



PRIVACY POLICY

Av. Insurgentes Sur #1602 piso 10 Oficina 1001
Col. Crédito Constructor Del. Benito Juárez
C.P. 03940, México D.F.

Overview

Oportunidad ACN México, S. de R.L. de C.V. ("FLASH") is committed to protecting the privacy of its customer information. This document will provide information about FLASH's policy relating to the collection, use and disclosure of personal information and of our customer's right to limit such collection, use or disclosure. All personal information relating to our customers is maintained in strict confidence by FLASH and is not sold to third parties. For your protection, we utilize a Secure Socket Layer (SSL) on all pages that require you to complete personal information. Our privacy policies and procedures are subject to change.

Identifying Purposes

FLASH collects personal information for a variety of purposes related to your request for services from FLASH. Personal information is used to verify, process and administer your product and service requests, assess credit-worthiness, maintain our commercial relationship with you, and analyze, understand and respond to your service needs. FLASH also analyzes and uses customer information to improve the products that we offer to our customers. We analyze personal information in order to identify the products and services offered by our affiliates or ourselves or by companies that we believe may be of interest to you, and to offer you those products and services. Personal information is also used in order to communicate with you for billing and provisioning purposes. FLASH does not sell, rent or lease personal information to third parties. From time to time FLASH may outsource certain account processing, or other customer service functions to a third party. In such cases, personal information will only be provided to such third parties on the condition that the third parties agree that they will also maintain the personal information in confidence. From time to time FLASH is also required report to regulatory bodies or to present a summary of all our customer information, including your personal information, in statistical or analytical form to governmental authorities and industry organizations. When information is provided in statistical or analytical form, information that might specifically identify you will not be disclosed.

Card Holder Data

To make payment for products or services customers may conduct transactions with a credit or debit card. In order to facilitate future or recurring payments, fees, or other charges for services, FLASH may require a customer to provide a credit or debit card to be stored for such future uses. Each customer's credit or debit card has a primary account number ("PAN"), cardholder name, expiration date and/or service code (collectively, "Cardholder Data"). FLASH maintains a Payment Card Industry Data Security Standard ("PCI DSS") compliance program, as well as other credit card controls that are consistent with PCI DSS. Although FLASH applies current industry standards in order to protect Cardholder Data, including PCI DSS, no method of processing, transmission, or storage of Cardholder Data is 100% secure. Therefore, FLASH cannot guarantee that its safeguards will prevent every unauthorized attempt to access, obtain, use or disclose Cardholder Data. In the event a customer suspects a security issue regarding Cardholder Data, the customer should immediately contact FLASH's Privacy Officer at the address listed at the end of this document.



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Collection and Use

FLASH will collect and use customer identifiable information for billing purposes, to provide and change service, to anticipate and resolve problems with your service, or to create and inform you of products and services that better meet your needs. This means that FLASH may use your customer identifiable information, in conjunction with information available from other sources, to market new services to you that we think will be of interest to you, but we will not disclose your customer identifiable information to third parties who want to market products to you.

Security

FLASH has implemented and maintains technological functions and security to safeguard the privacy of the personal information of its customers from unauthorized access or improper use.

E-mail Content

The company will not disclose to third parties private e-mail communications that are transmitted using FLASH services, except as required to operate the service or as otherwise authorized by law.

FLASH will never request sensitive personal information through email. Do not respond to e-mails requesting credit information, account numbers, passwords or PINs. Call the company to verify the legitimacy of the e-mail.

Disclosure

FLASH may also use customer identifiable information to investigate and help prevent potentially unlawful activity or if required by subpoena, search warrant, or other legal process.

Account Information

FLASH honors requests from customers to review all customer identifiable information maintained in reasonably retrievable form, and will correct any such information which may be inaccurate. Customers may verify that appropriate corrections have been made.

Minors

FLASH complies with all federal laws and regulations regarding the protection of the privacy of minors on the Internet.

FLASH BRAND LEADER INDEPENDENT DISTRIBUTOR AGREEMENT

LPDP

FLASH is committed to observing the principles of legality, consent, information, quality, purpose, loyalty, proportionality and liability dictated by the Mexican Federal Law on Protection of Personal Data Held by Private Parties ("LPDP"). FLASH is responsible for the personal information it has collected or will obtain in the future from you, for the use of the same and for its adequate protection. In this context and in accordance with the provisions of articles 15 and 16 of the LPDP as well as related articles and provisions of its Regulation, FLASH does hereby inform you ("Customer") of the purposes of the treatment of your personal information:

1. Personal information obtained by FLASH shall be used for the following purposes: (i) to provide services to Customer;(ii) to administer the purchase of products and services by the Customer from FLASH and/or service providers or other parties with whom FLASH conducts business;(iii) for commercial purposes including delivery of products and services;(iv) for tax and invoicing purposes;(v) to comply with FLASH's obligations with the Customer;(vi) for control purposes including reporting of the status of the relationship of Brand Leaders, FLASH, and/or service providers or other parties with whom FLASH conducts business with the Customer and/or the provision of products and services to the Customer; and (vii) for statistical purposes.

2. For the purposes set forth above, FLASH may collect personal information such as name, phone number, address, email, fax, date of birth, Federal Tax-Payer Number (RFC), credit card data, data on bank accounts, etc.

3. Customer expressly agrees and authorizes FLASH to transfer Customer's personal information to those third parties that must obtain such personal information for the purposes of processing payments to and from Customer, fulfilling Customer's purchases of products and services, and administering Customer's participation in the FLASH opportunity.

4. Consent to use the personal information pursuant to the terms and conditions described in this Privacy Notice, is considered to have been granted by Customer provided that Customer expresses no objection concerning this Privacy Notice.

5. FLASH undertakes to obtain the consent from Customer if the use relates to sensitive personal data as defined in the LPDP, except upon the occurrence of any of the exceptions provided for in article 10 of the LPDP.

6. If you have any questions or concerns about FLASH's privacy practices please contact FLASH at www.miacn.com or at the mailing address indicated at the end of this Privacy Policy.

7. You may revoke the consent granted for the treatment of your personal information by submitting a written request at the FLASH address provided. Likewise you have the rights (i) to have access to your personal information that is in FLASH's possession, and to the details of its treatment;(ii) to update or rectify such personal information if it is inaccurate;(iii) to demand that the personal information be cancelled, deleted or destroyed (when the purposes for which it was collected have been fulfilled) and (iv) to oppose to the use of personal information for

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specific purposes or for a legitimate cause. These rights of access, rectification, cancellation and opposition can be exercised by submitting a written document that contains the following: your name and address; documents proving your identity or documents evidencing representation of the Customer; a clear and precise description of the personal information with respect to which you seek exercising any of these rights, and description of your request. This document must be sent to Av. Insurgentes Sur #1602 piso 10 Oficina 1001, Col. Crédito Constructor Del. Benito Juárez, C.P. 03940, México CDMX. FLASH is obliged to respond to such request within a period of twenty days from the date of receipt thereof.

8. FLASH reserves the right to update and/or change the terms of this Privacy Notice at any time.

In compliance with the provisions of the Federal Law on Protection of Personal Data held by Private Parties, I acknowledge that I have read and accept FLASH's Privacy Notice, above, which I understand will govern the use and protection of my personal information collected now and in the future by FLASH.

Enforcement

FLASH uses the self-assessment approach to maintain compliance with its Privacy Policy. FLASH periodically verifies that its policy is accurate, comprehensive for the information covered, displayed appropriately, implemented and in conformity with Safe Harbor Principles. FLASH also encourages individuals covered by this Policy to raise any concerns about our processing of their personal information by contacting the FLASH Privacy Officer at the address below or the FLASH Legal Department. FLASH will seek to resolve any concerns.

Limitations

Adherence to this Privacy Policy may be limited to the extent required to meet a legal, governmental, national security or public interest obligation.

Should you have any questions with respect to the FLASH Privacy Policy or if you do not consent to, or would like to limit, the manner in which information about you is collected, used or disclosed, please contact FLASH in writing at Oportunidad ACN México, S. de R.L. de C.V., Av. Insurgentes Sur #1602 10th floor Office 1001, Col. Credit Constructor Del. Benito Juarez, C. P. 03940, Mexico CDMX.