

PRIVACY POLICY

Nutri Ventures USA, Inc. ("Nutri Ventures") wants you to know how we address privacy issues on the Nutri Ventures USA, Inc. web site, including all apps published by Nutri Ventures USA, Inc., whether for tablets or mobile devices or any other platform (the "Site"). We have established the privacy policy below (the "Privacy Policy") to explain how your personal information will be treated by us. Nutri Ventures USA, Inc. reserves the right to amend this Privacy Policy at any time. Please check back frequently in order to see changes, and your use of the Site constitutes your acceptance of the Privacy Policy, as it may be changed from time to time.

Collection of Personal Information from Site Users

To the extent that Nutri Ventures USA, Inc. is able to determine the age of users by their submissions to, or communications with, the Site, Nutri Ventures USA, Inc. will not knowingly (a) collect or post information from individuals under thirteen years of age ("Children" or "Child") without their parent's or legal guardian's verifiable consent, or (b) provide any personally identifying information collected from Children, regardless of its source, to any third party (non-law enforcement) for any purpose whatsoever. We do not ask for more personal information than is reasonably necessary for a child to participate in an activity. Parents can ask us to update or delete their children's information at any time.

We require verifiable consent from a parent when a child wants to register. As described in this Privacy Policy, we directly collect from child users during our initial registration process a parent's email address, the child's account name, and the child's password. When a child registrant acquires a paid membership, it may be collected additional personally identifiable information ("PII") from the registrant's parent. Nutri Ventures does not collect directly the data regarding credit card. It is PayPal who manages the payment operation and it is PayPal that collects that information. The types of PII that may be collected at that time include the parent's full name, email address, and credit card (or other payment method) billing information including mailing address. The Nutri Ventures website does not condition a child's participation in an online activity on the child providing more personal information than is reasonably necessary for that activity.

When we ask for your permission, we will tell you what we will do with the information you or your child provides us, and how you can review your child's information and ask us to delete the information. With your verifiable consent, we may collect other personal information from your child such as a last name or home address when the information is necessary for a particular activity. We may ask for certain non-personal information that helps us understand our visitors, like city and state, birth date, gender, hobbies, etc.

The Nutri Ventures website requires child users to provide a parent or legal guardian's valid email address in order to register on the website to participate in the virtual kingdoms, play games and view content. We use the parent or legal guardian's email address to send the parent or legal guardian a message that can be used to activate the Nutri Ventures account, to notify the parent or legal guardian about our privacy practices, and to send the parent or legal guardian

communications either about the parent/legal guardian's and child's Nutri Ventures accounts or about features of our website, including periodic parent newsletters about Nutri Ventures, and for such other purposes as described in this Privacy Policy. This email address is correlated with the account user name. With the parent or legal guardian's prior permission, we also may use this email address to send the parent or legal guardian promotional messages regarding Nutri Ventures products and services. The parent or legal guardian may revoke their permission to receive promotional messages regarding Nutri Ventures at any time by contacting customer support at web@nutri-ventures.com and may unsubscribe from promotional email communications from Nutri Ventures by clicking on unsubscribe links in those emails.

All personal information is contained in a secure database and is never distributed to Third Parties. Please review FTC Child Privacy Protection guidelines at <http://www.ftc.gov/privacy/coppafaqs.shtm#except>.

Nutri Ventures advises parents to become familiar with the privacy policies for all sites visited by their children. Consider the guidelines posted at <http://www.ftc.gov/bcp/online/edcams/kidzprivacy/adults.htm> in order to help promote safe surfing.

Nutri Ventures cannot condition a child's participation on this Site, the virtual kingdoms and play games on the child providing more personal information than is reasonably necessary for participation on this Site and its features.

Additionally, when visitors come to our site, we may also collect any of the following information:

1. Nutri Ventures USA, Inc. may collect and/or track (a) the home server domain names, e-mail addresses, type of computer, and type of Web browser of visitors to the Site, (b) the e-mail addresses of visitors that communicate with Nutri Ventures USA, Inc. or the Site via e-mail, (c) information knowingly provided by the visitor in online forms, registration forms and surveys, (including name, address, e-mail and other personal profile data), and (d) aggregate and user-specific information regarding page views.
2. Nutri Ventures USA, Inc. may use Internet "cookies", web beacons, or other technology to collect information from visitors' hard drives. Cookies or other like technologies save data about individual visitors, such as the visitor's name, password, user-name, screen preferences, the pages of a site viewed by the visitor, and the advertisements viewed or clicked by the visitor. When the visitor revisits the Site, Nutri Ventures USA, Inc. may recognize the visitor by the Internet cookie or other technology and customize the visitor's experience accordingly.
3. When a visitor performs a search within the Site, Nutri Ventures USA, Inc. may record information identifying the visitor or linking the visitor to the search performed. Nutri Ventures USA, Inc. may also record limited information associated with every search request made by the visitor and use that information to, among other things, solve technical problems with the service and to calculate overall usage statistics.
4. We may collect financial information as set out in the Financial Information section of this Privacy Policy. We use this financial information to process payments to Nutri Ventures Membership for fraud prevention purposes. The financial information that you enter to

purchase a membership is not stored by Nutri Ventures, but, instead, is retained by our payments processing vendor who acts on our behalf for the purpose of processing payments made to Nutri Ventures and for fraud prevention purposes.

5. We may collect geolocation information if a visitor enables their computer or mobile device to send us location information. The visitor may be able to change the settings on their computer or mobile device to prevent it from providing us with such information.

Use of Personal Data Collected

Nutri Ventures USA, Inc. may use personally identifiable information in a number of ways, such as:

1. To communicate with you about your account, if applicable, or to communicate information about the Site. For example, we may send all new users a registration email, and we will also occasionally send important notices or information.
2. To build higher-quality, more useful services, such as by analyzing usage trends, and by measuring demographics and interests regarding specific areas of the Site.
3. To provide you with prompt and effective customer service.
4. To support the operation of the Site (such as account maintenance and record-keeping), troubleshoot problems, resolve disputes, and to enforce our Terms of Use.

Disclosure of Personal Data Collected

Nutri Ventures USA, Inc. does not sell, rent or exchange any information that personally identifies Site visitors. However, Nutri Ventures USA, Inc. may disclose personally identifiable information about you to Third Parties as follows:

1. With your consent.
2. As Nutri Ventures USA, Inc. believes necessary to: (a) comply with law (including court and government orders, and civil subpoenas); (b) enforce or apply Nutri Ventures' Terms of Use and other agreements; or (c) protect the rights, property, or safety of Nutri Ventures USA, Inc., our users, or others.
3. If you partake (or we reasonably suspect that you are partaking) in any illegal or potentially illegal activity. We may disclose personal information even without a subpoena, warrant, or other court order, to the extent we feel is necessary to inform and cooperate with law enforcement agencies or other appropriate authorities.
4. In aggregated form, i.e., information about multiple users collectively without identifying any individual user, such as the total number of visitors to a particular section in a given week.

Financial Information

As noted above in Collection of Personal Information from Site Users, if a child registrant wants to acquire a paid membership, the parent's full name, email address, credit card billing information including mailing address will be required at the time of purchase. That information is not stored by Nutri Ventures, and, instead, is stored by our payments processing vendor for the purpose of processing payments made to Nutri Ventures and for fraud prevention purposes. That information is safeguarded with appropriate security, and it will not be used for other purposes. Furthermore, our payments processing vendor has agreed to maintain the confidentiality, security, and integrity of the personal and financial information it obtains from the Nutri Ventures website, and only to use this information on our behalf. Our financial institution is bound by all applicable privacy laws relating to the provision of financial services.

Security Measures

While no physical or electronic security system is impenetrable, Nutri Ventures USA, Inc. strives to maintain levels of privacy and security consistent with the best practices in information technology. Nutri Ventures USA, Inc. has implemented numerous security features to prevent the unauthorized release of or access to personal information. In particular, when a visitor provides information through the Site, Nutri Ventures USA, Inc. offers the visitor the ability to use a secure server. The secure server encrypts all information a visitor inputs before it is sent to Nutri Ventures USA, Inc., and is also used to store personal information securely.

Third Party Web Sites

The Site may contain links to other Internet web sites. Unless we explicitly state otherwise, we have no control over these third party sites and their privacy practices, and this Privacy Policy applies only to information you supply (or that we collect) in connection with use of the Site. You should review third party privacy policies in connection with visiting other Sites.

Opt-Out Right

Visitors may opt-out of having their personal information collected by Nutri Ventures USA, Inc., used by Nutri Ventures USA, Inc. for secondary purposes, or used by Nutri Ventures USA, Inc. to send promotional correspondence to the visitor, by contacting Nutri Ventures USA, Inc. via email at web@nutri-ventures.com or via postal mail or at the address and phone number below.

Nutri Ventures USA, Inc.
45, Rockefeller Plaza, suite 2000,
NYC, 10111 – New York

T: 212 332 3226

Access to and Ability to Correct Personal Data

Visitors and parents/guardians of children under the age of 13 may review any personally identifiable information collected about themselves or their child, have this information deleted, and/or request that there be no further collection or use of their own and/or their child's personally identifiable information by contacting Nutri Ventures USA, Inc. via postal mail, e-mail, or telephone (during regular business hours) at the address, e-mail address or telephone number listed below. Nutri Ventures USA, Inc. will take steps to verify the identity of anyone requesting personally identifiable information about a child and to ensure that the person is in fact the child's parent or legal guardian.

In addition, visitors and parents/guardians may modify, correct, change or update the personally identifiable information that Nutri Ventures USA, Inc. has collected about themselves or their child through the Site by contacting Nutri Ventures USA, Inc. via postal mail, e-mail, or the telephone number indicated below.

web@nutri-ventures.com:
T: 212 332 3226

Nutri Ventures USA, Inc.
45, Rockefeller Plaza, suite 2000,
NYC, 10111 – New York
T: 212 332 3226

Our Contact Information

If you have any questions regarding this Privacy Policy or you would like to review, change, and/or remove personal information, you may contact us at:

web@nutri-ventures.com |
T: 212 332 3226

Nutri Ventures USA, Inc.
45, Rockefeller Plaza, suite 2000,
NYC, 10111 – New York
T: 212 332 3226

Right to Contact Visitors; Changes to Web Site and Privacy Policy

Nutri Ventures USA, Inc. reserves the right to contact visitors to the Site regarding the Web Site and its features, as well as changes to the Terms and Conditions, Privacy Policy, or any other policies or agreements relevant to Website visitors. Nutri Ventures USA, Inc. may change the content of the Website and Privacy Policy at any time. Please revisit our Privacy Policy from time to time to be sure you are familiar with our current policy.

Governing Law

This Privacy Policy and the privacy practices of Nutri Ventures USA, Inc. will be subject exclusively to the laws of the State of Delaware within the United States of America. Nutri Ventures USA, Inc. makes no representation that this Privacy Policy and such practices comply with the laws of any other country. Visitors who use the Site and reside outside the United States do so on their own initiative and are responsible for compliance with local laws,

if and to the extent local laws are applicable. If you reside outside of the United States, by using the Site, you consent to the transfer and use of your information outside your country.

Special California Privacy Notice

California Civil Code Section 1798.83 (also known as S.B. 27 or the "Shine the Light" law), allows users that are California residents to request certain information regarding Nutri Ventures USA, Inc.'s disclosure, if any, of personal information to third parties for the third-parties' direct marketing purposes. To make such a request, please send an email message to web@nutri-ventures.com with "Request for California Privacy Information" in the subject line. If applicable, we will provide you, by email, a list of the categories of personal information disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the third parties' names and addresses. Please note that not all personal information sharing is covered by S.B. 27's requirements.