# **Passport Partners LLC DBA Levarti**

## PRIVACY POLICY

Effective July 31, 2023. Last Revised July 31, 2023.

At Levarti, we value the privacy and security of our Affiliates' personal information. This Privacy Policy outlines how we collect, use, and protect the information you provide to us. By becoming a Member or Affiliate and agreeing to our Policies and Procedures, you consent to this Privacy Policy.

- 1. Keeping Member or Affiliate Information Up to Date: We understand the importance of accurate information for effective communication. Each Member or Affiliate is responsible for ensuring that their Member or Affiliate Information is kept up to date. Any changes in your personal details should be promptly updated in your back office to ensure smooth communication with us and your upline.
- 2. Email Communication: Email is one of the primary methods of communication between Levarti and our Affiliates. It is essential for each Member or Affiliate to provide us with their current and valid email address. By doing so, you agree to receive emails from Levarti and your upline regarding important updates, promotions, and other relevant information.
- 3. Sharing Information with Upline: To support and enhance the success of our Affiliates, we may share certain information with their upline. This includes the Member or Affiliate's name, telephone number, address, email address, and select sales performance data for all Affiliates in their downline. However, we will never share sensitive information such as Social Security Numbers or credit card numbers with an Member or Affiliate's upline without separate and explicit permission from the Member or Affiliate.
- 4. Modifying Member or Affiliate Information: We understand that personal information may change over time. As an Member or Affiliate, you have the right to modify your Member or Affiliate Information, such as updating your address, phone number, or email address. You can do this through your back office or by contacting our support team.
- 5. Processing of Information: Please be aware that the information provided by Affiliates to Levarti will be shared with and processed by our corporate offices. We take appropriate measures to safeguard your data and comply with applicable privacy laws and regulations.
- 6. Consent to Receive Communications: By providing your email address and telephone number, you explicitly consent to disclose this information to Levarti and your upline. This consent allows us and your upline to communicate with you effectively, ensuring you stay informed about the latest developments and opportunities within our travel company.

Your privacy is of utmost importance to us, and we are committed to protecting your personal information. If you have any concerns or questions regarding our Privacy Policy, please contact our Customer Service team for assistance.

## **Expectation of Privacy**

Company recognizes and respects the importance its Customers/Affiliates place on the privacy of their financial and personal information. Company will make reasonable efforts to safeguard the privacy of and maintain the confidentiality of its Customers'/Affiliates' financial and account information and non-public personal information.

## **Employee Access to Information**

Company limits the number of employees who have access to Member's/Affiliate's nonpublic personal information.

#### **Restrictions on the Disclosure of Account Information**

Company will not share non-public personal information or financial information about current or former Customers/Affiliates with third parties, except as permitted or required by laws and regulations, court orders, or to serve the Customers'/Affiliates' interests or to enforce its rights or obligations under these Policies and Procedures, the Member and Affiliate Agreement, or with express written permission from the accountholder on file.

## **Security and Security Breaches**

All Affiliates must adopt, implement and maintain appropriate administrative, technical and physical safeguards to protect against anticipated threats or hazards to the security of confidential information, including Member & Affiliate Data. These safeguards must be appropriate to the sensitivity of the information.

Appropriate safeguards for electronic and paper records may include but are not limited to:

- (i) encrypting data before electronically transmitting it;
- (ii) storing records in a secure location; and
- (iii) password-protecting computer files and securely shredding paper files containing confidential information.

Affiliates must keep confidential information secure from all persons who do not have legitimate business needs to see or use such information. Affiliates must ensure they obtain and maintain consent from prospective Customers/Affiliates and existing Customers/Affiliates before sharing such data with the Company.

Affiliates must comply with all applicable privacy and data security laws, including any security breach notification laws. Without limitation of the preceding sentence, in the event of an actual or suspected Security Breach affecting Company's data, the applicable Affiliates shall first promptly notify the Company Compliance Department in writing after becoming aware of such Security Breach, and if instructed by the Compliance Department, notify applicable Customers/Affiliates. Any such notification to Customers/Affiliates shall be made in compliance with applicable law and shall specify the following:

- (i) the extent to which Member/Affiliate Data was or was suspected to be disclosed or compromised;
- (ii) the circumstances of the Security Breach;
- (iii) the date or period of time on which it occurred;
- (iv) a description of the information affected;
- (v)a description of the steps taken to reduce the risk of harm from the Security Breach;
- (vi) contact information for a person able to answer questions regarding the Security Breach;
- (vii) any other information required by the applicable law; and
- (viii) in the case of a notice to a privacy commissioner or other regulatory body, an assessment of the risk of harm to any affected persons and an estimate of the number of persons affected.

Affiliates shall promptly comply with all applicable information Security Breach disclosure laws. Affiliates, at their expense, shall cooperate with Company, any applicable privacy commissioner or other regulatory body and the applicable Customers/Affiliates and use their best efforts to mitigate any potential damage caused by a breach of their obligations under the Member and Affiliate Agreement or any law applicable to confidential data, including by sending notice to the affected individuals, applicable agencies and consumer reporting agencies, if such notification is required the Company in its sole and absolute discretion.

### **Privacy and Confidentiality**

All Affiliates are required to abide by the Company's Privacy Policy with regard to Affiliate and Member information.

#### The Data Management Rule

The Data Management Rule (the "Rule") is intended to protect the LOS for the benefit of all Affiliates, as well as the Company. LOS information is information compiled by the Company that discloses or relates to all or part of the specific arrangement of sponsorship within the Company business, including, without limitation, Member and Affiliate lists, sponsorship trees, and all Member and Affiliate information generated therefrom, in its present and future forms. The Company LOS, constitutes a commercially advantageous, unique, and proprietary trade secret ("Proprietary Information"), which it keeps proprietary and confidential and treats as a trade secret. Company is the exclusive owner of all Proprietary Information, which is derived, compiled, configured, and maintained through the expenditure of considerable time, effort, and resources by the Company and its Affiliates. Through this Rule, Affiliates are granted a personal, non-exclusive, non-transferable and revocable right by the Company to use Proprietary Information only

as necessary to facilitate their business as contemplated under these Policies. The Company reserves the right to deny or revoke this right, upon reasonable notice to the Member or Affiliate stating the reason(s) for such denial or revocation, whenever, in the reasonable opinion of the Company, such is necessary to protect the confidentiality or value of Proprietary Information.

All Affiliates shall maintain Proprietary Information in strictest confidence and shall take all reasonable steps and appropriate measures to safeguard Proprietary Information and maintain the confidentiality thereof.

Thank you for being a valued member of Levarti, and we look forward to providing you with exceptional travel experiences and opportunities for personal and professional growth.