

Neomantra Privacy Policy

Last modified: November 18, 2017

At Neomantra Corp (“Neomantra”, “we” or “us”), we recognize that privacy is important. We have created this privacy policy (“Privacy Policy”) to inform you of how we and our affiliates, if any, collect, use and disclose your personally identifiable information. This Privacy Policy applies to users of our websites, applications and other products and services (the “services”), except to the extent they have separate privacy policies that do not incorporate this Privacy Policy. We may post supplementary privacy notices incorporating this Privacy Policy that describe how we process personally identifiable information with respect to portions of our service. This Privacy Policy does not apply to entities that we do not own or control, websites, applications or other products or services not offered by us or to people that we do not employ or manage. As we update and expand our services, this Privacy Policy may change, so please refer back to it periodically. By accessing or using our services, you consent to the information practices described in this Privacy Policy.

Privacy is important to us. If you have questions or concerns regarding this Privacy Policy or would like more information from us, you may email us at support@neomantra.net or write to us at: Neomantra Corp, 309 Greenwich Avenue, Suite. 305, Greenwich, CT 06870 Attn.: Privacy Matters.

What Information Do We Collect?

We collect information about you in the following ways:

- **Information You Provide To Us.**
 - To use our services, you are required to register and create an account with Neomantra. When you register, we require you to provide certain information, including personally identifiable information, such as your name, address, a photo, a mobile phone number, payment account information and professional status, and permit you to provide additional optional information. You will be able to add to and modify that information as you use the services.
 - We collect information you submit to us in the form of reviews, comments, feedback, emails, and other communications about us and our services.
 - We may also provide community activities, such as user forums, chat rooms, message boards or blogs, to our users. You are not required to disclose any personally identifiable information when submitting comments or other information through such community activities, but you will be able to do so. Your submissions through community activities are public and may be subject to further distribution and used for any purpose permitted under the applicable terms of use. Accordingly, we urge you to use caution in disclosing personally identifiable information through your participation in community activities.
 - We may elect to implement a referral service to allow you to refer other potential users to our services. In such event, we will ask you to provide certain information about that person (such as name and email address) and send such person a one-time communication inviting him or her to use our services. We will use this information for the sole purpose of sending this one-time communication and to track the success of the referral program. The referred person may, at any time, contact Neomantra at 309 Greenwich Avenue, Suite 305, Greenwich, CT 06870 and request that his or her information is deleted from our database.
- **Information We Collect Through Your Use of the Services.** We collect information about the actions you take on Neomantra and your use of Neomantra services in the following ways:
 - We may collect information about the device you use to access our services, such as device type, operating system, mobile network, phone number and other device identifiers.
 - We may to collect and store certain information regarding your use of our services, including your ip address, browser type, event information such as device crashes, navigation within our services and elsewhere online and other details of how you use the services.
 - When you use certain features of our services, in particular our mobile applications, we may collect your location data. If you access the services through a mobile device and you do not

want your device to provide us with location-tracking information, you can disable the location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details.

- **Tracking and Local Storage Technologies.** We and our business partners may use various technologies to collect information through your use of the services as described above. These technologies may include cookies (small files that are sent to your browser or device when you visit a website which allow the website to recognize you when you visit again and permit storage of information such as user preferences), web beacons, clear GIFs, pixels and other pixel tags (small blocks of code that can be used to read and place cookies and transmit information), HTML5 and other local storage and caching (technology that allows an application or website to store and retrieve data on a user's device) and similar technologies. We use these technologies for a variety of reasons, including to perform analytics and assess performance to improve our services, to help keep our services secure by authenticating you, and to make your experience using the services easier and more personalized by pre-filling certain information and tailoring the content presented to you based on your preferences. For some of these technologies, your device or browser may offer settings which may enable you to disable the usage of such technologies. However, some services or features may not function properly or as well as a result, and the settings offered by your device or browser may only apply to that device or browser.
- **Social Media.** You may be able to register for the services or be able to connect your Neomantra account to social websites and applications. If you choose to register through or connect to a social media website or application, you will be able to take advantage of various social features we will be creating as well as features available from such websites or applications. These features will be designed to share information with others - the essence of social media. For example, we may personalize and otherwise enhance your experience based on your information from social media websites or applications and share information you share through such websites or applications with other users of our services or publicly. You may be able to disconnect or control how certain information is shared with social media websites or applications in your privacy settings with such websites or applications. Please note however that we may retain and continue to use information obtained prior to such disconnection or change in your privacy settings. Please refer to the privacy policy of the third party providing the social media website or application to find out more about its data practices, such as when data is collected about you and how the third party uses the data.
- **Other Sources.** We may further supplement the personal information you provide with publicly available information about you as well as information from other sources.

Information we collect through our use of the services or from other sources may be combined and associated with your account information and profile. When information is associated with your account in a way that is personally identifiable, we treat it as personal information.

How Do We Use Information That We Collect?

We use personal information we collect for the purposes described in this Privacy Policy or separately disclosed to you on or through our services. We may use your information to:

- provide you with the services, for example to authenticate your use of specific content for which you have purchased a subscription
- operate and maintain the services, for example by using crash data or your feedback regarding support issues to ensure the technical functioning of the services
- improve our services and develop new products and services, and understand you and your preferences to enhance and customize your experience and use of the services, for example by using data we automatically collect during your use of the services and analytics generated from such data
- to personalize and target advertising and other marketing and sales activities to you

- create, publish, disclose and use information from which we have removed personally identifiable information, for example by summarizing, aggregating or removing certain data elements for industry analysis, demographic profiling, marketing and advertising and other business purposes
- respond to your comments and questions and provide customer service
- send you information relating to our services, including order confirmations and receipts, payment and credit information, technical notices, updates, security alerts, and support and administrative messages and to otherwise communicate with you about your account and use of the services
- communicate with you about contests, offers, promotions, rewards, upcoming events, and other news about products and services offered by us, our affiliates or our other selected partners
- link or combine with other personal information we get from third parties to help understand your needs and provide you with better service
- authenticate and process your credit card, debit card or other payment account information
- protect, investigate, and deter against fraudulent, unauthorized, or illegal activity
- protect our rights and property and those of our users
- comply with our legal obligations, resolve any disputes we may have with any of our users
- to fulfill any other purpose for which you provide your information
- in any other way we may describe when you provide the information
- for any other purpose with your consent.

Neomantra may process personally identifiable information on servers in the United States and in other countries. In some cases, we may process personal information on a server outside your own country. By using Neomantra, you consent to having your personal data transferred to and processed in the United States and in other countries.

When Do We Share Personal Information With Others?

- **Information Shared With Our Information Suppliers.** Our services include the ability to subscribe to various content and information provided by our third party information supplier business partners. When you subscribe for content and information from an information supplier through our services, certain of your account information, including your full name and professional status and information needed to verify that status, is provided to the information supplier for purposes of verifying your order and establishing and maintaining your subscription with the information supplier. Your payment is made through us, and we will not provide your credit card, debit card or other payment account information to the information supplier. However we may also share other information regarding your use of the services with our information suppliers, such as information about your user preferences.
- **Payment Account Information.** To use our services, we require credit card, debit card or other payment account information. By submitting your credit card, debit card or other payment account information through our services, you expressly consent to the sharing of your information with third-party payment processors, and other third-party service providers (including but not limited to vendors who provide fraud detection services to us and other third parties). For information about the security of your credit or debit card account information, see the Section called “How Do We Protect the Integrity and Security of Personal Information?” below.
- **Information You Share Publicly or Socially.** Portions of your profile data are intended to be public and will be displayed to other users of the services. Our services may further allow you to connect and share your actions, comments, content, and information publicly or with friends. Our services may also allow you to connect with us on, share on, and use social media websites and applications, including those on which we have a presence. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. We also do not control the privacy practices of third parties such as social media websites or

applications. Please contact those websites and applications directly if you want to learn about their privacy practices.

- **Other Sharing.** We may also share your personal information with third parties in the following circumstances:
 - We may share personal information with third parties when you authorize us to do so
 - We may share your information with other third parties for their own marketing purposes, which are subject to the separate privacy policies of such third parties.
 - We may share personal information with affiliates and third parties who provide services to us, such as payment processing services, fraud detection services, services relating to data collection, processing and reporting, and analytics.
 - We may disclose your personal information for legal reasons, including to comply with laws and to respond to lawful requests and legal process, to protect our rights and property and the rights and property of others, to enforce our agreements, policies, and terms of use and investigate potential violations, and to protect the personal safety of our users, our employees or any person.
 - We may disclose or transfer your personal information to a third party if we sell, transfer, divest, or disclose all or a portion of our business or assets to another company or in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution or similar transaction or proceeding.
 - We may also share aggregated, de-identified or other non-personally identifiable information with third parties in our discretion
 - We may share personal information with third parties when you authorize us to do so. We will not disclose your personal information to affiliates or other third parties for their direct marketing purpose without first obtaining your “opt-in” consent.

How Do We Protect the Integrity and Security of Personal Information?

We take reasonable security measures, including physical, technological and organization procedures, designed to protect the integrity and security of personally identifiable information that we collect. For certain sensitive data, such as your credit card, debit card or payment account information, we use industry standard encryption technology to protect such data during storage and transmission through our services. We also use industry standard security technology such as firewalls designed to protect our network and systems from external attack. Our contracts with our employees and with third parties that receive your personal information include standard provisions requiring them to maintain its security and confidentiality.

You play an important role in keeping your personal information secure. Your account information is protected by a password that you select for your privacy and security. We encourage you to use “strong” passwords (that use a combination of upper and lower case letters, number and symbols). Please also make sure to protect your account information and log off when you are done using the services, especially if other users have access to the device you are using to access the services. You should not share your user name, password, or other security information for your account with anyone. If we receive instructions using your user name and password, we will consider that you have authorized the instructions.

Please be aware that no protection measures are perfect or impenetrable. Although we believe the measures we take are reasonable, we cannot guarantee the absolute integrity and security of your personal information or that unauthorized third parties will never be able to defeat the security measures taken by us, our affiliates or our third party service providers or business partners. **We assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond our control.**

How Can You Update, Correct, or Delete Your Personal Information?

We also take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary. We will provide you with a means to update or correct your account information or to delete/deactivate your user account. If a means is not provided or available to update, correct or delete your information through your user account, you may send requested updates, corrections or deletions about your account information to us at Neomantra Corp, 309 Greenwich Avenue, Suite 305, Greenwich, CT 06830, and we will make reasonable efforts to incorporate the updates, corrections or deletions promptly. When information is corrected, updated or deleted, we may keep a copy of the prior version for our records. You may not be able to change or remove information you submit or post publicly while participating in the services once such information has been submitted or posted.

How Can This Privacy Policy Be Changed?

We reserve the right to change this Privacy Policy at any time. If we make a change, this Privacy Policy will be updated accordingly. We recommend that you review this Privacy Policy periodically so that you are aware of any changes. If we make a significant change to this Privacy Policy, we will endeavor to provide a more prominent notice, such as an email to the email address associated with your account, presentation to you when you access the services or by means of a prominent notice on our website. Changes will take effect immediately upon posting of the updated Privacy Policy. Your continued use of any portion of Neomantra following posting of the updated Privacy Policy constitutes your acceptance of the changes.