

## **Club Elektra: Website Privacy Policy**

Effective Date: **April 15<sup>th</sup>**

Nueva Elektra del Milenio, S.A. de C.V. (“Elektra”, “we” or “us”) respects your concerns about privacy. This Privacy Policy applies to <https://www.clubelektra.us/> (the “Site”). This Privacy Policy describes the types of personal information we collect on the Site, how we use the information, with whom we share the information and the choices available to you regarding our use of the information. We also describe measures we take to protect the security of the personal information and how you can contact us about our privacy practices.

### **What information do you obtain?**

The types of information we collect about you may include:

- information such as your name, contact information (email and phone number), gender, date of birth, nationality, address, agency name, business type, Facebook and other social media information;
- information regarding money transfers and money services businesses for which you act as an agent; and
- other information you submit through the Site, such as through the “Contact Us” feature.

### **Do you obtain any information by automated means?**

When you use the Site, we may collect certain information by automated means using technology such as cookies, web beacons and web server logs. The information we collect in this manner may include your device IP address, unique device identifier, web browser characteristics, device characteristics, operating system, language preferences, internet service providers, referring URLs, clickstream data, and dates and times of website visits.

#### *Cookies and Web Beacons*

Cookies are files that websites send to your computer to uniquely identify your browser or to store information or settings in the browser. A web beacon (also known as an Internet tag, pixel tag or clear GIF) links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of the website.

### **How do you use the information you obtain about me?**

We may use the information we obtain about you to:

- communicate with you and respond to your inquiries, including sending you information about the Elektra and our products, services, programs and events;
- provide products and services that you request;

- customize your experience with the Site;
- understand how we can help you or provide access to our products, services, programs and events;
- increase and maintain the safety and security and prevent misuse of the Site;
- operate, maintain, evaluate and improve the Site and our products, services, programs and events (including analyzing and improving the Site and our programs, managing our communications; performing data analytics; and performing accounting, auditing and other internal functions);
- protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies including our Terms and Conditions.

We also may use the information we obtain in other ways for which we provide specific notice at the time of collection.

### *Third-Party Analytics Services*

We may use third party analytics services on the Site, such as Google Analytics. The analytics providers that administer these services use technologies such as cookies, web beacons and web server logs to help us analyze your use of the Site. The information collected through these means (including IP address) may be disclosed to these analytics providers, and other relevant third parties who use the information to evaluate use of the Site. To learn more about Google Analytics and how to opt out, please visit <https://www.google.com/intl/en/analytics/learn/privacy.html> or <https://support.google.com/analytics/answer/181881?hl=en>.

### *Online Tracking*

On the Site, we and third parties may collect information about your online activities. This section of our Privacy Policy provides details and explains how to exercise your choices.

The Site is not designed to respond to “do not track” signals received from browsers.

### **With whom do you share my information?**

We may share personal information we collect on the Site. We may also share your personal information with our subsidiaries and affiliates for the purposes described in this Privacy Policy. We also may share personal information with service providers who perform services on our behalf based on our instructions or any third party which we deem necessary to carry out the services. We do not authorize these service providers to use or disclose the information except as necessary to perform services on our behalf or to comply with legal requirements. In addition, we may share member information with other partners to provide benefits and services.

In addition, we may disclose information about you (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights, including

to enforce compliance with our internal policies or the Terms of Use; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; (6) in the event we transfer all or a portion of the Elektra or its resources (including in the event of a reorganization or dissolution); or (7) otherwise with your consent.

### **How can I unsubscribe from marketing emails from the Elektra?**

To unsubscribe from our marketing emails, click the “unsubscribe” link found in our marketing email messages or let us know by sending us an email or writing to us at the below email or mailing address. Please note that, even if you unsubscribe from marketing email correspondence, we may still need to email you with transactional or administrative information.

### **Do you collect information from children?**

The Site is not directed to children under the age of 13 and we do not knowingly collect personal information from children under the age of 13 on the Site. If we become aware that we have inadvertently received personal information from a visitor under the age of 13 on the Site, we will delete the information from our records.

### **How do you protect my information?**

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized access, destruction, loss, alteration, disclosure or use.

### **Why do you provide third-party links or online services, and what do I need to know about the third parties’ privacy practices?**

This Privacy Policy does not apply to other websites or online services that are accessible through the Site. The Site may provide links to other websites and online services for your convenience and information, and may include third-party features such as apps, tools, widgets and plug-ins. These third-party sites and services may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy policies of these parties, which we strongly suggest you review. To the extent any linked online websites, services or third-party features are not owned or operated by the Elektra, we are not responsible for these third parties’ information practices.

### **How will I know about Privacy Policy updates?**

This Privacy Policy may be updated periodically to reflect changes in our personal information practices. Changes to the Privacy Policy will be posted on this page. For significant changes, we will notify you by posting a prominent notice on the Site indicating at the top of the Privacy Policy when it was most recently updated.

### **How do I contact Elektra with questions about this Privacy Policy?**

If you have any questions about this Privacy Policy, please contact us by email at [clubekt@elektra.com.mx](mailto:clubekt@elektra.com.mx).