
Privacy Policy

Effective Date: 06/26/2020

This Online Privacy Policy (this “Policy”) describes the information we collect from or about you through the www.thrivs.com website (the “Site”) and the ways in which we use this information.

Please read this Privacy Policy carefully. By visiting and using the Site, you agree that your use of our Site, and any dispute over privacy, is governed by this Privacy Policy.

Scope

This Policy applies to the information we collect from or about you through this Site. It does not apply to information we collect through other channels, such as over phone or in person. Some of the information we collect through this Site may be “personal information”—information that identifies you personally, alone or in combination with other information available to us. Other information may be nonpersonally identifiable, such as your IP address.

We have provided this Policy so that you will know what information we collect, how we use this information, the types of third parties with whom we may share this information, and some of the choices that are available to you.

Your Consent

By using this Site, you are consenting to the collection, use, disclosure, and transfer of your information as described in this Policy. If you do not consent to the collection, use, disclosure and transfer of your information as described in this Policy, you may not use this Site. If you have questions about this Policy, please contact us by email at dagmara@thrivs.com.

Our Terms of Use

This Policy is part of the **Terms of Use** that govern your use of this Site. A link to our Terms of Use is provided at the bottom of each page of this Site.

Changes to Privacy Policy

THrivs.com reserves the right to change this policy at any time. Please check this page periodically for changes. Your continued use of our site following the posting of changes to these terms will mean you accept those changes.

Information collected prior to the time any change is posted will be used according to the rules and laws that applied at the time the information was collected.

Information We Collect

THrivs.com collects the information you manually provide when you use this Site. For example, we collect the information you provide when you create an account, complete a questionnaire, communicate with us, sign up for an event, or otherwise interact with this Site. Some of the information you manually provide may be personal information, such as your name and contact information.

Like most websites, THrivs.com also collects information automatically and through the use of electronic tools that may be transparent to our visitors. This information typically includes your IP address, the name of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. The information we receive may depend on your browser or device settings.

The information we receive from your web browser and device is not, in and of itself, personally identifiable. Generally, we use this information in the aggregate to help us improve this Site and make it more compatible with the technology used by our visitors. However, we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you. We may also review our server logs for security purposes—for example, to detect intrusions into our network—and we might share our server logs, which contain visitors' IP addresses, with the appropriate investigative authorities who could use that information to trace and identify you.

Information We Collect

We use “cookies” and other technologies to collect information and support certain features of this Site. For example, we may use these technologies to:

- collect information about the ways visitors use this Site—which pages they visit, which links they use, and how long they stay on each page;
- support the features and functionality of this Site—for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits;
- personalize your experience when you use this Site; and
- improve our marketing efforts, including through use of targeted advertising.

The information we collect using cookies and similar technologies is not, in and of itself, personally identifiable, but we may link it to personal information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit this Site, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

We use Google Analytics, a web analytics tool that helps us understand how visitors engage with this Site. To learn more about Google Analytics, [click here](#). In addition, we may engage in interest-based advertising or “online behavioral advertising” by collecting (or by allowing third parties to collect) information through this Site about your web-viewing behaviors over time and across non-affiliate websites for the purpose of using that information to predict your preferences or interests and to deliver advertising to you based on the preferences or interests inferred

from your web-viewing behaviors. On our website, interest-based advertising may be executed through delivery of third-party cookies to your computer or mobile device. Other technologies may be used for the purpose of interest-based advertising on our mobile app.

You have choices about the collection of information by third parties on this Site. For example, if you don't want information about your visit to this Site sent to Google Analytics, you may download an Opt-out Browser Add-on by [clicking here](#). Please note that the Add-on does not prevent information from being sent to THrivs.com.

How We Use Your Information

Generally, we may use the information we collect through this Site:

- to provide the information, products and services you request;
- to provide you with effective customer service;
- to provide you with a personalized experience when you use this Site;
- to contact you with information and notices related to your use of this Site;
- to contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- to invite you to participate in surveys and provide Feedback to us (in accordance with any privacy preferences you have expressed to us);
- to improve the content, functionality and usability of this Site;
- to better understand your needs and interests;
- to improve our products and services;
- to improve our marketing and promotional efforts;
- for security, credit or fraud prevention purposes; and
- for any other purpose identified in an applicable click-through agreement or other agreement between you and us.

Affiliated sites, linked sites and advertisements

THrivs.com expects its partners, advertisers and affiliates to respect the privacy of our users. Be aware, however, that third parties, including our partners, advertisers, affiliates and other content providers accessible through our site, may have their own privacy and data collection policies and practices. For example, during your visit to our site you may link to, or view as part of a frame on Thrivs.com pages, certain content that is actually created or hosted by a third party. Also, through THrivs.com you may be introduced to, or be able to access, information, surveys, Web sites, features, contests or sweepstakes offered by other parties. THrivs.com is not responsible for the actions or policies of such third parties. You should check the applicable privacy policies of those third parties when providing information on a feature or page operated by a third party.

While on our site, our advertisers, promotional partners or other third parties may use cookies or other technology to attempt to identify some of your preferences or retrieve information about you. For example, some of our advertising is served by third parties and may include cookies that enable the advertiser to determine whether you have seen a particular advertisement before. Other features available on our site may offer services operated by third parties and may use cookies or other technology to gather information. THrivs.com does not control the use of this technology by third parties or the resulting information, and are not responsible for any actions or policies of such third parties.

You should also be aware that if you voluntarily disclose Personally Identifiable Information on message boards or in chat areas, that information can be viewed publicly and can be collected and used by third parties without our knowledge and may result in unsolicited messages from other individuals or third parties. Such activities are beyond the control of THrivs.com and this policy.

How We Protect Your Information

Thrivs.com takes reasonable precautions to provide a level of security appropriate to the sensitivity of the information we collect. Although we use reasonable measures to help protect your information against unauthorized use or disclosure, we cannot guarantee the security of information provided over the Internet or stored in our databases and will not be responsible for breaches of security beyond our reasonable control.

A Note About Children's Privacy

You must be at least 13 years old to have our permission to use this Site. We do not knowingly collect, use or disclose personal information about visitors under 13 years of age. If you are under the age of 13, you can use this service only in conjunction with your parent's or guardian's permission.

Links to Other Websites

This Policy applies only to this Site. This Site may contain links to websites that are not operated by THrivs.com. These links are provided for your reference and convenience only and do not imply any endorsement of the products sold or information provided through these websites, nor any association with their operators. THrivs.com does not control these websites and is not responsible for their data practices. Any information you provide to third parties on their websites is covered under their privacy and data collection policies and is not covered by this Policy. We urge you to review the privacy policy posted on any site you visit before using the site or providing any personal information.

General Data Protection Regulation Rights

If you are located within the European Union, the General Data Protection Regulation (GDPR) gives you certain rights, including, but not limited to:

- The right to request a copy of your data and to update or erase that data
- The right to restrict how we process your data or object to our use of that data
- The right to revoke your affirmative consent of our processing of your data
- The right to portability of your data
- The right to make a complaint to a supervisory authority that has jurisdiction under the GDPR

We require and retain only the minimum information necessary, and for the minimum amount of time necessary, to provide you with the information that you have requested from us. We may retain your information for longer as needed, but you have the right to request that we delete your information at any time.

Under GDPR, we are considered data controllers and we use third parties as our data processors for services such as payment processing and email marketing. Note that we may transfer data internationally, including transferring data outside of the European Union.

If you have any questions related to your data, please email dagmara@Thrivs.com.

Governing Law

This Policy shall be governed under the laws of the State of Hawaii, United States of America without regard to its conflicts of law provisions. If a dispute arises under this Policy we agree to first try to resolve it with the help of a mutually agreed-upon mediator in the following location: Island of Oahu, Hawaii. Any costs and fees other than attorney fees associated with the mediation will be shared equally by each of us.

If it proves impossible to arrive at a mutually satisfactory solution through mediation, we agree to submit the dispute to binding arbitration at the following location: Honolulu, Hawaii.