

## **Toptime Privacy Policy for Toptime Associates and Franchisee**

This Privacy Policy describes how Toptime Network Pvt. Ltd. (hereinafter "Toptime") uses personal data collected or received from Toptime Associates and Franchisees. It describes how we may collect or receive your personal data, the types of personal data we may collect, how we use, share and protect these data, how long we retain these data, your rights, and how you can contact us about our privacy practices.

### **How We May Collect or Receive Personal Data from You?**

**Registration.** Toptime collects your personal data through the registration form that you complete and send to us in paper form or electronically through the Toptime website (the "Website") in order to become an Associate or Franchisee.

**Logged in as Associate or Franchisee.** If you are logged in on the Website as an Associate or Franchisee, we may collect your personal data from you, for example, when you order products or services.

**Contacting Us.** You may also choose to submit your personal data and other information to us through various communication channels provided on the "Contact Us" webpage of the Website, for example, Toptime e-mail addresses, telephone numbers or online forms.

**Cookies.** If you are logged in on the Website we may also use cookies or similar technologies that collect certain Website usage information when you access, view and use the Website. A cookie is a data file placed on a computer or mobile device when it is used to visit websites. To learn more about the cookies used by Toptime, please read the "Website Privacy Policy".

You may disable cookies in your browser's settings (e.g., under the "Preferences" or "Internet Options" features of your browser). Note, however, that some features of the Website may not function properly if you disable the use of cookies. For detailed information on how to manage or delete cookies, visit <http://www.allaboutcookies.org/>.

### **The Types of Personal Data We May Collect**

**We may collect the following personal data from you:**

- Contact information (e.g., name, postal or e-mail address, fax number and phone number);
- Gender, age, nationality, date and place of birth;
- Marital Status
- Associate or Franchisee registration number, username;
- Passport details (including number, issue date, issue location and expiration date) and National ID number to the extent permitted or required by applicable law;
- Associate or Franchisee performance information (e.g., class, status, group and personal qualifications under the Toptime Sales and Marketing Plan and financial/bonus history/Franchise commission/Franchise sales data);
- Product preferences, purchasing habits, purchasing history and spending behaviour;
- Communication preferences; and
- Your website usage, IP-address, browser type and operating system.

### **The Types of Sensitive Personal Data We May Collect**

**We may collect the following Sensitive personal data from you:**

- Passwords for accessing our Site
- Payment information (e.g., such as bank account or credit card numbers);

- We may collect other personal data in exceptional circumstances only. If we do need to process such personal data about you, we will make sure that there is a valid legal basis for doing so (e.g. your explicit consent).

### **How We Use the Personal and Sensitive Data We Collect**

#### **We may use the information we obtain about you to:**

- To manage your registration as an Associate or Franchise.
- Create and manage your online account and respond to your inquiries;
- Process your orders of products or services;
- Communicate with you (e.g., about products or services that we offer, or intend to offer);
- Operate, evaluate and improve our business, including by:
  - Evaluating your satisfaction with our current communications, materials, products and/or services;
- Developing new products and services and determining the effectiveness of our advertising; and
- Tracking and analyzing your use of products, materials and/or services;
- Track, document and analyze your Tree of sponsorship;
  - Assessing your performance under your Toptime Associate Registration Agreement or Franchise agreement with us;
  - In case of an Associate, provide business performance information to you (e.g., information on your line of sponsorship, purchase volumes, earned bonuses, levels of awards, your referring Associate or, and your upline Associate under the Toptime Sales and Marketing Plan);
  - In case of an Associate, provide your name, address, telephone number or e-mail address to Associates in both your upline and your downline.;
  - In case of a Franchisee, provide information to you related to your purchases and sales.
  - In case of Franchise, your name, address, telephone number or e-mail address to your Servicing Distributor and other Associates and their upline.
  - Facilitate your use of the Website through the use of cookies (e.g., to offer the shopping basket facility, to remember log in details and language preferences, etc.);
  - Improve the Website, including by tracking and monitoring your use of the Website through the use of cookies, and to diagnose problems with the software or hardware we use;
  - Perform accounting, auditing, billing and collection activities;
  - Enforce contractual terms and conditions;
  - Protect against and prevent fraud, unauthorized transactions, claims and other liabilities; and
  - Comply with applicable legal requirements, industry standards and our policies. If you choose not to provide your personal data or withdraw consent in writing subsequently, we may not be able to provide the above services and reserve the right to terminate the Associate contract or Franchise agreement with you.

### **How We May Share Personal and Sensitive Data**

Toptime does not sell, rent or trade or publish your personal and sensitive data except as required by law. Toptime may share your personal and sensitive data only with:

- Entities within the Toptime group to whom it is reasonably necessary or desirable for Toptime to disclose personal and Sensitive data;
- Government authorities or other third parties, if required by law or reasonably necessary to protect the rights, property and safety of others or ourselves.

### **How We May Share Personal Data**

- For IBDs

With IBDs in your upline or downline organization, to support your business and/or allow communication regarding product advice, ordering advice and product information for the products that you order from Toptime; and

- For Franchise

With your Servicing Distributors.

### **International Data Transfers**

In case if we transfer your personal data to Toptime entities in other countries during expansion of Toptime business, we will protect that data as described in this Privacy Policy and in accordance with applicable law.

### **How We Protect Personal Data**

We maintain appropriate technical and organizational security safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

### **How Long We Retain Personal Data**

We store personal data for as long as necessary to fulfil the purposes for which we collect the data (see above under "How We Use the Personal Data We Collect"), except if required otherwise by law.

### **Updates to this Privacy Policy**

Toptime may update this Privacy Policy from time to time. Any updates or changes to the terms of this Privacy Policy will be posted here on our website [www.toptimenet.com](http://www.toptimenet.com) and the date of the newest version posted. Please check back frequently, especially before you submit any Personal and/or Sensitive Information, to see if this Privacy Policy has changed. We will notify you of any significant changes to this Privacy Policy on the relevant Toptime websites, in official Toptime publications, or through other appropriate communication channels. All changes shall be effective from the date of publication, unless otherwise provided in the notification.

### **Acceptance to this Privacy Policy**

By accessing the [www.toptimenet.com](http://www.toptimenet.com), contacting us through website, providing us with personal information or signing the Associate Contract or the Franchise Agreement, you acknowledge acceptance of this Privacy Policy in effect at the time of use.

### **Your Rights**

Your rights under applicable law may include access to the personal data we process about you and the right to have such personal data corrected.

### **How to Contact Us**

If you have any comments or inquiries about this Privacy Policy, if you would like to update information, we have about you, or to exercise your rights, you may contact our Grievance Officer, at [customercare@toptimenet.com](mailto:customercare@toptimenet.com).