

Privacy Statement

Below, we explain, which data are collected when you visit or use our website <https://www.lectera.com> and/or when you conclude and execute a contract as a sales partner and how such data are used, processed or disclosed.

Controller within the meaning of data protection law:

NAME

Luidmila Semeshkina

ADDRESS

LECTERA LLC, 1990 NE 163RD Street,
#233 North Miami Beach, FL.US 33162

E-Mail:

legal@lectera.com

To assert the rights specified in this Privacy Statement or in case of questions regarding use, collection or processing of personal data, users should contact the controller named above.

As controller in accordance with the provisions of data protection law, LECTERA undertakes to protect the personal data and privacy of its users and to treat them confidentially. Collection, storage, modification, transmission, blocking, erasure and use of personal data are carried out on the basis of the applicable legal provisions.

LECTERA has technical and organizational security measures in place to protect user data against access by unauthorized persons, accidental or intentional manipulation, destruction or loss.

Definition

The law requires that personal data are processed lawfully, fairly and in a transparent manner in relation to the subject ("lawfulness, fairness, transparency"). To ensure this, we inform you about the individual legal definitions of terms which are also used in this Privacy Statement:

1. Personal data

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter: "data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2. Processing

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. Restriction of processing

"Restriction of processing" means the marking of stored personal data with the aim of limiting their processing in the future.

4. Profiling

"Profiling" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

5. Pseudonymization

"Pseudonymization" means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

6. Filing system

"Filing system" means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.

7. Controller

"Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by applicable law, the controller or the specific criteria for its nomination may be provided for by applicable law.

8. Processor

"Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

9. Recipient

"Recipient" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with applicable

law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

10. Third party

"Third party" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

11. Consent

"Consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Lawfulness of processing

The processing of personal data is only lawful if there is a legal basis for the processing.

Legal basis for the processing can in particular be:

- a. The data subject has given its consent to the processing of his or her personal data for one or more specific purposes;
- b. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c. Processing is necessary for compliance with a legal obligation to which the controller is subject;
- d. Processing is necessary in order to protect the vital interests of the data subject or of another natural person
- e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Information about the collection of personal data

Below, we explain the collection of personal data when using our website. Personal data are e.g. name, address, e-mail addresses, user behavior.

Sec. 1 Collection of personal data when visiting our website

When the website is used for information purposes, LECTERA collects only personal data transmitted by the user's browser to the LECTERA server. When users want to visit the LECTERA

website, LECTERA collects the following data that are technically required to display the website to users and to ensure stability and security.

Request location

IP address

Date and time of the request

Time zone difference to Greenwich Mean Time (GMT)

Content of the request (specific page)

Access status/HTTP source code

Amount of data transmitted in each instance

Website, from where the request is sent

Browser

Operating system and its interface

Language and version of the browser software

These data are deleted immediately after a technical evaluation. This data collection protects our predominantly legitimate interests in the correct presentation of our website offering within the scope of a weighing of interests, as well as compliance with the applicable law in terms of security and confidentiality of data.

Sec. 2 Use of cookies

In addition to the aforementioned data, cookies are stored on your computer when you use our website. Cookies are small text files that are stored on your hard disk and assigned to the browser you are using. They provide certain information to the entity setting such cookie. Cookies cannot execute programs or transmit viruses to your computer. Their purpose is to make the website overall more user-friendly and effective.

Our website uses the following types of cookies, the scope and function of which are explained below:

a) Transient cookies are deleted automatically when you close the browser. This includes in particular session cookies. They store a so-called session ID, which can be used to assign various requests by your browser to the joint session. In this way, your computer can be recognized when you return to the website. The session cookies are deleted when you log out.

b) Persistent cookies are deleted automatically after a specified period, which may vary depending on the cookie. You can delete the cookies in the security settings of your browser at any time.

c) Flash cookies are not captured by your browser, but by your Flash plug-in. These objects store the required data regardless of your browser and do not automatically expire.

d) Third party cookies are not set by us, but by third party providers. For example, third-party cookies are created by "social media plugins" (see below) of social networks such as Facebook, Instagram, or the services of Google Analytics, You Tube, etc. which are integrated into our website. These third-party cookies are generated by embedded plugins or technologies of the respective organizations. We have no control over the cookies and privacy settings of such services or organizations and expressly note that our third-party services are subject only to their respective cookie & privacy policies.

Information on cookies of the following third-party services are available under the following links:

YouTube, Google Analytics

www.google.com/intl/de/policies/technologies/cookies/

Facebook, Instagram:

www.facebook.com/help/cookies/

You may configure your browser settings according to your wishes and refuse to accept cookies. If you do not want Flash cookies to be processed, you will need to install an appropriate add-on, e.g. "Better Privacy" for Mozilla Firefox (<https://addons.mozilla.org/de/firefox/addon/betterprivacy/>) or Adobe Flash Killer Cookie for Google Chrome. You can prevent the use of HTML5 storage objects by using your browser in private mode. We also recommend that you regularly delete your cookies and browser history manually. Please note that by deactivating cookies you may not be able to use all the functions of this website.

Sec. 3 Server log files

You can visit our website without providing any personal information. Every time our website is accessed, usage data are transmitted to us or to our web host/IT service provider via your Internet browser and are stored in log data (so-called server log files). Such stored data include, for example, the name of the visited site, the date and time of access, the IP address, the amount of data transferred and the requesting provider.

Sec. 4 Collection and use of personal data for contact enquiries

When contacting LECTERA by e-mail or by using the contact form, the provided data (your e-mail address, possibly your name and surname) will be stored by LECTERA in order to answer your enquiry. LECTERA will delete the data collected in this context once storage is no longer required, e.g. when your request has been dealt with. Otherwise, processing will be restricted if legal retention obligations apply.

Sec. 5 Collection of personal data when concluding a contract as a sales partner

For the conclusion of a contract as a sales partner, we require the following personal data from you:

1. Salutation,
2. Surname,
3. Name,
4. Address,
5. Phone number,
6. E-mail address,
7. VAT ID number,
8. Credit card, bank and bank transfer data.

LECTERA uses these data exclusively for the purpose of performing the contract and the necessary communication with the sales partners. This includes initiation, conclusion, processing, warranty and, if applicable, rescission of the contract. The data will be kept until the contract has been performed in full. Insofar as commercial and tax retention periods exist, the retention period may be up to 10 years.

This information is necessary to establish and execute the contract as a sales partner.

Sec. 6 Data transmission to third parties

- (1) LECTERA will disclose personal user data to third parties only insofar as this is necessary to perform the contract or to protect the legitimate interests of LECTERA. LECTERA also uses external service providers (processors - StoreData Datacenter, DataLine Datacenter, NGENIX CDN, Hetzner AG, Amazon Web Services, SendGrid, MailChimp) to perform the contract. Separate data processing contracts have been concluded with the service providers in order to guarantee the protection of personal user data.

As a sales partner, you have access to the back office (dashboard). In this back office you will receive an overview of the orders initiated by you. The following information about the persons who initiated your order will be displayed:

Status (customer/distributor), surname, name, e-mail, net order value of the previous month, number of team members, time of last online activity.

This information is required to calculate and track your commission entitlements.

You can also see a team overview in the back office. Sales partners there are given information on the sales partners they have recruited in the downline; i.e. the following data of a sales partner are visible for its upline:

Status (customer/distributor), surname, name, net order value of the previous month, number of team members, time of last online activity.

This data processing is required for the purpose of fulfilling a sales partner contract.

In addition, this data processing also takes place due to LECTERA's legitimate interest in organizing sales in the best possible way.

- (2) If you are a sales partner, the above personal information about your orders as well as your team overview will also be displayed to the sales partners in your downlines for the purpose of calculating the differential commission of the sales partners in your upline. This data processing is required to calculate and track commission entitlements.

- (3) We require the following data to process commission payments: Name, Last name, Birthday, Citizenship, Country, Legal address, Billing address, Passport/ID, Photo of KYC docs, Nickname, UUID, Contact data (email, skype, whatsapp, phone), Payer id, Paypal/adv accounts email.

This information is required to calculate and track commission entitlements.

(4) For payment processing, the payment data of the sales partner, namely name, surname, address, e-mail address, telephone number, are forwarded to the respective payment provider. Such data processing is done for the performance of the contractual relationship with you as sales partner or based on your consent.

Sec. 7 Use of external tools

Various tools of a range of companies are integrated into our website which enable us to evaluate your user behavior or to include links to other websites. To this end, we have concluded separate data processing contracts with the service providers in order to guarantee the protection of your personal data.

We cooperate with the following service providers:

Use of Google Analytics

This website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses so-called "Cookies", text files that are stored on your computer and allow for analyzing your use of the website. On behalf of the operator of this website, Google will use this information to evaluate your use of the Website, to compile reports on website activities, and to provide the website operator with further services related to website and Internet use.

The IP address transmitted in the context of Google Analytics by your browser is not merged with other data provided by Google.

You may refuse the placement of cookies by selecting the appropriate settings on your browser; however, please note that if you do this you may not be able to use the full functionality of this website. You may furthermore prevent the collection of the data generated by the cookies relating to your use of the website (incl. your IP address) by Google as well as the processing of such data by Google, by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout>.

This website uses Google Analytics with the extension "_anonymizeIp()". IP addresses thus are processed in a shortened form, excluding the possibility of any personal references. If the data collected about you can be related to a person, this will be excluded immediately and the personal data will be deleted immediately.

We use Google Analytics to be able to analyze the use of our website and to improve it regularly. The generated statistics will enable us to enhance our services and make them more interesting for you as a user.

This website also uses Google Analytics for a cross-device analysis of visitor flows, which is carried out via a user ID. You may deactivate the cross-device analysis of your use in your user account under “My data”, “Personal data”.

Cookies set via this website are stored for up to 12 months.

Google Analytics advertising functions

If you consent to the use of Google Analytics advertising features, this website will use the enhanced features of Google Analytics in addition to the standard features. The Google Analytics advertising features implemented on this site include Google Analytics reports on performance broken down by demographics and interests.

We use first-party cookies (e.g. Google Analytics cookies) and third-party cookies (e.g. DoubleClick cookies) together to help us analyze the typical demographic characteristics and interests of visitors to our website in anonymous and aggregated form. We use this information to improve our website offerings.

You can prevent participating in this tracking process in a number of ways: a) by selecting your browser settings accordingly; b) by deactivating the Google ad settings at <https://www.google.com/ads/preferences/?hl=en>; c) by selecting the cookie settings accordingly [link to cookie settings page]. Please note that in this case you may not be able to make full use of all the functions of this offering. The storage period is up to 26 months.

Use of Google Analytics Maps

Our website uses Google Maps to display our location and to give directions how to find us. This is a service provided by Google.

If you access the component Google Maps which is integrated in our website, Google sets a cookie on your terminal via your Internet browser. Your user settings and data are processed in order to display our location and create directions.

Our legitimate interest lies in optimizing the functionality of our website.

By establishing this connection with Google, Google is able to determine the website, from which your enquiry was sent and which IP address the directions should be sent to.

If you do not agree with this processing, you have the option to prevent the installation of cookies by selecting your browser settings accordingly. For details, refer to the section on "Cookies" above.

Moreover, the use of Google Maps as well as the information obtained via Google Maps is governed by the [Google Terms of Service](#) and the Google Maps Terms of Service.

To protect your rights and personal data, we provide Google Maps with a so-called double-click solution, which transmits data to Google only after you have explicitly activated the map function.

Google Ads Conversion

We use the services of Google Ads Conversion to draw attention to our attractive offerings with the help of advertising media (so-called Google Ads) on external websites. We are able to use the data of the advertising campaigns to determine the success of the individual advertising measures. Our aim is to show you advertisements that are of interest for you, to make our website more interesting to you and to calculate fair advertising costs.

These advertising media are delivered by Google via so-called "Ad servers". We use Ad server cookies, which can be used to measure certain parameters such as the display of ads or clicks by users. If you access our website via a Google ad, Google Ads stores a cookie on your terminal. The validity of these cookies usually is limited to 30 days and they are not meant to identify you personally. The unique cookie ID, the number of ad impressions per placement (frequency), last impression (relevant for post-view conversions) as well as opt-out information (marking that the user no longer wishes to be addressed) are usually stored as analysis values for this cookie.

These cookies enable Google to recognize your Internet browser. If a user visits certain pages on an ad user's website and the cookie stored on his or her computer has not yet expired, Google and the user may recognize that that user clicked on the ad and was directed to that page. Each ads user is assigned a different cookie. Cookies can therefore not be traced via the websites of ads users. We do not collect and process any personal data in the aforementioned advertising measures ourselves. We only receive statistical evaluations from Google. Based on these evaluations, we are able to identify which of the advertising measures used are particularly effective. We do not receive any further data from the use of the advertising media, in particular we cannot identify the users based on such information.

Due to the marketing tools employed, your browser automatically establishes a direct connection with the Google server. We do not have any influence on the extent and further use of the data collected by Google through the use of said tool and therefore inform you according to our state of knowledge: Through the integration of Ads Conversion, Google receives the information that you have accessed the relevant part of our website or clicked on an ad from us. If you are registered with a Google service, Google can assign the visit to your account. Even if you are not registered with Google or have not logged in, the provider may still collect and store your IP address.

Facebook Custom Audiences – Facebook Pixel

The website uses the remarketing function "Custom Audiences" of Facebook Inc. ("Facebook") to be able to contact you again within 6 months. This enables users of the website to view interest-based advertisements ("Facebook Ads") when visiting the Facebook social network or other sites that also use the process. Our aim is to show you advertisements that are of interest for you, to make our website more interesting to you.

Due to the marketing tools employed your browser automatically establishes a direct connection with the Facebook server. We do not have any influence on the extent and further use of the data collected by Facebook through the use of said tool and therefore inform you according to our state of knowledge: Through the integration of Facebook Custom Audiences, Facebook receives the information that you have accessed the relevant page of our website or clicked on an ad from us. If you are registered with a Facebook service, Facebook can assign the visit to your account. Even if you are not registered with Facebook or have not logged in, the provider may still collect and store your IP address and other identifying information.

You can deactivate the "Facebook Custom Audiences" function [here](https://www.facebook.com/settings/?tab=ads#) and logged-in users may do so at <https://www.facebook.com/settings/?tab=ads#>.

For more information about Facebook's data processing practices, please visit <https://www.facebook.com/about/privacy>.

Cookies used: type c. For more information, refer to the section on "Cookies".

Sec. 8 Facebook fan page

LECTERA uses the technical platform and services of Facebook for the information service offered here.

Facebook and LECTERA have therefore concluded a joint responsibility agreement, which is available [here](#).

LECTERA provides you with the following information on data processing on our Facebook fan page:

(1) Controllers

The processing of your personal data on the Facebook fan page of LECTERA takes place in joint responsibility with Facebook

(2) Data processing

When accessing a Facebook fan page, your terminal's IP address is transmitted to Facebook. According to Facebook, this IP address is made anonymous and is deleted within specified term. In addition, Facebook stores further information on its users' terminals, e.g. the Internet browser used. Facebook may potentially use this to assign IP addresses to individual users. If you are logged into your Facebook account while visiting our fan page, a cookie containing your Facebook identifier will be stored on your device. Because of this cookie, Facebook is able to track your visit to our fan page and how you used it. Facebook uses this information to provide you with customized content or advertising.

If you do not want this, you should log off your Facebook account or deactivate the "stay logged in" function. We furthermore recommend that you delete cookies from your device and exit and restart your browser. This process deletes Facebook information which Facebook can use to establish a link to you.

However, if you want to use the interactive features of our fan page, you will need to log on to Facebook again with your Facebook details. This also makes it possible for Facebook to establish a link to you again.

Facebook does not conclusively and clearly disclose and we do not know, how Facebook uses the data from visits to Facebook pages for its own purposes, to what extent activities on the Facebook page are attributed to individual users, for how long Facebook stores such data and whether data from a visit to the Facebook page are disclosed to third parties. We can only refer you, as a user of our fan page, to Facebook's statements on data protection.

The data collected about you in this context are processed by Facebook.

What information Facebook receives and how this is used is described by Facebook in a general manner in its data use policy. They also include information on how to contact Facebook and also how to post advertisements.

Facebook's data policy contains further information on data processing:

<https://www.facebook.com/about/privacy>

Opt-out options can be selected here: <https://www.facebook.com/settings?tab=ads> and here <http://www.youonlinechoices.com>

We as operator of the Facebook fan page are unable to assess the Transmission and further processing of personal user data in third countries, as well as the potential risks associated with this for you.

(3) Insight function

As part of the so-called "insights" function, Facebook furthermore provides a series of statistical data for the third party as fan page operator. These statistics are generated and provided by Facebook. We as the operator of the fan page do not have any influence on the creation, in particular, we cannot block this function. As part of the "insights" function, the following information is displayed to us for the categories "fans", "subscribers", "people reached" and "interacting people" for a selected period of time:

Website activities such as page views, page previews, actions on the site; reach activities such as "like" information, people reached and recommendations, posting activities such as posting interactions, video views, comments, shared content.

We also receive statistical information on the Facebook groups that are linked with our fan page. In accordance with Facebook's Terms of Service, which each user has accepted to when creating a Facebook profile, we may also identify subscribers and fans of the website and view their profiles and other information shared by them.

Facebook provides further information on this here:

<https://www.facebook.com/help/pages/insights>

LECTERA uses the data available in aggregated form to make contributions to and activities on the fan page more attractive to users, e.g. for planning the content and timing of posts.

(4) Storage period

We keep information provided by Facebook only for as long as it does not outweigh your interest in erasure or anonymization.

If you no longer wish to have the data processing described here performed in the future, please terminate the connection of your user profile to our fan page by using the functions "I no longer like this page" and/or "No longer subscribe to this page".

(5) Your rights as data subject

We recommend that you contact Facebook directly with any requests for information or other questions regarding your rights listed at the end of this Privacy Statement, as only Facebook has full access to user data. However, if you do address your request to us, it will of course still be processed and additionally forwarded to Facebook.

Sec. 9 Children

Our offering is generally aimed at adults. Persons under the age of 18 should not transmit any personal data to us without the consent of their parents or legal guardians.

Sec. 10 Rights of data subjects

Data subjects have the following right:

- Information on or confirmation of the processing of their data
- Rectification or erasure of their data
- Restriction of processing
- Object to processing
- Data portability
- Revocation of your consent with effect for the future
- Complaint with the supervisory authority

We hope that this information is of help to you when exercising your rights. Please contact us if you would like further information on the data protection provisions.