

# Privacy Notice of Ms. Camay International, LLC

**This Privacy Notice is effective as of September 18, 2018.**

At Ms. Camay International, LLC (“MCI”), we recognize the importance of protecting your personal information and are committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which we operate.

In the normal course of its business activities, MCI collects, uses, and sometimes shares personal information of various individuals and organizations in order to run its day-to-day operations. This Privacy Notice describes MCI’s general privacy practices that apply to such personal information collection and use.

## **TYPES OF PERSONAL INFORMATION WE COLLECT**

In describing our collection, use, and sharing of information in this Notice, we refer to our collection and use of "Personal Information." "Personal Information," as used in this Notice, is any information related to an identified or identifiable natural person. Examples of Personal Information include first and last name, mailing address, email address, billing information, IP address, other online contact information, or telephone number.

## **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We collect Personal Information in three ways:

1. We collect information you provide to us in optional, voluntary submissions, such as in registration forms, user profiles, promotional signups, surveys, sweepstakes/contest entries, requests for customer service, software and mobile applications downloads.
2. We may collect some Personal Information automatically. This is described below in "Passive Data Collection."
3. We may also obtain information, including Personal Information, from third party sources. If we directly combine information from third parties with Personal Information that we have collected, we will treat the combined information as Personal Information and handle it in accordance with this Notice. In addition, please note that we may solicit third parties to collect Personal Information on our behalf such as social media platform providers and in such cases we instruct those third parties to comply with this Notice and all applicable data protection laws.

### **Passive Data Collection**

#### *Location-Based Services*

We may collect, use, and share (with MCI partners, service providers and licensees) precise location data, including the real-time location of your mobile or fixed location device.

#### *Analytics Tools*

We use analytics tools and other third party technologies, such as Google Analytics, Facebook Analytics, and DoubleClick Cookies, to collect non-personal information in the form of various usage and user metrics when you use the MCI website or use our services (the MCI website and our services are referred to as "Sites and/or Services" in this Notice). These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage and purchase history, MAC Address, mobile unique device ID, and other similar information.

The third party analytics companies who collect information on our Sites and/or Services and other online products and/or services may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

In addition to our use of technologies as described herein, we may permit certain third party companies to help us tailor advertising that we think may be of interest to you based on your use of our Sites and/or Services and to otherwise collect and use data about your use of our Sites and/or Services. For more information about this practice, please see the "Third Party Advertising Technologies" section below.

You may opt out of the DoubleClick cookie by visiting the Google advertising opt-out page or you may opt out of Google Analytics by visiting the Google Analytics opt-out page.

Google has additional information available about their Remarketing Privacy Guidelines, and Restrictions.

You may view a list of other third party service providers who collect information, and/or opt-out of such collection of information about you, by visiting <http://www.networkadvertising.org/choices/> or <http://www.aboutads.info/choices/>.

## **Cookies**

We may use a variety of methods, including "cookies" to collect information.

*What is a cookie?*

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device. You can find more information about cookies at: <http://www.allaboutcookies.org>.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that advertisements you see online are more relevant to you and your interests.

The cookies used on our Sites and/or Services have been categorized based on the categories found in the ICC UK Cookie guide. The cookies used on our Sites and/or Services by category are described below.

### *Performance Cookies*

MCI collects cookies on our Sites and/or Services to capture information about page visits (e.g. “performance cookies.”) This information is anonymous and MCI uses this information only internally to deliver the most effective content to our visitors. Information from the cookie is used to gauge page popularity, analyze traffic patterns on our Sites and/or Services and guide development of other improvements to our Sites and/or Services.

### *Targeting, Performance, and Functionality Cookies*

In our email programs, MCI may employ some tracking methods (e.g. “targeting, performance, and functionality cookies”). We track “opens” via a tracking pixel in the email- meaning we track who opens our e-mail messages and when you open our e-mail messages; and we track “clicks” via encoded URLs-meaning we track whether you click on the links contained in our e-mail messages. This information is used internally only to help us deliver relevant messaging, and is not shared with any third parties.

### *Functionality and Necessary Cookies*

MCI does not require that you accept cookies and you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings, however, some functionality on our Sites (e.g. “functionality cookies”), our product or service check-out process, and Services may be disabled if you decline to accept cookies ( e.g. “necessary cookies”).

### *Opting Out of Cookies*

By using the Sites and Services, you consent to the placement of the cookies referenced above. You can, however, set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. You may also change your cookie settings through preference options in our Sites and/or Services, where applicable. We will indicate that upon selecting your preferences, that we will use a cookie to remember your preferences.

## **Third Party Advertising Technologies**

In addition to using cookies and related technologies as described above, we also may permit certain third party companies to help us tailor advertising that we think may be of interest to users and to collect and use other data about user activities on our Sites and/or Services (e.g., to allow them to tailor ads on third party services). These companies may deliver ads that might

also place cookies and otherwise track user behavior. These companies may use information about user behavior in order to provide customized advertisements across various services and products. In the course of providing these services, products or placing advertisements, these third party companies may place or recognize a unique cookie on your computer, and may record information to these cookies based upon your activities on any of our Sites and/or Services and on third party websites. Each of these companies uses this cookie information according to their own privacy and security policies. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out as indicated in this Notice. Please note this does not opt you out of being delivered advertising. You will continue to receive generic ads.

### **Personal Information relating to Children**

We do not knowingly seek or collect Personal Information from users under the age of 16 (a “Child” or “Children”), except to the extent that MCI may collect limited personal information from Children (but not their email addresses), where that Child's school or school district, has contracted with MCI to collect the personal information from the Children for the educational context authorized by the school or school district.

In the event that we learn that we have collected personal information from a Child without parental or guardian consent being obtained by his or her school or school district, or if we learn a Child has provided us Personal Information beyond what we request when he or she signs up for any of our Sites and/or Services, we will delete that information as quickly as possible. If you believe that a Child may have provided us Personal Information beyond what is requested when signing up for any of our Sites and/or Services, or that a student's school or school district has not obtained parental or guardian consent for Children, please contact us at [mscamayinternational@gmail.com](mailto:mscamayinternational@gmail.com).

Notwithstanding anything to the contrary contained in this Notice, if you are a Child (as defined above), and your parent or guardian signed up for our Sites and/or Service with a password or access ID provided by your school, you understand that your parent or guardian may be able to view all information within or associated with your account.

### **HOW WE USE YOUR PERSONAL INFORMATION**

We only use your data as expressly set forth in this Notice. If a need arises to use your data for a secondary purpose, we will provide you prior notice of such use.

### **Communication and Responding to Requests**

We use your information, including Personal Information to provide you with customer support, process transactions, respond to users' requests, send newsletters and updates, send special offers and advertisements, seek your opinions and feedback, and connect users to MCI Sites and/or Services, and to products and services of our partners and licensees.

### **Optimization**

We use your information, including Personal Information, behavioral metrics, and other non-personally identifiable information to operate, provide, improve, and maintain our Sites and Services, to develop new products and services, to prevent abuse and fraud, to personalize and display advertisements and other content for you, and for other administrative and internal business purposes.

### **Advertising**

We use your information, including Personal Information, behavioral metrics, geo-location data, demographic data and marketing preferences to personalize and display advertisements and other content for you.

### **Sharing Features**

We use your information, including Personal Information and any other information you submit directly or through passive means to provide you with various ways to connect and share content (e.g., web content, user generated videos, text, drawings, and screen and lecture captures, and quizzing features, media, tools, services and other products) with third parties. For example, we may provide you with the opportunity to email a link to certain content to another person. To use this feature, we may require you to provide certain Personal Information including your email address and the email address of each person to whom you send the link.

We also may allow you to share links to content with users of various third party services (e.g., social networking, search and sharing services). When sharing links using one of these third party services, if you are not already logged in to the third party service, you will need to supply login credentials for it. If you are not a registered user of the third party service, you will need to sign up for it. You are supplying the registration information or login credentials for the third party service directly to that third party, and not to us. By using any of these third party services to share links to content, you permit us to access, use and disclose any information relating to your account on each such third party service (such as your user name and profile information) that is available to us through the third party service, including through its application programming interface (API) pursuant to this Notice.

More specifically, our Sites and/or Services may use interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or share information from our Sites and/or Services through these services, you should review the privacy notice of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your site visit to your personally identifiable information resulting in the public display of the same.

### **Legal basis for processing personal information (EEA visitors only)**

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to Contact Us” heading below.

## **REASONS WE SHARE YOUR PERSONAL INFORMATION**

We do not share your personal information with third parties except as noted herein. We may share your personal information as necessary to maintain business operations, such as with vendors working on our behalf (for example, delivery of services and digital advertising); as required by law or to respond to legal process; to maintain the security of our products; to protect MCI’s customers, employees, rights, or property; as part of a merger or acquisition; or with your express consent.

## **HOW WE SECURE YOUR PERSONAL INFORMATION**

MCI uses a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the internet, we cannot guarantee that data, during transmission through the internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

## **HOW LONG WE RETAIN YOUR PERSONAL INFORMATION**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **HOW TO ACCESS AND CONTROL YOUR PERSONAL INFORMATION**

You may access and review the Personal Information MCI stores about you and correct any factual errors. Most of your Personal Information may be accessed and corrected by simply logging into your account and accessing your profile.

If you are an EU resident, you have the following data protection rights:

- You may access, correct, update or request deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

You can exercise your rights by contacting us using the information provided in the “How to Contact Us” section heading below.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## **NOTICE REGARDING AUTOMATED DECISION-MAKING AND PROFILING**

In some instances, our use of your personal information may result in automated decisions being taken (including profiling).

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. For example, we may use automated decisions to provide targeted advertising on our Services that may be of interest to you. You can opt-out of targeted advertising by contacting us using the information provided in the “How to Contact Us” section heading below.

## **NOTICE REGARDING THIRD PARTY PRIVACY PRACTICES & SOCIAL MEDIA**

This Privacy Notice applies solely to our Site and/or Services. Our site includes links to other, unaffiliated websites. If you access those sites and submit personal information, you are subject to the privacy notices applicable to those sites. We encourage you to carefully read the privacy notice of any website you visit.

## **HOW TO CONTACT US**

To exercise your data subject rights or if you have a privacy-related concern complaint, or question, please contact us at:

[mcamayinternational@gmail.com](mailto:mcamayinternational@gmail.com)

Or, you may reach us using the following information:

Ms. Camay International, LLC  
2001 Sue Ct., Suite 201  
Las Vegas, NV 89108

If you are a resident of the EU, you also have the right to file a complaint with the applicable data protection or other supervisory authority (“DPA”). You can find a list of DPAs at: <https://www.dataprotection.ie/docs/Home/4.htm>

## **CHANGES TO NOTICE**

Please note that this Privacy Notice may change from time to time. If there are material changes to this Privacy Notice or in how we use your personal information, we will post a notice on our home page that this Privacy Notice has changed. You are also encouraged to periodically review this Privacy Notice to stay informed on how we are protecting your personal information.