



# Internet Privacy Policy

## Scope

---

This statement applies to The Sotis Group website and all websites belonging to The Sotis Group (collectively known as The Sotis Group websites) and includes the collection, use, security of and access to information that may be obtained through the use of these websites.

The Sotis Group manages these websites.

## Information Collected

---

If you visit The Sotis Group websites to read or download information, or to process a transaction, the Sotis Group automatically records the following information in their log files:

- Your Internet Protocol (IP) address. The IP Address is a unique numerical identifier used by computers and other devices to identify and communicate with each other over a network. The Sotis Group uses the IP Address to direct requested web pages to you where this is required;
- Top level domain name (eg: .com, .net, .gov, etc);
- The type of browser and operating system you used;
- Date and time of your visit;
- The previous site visited;
- Which pages are accessed;
- The time spent on individual pages and the site overall;
- Which files were downloaded; and
- What keywords you used to search the site.

Affiliate identification details are stored in a cookie to produce the affiliate page entries.

This information may be used to improve the content of web services and to help The Sotis Group to understand how people are using these services. The logs do not collect or store personally identifiable information. The Sotis Group makes no attempt to identify individuals that browse these websites.

## Cookies

---

The Sotis Group uses Google Analytics, a web analytics service provided by Google Inc. (Google). Google Analytics uses cookies and JavaScript code to enable analysis on usage of this website. 'Cookies' are small pieces of information that are stored by the browser on your computer's hard drive. The data collected about your use of this website, (including your IP address) will be transmitted to and stored on Google's servers. Google will use this data for the purpose of compiling reports on website activity for The Sotis Group and providing other services relating to website activity and Internet usage.

Any reports provided by Google to The Sotis Group will only contain aggregate non personal data about your use of this website. These reports may contain data relating to pages viewed, files downloaded or the completion of online subscriptions. The Sotis Group will use the data collected by Google Analytics to improve the functionality of this website.

Google may transfer this data to third parties where required to do so by law, or where third parties process this data on Google's behalf.

You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that if you do this, you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## Personal information

---

Personal information is defined as information about an individual whose identity is apparent or can reasonably be ascertained by that information.

No personal information is collected automatically through these sites. All personal information collected and/or stored must be voluntarily provided by you.

The Sotis Group will only collect personal information about you when you voluntarily participate in an activity that asks for information, such as:

- Sending an enquiry or feedback;
- Participating in a survey;
- Undertaking a payment or other transaction; and
- Suggesting a link.

Specifically, The Sotis Group will ask for the following information in order to facilitate the subscription process:

- First name (not family name);
- Email; and
- Country of residence.

The Sotis Group may collect personal (e.g. full name, postal address) for particular activities (e.g., to send you a gift) only where you choose to provide this information.

If you choose not to provide personal information when completing one or more of these activities, you may not be able to complete that activity. If you choose not to participate in these activities, your choice will in no way affect your ability to browse these websites.

Subscription transactions are completed through Clickbank, the online transaction company utilised by The Sotis Group to complete online transactions, and not through The Sotis Group. The Sotis Group does not have any access to personal information provided by you to Clickbank during the transaction process.

## Children

---

The Sotis Group follows the Children's Online Privacy Protection Act. We do not knowingly collect, solicit, use, or retain any Personal Information from children under the age of 16 years old ("Child" or "Children"). We do not communicate any Personal Information about Children to any third party. We do not allow Children to register as subscribers on this website or stream videos. We do not ask any subscriber or visitor to our website to provide any Personal Information about other friends or family members, including Children. If we believe that a Child has subscribed to this website, we will take all prompt and reasonable measures to prevent that Child from subscribing.

## Parents

---

If you become aware of a Child's subscription to our website, please contact The Sotis Group immediately so that it can rectify the situation.

## Use of Your Personal Information

---

Personal information you provide in relation to surveys, feedback or completing forms is strictly used only for the purpose for which it was collected.

Information you provide voluntarily to The Sotis Group is used exclusively for delivering the subscription offering (including your access to The Sotis Group forum should you elect to access that forum), and to monitor trends in subscriptions from country to country.

Credit card or other financial details provided to Clickbank are used only by the Clickbank and are not stored by or made known to The Sotis Group in any form. Clickbank may use your email address, or other personal information (e.g., postal address) to respond appropriately. This may include confirmation of payments by Clickbank made for subscription payments to The Sotis Group, or Affiliate payments made by Clickbank to Affiliates for subscribers who pay a subscription fee that is connected by HOPLink to that Affiliate. Clickbank has separate privacy considerations for these payment activities.

Survey information is used for the purpose designated.

The Sotis Group will not share information about you with other government agencies or other organisations without your permission unless it:

- Is necessary to provide you with a service that you have requested;
- Is required or authorised by law;
- Is reasonably necessary for enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue; or
- Will prevent or lessen a serious and imminent threat to somebody's health.

If The Sotis Group asks you for personal information in order to provide you with a service that you have requested, then you will be informed how that personal information will be used if you choose to give it to us.

## Access and Correction of Personal Information

---

You can review any personal information collected about you at any time by making a formal request in writing to The Sotis Group. You may recommend changes to your personal information that you believe to be in error by submitting a written statement that credibly shows the error. The obligation to correct information is subject to any applicable limitation in a law that provides a right to require the collection or amendment of documents.

If you believe that your personal information is being used for a purpose other than what was intended when submitted, you may contact The Sotis Group. In all cases, The Sotis Group will take reasonable steps to verify your identity prior to granting access to your personal information or making corrections to the information collected.

## Visitors from Outside the United States

---

All Personal Information collected by The Sotis Group and / or ClickBank may be stored in the United States. By visiting this site or subscribing, you consent to having all information transferred to the United States, subject to U.S. law, which may be different from the laws governing your information in your home country.

## Security

---

The Sotis Group has taken several steps to safeguard the integrity of its telecommunications and computing infrastructure including, but not limited to, authentication, monitoring, auditing and encryption. Security measures have been integrated into the design, implementation and day-to-day practices of the entire The Sotis Group operating environment as part of its continuing commitment to risk management.

The Sotis Group has security measures in place to protect your information against loss, misuse and alteration. These security measures ensure the privacy of information while it is being transmitted across the Internet.

## Disclaimer

---

Neither The Sotis Group, nor any agency, officer nor employee of The Sotis Group, warrants the accuracy, reliability or timeliness of any information published by this system, nor endorses any content, viewpoints, products or services linked from this system and shall not be held liable for any losses caused by reliance on the accuracy, reliability or timeliness of such information.

Portions of such information may be incorrect or not current. It is your responsibility to verify all information provided by this web site and / or web sites linked to or from

this site. Any person or entity that relies on any information obtained from this system does so at his or her own risk.

## How to Contact Us

---

If you have any comment in relation to any aspect of the collection, use, security of, or access to your personal information, please contact The Sotis Group.

Alternatively, you can write to The Sotis Group at:

The Business Manager  
PO Box 294  
Manville RI 02838 USA