

PRIVACY POLICY

Effective Date: From January 1, 2016

PLEASE READ. YOUR USE OF THIS WEBSITE IS SUBJECT TO THE FOLLOWING PRIVACY POLICY AND THE WEBSITE TERMS AND CONDITIONS.

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I. Notice

The "Website" refers to the website at www.tips4leads.com.ng and its subdomains. This Website is owned or operated by Helen Okeke and/or its subsidiary companies in Nigeria, (collectively, "COMPANY"). This privacy policy ("Privacy Policy") applies to information that you provide to COMPANY via this Website, and/or by use of other services (collectively, the "Services") that may be provided by other means or media, including as set forth below and as defined in the applicable Terms and Conditions or other terms.

This Privacy Policy is intended to provide you notice of COMPANY's information management practices, including the types of information gathered, how it is used and safeguarded, and the degree to which you may control the maintenance and sharing of your information. Your use of any COMPANY Service or Website constitutes acceptance of this Privacy Policy and any other applicable terms. This Privacy Policy is part of and incorporated by reference into the Terms and Conditions for this Website.

II. Personally Identifiable Information That We Collect

COMPANY respects your privacy and is committed to protecting personally identifiable information that you provide in connection with your use of its Websites and Services. Such personally identifiable information collected includes your name, shipping address, billing address, telephone numbers, e-mail address, and payment information such as your credit card number.

III. E-mail Newsletter Subscriptions

To subscribe to our e-mail newsletters, if any, you will need to provide your e-mail address. You may also be asked for other information when you subscribe.

Participating on a third party's website (or through some other means or medium), we will collect your information from the third party only if you opt-in to receive additional communications from us, or we are required to fulfill some function in relation to your activity (e.g., to send your order or deliver a prize).

If you submit to the Website a comment, photograph or other content to be published, online or offline (including on-air, in a DVD, or any other format), we may publish your name or other personally identifiable information in connection with publishing the content and you are hereby deemed to give us permission to do such.

VI. Information Collected by Other Means or Media

In some situations, we may also collect personally identifiable information and other information about you through other means, directly or indirectly. For example, if you access any COMPANY content, or

purchase such content via your wireless carrier or through another third party, the COMPANY may collect information directly from you or through the third party. Likewise, if you use our software, or provide information to other companies who share information about their customers, we may collect additional information about you. In each of these cases, the COMPANY will apply this policy to any personally identifiable information.

VII. Information About Other People

Some COMPANY Websites and Services may ask you to submit personally identifiable information about other people. If you provide us with personally identifiable information of a friend, or your friend provides personally identifiable information about you, to e-mail a feature from the Website, the e-mail addresses you or your friend supply us for those activities will not be used to send you or your friend other e-mail communications unless disclosed at the time you provide the information. A record of that transaction will be maintained as allowed and/or required by law.

VIII. Customer Service

Some Services may offer support and technical assistance through customer service centers via telephone, online chat, or e-mail. Whenever you communicate with customer service, you do so with the understanding that an operator may view and make changes to the information in your User Account in order to provide the assistance that you need.

IX. Non-Personally Identifiable Information That We Collect

As part of the registration process for some Services, you may be asked to provide information that does not personally identify you. For example, you may be asked to provide information concerning your personal preferences, purchasing habits, and the like. This information is generally optional but may be included in your User Account profile. COMPANY requests this information to understand you better and to also bring to your attention new services, programs, or offers that may be of interest to you.

In many cases, COMPANY will automatically collect certain non-personally identifiable information about your use of its sites and Services. COMPANY might collect, among other things, information concerning the type of Internet browser or computer operating system you are using, the domain name of your Internet service provider, your "click path" through the COMPANY sites or "click-through" from an e-mail, the Website or advertisement that was linked to or from the COMPANY site when you visited, and your IP address. To do this, COMPANY may use cookies and other technology (see below). If you are using our wireless Services, we may also automatically collect information such as the type of wireless device you are using, your mobile identification number (assigned by your telecommunications carrier) and telecommunications carrier. Your use of our Websites and Services, and information provided through these technologies, will be anonymous unless you provide us with personally identifiable information or have provided such information in the past.

X. Cookies and Related Technology

This Website's pages or e-mail messages may contain cookies, web beacons (also known as clear gifs), or similar technologies as they become available. Cookies are information files that this Website may place on your computer to provide extended functionality. The COMPANY may use cookies for a number of purposes, such as tracking usage patterns on the Website, measuring the effectiveness of advertising, limiting multiple responses and registrations, facilitating your ability to navigate the Website and as part of a verification or screening process. Most browsers are initially set up to accept cookies. Most browsers will allow you to erase cookies from your computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You should refer to your browser instructions, "Help" screen, or similar such resource to learn more about how to manage cookies and possibly reset your browser to refuse all cookies or to indicate when a cookie is being sent by indicating this in the preferences, options, or similar such menu in your browser. However, it is possible that some parts of this Website will not operate correctly if you disable cookies and you may not be able to take advantage of some of this Website's features. You should consult with your browser's provider/manufacture if you have any questions regarding disabling cookies.

The COMPANY's web pages may include advertisements for third parties and their products, and those third-party advertisements may include a cookie or web beacon served by the third party. The COMPANY does not control cookies in such third party ads, and visitors are encouraged to check the privacy policies of advertisers and/or ad services to learn about their use of cookies and other technology. The COMPANY's Privacy Policy does not cover the use of information collected from you by third party ad servers. These companies may use information (not including your name, address, e-mail address or telephone number) about your visits to this and other Websites in order to provide advertisements on this site and other sites about goods and services that may be of interest to you.

A web beacon is a small graphic image that allows the party that set the web beacon to monitor and collect certain information about the viewer of the web page, web-based document or e-mail message, such as the type of browser requesting the web beacon, the IP address of the computer that the web beacon is sent to and the time the web beacon was viewed. Web beacons can be very small and invisible to the user, but, in general, any electronic image viewed as part of a web page or e-mail, including HTML based content, can act as a web beacon. The COMPANY may use web beacons to count visitors to the web pages on the Website or to monitor how our users navigate the Website, and the COMPANY may include web beacons in e-mail messages in order to count how many messages sent were actually opened, acted upon or forwarded.

XI. Special Notice Regarding Children Under 13

COMPANY recognizes the sensitivity of personally identifiable information concerning children under the age of 13 and therefore provides this special notice. COMPANY is committed to complying with all applicable laws and regulations regarding children, including the Children's Online Privacy Protection Act ("COPPA"). Except in limited circumstances allowed by COPPA, COMPANY will not knowingly collect, maintain, or disclose any personally identifiable information from a child under 13 without first obtaining consent from that child's parent or legal guardian.

If you are a parent or guardian who has discovered that your child under the age of 13 has submitted his or her personally identifiable information without your permission or consent, COMPANY will make

reasonable efforts to remove the information from its active list, at your request. To request the removal of your child's information, please send an e-mail to support@tips4leads.com.ng and be sure to include in your message the same User Name and password and/or e-mail address that your child submitted.

COMPANY encourages parents and guardians to spend time online with their children to become familiar with the types of content available on the COMPANY Web sites and the Internet generally.

XII. Use, Disclosure, and Sharing of Information

a. Non-Personally Identifiable Information

From time to time, COMPANY may use and share with third parties aggregate, non-personally identifiable user information to show general demographic and preference information among users of the COMPANY Web sites. When you visit or download information from this Website, our web servers may automatically collect website usage information. Website usage information is non-personally identifying information that describes how our visitors use the Website. It can include the number and frequency of visitors to each web page and the length of their stays, browser type, referrer data that identifies the web page visited prior and subsequent to visiting the Website, and IP addresses (see below for more information on IP addresses). COMPANY may use IP addresses for a number of purposes, such as system administration, to generally determine your computer's server location, to report aggregate information to our business partners or to audit use of the Website. We also may determine your screen resolution and the technology available in order to serve you the most appropriate version of a web page, e-mail or similar service.

b. Personally Identifiable Information

COMPANY uses information about you to deliver the Services that you request, to keep you informed about changes affecting our Services or your account, to inform you of other Services or offers in which you might be interested, and to improve and enhance our sites and Services. If you provide COMPANY with personally identifiable information, we will take all reasonable and appropriate steps to protect it from unauthorized disclosure.

If you opt in to receive e-mail from us, you can always opt out of future marketing messages by following the directions in each message to "unsubscribe". However, if you choose to opt out of marketing messages, we reserve the right to contact you regarding your account status, technical support, product information, changes to account terms, and any other matter that might affect our service to you and/or any products you purchased from us or registered with us, as applicable.

As stated in the Terms and Conditions, you will be deemed to have consented to the disclosure to, and use by, a subsequent owner or operator of a COMPANY Website or Service, of any information about you contained in the applicable COMPANY database, if COMPANY or one of its companies assigns its rights and obligations regarding any of your information at the time of a merger, acquisition, or sale of all or substantially all of COMPANY's or such COMPANY company's assets related to the applicable site or Service to a subsequent owner or operator. In the event of such a merger, acquisition, or sale, your continued use of the Website or any related Service signifies your agreement to be bound by the

Terms and Conditions, California Privacy Policy and Privacy Policy of the Website's or Service's subsequent owner or operator.

The COMPANY and its companies may work together in order to provide portions of the COMPANY Websites and some Services (e.g., to fulfill prizes won in a sweepstakes, or to provide other support for a Service). These companies will handle your personally identifiable information in accordance with this Privacy Policy.

As stated above in “Personally Identifiable Information That We Collect - Special Promotions and Purchases; Submission of Content to be Published”, COMPANY may also work with third parties to provide some Services on our Websites. In connection with those Services, you are deemed to consent to us sharing your information with third parties who provide services such as processing of credit card transactions, customer service, promotion administration, order fulfillment and/or prize delivery, as applicable. Third parties who provide, or participate in, Services on COMPANY Websites are prohibited from using our customers' personally identifiable information for marketing purposes and/or from sharing, selling, or otherwise using such information, unless you choose to opt in to marketing, sharing, or other uses by the third parties. If you do not want your information to be used for marketing (or other purposes unrelated to the provision of COMPANY Services) by a third party who participates in a Service on one of our sites, do not opt in to such use by that third party when you register to participate in the Service.

Please note that whenever you opt in to receive future communications from a third party, your information will be subject to the third party's privacy policy. If you later decide that you do not want that third party to use your information, you will need to contact the third party directly, as we have no control over how third parties use information. You should always review the privacy policy of any party that collects your information to determine how that entity will handle your information.

COMPANY will not share, sell, rent, or disclose any personally identifiable information that we have collected except as stated herein, or in the following instances; 1) where we supply companies we have associations with, with your information in order to offer you services we feel may be of interest to you and who may then contact you by telephone or direct mail (unless you have opted out of their marketing programs under the procedures set forth by them – See our California Privacy Policy [F3] for more information); 2) where we are required by law, legal process, or court order to disclose; 3) where disclosure is necessary to identify, contact, or bring legal action against someone who may cause or be causing harm to, or interference with, the COMPANY's rights or property, other COMPANY Website users, or anyone else; or 4) to respond to an inquiry, request or complaint that you have made. COMPANY may also use IP addresses it collects in cooperation with Internet service providers, to identify users if we deem it necessary to comply with law, to enforce compliance with this Privacy Policy or our Terms and Conditions, or to protect our sites, customers, or others.

XIII. Our Commitment to Data Security

While COMPANY takes reasonable and appropriate precautions to protect your personally identifiable information from unauthorized disclosure and to prevent possible security breaches in our Websites, Services, and customer databases, no website, Internet transmission, computer system, or wireless

connection is completely secure. Consequently, COMPANY cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. Your use of the COMPANY Websites and Services is at your own risk. COMPANY urges you to take steps to keep your information safe by memorizing your password or keeping it in a safe place (separate from your account information), logging out of your User Account, and closing your Web browser.

Whenever you give COMPANY sensitive or confidential information (for example, credit card numbers for Purchases), COMPANY will take commercially reasonable steps to protect the information by establishing a secure connection with your Web browser. COMPANY employs a security technology known as a secure-socket-layer ("SSL") to protect the transmission of payment information to the site. Unless otherwise specified herein or on the Website where you make a Purchase, credit card numbers are used only for payment processing and are not retained for marketing purposes.

XIV. Hyperlinks To and From Other Sites

COMPANY sites may frame, and/or contain links to, or advertisements about, non-COMPANY Web sites. Other sites may also reference, advertise, or link to COMPANY Websites. COMPANY does not endorse or sponsor other websites, is not responsible for the privacy practices or the content of non-COMPANY sites, expressly disclaims any statements or assertions made on such websites, and denies and disclaims all liability associated with your use of, and the content on, such other sites and advertisements.

XV. Consent to Processing in Nigeria

By providing any personally identifiable information to COMPANY, all users, including, without limitation, users in the member states of the European Union, fully understand and unambiguously consent to this Privacy Policy and to the collection, storage, and processing of such information in Nigeria

XVI. Contact Us Regarding Privacy

COMPANY is dedicated to protecting your personally identifiable information and welcomes comments and questions on this Privacy Policy. You may e-mail your questions or comments to:

support@tips4leads.com.ng

Please note that information submitted to the Website via a "contact us," "help" or other similar e-mail address or form will not necessarily receive a response. We will not use the information provided to these e-mail addresses or forms for marketing purposes unrelated to your request.

XVII. Notification of Changes

COMPANY reserves the right to change this Privacy Policy and its Terms and Conditions at any time. In case of any material change to the Privacy Policy, we will replace the "Privacy Policy" link on the home page of our sites with a link entitled "Updated Privacy Policy" for no less than 30 days. All

changes to the Privacy Policy and/or Terms of Service will be effective when posted, and your continued use of any COMPANY Website or Service after the posting will constitute acceptance of, and agreement to be bound by, those changes.