Privacy Policy

Last modified: November 28, 2018

Introduction

WorldVentures Marketing, LLC ("WorldVentures", "Company", or "We") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy and any other documents referred to in it describe the personal information that we collect from you, or that you provide on this website worldventures.biz (our "Website") and how that information may be used or disclosed by us. In this policy we use the word "Members" to mean the customers who purchase DreamTrips Gold membership or DreamTrips Platinum membership (collectively "DreamTrips Memberships"). We use the word "Representatives" to mean the independent contractors of WorldVentures who promote the sales of WorldVentures' products and services including the DreamTrips Memberships and earn commissions based on the sales of the WorldVentures' products and services.

This Privacy Policy relates to information we collect on this Website; in email, text and other electronic messages between you and us; through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website; when you apply to become or interact with us online or offline as a Representative or Member; and when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

Other websites owned and operated by WorldVentures and our affiliated companies (hereinafter referred to as the "WorldVentures Family") contain privacy policies which are different from this Privacy Policy. In addition, specific terms and conditions may apply to specific content, services or products contained in or available from such other WorldVentures Family websites. On your visits to WorldVentures Family websites or third-party websites, please check the privacy policy of each website which you visit and do not assume that this privacy policy applies to all WorldVentures Family websites or any third-party websites.

This policy does not apply to information collected on any third-party site or by any third-party application that may link to or be accessible from the Website, unless such third party site or third party application includes links to this policy.

Please read the following carefully to understand our policies and practices regarding your personal information and how we will treat it. If you do not agree with our policies and practices, you should not use the Website or interact with WorldVentures online or offline.

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Children Under the Age of 18

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, please do not register on the Website, make any purchases through the Website or send any information about yourself to us, including your name, address, telephone number or email address. In the event that we learn that we have collected personal information from a child under age 18 without verification of parental consent, we will delete that information. If you believe that we might have any information from or about a child under 18, please contact us at privacy@worldventures.com.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website and our Members and Representatives, including:

- Information you provide to us.
- Information we collect as you navigate through the site, including usage details, IP addresses.
- Information we receive from third parties, for example, our other Representatives and the regulatory authorities. For instance, we may receive personal information from regulatory authorities from time to time where they are investigating possible complaints about possible breaches of consumer, marketing and other laws.
- Information about your internet connection, the equipment you use to access our Website and usage details.

Our "lawful basis" for Using Your Data

Data protection law in Europe contains a number of "lawful bases" – which are really legal justifications which mean organisations like us are allowed to have your personal information in the first place. We have been careful to ensure we have a lawful basis for all data we have. Our lawful bases include:

- Performing the contract(s) we have with you
  
  In certain circumstances, we need your personal data to comply with our contractual obligation to provide you necessary support for your WorldVentures business, deliver the events you want, ensure you get the benefits associated with your membership, etc.

- Legal compliance
  
  Sometimes the law says we need to collect and use your data. For example, we can pass on details of people involved in fraud or other criminal activity to law enforcement; tax laws require us to retain records of orders and payments made through our systems. In some countries, local law requires us to verify the identity of Representatives.
• Legitimate interests - this is a technical term in data protection law which really means we have a good and fair reason to use your data and we do so in ways which does not hurt your interests and rights.

We sometimes require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we may send you promotional communications about the DreamTrips packages, DreamTrips Local, training events and incentive promotions for Representatives, subject to your legal rights to control whether we do so. We do analyse how users interact with our Website so we can understand better what elements of the design are working well and which are not working so well. This allows to improve and develop the quality of the online experience we offer all our users.

How We Use Your Information

We may use your information in the following ways:

• Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our services, posting material or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website. For instance, to register as a Member and/or Representative, we need to collect your name, your chosen login details, your residential address, contact details, the DreamTrips membership you have selected (if you register as a Member) and/or magazine subscriptions (if you are registering as a Representative), your date of birth, language preference, your chosen security question and answer, and payment details. We may also collect tax information or identification information from Representatives where required by local law. We collect this information so we can consider your membership and/or Representative application; open and operate your WorldVentures account(s); provide you with information, products or services that you request from us; check it is you when you logon onto the user portal for the Member and/or Representative and our other systems, for instance, the WorldVentures Pay app; communicate with you in relation to your DreamTrips membership; provide and arrange for your attendance at the training events you decide to book; pay you the commissions and/or bonuses you are entitled to and, where we have your consent, promote our business and products and those of our affiliated companies.

• Records and copies of your correspondence (including email addresses), if you contact us. We use this to administer your account, deal with your queries, notify you about changes to our service and support you for your DreamTrips membership and/or WorldVentures business.

• Your responses to surveys that we might ask you to complete for research purposes, although you do not have to respond to them. We use this to understand what our Members and/or Representatives think and how we can improve your experience with us.

• Details of transactions you carry out through our Website and of the fulfilment of your orders. You may be required to provide financial information before placing an order through our Website. We collect this information so we can provide the membership you want and to keep records of your membership status and the rewards points you accrued under your account. In relation to our Representatives, we also record data relating to their rankings, account status, the training events attended, the commissions and bonuses received, and performance in promoting DreamTrips memberships and products.

• Your search queries on the Website.

• We assign a Sponsor ID to all new Representatives, and will record against that Sponsor ID the new Members and/or Representatives that Representative has introduced and the other information collected in relation to that Representative as set out above.
We may also use your information to contact you about goods and services that may be of interest to you where you have consented to be contacted for such purposes. If you do not want us to use your information in this way, please send us an email with the subject line “unsubscribe” to privacy@worldventures.com.

Information Available to Representatives

New Members and/or Representatives, need to be introduced by an existing Representative. This is why new Members and new Representatives need a Sponsor ID to register. Sponsor ID is given to each Representative. Where you sign up as a Member, the Representative who introduced you to us, and the other Representatives who introduced them, will see your Member ID, your name, and your membership status (i.e. whether you are an active Member) through our Representative portal. Where you sign up as a Representative, the Representative who introduced you to us, and the other Representatives who introduced them, will see your name and your email address and mobile phone number and certain other information about you through our Representative portal. This information is relevant to our relationship with them and for us to understand and record who has introduced each new Member and new Representative, and to calculate the commissions and bonuses for the Representatives based on the new Member they introduce. Those ‘upstream’ Representatives may also contact you by email and by phone in relation to your activities as a Member and/or as a Representative. Representatives in your network may also contact us in relation to your performance, compliance with our policies and procedures and for other reasons related to your participation. Representatives are not employed by us, and under EU data protection law are ‘controllers’ in legal terminology – meaning they are responsible for their own compliance with applicable law, including privacy and data protection laws as such laws relate to your information.

Usage Details, IP Addresses, Cookies and Other Technologies

- **Usage Details and IP Addresses.** As you navigate through the Website, we may also collect details of your visits to our Website, including, but not limited to, traffic data, location data, logs of pages visited on our Websites, and other data, whether this is required for our own billing purposes or otherwise and the resources that you access, as well as information about your computer and Internet connection, including your IP address, operating system and browser type for system administration. This is statistical data about our users’ equipment, browsing actions and patterns, and does not identify any individual.

- **Cookies.** For the same reason, we may obtain information about your general Internet usage by using cookies. A cookie is a small file stored on the hard drive of your computer. Use of cookies help us to improve our Website and to deliver a better and more personalized service by enabling us to:
  
  - Estimate our audience size and usage patterns.
  - Speed up your searches.
  - Recognize you when you return to our Website.

For more information on the cookies and similar technologies we and our third party partners use on the Website and what you can do to control them, please see our [Cookies Policy](#).

You may refuse to accept cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- **Web Beacons.** Pages of the Website may contain electronic images known as web beacons (also referred to as single-pixel gifs) that permit the Company to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). Web beacons are not used to access your personal information on the Website and are only used to compile aggregated statistics concerning use of the Website.

Transfer, Storage and Processing of the Information We Collect From You

If you are a resident of a Member State of the European Union, the European Economic Area or the United Kingdom, please be notified that the information we collect from you will be transferred to and stored and processed in countries outside the European Economic Area including by us and third parties described in this Privacy Policy in the United States, where our head office is based, and to outsourced customer service providers in US, Philippine, Malaysia and
Taiwan We make every effort to look after your information in accordance with this policy, and you should be aware that the law and practice in the United States relating to the rights of law enforcement agencies to access and monitor your data and communications may be different from what happens in your country.

**User Contributions**

You are responsible for any content, including personal information, that you contribute to be published or displayed (hereinafter, "posted") on the Website, or transmit to other users of the Website (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to other users of the Website at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. You understand and acknowledge that, even after removal, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users.

**Disclosure of Your Information**

We may disclose personal information that you provide via this Website to the following third parties:

- Our holding entities, subsidiaries and affiliates. For instance, Our IT systems, which host and process your information for the purposes set out in this policy are managed by WorldVentures Holdings, LLC, and it will process your information in order to manage and support those systems as processor for us.
- Contractors including Representatives
- Service providers we use to support our business including contents of the magazine subscription, payment processors, IT systems relating to customer relationship management, order management, online authentication and identity management, hosting providers and outsourced support providers.
- To a buyer in the event of a merger, divestiture, restructuring, reorganization, dissolution or any other form of sale of some or all of WorldVentures Marketing, LLC’s assets or those of its holding company or entity, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by WorldVentures Marketing, LLC about its customers is among the assets transferred.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information to third parties to:

- Comply with any court order or other legal obligation or to co-operate with investigations or requests from regulatory authorities where your information is relevant to their investigation or request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of WorldVentures Marketing, LLC, other members of the WorldVentures Family, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

**Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookies.** If you do not wish us to collect cookies, you may set your browser to refuse cookies, or to alert you when cookies are being sent. If you do so, please note that some parts of this site may then be inaccessible or not function properly. See our Cookies Policy for details.
- **Promotional Offers from the Company.** If you do not wish to have your email address used for promotional purposes by us, you can opt-out by sending an email with the subject line "unsubscribe" to privacy@worldventures.com. You can also always opt-out of receiving email information from us other than the email informing you of the completion of user registration, correction of user data, change of password or change of applicable terms and conditions by sending us an email stating your request at
privacy@worldventures.com. If we have sent you a promotional email, you may send us an email at privacy@worldventures.com asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product or service purchase, product service experience or other transactions.

- **Personalized Advertising.** If you do not want us to use personal information that we gather to personalise our promotional communications to you, you can opt-out by sending an email with the subject line “unsubscribe” to privacy@worldventures.com

**What Are Your Rights and How Can You Exercise Them**

Your rights under applicable law may include access to the personal data we process about you, the right to have such personal data corrected or erased, the right to restrict the processing of your personal data, the right to data portability, etc. You may send us an email at privacy@worldventures.com to exercise your right(s).

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know.

Where we are processing your personal data for direct marketing purposes, you have the right to object to that processing at any time by clicking the “unsubscribe” link which we provide in each communication sent to you.

If you have provided personal information when registering to receive services or information, you can review and update your personal information by logging into the Website and visiting your account profile page and making changes with the exception of your name, Social Security Number (SSN) or Tax Identification Number or local equivalents. To change the name, SSN, or Tax Identification Number on an account, the account holder must telephone us at Customer Services. If you have forgotten your password, once you have tried to register and failed, you can click on the “Forgot your password?” link to reach a page on which you can submit your email address. Your user name and password will be emailed to you.

**Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and personally identifiable information will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website.

**Retention**

We will retain your information as long as your membership or Representative status is active, as necessary to provide you with our products and service or as otherwise set forth in this Policy. We will also retain and use this information as necessary for the purposes set out in this Policy and to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements and protect our legal rights, those of other members of the WorldVentures Family and as may be required to manage our relationship with Representatives.

We also collect and maintain aggregated, anonymized or pseudonymised information which we may retain indefinitely to protect the safety and security of our Site, improve our Website and services or comply with legal obligations.
Subject to applicable law, if you are a citizen or resident of the European Economic Area, you also have the right to (i) object to our use of your personal information and (ii) lodge a complaint with your local data protection authority or the Dutch Data Protection Authority, which is our lead supervisory authority in the European Union.

Dutch Data Protection Authority
Autoriteit Persoonsgegevens
Postbus 93374
2509 AJ DEN HAAG
Telephone: (+31) - (0)70 - 888 85 00
Fax: (+31) - (0)70 - 888 85 01

If you are based outside of the Netherlands you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. For a list of all national and regional EU data protection authorities, see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page and the Website home page. If we make material changes to this Privacy Policy, we will notify you by email or through a notice on the Website home page. The date the Privacy Policy was last revised is identified at the top of the page.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at privacy@worldventures.com.