# **PRIVACY POLICY**

This is the Privacy Policy of Institute for Real Growth (hereinafter referred to as "IRG," "we," "us" or "our"), a company having its address at Amsteldijk 166, 1079 LH Amsterdam. IRG is registered with the Chamber of Commerce under number 74816195. Our Privacy Policy explains how we collect, use, share and protect information in relation to our website https://instituteforrealgrowth.com/ (the "Service"). We collect this information when you visit our website with your computer, tablet or mobile phone ("Computer"). We process personal data in a manner that is in accordance with the General Data Protection Regulation (the "GDPR"), the GDPR-based legislation and the other current privacy legislation.

By using our Service you understand and agree that we are providing a platform for you to post content, including photos, comments and other materials ("**User Content**"), to the Service and to share User Content publicly. This means that other Users (as defined below) may search for, see, use, or share any of your User Content that you make publicly available through the Service, consistent with the terms and conditions of this Privacy Policy and our Terms of Use. Our Privacy Policy applies to all visitors, users, and others who access the Service ("**Users**").

### What kinds of information do we collect?

### Information you provide

We collect the following information you provide us with directly:

- a. Your username, password and e-mail address when you register for an IRG account;
- b. Profile information that you provide for your user profile;
- c. User Content (e.g., photos, comments, and other materials) that you post to the Service;
- d. Communications between you and IRG (e.g., we may send you Service-related emails);

# Log file information

We collect information that your browser sends whenever you visit our Service. This log file information may include information such as your computer's Internet Protocol address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics.

### Metadata

Metadata is usually technical data that is associated with User Content. For instance, metadata can describe how, when and by whom a piece of User Content was collected and how that content is formatted. Users can add or may have metadata added to their User Content including a hashtag (e.g. to mark keywords when you post a photo), geotag (e.g. to mark your location to a photo), comments or other data. This makes your User Content more searchable by others and more interactive.

## Analytics services (non-personally identifiable information only)

We use third-party analytics tools to help us measure traffic and usage trends for the Service. These tools collect information sent by your device or our Service, including the web pages you visit, add-ons, and other information that assists us in improving the Service. The tools use 'cookies', which are text files placed on your device, to collect your log information and behavior information in an anonymous form. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User. With respect to Google Analytics, although Google Analytics

plants a permanent cookie on your web browser to identify you, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits by disabling cookies.

# Remarketing

IRG uses remarketing services to advertise on third party web sites to you after you visited our Service. We, and our third party vendors, use cookies to inform, optimize and serve ads based on your past visits to our Service.

## How do we use this information?

We use all of the information we have to help us provide and support our Services. Here is how:

- a. remember information so you will not have to re-enter it during your visit or the next time you visit the Service;
- b. provide, improve, test, and monitor the effectiveness of our Service;
- c. To help you efficiently access your information after you sign in;
- d. monitor metrics such as total number of visitors, traffic, and demographic patterns;
- e. diagnose or fix technology problems;
- f. develop and test new products and features; and

### Communications

We may use your information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link.

### How is this information shared?

We will not rent or sell your information to third parties outside IRG.

### People you share and communicate with

Any information or content that you voluntarily disclose for posting to the Service, such as User Content, becomes available to the public. Once you have shared User Content or made it public, that User Content may be re-shared by others. Subject to your profile, any User Content that you make public is searchable by other Users. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users or third parties have copied or saved that information.

## **Change of control**

If we sell or otherwise transfer part or the whole of IRG or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information such as name and email address, User Content and any other information collected through the Service may be among the items sold or transferred. You will continue to own your User Content. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

### Legal requests and preventing harm

We may access, preserve and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; and to prevent death or

imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

## Safety and security

IRG has taken appropriate technical and organizational measures by using the latest technologies to protect your information against loss or unlawful processing. We use safeguards to help keep the information collected through the Service secure and take steps (such as requesting a unique password) to verify your identity before granting you access to your account. However, IRG cannot ensure the security of any information you transmit to IRG or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed. We request you to do your part to help us. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and IRG, at all times. We are not responsible for the functionality, privacy, or security measures of any other organization.

## **International transfer**

Your information may be transferred to, and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside Netherlands and choose to provide information to us, please note that we transfer the information to The Netherlands. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

# **Retention period**

In accordance with the law, IRG does not retain data any longer than is required for attaining the purposes for which they were collected.

# **Inspection and correction**

If you wish to know which of your data IRG has recorded or if you wish to amend or remove data that you cannot amend via your account, please contact IRG.

# Third-party applications, websites and services

We are not responsible for the practices employed by any applications, websites or services linked to or from our Service, including the information or content contained within them. Please remember that when you use a link to go from our Service to another application, website or service, our Privacy Policy does not apply to those third-party applications, websites or services. Your browsing and interaction on any third-party application, website or service, including those that have a link on our Services, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your User Content. If you are using a third-party app, website or service and you allow them to access your User Content you do so at your own risk.

## **Children's privacy**

Our Service does not address anyone under the age of 13 ("**Children**"). We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you are aware that your Children has provided us with personal information, please contact us. If we become aware that we have collected personal information from a child under age 13 without verification of parental consent, we take steps to remove that information from our servers.

## Changes to this privacy policy

We may modify or update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### How to contact us

If you have any questions about this Privacy Policy of the Service, please send an email to info@instituteforrealgrowth.com.