

INTRODUCTION

This Privacy Policy sets out how **Happiness Publishing, 1495 Laurel Street, San Carlos, California 94070** (“Company,” “we,” and “our”) uses and protects any information that you provide when you use this website **www.mikeduffyspeaks.com** (the “Site”). We are committed to protecting your privacy and adopt best practice in compliance with appropriate privacy law and regulations, including the EU General Data Protection Regulation (“GDPR”).

We have developed this Privacy Policy to explain how we collect and use information that you provide via our Site or when you register for our services. Please review this Privacy Policy before you give us any information. **By using our Site or registering for our Services, you consent to the collection and use of your information as described in this Policy.**

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 10th October 2024.

The policy is intended to be read in conjunction with our Terms & Conditions. For the purpose of this Privacy Policy, the data controller is Happiness Publishing, 1495 Laurel Street, San Carlos, California 94070

1. PURPOSES OF PROCESSING

i. What is personal data?

We collect information about you in a range of forms, including personal data. As used in this Policy, “personal data” is as defined in the General Data Protection Regulation, this includes any information which, either alone or in combination with other information we process about you, identifies you as an individual, including, for example, your name, postal address, email address and telephone number.

ii. Why do we need your personal data?

We will only process your personal data in accordance with applicable data protection and privacy laws. We need certain personal data in order to provide you with access to the Site. If you are registering with us, you will be asked to tick to agree to provide this information in order to access our services, purchase our products, or view our content. This consent provides us with the legal basis we require under applicable law to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this Policy, please do not use our Site.

2. COLLECTING YOUR PERSONAL DATA

We collect information about you in the following ways:

i. Information You Give Us.

This includes:

- a.** the personal data you provide when you register to use our Site, including your name, postal address, email address, telephone number, username, password and demographic information (such as your gender);
- b.** the personal data you provide for financial account information, such as credit card number and other payment information. Please note, we do not retain credit card information;
- c.** the personal data you provide when you create an account with us, your username,

password, and other demographic information that you provide;

d. the personal data you provide when you subscribe to our services ,what you subscribe, and how frequently you subscribe;

e. the personal data that may be contained in any video, comment or other submission you upload or post to the Site;

f. the personal data you provide in connection with our rewards program and other promotions we run on the Site;

g. the personal data you provide when you report a problem with our Site or when we provide you with customer support;

h. the personal data you provide when you correspond with us by phone, email or otherwise; and

i. the personal data you provide when you connect your account to another service such as LinkedIn, Facebook or Twitter, the other service may send us your registration or profile information on that service that you authorize. This information enables cross-platform data sharing to improve your user experience.

ii. Information We Automatically Collect

Whenever you visit or interact with the site, we, as well as any third-party advertisers and/or service providers, may use cookies, web beacons, local shared objects (Flash Cookies), or other technologies to automatically or passively collect information about your online activity and

Site use information. For information about our use of cookies and other similar technologies through the site, you can read our Cookie section below.

Please note that we automatically collect the following information about you:

a. Site Use Information. We may automatically collect Site use information when you visit our site. This may include information about your Internet service provider, your operating system, browser type, domain name, Internet protocol (IP) address, your access times, the website that referred you to us, the Web pages you request, and the date and time of those requests.

b. Third Party Service Providers. We may use third party service providers to support our Site. Some of these service providers may use technology such as cookies, web beacons, pixel tags, log files, or Flash cookies to receive, collect, and store information.

c. Third Party Analytic Technologies. We may use third parties' analytics and tracking tools to better understand who is using the Site, how people are using Site, how to improve the effectiveness of the Site, our services and related content, to help us or those third parties serve more targeted advertising to you across the Internet, and to allow "Like" buttons and "Share" buttons to work. These tools may use technology such as cookies, web beacons, pixel tags, log files, Flash cookies, HTML5 cookies, or other technologies to automatically collect and store certain information. They may also combine information they collect from your interaction with the Site with information they collect from other sources. We do not have access to, or control over, these third parties' use of cookies or other tracking technologies.

iii. Information from Social Networking Sites

Our Site include interfaces that allow you to connect with social networking sites (each a "SNS"). If you connect to a SNS through our Site, you authorize us to access, use and store

the information that you agreed the SNS could provide to us based on your settings on that SNS.

We will access, use and store that information in accordance with this Policy. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account settings on the applicable SNS.

iv. Information Collected From Other Sources

We may acquire information from other trusted sources to update or supplement the information that you provide or that we collect automatically. We may use this information to help us maintain the accuracy of the information we collect, to target our communications so that we can inform you of products, services or other offers that may be of interest to you, and for internal business analysis or other business purposes.

v. Combination of Information

We may combine the information we receive from and about you, including information you provide to us and information we automatically collect through our online services, as well as information collected offline, across other computers or devices that you may use, and from third party sources.

3. Cookies & Similar Technologies

We, or third-party service providers acting on our behalf, may use cookies or web beacons on our Site. A cookie is a small text file that may be stored on the hard drive of your computer when you access the site. A web beacon is an electronic image used to recognize a cookie on your computer when you view a web page. We may use cookies and web beacons to collect non-personal data from you, including your IP address, browser type, the time and length of your visit, the pages of the site you visit and other clickstream data. This information may be used in order to:

- a. recognize you when you return to the site;
- b. improve and personalize your experience on our site;
- c. provide you with customized advertising; and
- d. monitor site usage and analyze the behavior of site visitors.

We do not collect any personal data through our use of cookies and web beacons, and we do not combine the non-personal data we collect through them with any of your personal information. You may decline cookies, but by doing so, you may not be able to use certain features on our site. You also may be able to make some web beacons unusable by rejecting cookies. Check the “Help” menu of your browser to learn how to change your cookie preferences.

4. Disabling Cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

4. Advertising

We may use other companies to serve third-party advertisements when you visit and use the Site. These companies may collect and use click stream information, browser type, time and date, subject of advertisements clicked or scrolled over during your visits to the Site and other websites in order to provide advertisements about goods and services likely to be of interest to you. These companies typically use tracking technologies to collect this information. Other companies' use of their tracking technologies is subject to their own privacy policies.

5. Using Your Personal Data

We may use personal data we collect from and about you for a variety of business purposes, including to:

- a. to operate, maintain, and improve our Site, products, and services;
- b. to manage your account, including to communicate with you regarding your orders, purchases, accounts, and requests for information if you have an account on our Site;
- c. to operate and administer our rewards program and other promotions you participate in on our Site;
- d. to respond to your comments and questions and to provide customer service;
- e. to send information including technical notices, updates, security alerts, and support and administrative messages;
- f. with your consent, to send you marketing e-mails about upcoming promotions, and other news, including information about products and services offered by us and our affiliates. You may opt-out of receiving such information at any time: such marketing emails tell you how to "opt-out." Please note, even if you opt out of receiving marketing emails, we may still send you non-marketing emails. Non-marketing emails include emails about your account with us (if you have one) and our business dealings with you;
- g. to process payments you make via our Site- We use the external payment system to process all our online payments. They have their own security and our data protection legislation compliant. We do not store your credit card details and we do not store your card's security/CVV code.
- h. as we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others;
- i. Address problems with the website or our business, and to protect the security or integrity of the Site and our business
- j. for analysis and study services; and
- k. as described in the "Sharing of your Personal Data" section below

We also use anonymous or aggregated information to allow us to audit site usage, create marketing profiles, manage our relationship with advertisers, and to provide support services to us. This processing may involve profiling – for example to create audiences based on demographic or location-based information for marketing and customization.

We will have a lawful basis for processing your data if:

- a. We need to process your information in order to provide you with the products or service you have requested or to enter into a contract;

- b. You have consented to such processing;
- c. We have a legitimate interest for processing your data e.g., for fraud prevention; network and information systems security; data analytics; enhancing, modifying or improving our services; identifying usage trends; and/or
- d. We are legally obliged to process it.

6. Sharing Your Personal Data

We do not share your personal data except in the limited circumstances described here.

We may share your personal data with:

- i. **Our Affiliates:** We may share your data with our affiliates and subsidiaries bearing the **Mike Duffy Speaks** brand for business, operational, promotional and marketing purposes.
- ii. **Third Party Service Providers:** We may share your data with third party service providers that provide business, professional or technical support functions for us (including to the extent necessary or desirable to fulfill or complete your transaction), help us operate our business and Site, or administer activities on our behalf.
- iii. **Selected Advertisers:** We sometimes work with advertisers or other third parties to serve ads targeted to your interests, or to collect data for conversion tracking (that is, what actions you take after you click on an ad). We do on occasion provide our service subscribers' postal mailing addresses (but not your email address) to selected advertisers who wish to reach you by mail.
- iv. **Legal Obligations; Safety:** We may access and disclose your data to respond to subpoenas, judicial processes, or government requests and investigations, or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law. We may disclose your information to protect the security of our site, servers, network systems, and databases. We also may disclose your information as necessary, if we believe that there has been a violation of our Terms of Use, any other legal document or contract related to our services, or the rights of any third party.
- v. **Sale or Transfer of Business or Assets:** We may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, data we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such data may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal data provided through our services in a manner that is consistent with this Privacy Policy.
- vi. **Aggregate or Anonymous Non-Personal Information:** We may also share aggregate, anonymous, or de-identified non-personal information with third parties for their marketing or analytics uses.

7. Third Party Sites

This Privacy Policy only addresses the collection, processing and use (including disclosure) of data by us. This site may contain various links to third-party websites. These sites may provide additional information, goods, services and/or promotions. These sites are owned and operated independently of **Mike Duffy Speaks**, and have their own separate privacy and data collection practices. Any information you provide to these Websites will be governed under the terms of their privacy policy, if any. We have no responsibility or liability whatsoever for the

independent actions or policies of these independent sites, and is not responsible for the content or privacy practices of such sites.

8. User Generated Content

You may share personal data with us when you submit user generated content to our Site, including via our rewards program, forums, message boards and blogs on our Site. Please note that any information you post or disclose on our Site will become public information, and will be available to other users of our Site and to the general public. We urge you to be very careful when deciding to disclose your personal data, or any other information, on our Site. Such personal data and other information will not be private or confidential once it is published on our Site.

If you provide feedback to us, we may use and disclose such feedback on our Site, provided we do not associate such feedback with your personal data. If you have provided your consent to do so, we may post your first and last name along with your feedback on our Site. We will collect any information contained in such feedback and will treat the personal data in it in accordance with this Policy.

9. International Data Transfer

Your information, including personal data that we collect from you, may be transferred to, stored at and processed by us outside the country in which you reside, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By accepting this Policy, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

10. Security

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us.

11. Data Retention

We will retain your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We will also keep your personal data for as long as your account is active or as needed to provide you services and to maintain a record of your transactions for financial reporting purposes. We retain archived copies of your information as required by law or for legitimate business purposes.

12. Our Policy On Children

Our Site is not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. We will delete such information from our files as soon as reasonably practicable.

13. Your Rights

i. Opt-out. You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) automated decision-making and/or profiling; (iii) our collection of

sensitive personal data; (iv) any new processing of your personal data that we may carry out beyond the original purpose; or (v) the transfer of your personal data outside the EEA. Please note that your use of some of the Site may be ineffective upon opt-out.

ii. **Access.** You may access the information we hold about you at any time via your profile/account or by contacting us directly.

iii. **Amend.** You can also contact us to update or correct any inaccuracies in your personal data.

iv. **Move.** Your personal data is portable i.e. you have the flexibility to move your data to other service providers as you wish.

v. **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

If you wish to exercise any of these rights, please contact us. In your request, please make clear: (i) **what** personal data is concerned; and (ii) **which of the above rights** you would like to enforce. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your

request as soon as reasonably practicable and in any event, within one month of your request. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

14. Complaints

We are committed to resolve any complaints about our collection or use of your personal data. If you would like to make a complaint regarding this Policy or our practices in relation to your personal data, please contact us at: mike@mikeduffyspeaks.com. We will reply to your complaint as soon as we can and in any event, within 30 days. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority

15. Contact Information

We welcome your comments or questions about this Policy. You may contact us in writing at **Happiness Publishing, 1495 Laurel Street, San Carlos, California 91942** or mike@mikeduffyspeaks.com