

# Thatcher Technology Group Privacy Policy

**Effective Date:** June 11, 2019

## Introduction and About This Privacy Policy

This privacy policy ("Privacy Policy") applies to Thatcher Technology Group (collectively, "we" "our" or "us"). We respect your privacy rights and value your trust. This Privacy Policy describes how we collect, receive, use, store, share, transfer, and process your personal information, as well as your rights in determining what we do with the information that we collect or hold about you.

Additionally, Thatcher Technology Group is responsible for the processing of your personal information when you interact with our Website, Services and Products ("Site and Services") through a Thatcher Technology Group Client ("Client"). Details on the Collection and Use of, and Access to, personal information through such an interaction with a contracted Client is detailed in the Data Processing section of this Policy.

You may contact us at any time via the methods described below.

## Thatcher Technology Group: Collection of Personal Information

For purposes of this Privacy Policy, "personal information" refers to information that relates directly or indirectly to an identified or identifiable individual ("you"). The personal information that we collect about you varies depending on your interactions and touchpoints with us, as follows:

### Information You Voluntarily Provide Us

While you interact as a visitor or user of our Site and Services, we may ask, or you may volunteer, certain personal information, as follows:

- Name and Role
- Contact Information

For more information about our use of cookies and similar tracking Technology, please see the relevant section in this Privacy Policy below.

## Thatcher Technology Group: Use of Personal Information

The purposes for which we may process information about you are as follows:

### Information You Voluntarily Provide Us

We collect the information you directly provide to us in order to:

- Provide better experience while navigating the site
- Contact information for the purpose of lead management

## Thatcher Technology Group: Access

Thatcher Technology Group respects your control over your information and, upon request, we will confirm whether we hold. You also have the right to amend or update inaccurate or incomplete personal information, request deletion of your personal information, or request that we no longer use it. Under certain circumstances we will not be able to fulfill your request, such as if it interferes with our regulatory obligations, affects legal matters, we cannot verify your identity, or it involves disproportionate cost or effort, but in any event we will respond to your request within a reasonable timeframe and provide you an explanation. In order to make such a request of us, please contact us at (630) 696-4545 or by filling out our Contact form at <https://www.thatchertech.com/contact-us-for-mlm-software/>.

## Sharing of Personal Information and Legal Compliance

We do not share your Personal Information to third parties such as service providers and marketing companies, and we do not sell your Personal information.

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

## Cookies and Similar Tracking Technology

We use Technology on our sites and services to collect information that helps us improve the quality of our sites and services and the online experience of our visitors and users. In this Privacy Policy, we refer to these Technology, which include cookies, javascript, etag, beacons and similar Technology collectively as "cookies." Most web browsers support cookies, and users can control the use of cookies at the individual browser level. Please note that if you choose to disable cookies, it may limit your use of certain features or functions on our sites and services.

We use cookies and similar technology to:

- Maintain or analyze the functioning of the website or online service
- Authenticate users of, or personalize the content on, the website or online service
- Protect the security or integrity of the user, website, or online service

## EU-U.S. Privacy Shield

Thatcher Technology Group participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Thatcher Technology Group is committed to subjecting all personal

data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List.

[\[https://www.privacyshield.gov/list\]](https://www.privacyshield.gov/list)

Thatcher Technology Group is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Thatcher Technology Group complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Thatcher Technology Group is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Thatcher Technology Group may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website [\[https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint\]](https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

## Changes to This Privacy Policy

We may update this Privacy Policy and its Effective Date to reflect changes to our data governance practices. If we propose to make any material changes, we will notify you by means of a notice on this page prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

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## Data Processing:

Thatcher provides Data Processor services via its Service/Platform to Clients. Clients are responsible for determining what information is collected, and directing Thatcher Technology Group on how it shall be used.

## Collection of Personal Information Through a Thatcher Technology Group Client

When using our Service/Platform, a Thatcher Technology Group Client defines the information they wish our Service/Platform to collect. This information may include personal information such as:

- Name and Role

- Contact Information
- Financial Information
- Identification Numbers for 1099 and other government reports
- Registration Date

For questions regarding what information is collected, please review the Thatcher Technology Group Client's privacy policy.

### Use of Personal Information Through a Thatcher Technology Group Client

Thatcher Technology Group Clients configure or enable our Service/Platform to collect certain information about you in order to:

- Process e-Commerce orders for fulfillment
- Process e-Commerce orders for compensation calculation, management, payout deposits, and reporting.
- Process Registrations of new and returning distributors

### Access to Personal Information Processed by Thatcher Technology Group

For requests regarding personal information about you that has been obtained or received for processing on behalf of a separate, unaffiliated entity through Client implementation of our platform, which determined the means and purposes of processing, should be made to that entity directly. We will honor and support any instructions they provide us with respect to your personal information.

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### Contact Us

If you have a question about this Privacy Policy, or wish to inquire about our personal information handling practices, please contact us as follows:

Thatcher Technology Group  
55 Shuman Blvd.  
Suite 350  
Naperville, IL 60563  
(630) 696-4545

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