

Privacy Policy

ECG solutions LLC (“us,” “we,” or “our”) operates the Temple Bliss website and mobile application (the “Service”). We respect our users’ privacy. Please take a moment to familiarize yourself with our privacy practices and let us know if you have any questions. This Privacy Policy (“Policy”) explains our policies regarding the collection, storage, use, transfer and disclosure of Personal Information when you use our Service. The Policy does not address our collection of Personal Information from other sources. The Policy applies to you if you are a user, Advisor or other visitor to our website and/or Service. We will not use or share your information with anyone except as described in this Privacy Policy. The Personal Information you provide us will be used to provide and improve the Service. By using the Service, you agree to our collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Policy, the terms used here have the same meanings as in our term of use.

This privacy policy has been updated to comply with the EU’s General Data Protection Regulation (GDPR).

It is your responsibility to read this Policy. If you do not accept this Policy, you must not use the Service.

INFORMATION COLLECTION AND USE

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to purchase the Service and to contact or identify you. Personally, identifiable information may include, but is not limited to, your email address, name, phone number, postal address, or credit card or other financial information (“Personal Information”). If you are using the Service as an Advisor, you may be required to provide additional information, including, but not limited to, photo identification or other identity-verifying information and tax related documents, such as a Form W-9 or Form W-8BEN, that will be maintained in our databases. Even though you may provide us with credit card or other financial information, we do not handle, process, or store that information. Payment for our Service is processed through a carefully selected third party, such as PayPal or Stripe. Personal Information shared with third party payment services will be used only in accordance with the terms of the third-party services. We retain sole discretion to choose another third-party payment service.

You understand that you are providing us with this information voluntarily and it will be shared with third parties in connection with processing payment and the performance of the Service. Your Personal Information may also be used to send you updates regarding our company, to respond to your requests for information or customer service, or to inform you of other services or benefits that you may be interested in.

The following is a list of personal information collected by Temple Bliss:

- Email address
- Login name
- Full name
- PayPal payer ID
- PayPal email address
- IP address
- Geographic location
- Profile photo
- Live chat transcripts
- Video recordings
- In-app messages
- Favorite advisors list
- Reviews
- Information in your customer service inquiries

This information will be stored on third party partner servers (e.g., Amazon Web Services) for as long as your account is active. User data is hosted on servers belonging to third parties with whom we have signed Data Processing Agreements. All third-party partners are GDPRcompliant. All communications on Temple Bliss are stored, and are used for analytics purposes, for quality assurance, and to maintain long term relationships between clients and advisors.

RIGHTS UNDER GDPR

Under certain circumstances, users based in the EU have rights under data protection laws in relation to your personal data, namely:

- Access, correction, update, or erasure of your data: You may have the right to request access, correction, update, or erasure in regard to any personal data we hold about you. We will consider your request in accordance with applicable laws.
- Restriction of processing your personal data. You may have the right to prevent or restrict processing of your personal data.
- Portability of your personal data. You may have the right to request transfer of your personal data to a third party, when technically feasible.

You can exercise any of these rights by contacting us.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

This section contains information about policies that apply solely to California residents who use Site and/or Services. If you are a California resident, as of January 2020 you have certain rights regarding your personal information under the California Consumer Privacy Act of 2018 (“CCPA”):

(1) Right to Know About Personal Information Collected, Disclosed, or Sold You may request that we provide you with the following information:

- The categories or specific pieces of personal information that we have collected about you.
- The categories of sources from which the personal information was collected.

- The purposes for collecting, using, or selling that personal information. Please note that we do not sell personal information (as we understand the term “sell” to be defined in the CCPA).
- The categories of third parties with whom we shared that personal information.
- The categories of personal information we have disclosed or sold for a business purpose.

Details about the personal information we collect can be found in the “Information Collection and Use” section of this Privacy Policy. The supplemental policy for the CCPA regarding the personal information we have collected over the last 12 months, including the categories of personal information, business purposes, and whether we collect or sell your personal information are provided below

Categories of personal information	Business purpose	Collected?	Sold?
<p>A. Identifiers, such as full name, login name/nickname, street address, unique personal identifier, online identifier, date of birth, device type, unique device ID, browser type, Internet Protocol (IP) address, email address, account ID number, social security number, driver's license number, passport number, signature, or other similar identifiers.</p>	<p>A. To provide our products and services to you.</p> <p>B. To personalize, develop, and improve our products and services.</p> <p>C. To create, customize, maintain, and secure your account with us.</p> <p>D. To process your purchases, transactions, and payments.</p> <p>E. To prevent fraudulent transactions and fraudulent usage of our products and services.</p> <p>F. To provide you with customer support.</p>	YES	NO
<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)), such as: social security number, address, telephone number, passport number, driver's license or state identification card number, PayPal payer ID, PayPal email address, bank account number, credit/debit card number, or any other financial information.</p> <p>“Personal information” does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.</p>	Same as category A above	YES	NO
<p>C. Protected classification characteristics under California or federal law, including (but not limited to): age, race, color, citizenship, religion, marital status, sex/gender/gender identity, sexual orientation.</p>	Same as category A above (only the information provided by you voluntarily is collected)	YES	NO
<p>D. Commercial information, such as products or services purchased or other purchasing or consuming histories or tendencies.</p>	Same as category A above	YES	NO
<p>E. Biometric information</p>	Not applicable	NO	NO
<p>F. Internet or other electronic network activity, such as app/website usage history and information regarding interaction with our apps, websites, or advertisements.</p>	Same as category A above	YES	NO
<p>G. Geolocation data</p>	Same as category A above	YES	NO

H. Sensory data, such as photographs, video recordings, or voice recordings.	Same as category A above	YES	NO
I. Professional or employment-related information	Same as category A above	YES (advisors only)	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Not applicable	NO	NO
K. Inferences drawn from other personal information, such as consumer preferences, characteristics, trends, and behavior.	Same as category A above	YES	NO

Sources of Your Personal Information

The personal information we collect is obtained from the following sources:

- Directly from you. For example, from forms you complete in our app or website, advisor applications or the purchase of products.
- Indirectly from you. For example, through your interactions on our apps or websites.
- From third parties. For example, third party social networking providers, analytics services, advertising companies, and affiliates. If you do not want us to collect information from such third parties, you should review and adjust your privacy settings on those networks accordingly. To assist you in doing this, we have provided links to opt out of these third parties below:
 - Google Analytics: [Opt-out page](#)
 - Facebook (advertising and analytics): [Ad settings](#)
 - Mix panel (analytics): Contact Temple Bliss Support panel

(2) Right to Request Deletion of Personal Information Subject to certain limitations, you may request that we delete the personal information that we have collected about you. Upon verification of your request, we will queue your request for processing and notify you. If your request is denied, we will reply explaining why.

(3) Right to Opt-out of the Sale of Personal Information Your personal information is “sold” (as we understand the term “sell” to be defined in the CCPA) when it is shared with a third party for monetary or other valuable consideration for a purpose that is not a “business purpose” as defined in the CCPA. We do not sell your personal information.

If you would like to opt out of promotional email messages, you may do so by clicking the “Unsubscribe” link in any of the email messages you receive.

(4) Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights We will not discriminate against you for exercising your rights under the CCPA.

To exercise the “Right to Know” or the “Right to Request Deletion”, please email customer support. Before processing your request, we may ask to verify your identity or the identity of your authorized agent. Requests will be handled within the timeframes specified in the CCPA.

INFORMATION SHARING AND DISCLOSURE

Your personal information will be used primarily in connection with operating and facilitating the Service. However, we may send your Personal Information to other companies or people:

- such as our subsidiaries and/or affiliates.
- when we have your consent to share the information.
- when we need to share your information to provide the Service.
- when we need to send the information to companies who work on our behalf to provide the Service.
- when we team up with another company to offer or provide products, services, contests, or promotions.
- to perform data analyses (including market research); or
- when we respond to subpoenas, court orders or legal process; or find that your actions on our web sites violate the Terms and Conditions, or any of our usage guidelines for specific products or services.

LOG DATA

We collect information sent to us when you visit the Temple Bliss website or use the mobile application ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser language, referring/exit pages and URLs, platform type, number of clicks, domain names, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics. When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use and other statistics. We log this information for our internal use to help diagnose technical problems and to further administer and improve the quality of our services to you. We also maintain a record of your IP address to analyze the use of our Services on an aggregate basis. This information is helpful to understand your preferences when using our Services and enables us to customize and tailor your experience with us to your likes and dislikes, as well as to your geographical location. Some of this information is analyzed and used internally in order to develop, market or advertise new products or services that we think might interest you. We may also share this information with advertisers and other third parties at our sole discretion. In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information in order to increase our Service's functionality. This analysis helps us to (i) better understand your use of, or interest in, our products, services, content, as well as the products, services and content offered by others; (ii) communicate with you via email, regular mail, telephone and/or mobile devices about products or services that you may be interested in; and (iii) develop, display, and tailor content and advertising to your interests.

SECURITY

The information you provide to us will be kept in our database. The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security and any transmission of Personal Information is done at your own risk. We rely on professional hosting solutions that use reasonable care in maintaining security measures to protect you and our systems against unauthorized access to, or alteration, disclosure, destruction or loss of personal data hosted on our system. These protections, however, are not a replacement for the security measures in your control. It is important that you protect against unauthorized access to your password and to your computer or mobile device.

COOKIES

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Cookies allow your server or device to store its own information and can be used to customize pages and automatically recognize you based on your past usage. Cookies can help streamline your user experience and specifically tailor your information for your experience. We use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. Rejecting cookies, however, may affect your ability to use the Service and some program features or services may not function properly if cookies are disabled. If you do not reject cookies, we assume that you consent to the use of cookies.

DO NOT TRACK DISCLOSURE

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser

THIRD PARTY SERVICE PROVIDERS

This Policy exclusively addresses our activities from our servers and does not make promises or guarantees as to other third-party sites or services that may be used in conjunction with our Service. We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. We take care to select and enter into agreements with third parties capable of maintaining appropriate security measures that are in line with our policies and relevant privacy laws and regulations. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. These third-party service providers have their own privacy policies addressing how they use such information.

LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. If you click on a thirdparty link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

COMMUNICATIONS

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

COMPLIANCE WITH LAWS

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service. We reserve the right to release all types of information to law enforcement agencies if we determine, in our sole judgment, that either you have violated our policies, or the release of information about you may protect the rights, property, or safety of us or another person.

BUSINESS TRANSACTION

If ECG Solutions LLC is involved in a merger, acquisition, asset sale, bankruptcy or reorganization, your Personal Information may be shared, as well as retained by us. By providing us with your Personal Information, you consent to that transfer.

INTERNATIONAL TRANSFER

Your information, including Personal Information, may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside United States and choose to provide information to us, please note that we transfer the information, including Personal Information, to United States and process it there. Your consent to this Privacy Policy, followed by your submission of such information, represents your agreement to that transfer.

CHILDREN'S PRIVACY

Our Service is not marketed to under the age of 13, or the equivalent minimum age in the relevant jurisdiction, and we do not knowingly collect personally identifiable information from children. We encourage parents to be involved in the online activities of their children to ensure that no information is collected from a child without verifiable parental permission. If we become aware that a child has provided us with Personal Information, we will delete such information from our servers as soon as possible.

To use Temple Bliss, you must be at least 18 years of age. If you are under 18 years of age, please do not use our Service.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to replace, modify or amend this Policy from time to time. It is your responsibility to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page, as reflected by updating the date at the beginning of this Policy, and your continued use of our Service represents your consent to any changes in our Policy. Any changes made will apply to information collected after the revised date.

ACCESS TO PERSONAL INFORMATION

If your Personal Information changes, or if you no longer desire our Service, you may correct, update, delete, or deactivate it by making the change on the member information page or by emailing us at support@templebliss.co

OPT-OUT

If you give the company your Personal Information and you wish to opt-out of receiving communications from us, our partners, or our third-party providers, simply click on the opt-out link provided in the e-mail communication.

TERMS AND CONDITIONS

Please also visit our Term of use and our Advisor term of use which explain the use, disclaimers, and limitations of liability governing your use of our Service.

GENERAL DATA PROTECTION REGULATION (GDPR)

For purposes of the EU's General Data Protection Regulation (GDPR), the data controller is ECG Solutions LLC in State of Delaware. If you feel that your personal data has been processed in a way that does not meet the GDPR, you have the right to file a complaint with the relevant supervisory authority.

NOTIFICATION IN THE EVENT OF A DATA BREACH

In the event of a data breach, we will notify the owners of Temple Bliss accounts as soon as possible from the discovery of said breach.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at support@templebliss.co