

Vfinity's Privacy Statement

Vfinity Privacy Policy effective June 1, 2014. Vfinity and its affiliates and subsidiaries ("Vfinity") are committed to respecting your privacy. We've structured our Web site so that, in general, you can visit Vfinity on the Web without identifying yourself or revealing any personal information. Once you choose to provide us personally identifiable information (any information by which you can be identified), you can be assured that it will only be used to support your customer relationship with Vfinity.

This statement regarding the privacy of the personally identifiable information you provide online covers five main areas: Awareness, Choice, Accuracy, Access, Security, and third party links.

Awareness

Vfinity provides this Online Privacy Statement to make you aware of our privacy policy and practices and of the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our homepage and from the bottom of every page on our Web site.

What we collect

Upon logging onto our Web server, our Web server automatically recognizes your domain name but not your Email address (where possible). We will collect the domain name from which you log on, aggregate information on what pages you access or visit, user-specific information on what pages you access or visit and information volunteered by you (such as survey information and/or site registrations).

We do not collect your Email address unless you contact us by Email or volunteer your Email address and other personal information.

Cookies

Vfinity websites use "cookies" to enable you to sign in to our services and to help personalize your online experience. As you browse, we may install cookies (tiny text files stored on your hard disk by a web page server) in your browser. Cookies cannot harm your computer and they do not contain any personally identifiable information. One of the primary purposes of cookies is to store your preferences and other information on your computer in order to save you time by eliminating the need to repeatedly enter the same information and to display your personalized

content on your later visits to websites. Cookies also help us to improve our site and to deliver a better and more personalized service. Among other things, they enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customize our site according to your individual interests.
- To speed up your searches.
- To recognize you when you return to our site.

We may collect Personal Information (including name, address, telephone number, email address and, when necessary, credit card information) when you:

- * Sign up as a customer
- * Place an order from our Web site
- * Return an item or make an exchange
- * Inquire about our products and services
- * Sign up as an Independent Associate

Personal information is used to verify process and administer your product and service requests, assess credit-worthiness, maintain our commercial relationship with you, and analyze, understand and respond to your service needs. In addition, you may voluntarily provide Personal Information (such as name, address, email address, and telephone number) to be forwarded to a Vfinity Independent Associate for the purpose of contacting you with details regarding the Vfinity opportunity, including contact by email. In this case, we will keep a record of the contact, including the Personal Information, in your Vfinity file. We use this information to provide better service in the event that you contact us again.

Vfinity Independent Associate (hereinafter " Associate")

When you decide to become an authorized Vfinity Associate, or when you register to shop online as a Customer, we will collect Personal Information (such as name, address, email address, and telephone number). This Personal Information is securely stored in your Vfinity contact file. You will be assigned an identification number and you will select a password which will be necessary to gain entrance to the website and to access your Personal Information.

As a Vfinity Customer, your credit card information will be retained and securely stored in your Personal Information file, and used for payment of fees. The credit card information is used only to process payment for each month, so you do not have to re-enter the information each time.

Vfinity

In order to tailor our subsequent communications to you and continuously improve our products and services, we may also ask you to voluntarily provide us with information regarding your personal or professional interests, demographics, experience with our products and contact preferences.

How we use this data

Vfinity uses your information to better understand your needs and provide you with better service. Specifically, we use your information to help you complete a transaction, to communicate back to you, to update you on services and benefits, and to personalize our Web sites for you. Credit card and bank account numbers are used only for payment processing and are not retained for other purposes. From time to time, we may also use your information to contact you for market research or to provide you with marketing information we think would be of particular interest. At a minimum, we will always give you the opportunity to opt out of receiving such direct marketing or market research contact. From time to time you may voluntarily provide Personal Information to complete questionnaires or to participate in contests, polls or personalized assessments. We use this information to improve our products and services. We will also follow local requirements, such as allowing you to opt in before receiving unsolicited contact, where applicable. Data collected online may also be combined with information you provide when you enroll with Vfinity.

Whom we share it with

Vfinity will not sell, rent or lease your personally identifiable information to others unless we have your permission or are required by law. We will only share the personal data you provide online with other Vfinity entities and/or business partners who are acting on our behalf for the uses described above. Such Vfinity entities and/or business partners, including those in the United States and/or any other countries, are governed by our privacy policies with respect to the use of this data and are bound by the appropriate confidentiality agreements.

We may employ third party vendors to perform functions on our behalf. Examples may include delivering packages, fulfilling orders, e-mail administrative functions, processing credit card payments, and providing customer service. These vendors will be under bound by contract to use confidential data only for those purposes for which they are hired. Vfinity may disclose Personal Information to a third party in the event that Vfinity sells all or part of its assets to such third party or merges with or is acquired by the third party.

This paragraph is for Associates: Your sponsoring Associate and upline sales organization act as a support network, providing advice, assistance and information to assist you in building and maintaining a successful Vfinity business. Therefore, Vfinity will share Personal Information with your sponsoring Associate and your upline sales organization. They have agreed that such information is confidential, and not to share your information with any non-affiliated third parties, and are obligated to observe the intent of this Privacy Policy.

Choice

Vfinity will not use or share the personally identifiable information provided to us online in ways unrelated to the ones described above without first letting you know and offering you a choice. As previously stated, we will also provide you the opportunity to let us know if you do not wish to receive unsolicited direct marketing materials from us and we will do everything we can to honor such requests. Your permission is always secured first, should we ever share your information with third parties that are not acting on our behalf and governed by our privacy policy.

Accuracy & Access

Vfinity strives to keep your personally identifiable information accurate and secure. We do not provide access to your information online. In order to update or correct your information with Vfinity it will be necessary for you to contact Vfinity directly through the methods listed below. To protect your privacy and security, upon contacting us we will also take reasonable steps to verify your identity before granting you access or enabling you to make corrections.

Security

Vfinity is committed to ensuring the security of your information. To prevent unauthorized access or disclosure, maintain data accuracy, and

ensure the appropriate use of information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect online. We use the latest in encryption technology when collecting or transferring sensitive data, such as credit card and bank account information. However, no data transmission over the Internet can be guaranteed to be 100% secure and while we strive to protect your personal information, we cannot guarantee or warrant complete security.

Every user that has an account on the Site is responsible for (i) keeping his or her account password confidential and secured, (ii) avoiding unauthorized access to his or her computer; and (iii) keeping the e-mail address associated with that account current (you acknowledge that it is important to keep the e-mail address associated with that account current because although you may be able to log into your Vfinity account using an old e-mail address, you will not receive messages from Vfinity about your orders and inquiries or other matters).

International Use

Information that is submitted to Vfinity's Web Sites will be collected, processed, stored, disclosed, and disposed of in accordance with applicable U.S. law. If you are a non-U.S. user, you agree and acknowledge that we may collect and use your personal data and disclose it outside your resident jurisdiction, as discussed in "Whom We Share It With" above. In addition, such information may be stored on servers located outside your resident jurisdiction. U.S. law may not provide the degree of protection for information that is available in other countries. By providing us with your information, you acknowledge that you have read this Policy, understand it, agree to its terms and consent to the transfer of such information outside your resident jurisdiction. If you do not agree to this policy, please do not use Vfinity Web sites.

Future Developments

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future, we will post the policy changes to our Web site to notify you of these changes and provide you with the ability to opt out of these new uses. If you are concerned about how your information is used, you should check back at our Web site periodically. We will only use data collected after a policy has changed for the new purposes.

Vfinity is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience.

Third Party Links

Vfinity may at times provide links to other websites. These sites are not controlled by Vfinity and we are not responsible for any content contained on any such website. While we try to link only to sites that share our high standards and respect for privacy, Vfinity is not responsible for the privacy practices employed by other sites. We recommend that you review the privacy and security policies of each website you visit.

Protection of Children's Privacy

The Site is a general audience web site that is not specifically designed or targeted at children. If you are under 18, you may use the Site only with involvement of a parent or guardian. We abide by the requirements of the Children's Online Privacy Protection Act (COPPA) and other relevant laws. We do not knowingly collect, use or disseminate any personally identifiable information from children under the age of 13. If, however, we become aware that personally identifiable information regarding a child under the age of 13 has been collected at the Site, we will delete such information from our records.

Special note for residents of California

Under California Civil Code § 1798.83, we are required to disclose to consumers the following information upon written request: (1) the categories of personal information that we have disclosed to third parties within the prior year, if that information was subsequently used for marketing purposes; and (2) the names and addresses of all such third parties to whom such the personal information was disclosed. We hereby disclose that we have not disclosed any such personal information regarding any California resident during the one-year period prior to the effective date of this Privacy and Information Security Policy. California residents seeking additional information on this requirement or our privacy practices in general may write to Customer Service at Info@vfinity.com with the headline "PRIVACY REQUEST" in the message line. They may also send paper mail to: 837 Fifth Ave S Suite 200, Naples FL 34102 USA. Please write "Attention: PRIVACY" in the address.

Modifications to Policy

The foregoing policies are effective as of 6/1/2014. Vfinity reserves the right to change this policy at any time and will notify users of the

existence of a new Privacy Policy via e-mail or by posting the latest version on our Site. Any changes to this Policy will be effective immediately upon notice. Use of the Site after notice of changes will be deemed acceptance of such changes. Be sure to review this Privacy Policy periodically to ensure that you are familiar with the most current version. This statement and the policies outlined here are not intended to and do not create any contractual or other legal rights in or on behalf of any party.

Contact Information

Vfinity welcomes your comments regarding this Statement of Privacy. If you believe that Vfinity has not adhered to this Statement, please contact Vfinity at Info@vfinity.com. We will use commercially reasonable efforts to promptly determine and remedy the problem.