required by applicable law, Your PII will be retained for the duration the duration you Use the Site and/or the Services; the NON-PII will be kept indefinitely.
6. **Security.**
- 6.1. We take the safeguarding of the Information very seriously, and use a variety of methods to try to protect the Information from loss or unauthorized use or access when it is in our possession or control, including reasonable technical and organizational measures that restrict access to the Information. However, we do not promise that any Information will be fully protected from unauthorized disclosure or use.
 - 6.2. Please note that PPC does not check the validity of the use of Your Account, and any use of Your Account with your name and password will be considered as your User of the Services.
7. **Changes to the Privacy Policy.** We reserve the right to change this Privacy Policy at our sole discretion. We will inform you of any such change by posting a new Privacy Policy and a prior notice prior to such change; the effective date of any change of Privacy Policy will be clearly marked at the end of each new Privacy Policy posted.
8. **Governing Law.** This Privacy Policy shall be governed by and construed in accordance with the laws of the state of New-York, excluding its choice of law principals. Disputes arising in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the competent courts in New-York, New-York.
9. **Contact Us.** If you have any concerns or questions about this Privacy Policy, please contact us at: support@ppcwinner.com

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