**NOTICE: This document alone costs GFT more than $2500. It alone is worth the price of the class. However, it is not specific to your region and *must be reviewed* by a lawyer.**

[YOUR NAME LLC] Privacy Policy (“Privacy Policy”) applies to the websites related to [YOUR NAME LLC] including but not limited to the site [yoursitename.com] as well as to any software, services, and/or products offered on such website (hereafter the “Sites”).

**Privacy Policy**

[YOUR NAME LLC] values privacy – ours and yours. To help maintain your privacy and the security of your personal information, we communicate this and all of our privacy policies to [YOUR NAME LLC] employees and agents, and we internally enforce privacy safeguards.

Our Privacy Policy was developed to explain how we collect, use, disclose, transfer, and store information received from you in connection with the Sites. Before disclosing information to us, please familiarize yourself with our privacy practices so you can understand how your information may be used by [YOUR NAME LLC]

**What Are We Going To Do With Your Information?**

[YOUR NAME LLC] may collect information in a number of ways from users who access our Sites or services. We collect personal and non-personal information in various ways. You may provide your information to us to receive a product, service, or communication from us; we may request your information to better serve you; or we may require your information in order to be able complete a transaction (e.g. a purchase) or provide access (e.g. to a paid service).

**A.** **Your Personal Information**

Personal information (or “Personally Identifiable Information” or “PII”) is information and data that can be used to specifically identify or contact a single person.

You may be asked to provide your personal information when you contact [YOUR NAME LLC] for any reason. [YOUR NAME LLC] may share your personal information internally. If we do, we will use it in accordance with this Privacy Policy. We may also combine personal information with other information to help us to develop or improve our products, services, content, communications, and/or advertising, or to provide improved user experiences for you.

Personal information we collect

Examples of some types of personal information [YOUR NAME LLC] may collect in connection with the Sites and how we may use it include the following:

* When you purchase, register, or login to use software, products, or services, request support, download an ad document, register for a webinar, live workshop, or training, provide feedback on a software product, or participate in a promotion, contest or online survey, or respond to an advertisement, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences, and/or social media credentials. We may collect credit card information in connection with your use of [YOUR NAME LLC] shopping cart services.
* We may also ask for certain information only in circumstances where required by law. For example, if you are using the [YOUR NAME LLC] when setting up certain financial accounts to obtain e.g. your Social Security number (SSN), then we will ask for it. As above, such information may only be stored transiently, during a secure session.

**How we use your personal information**

* Optional Communications: The personal information we collect allows us to provide you with [YOUR NAME LLC] latest product announcements, helpful tips and information, special offers, software updates, and upcoming events. If you don’t want to receive these communications, or do not wish to be on our mailing list, you can opt out of receiving them. Each communication will provide opt-out directions, and you can also generally opt-out via your account dashboard if you are a registered user, client, or customer. The information in connection with these optional communications and your responses help us to improve our products, services, content, and advertising.
* We also use personal information to help us develop, deliver, improve, and customize our software, products, services, content, and advertising and to provide a better user experience for every user of our software, products, and services.
* Important Communications: We may use your personal information to send important communications, e.g., about your purchases of or access to software, products, or services, material changes to our EULA, terms, conditions, and policies (including this Privacy Policy), critical updates to software products, or services, or changes (including regulatory changes) that impact your use of [YOUR NAME LLC] software, products, or services. Because this information is vital to your interaction with [YOUR NAME LLC] you may NOT opt out of receiving these communications if you wish to continue to use the Sites, or any software, products, or services offered in connection with the Sites.
* We may also use personal information for internal purposes such as auditing, data analysis, and research to improve [YOUR NAME LLC] products, services, communications, support and/or help functions, and user interfaces.
* If you enter into a promotion such as a contest, a giveaway, a one-time or special offer, or similar promotion, we may use the information you provide to administer those programs.
* If we become involved in a legal process as a result of your actions on the Sites, or in connection with any software, products, or services offered via the Sites, we may be required to disclose your PII or PIFI to a government authority, or a third party who e.g., issues a subpoena that require us to provide it. Our response(s) to any such legal process will be handled on a case-by-case basis following the advice of our attorneys.

**B.** **Collection of Non-Personal Information**

Information of a type or in a form that does not permit direct identification of or association with any specific individual is ‘non-personal information.’ Combinations of personal and non-personal information are considered personal information if the combined information can be used to identify or contact any specific individual(s). Aggregated data is considered non-personal information for the purposes of this Privacy Policy as long as it cannot be used to identify or contact any specific individual. Internet Protocol (IP) addresses and certain other identifiers may be considered personal information under various local laws; we endeavor to comply with the laws and regulations that are applicable to us.

**How we collect and use your non-personal information**

We may collect, use, transfer, and disclose non-personal information for any purpose.

The following are some examples of non-personal information that we collect and how we may use it:

* We may collect non-personal information (e.g. demographic information) regarding our customers collectively including information such as age, gender, occupation, preferred language, zip code, area code, geographic location, or the time zone from which customers access the Sites, products, or services. Such non-personal information is used so that we can better understand who our customers are, and their behavior generally with regards the Sites, and to improve our software, products, services, communications, support, help, user experiences, and advertising for our customers.
* We also may collect non-personal information regarding customer activities on the Sites or use of the [YOUR NAME LLC] software, products, and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of the Sites, or our software, products, and services are of most interest or which can be improved. Non-personal support or help request data may be used to improve our software or the Sites, communications, and user interfaces, or to allow us to provide additional product or service offerings to our present or future customers.
* We may collect non-personal information regarding the digital footprints of our customers with respect to accessing the Sites, or any related software, products, or services including mobile and non-mobile access, specific types of devices being used, unique device IDs, type of browser(s) being used, networks that our customers use, and other non-personal information. This information may be used to improve the Sites, software, products, or services including but not limited to their performance, functionality, design, or responsiveness.

**C.** **How We Manage Cookies and Other Technologies**

To help [YOUR NAME LLC] serve you better, we use technology to better understand and adapt to your behaviors. To accomplish this, the Sites, as well as our online software and services, email messages, and advertisements may use cookies or related technology such as pixel tags, clear gifs, and web beacons. These technologies help us to know which parts of the Sites people have visited, and provide data to aid us in understanding the effectiveness of the software services, our advertisements, and web searches. These data are used to improve our software, products, services, communications, and advertisements. We generally consider such information collected through the use of cookies and other technologies as non-personal information, and treat it accordingly.

We also use cookies and other technologies to remember personal information when you use the Sites, software, products, or services. These uses are intended to improve your personal experience. For example, we can provide better and more personal results if we ‘remember’ your preferred settings, your name, and such.

[YOUR NAME LLC] may use cookies or other technologies in connection with certain advertising services to determine your experience with our content including whether an ad is likely to be of interest to you, whether or not you are served a particular ad, and the number of times you are served a particular ad. These technologies allow us to measure the effectiveness of our ad campaigns. You may have options for opting out of such targeted ads. You should contact your service provider or your mobile provider to inquire about how to do so.

[YOUR NAME LLC] uses specific technologies in connection with certain communications such as emails that may be used to track actions by recipients. For example, these communications may include one or more clickable text or graphics that include URLs that link to content on the Sites. However, these URLs, may pass through a web server that tracks the click before arriving at the linked content on the Sites. The tracked data can help [YOUR NAME LLC] determine the effectiveness of our communications to users and customers, or to gage interest in specific topics. If you prefer not to have your responses to such communications tracked in this manner, do not click links in the email messages. Such communications may also include pixel tags that can tell us whether e.g. an email has been opened. We may use this information to throttle the number of messages sent to users or customers, or to remove people who do not read or interact with our communications from one or more lists.

Cookies and other technologies can generally be controlled on your devices. If you want to disable cookies and you should review your privacy or security settings. Please note that certain features of the Sites or related software, products, or services may not be available if you have cookies disabled on your device. We will typically try to warn you that a page or feature you are trying to reach will not function without cookies enabled. If you have your cookies on your device or browser disabled and are having difficulties you may wish to enable them to see if the problem is resolved.

**D.** **Log Files**

As part of standard protocols, [YOUR NAME LLC] servers automatically gather certain information and store it in log files. This information may include date/time stamp of access, Internet Protocol (IP) address(es), device type, operating system, browser and version, language, log-in details, Internet Service Provider (ISP), referring page, exit page, and other data.

These log files are useful for a number of purposes including helping [YOUR NAME LLC] to maintain security, measure relative usage, understand and analyze trends regarding users, server access, load, or server problems, more effectively and efficiently administer the Sites, as well as related software, products, services, or communications, and gather non-personal demographic information about our users. Consistent with the provisions of this Privacy Policy, [YOUR NAME LLC] may use the data in its Log Files in a variety ways useful to its business or to provide better experiences for its users and customers.

**E.** **Social Media**

[YOUR NAME LLC] may collect certain information from you if you interact with us via social media such as Facebook, Twitter, LinkedIn, Google+, Instagram, and other such services. For example, you may be given the option to register for webinars, take advantage of special offers, receive mailings, newsletters or the like, via your social media account. The information we receive or collect from such social media, and our ability to collect it, may depend on the social media site, its policies, and its requirements or its technology. We may collect the information you provide from these social media interactions and may use it for various purposes to improve our services or your experience, or to contact you regarding the reason you connected with us or with additional offers in the future. Of course, you have the opportunity to opt-out at any time provided we do not require a means of contacting you to fulfill your request.

**F. Children**

Protecting children's privacy is important to [YOUR NAME LLC] It is our policy to comply with the Children's Online Privacy Protection Act of 1998 and all other applicable laws. Therefore we restrict our website use to persons eighteen years or older. Therefore, we do not knowingly collect personal information from children under 18. If we learn that [YOUR NAME LLC] has inadvertently collected or received the personal information of a child under 18 we will take steps to delete the information.

[PLEASE NOTE: You must be 18 or older to use the Sites, and to purchase the products, or services offered via the Sites without an adult (parent or guardian).]

DUE TO THE AGE RESTRICTIONS FOR USE OF THIS WEBSITE, NO INFORMATION OBTAINED VIA THIS WEBSITE FALLS WITHIN THE CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA) AND IT IS NOT MONITORED AS DOING SO.

From time to time while providing services to people over the age of 18, we will receive PI related to children under the age of 18. the Children's Online Privacy Protection Act of 1998 and all other applicable laws.

**Who We Share Your Information With**

At times [YOUR NAME LLC] may make certain personal information available to strategic partners that work with us to provide software, products and services, or that help us service our customers. Personal information will only be shared by [YOUR NAME LLC] to provide or improve the Sites, and our software, products, services, and advertising.

**A.** **Service Providers**

To provide its various products or services, [YOUR NAME LLC] works with third party providers, who may be located wherever [YOUR NAME LLC] operates, or in any other location. Such companies provide services to [YOUR NAME LLC] Examples may include information processing, emailing services, server hosting, transaction processing and banking services, video hosting, product/service delivery, communications, managing and enhancing customer data, providing technical support and/or customer service, and conducting customer research or satisfaction surveys. At any given time, may work with one or more such provider. We will only provide personal information to these companies where required for them to provide their services, or to improve our products or services for our customers. These companies are contractually obligated to protect your information.

**B.** **Others**

[YOUR NAME LLC] will not share PII with third parties for their marketing purposes. In some cases, [YOUR NAME LLC] be required by legal process to disclose your personal information. Such disclosure may be compelled by [YOUR NAME LLC] may also disclose information about you if we determine, in our sole discretion, that disclosure is necessary or appropriate to ensure the safety of any individual(s), or for purposes of national security, law enforcement, or other issues of public importance.

If the Sites and/or products, or services, or [YOUR NAME LLC] becomes the subject of a reorganization under the bankruptcy law, a merger, a sale, or other change in control, any and all personal information in [YOUR NAME LLC]S’ will be transferred to the trustee, debtor in possession, successor, acquirer, or such other third party as will control [YOUR NAME LLC] the Sites, and/or software, products, or services thereafter.

We reserve the right to disclose personal information if we reasonably believe that disclosure is necessary to protect our users, customers, or the public, prevent fraud or financial wrongdoing, or in any action to enforce our End User License Agreement, Terms and Conditions, or other policies regarding [YOUR NAME LLC].

**Personal Information Protection**

[YOUR NAME LLC] uses commercially reasonable security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access of personal information to our employees, contractors, and/or agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. [YOUR NAME LLC] and its third party providers use Secure Sockets Layer (SSL) encryption on all web pages where personal information, including financial information is transmitted.

You are solely responsible for any personal information you choose to submit on non-secure sites including but not limited any discussion forums or public comment threads on the Sites, or any social media sites, groups, or threads related to the Sites or the related software, products, or services.

**How Can I Get Access To My Personal Information**

You can request access to any personal information we have for you. We will make a good faith effort to provide you with access to reasonably accessible information. You can request that we correct the data if it is inaccurate or delete your personal data. [YOUR NAME LLC] will comply with such requests if they are reasonable and we will delete your data if [YOUR NAME LLC] not required to retain it by law, and does not require it for legitimate business purposes. We may reserve the right to refuse deletion requests that we believe require undue time, or technical effort, or where not provided by local law. We also reserve the right to deny or delay requests where the personal information is scheduled to be deleted as part of any upcoming purge of data that is not being retained. Requests for access, correction, or deletion can be submitted to INSERT EMAIL.

**Links to Third-Party Sites**

The Sites, software, products, services, and communications may contain links to third-party websites, products, or services. Information collected by third parties is governed by their privacy practices, not this Privacy Policy. Please be aware when you leave the Sites and understand that you are subject to a third party’s privacy policy except when you are on the Sites, or using [YOUR NAME LLC] related software, products, or services

In certain circumstances, you may have recourse if [YOUR NAME LLC] to comply with the requirement or provisions set forth in this policy. Such recourse is available to you at no charge. As a first step we will always sincerely endeavor to thoroughly investigate and expeditiously resolve any concerns or complaints you may have. You can contact our privacy compliance staff at the following addresses (email and regular mail):

INSERT EMAIL or

INSERT ADDRESS

Before seeking further recourse regarding any concerns or complaints regarding your collected data, you should try to have us resolve it for you informally. This should be faster and easier for all involved. If you are not satisfied with the resolution we propose informally, you have the right to pursue further recourse via the independent recourse mechanism that we have made available to investigate unresolved complaints in accordance with the Privacy Shield requirements.

EUROPEAN UNION USERS:

**The Changes to this**

**Privacy Policy and Privacy Questions**

If you have any questions or concerns about this Privacy Policy please email us at INSERT EMAIL.

This Privacy Policy is subject to change from time to time at [YOUR NAME LLC]S’ sole discretion. Please check this page periodically for changes. Any such changes to the Privacy Policy will be available on this page. If the policy has been changed in a material way, a notice will be posted on our website along with a link to the updated Privacy Policy. Your continued use of our site following the posting of changes to these terms will mean you accept the 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.

We will also archive prior versions of this Privacy Policy and make those versions available for your review.

**LAST UPDATED:**

This Policy was created June 1, 2018

**Notice of Compliance to California Residents – Your California Privacy Rights Under The California Online Privacy Protection Act and the**

**California Business and Professions Code** This privacy policy identifies the categories of personally identifiable information that our company collects through our website or online services about individual consumers who use or visit [yoursitename.com] commercial websites or online services in connection with gftkills.com, and the categories of third-party persons or entities with whom our company may share that personally identifiable information.

[YOUR NAME LLC] does not maintain an online process for an individual consumer who uses or visits our commercial website or online service to review and request changes to any of his or her personally identifiable information that is collected through our website or online service.

See the section above titled "Changes To This Privacy Policy" for a description of the process by which our company notifies consumers who use or visit our commercial website or online service of material changes to our company's privacy policy for this website or online service.

The effective date of this Privacy Policy is listed at the end of this privacy policy under the heading, "Last Updated."

For the purposes of this policy and California compliance the following definitions apply:

Depending on your activity on our website or online service, the following "personally identifiable information" may be collected, in addition to what is in prior sections of this document. The term "personally identifiable information" means individually identifiable information about an individual consumer collected online via the Sites from an individual and maintained by us in an accessible form and may include any of the following:

1. A first and last name;
2. A home or other physical address, including street name and name of a city or town;
3. An e-mail address;
4. A telephone number;
5. Any other identifier that permits the physical or online contacting of a specific individual; and
6. Information concerning a user that the Sites collect online, from the user, and which is maintained in personally identifiable form, in combination with an identifier described within this Privacy Policy.Under California Law SB 27, California residents have the right to receive, once a year, information about third parties with whom we have shared information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of personal information shared. To make such a request, please send an email to insert email and please include the phrase "California Privacy Request" in the subject line, the domain name of the website you are inquiring about, along with your name, address and e-mail address. We will respond to you within thirty (30) days of receiving such a request.

**"Cookies" and How We Use Them**

A "cookie" is a small data file that can be placed on your hard drive when you visit certain websites. The Sites may use cookies to collect, store, and sometimes track information for purposes stated earlier as well as for statistical purposes to improve the products and services we provide and to manage our telecommunications networks. We may also use cookies for purposes of personalizing your experience on the Sites, or for providing online behavioral advertising such a retargeting or remarketing. These uses provide you with additional opportunities to take advantage of our services or products, and provide us with additional opportunities to reach you with personalized offers more tailored to your interests.

Advertisers and partners may also use their own cookies (e.g. on their own sites). [YOUR NAME LLC] does not control any third party’s use of such cookies and we expressly disclaim responsibility for information collected by or through them.

**Public Areas & Social Media:**

Any information you disclose in any public areas of our website or the Internet, including via social media becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

This Privacy Policy does not create any contractual or other legal rights in or on behalf of [YOUR NAME LLC] or any other party and is not intended to create any such rights.

Questions about this Privacy Policy may be directed to us in writing at:

Insert email

Insert address