

# PRIVACY POLICY

## GLOBALUTION CONSULTING LLC

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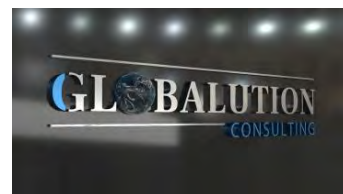
### 1. GENERAL

The consulting company Globalution Consulting LLC is a 360-degree boutique office. Upon contact, we help individuals to globalize their lives, expand their freedom, protect their wealth, and optimize their security ("Company Services"). Globalution Consulting LLC ("Globalution Consulting LLC" or "we" or "us" or "our") respects your ("Sites' visitor", "user", „client", "you", "your") privacy. Globalution Consulting LLC and its affiliated companies (collectively, Globalution Consulting LLC, "Company" or "we" or "us" or "our") present this Privacy Policy ("Privacy Notice" or "Privacy Policy") to inform you, as a user of our Websites (we have several Domains which refer and lead to the same Websites), as well as any other media form, media channel, mobile website, tool or mobile application related or connected thereto (collectively, the "Sites"); as a (potential) client of Globalution Consulting LLC, about the types of personal information that Globalution Consulting LLC may gather about or collect from you in connection with your use of the Sites or commissioning of services (also read our Terms: <https://globalution.net/Terms.pdf>). This Privacy Policy also explains the conditions under which Globalution Consulting LLC uses and discloses that personal information, and your rights in relation to that personal information.

If you are accessing [globalution.net](https://globalution.net), [kapitalumzug.com](https://kapitalumzug.com), [capital-relocation.com](https://capital-relocation.com), [reubicaciondecapital.com](https://reubicaciondecapital.com) or [globalution-consulting.com](https://globalution-consulting.com) ("homepages") from other jurisdictions, please be advised that you are agreeing to the use of your personal information in accordance with this Privacy Notice. You also agree to abide to the applicable laws of New Mexico/ USA concerning your use of the homepages and your respective agreements with us. If your use of the homepages or the Sites in general would be unlawful in your jurisdiction, please do not (continue to) use the respective homepages or Sites.

#### 1.1 THE BUSINESS (for European Users: Art. 13 or 14 GDPR)

**Globalution Consulting LLC** 5203 Juan Tabo Blvd. Suite 2b  
Albuquerque, New Mexico 87111  
UNITED STATES OF AMERICA  
Email: [New@Globalution.net](mailto:New@Globalution.net)  
Phone: +1 505 373 2327



#### 1.2 DISCLAIMER FOR CANADIAN USERS.

As defined under Canadian law, Personal Information means information about an identifiable individual ("Personal Information"). The disclosures mentioned herein are meant to transparently convey the methods of collecting, managing, storing, using, protecting, and sharing Personal Information by users ("Privacy Policy"). Users grant their consent to this Privacy Policy through it being readily available for viewing in accordance with the Personal Information Protection and Electronic Documents Act ("PIPEDA").

### 1.3 DISCLAIMER FOR EUROPEAN AND SWISS USERS.

Every user is entitled to the following data protection rights:

**The right to access** (Art. 15 GDPR) - You have the right to request from us a copy of your personal data.

**The right to rectification** (Art. 16 GDPR) - You have the right to request that our company correct any information you believe is inaccurate. You also have the right to request our company to complete the information you believe is incomplete.

**The right to erasure** (Art. 17 GDPR) - You have the right to request that our company erase your personal data under certain conditions – partly or fully.

**The right to restrict processing** (Art. 18 GDPR) - You have the right to request that our company restrict the processing of your personal data under certain conditions.

**The right to data portability** (Art. 20 GDPR) - You have the right to request that our company transfers the data we have collected about you to another organization or directly to you under certain conditions.

**The right to object to processing** (Art. 21 GDPR) - You have the right to object to our company's processing of your personal data under certain conditions.

**Automated Decision Making** (Art. 22 GDPR) - To meet international legal requirements, we execute “Know Your Customer” and “Know Your Business” checks. In case the outcome is positive in one of the relevant categories, we need to abstain from a contractual connection and may refrain from cooperating.

**Right to complain** (Art. 77 GDPR): EU and Swiss citizens can contact supervisory authorities to complain:  
EU supervisory authorities: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)  
Switzerland supervisory authority: <https://www.edoeb.admin.ch/edoeb/en/home.html>

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [New@Globalution.net](mailto:New@Globalution.net), call or write us: +1 (505) 373 2327. Or write a letter: Globalution Consulting LLC, 5203 Juan Tabo Blvd. Suite 2b, Albuquerque, New Mexico, 87111.

### 1.4 DISCLAIMER FOR CALIFORNIA USERS.

Your privacy and rights under the California Consumer Privacy Act (CCPA) and the California Online Privacy Protection Act (CalOPPA) are important to us. We offer this document as a resource to view how we collect, manage, store, and use your Personal Information in the day-to-day running of our website. This Privacy Policy, intended for California residents, can be applied to all website users to disclose how we collect, manage, store, and use your Personal Information as defined under CIV 1798.140(v) of the California Consumer Privacy Act (CCPA).

*If you are under 18 years of age*

If you have linked any account to our Sites or publicly posted text or content to our Sites, you have the right to request the removal of unwanted personal information that you publicly post on our Sites. To request the removal of such information, please contact us using the contact information provided below. Make sure to include relevant info and a statement that you reside in California.

*"Shine the Light Law"*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, personal information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this personal information would include a list of the categories of the personal information that was shared and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request to the (e-mail)-address listed below. We would like to add that the result of this request will be an empty list since we do not disclose your personal information to third parties for direct marketing purposes.

## 2. HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION

(For EU Users: Art. 6 and 13 GDPR)

The homepages automatically collect the minimum information necessary to operate the homepages, to ensure the proper functioning of the homepages, and to allow Globalution Consulting LLC to protect the homepages or the Sites from all forms of attacks. The information automatically collected may include the IP address of the user, the operating system, browser type, etc. We do not access this information unless there is a reason like the breach of our Terms or the analysis of an attack on the homepage or on the Sites. We do not actively implement cookies. We do not analyse your browsing behavior. We value your privacy.

However, when you subscribe to our Sites or contact us through the homepages or provided contact channels (that could be Whatsapp, facebook, Instagram, telephone, e-mail, and others) you are voluntarily and actively sharing personal information with us. This personal information may exemplarily include telephone numbers, e-mail addresses, or names. If you are not a client and don't have the intention to become a client, you agree that we, nonetheless, keep basic data for a reasonable time to have them at hand, should any context occur that requires us to access or disclose such data, e.g. to courts. If you are a client or plan to become a client, you agree that we keep relevant personal information in order to fulfill legal requirements, to be able to contact you, to communicate with you, to render commissioned services, to provide purchased products, and to bill you, if applicable.

It is possible to contact Globalution Consulting LLC via different channels and it is possible to commission services or to purchase products. If you commission services or purchase products from Globalution Consulting LLC, we gather personal and sensitive information from you that is actively and voluntarily provided by you to Globalution Consulting LLC. The information is only gathered and stored (a) for the purpose intended by you OR (b) to meet legal requirements (like retaining billing addresses for the event of regulatory verification of our business activities) OR (c) to ward off legal conflicts.

(Potential) clients and potential affiliates or network partners agree that their information is used to verify and authenticate their identity and reputation (KYC, KYB). Dependent on the services or products you commission or purchase, we need to know your full name, a valid e-mail address, your birthday, your citizenship, the state of your recent residency, your address, your passport details, a passport copy, birth certificate, or further data. These sensitive personal data are needed to allow Globalution Consulting LLC to execute KYC and KYB checks, to render the commissioned services or provide the purchased products. All such data may not just be needed from you but also from family members, if applicable. You guarantee and you release us from any responsibility and liability in this regard: You only submit or forward data from minor family members in case you are the legal guardian or in case you have the consent of the legal guardian and you only submit or forward data from adult family members, spouses, friends, etc. that have consented to you doing so. All identities of all persons that are subject to our services are verified (KYC, KYB) and you guarantee that all persons - and legal guardians for minors - have consented to this practice. The need to authenticate identities arises from legal requirements - given the nature of our services - or from contracts we maintain with affiliates, network partners, etc.

You know that no form of transmission and storage is 100% safe. We try to craft and to ensure the level of protection and security for your data that is needed in order to keep your information confidential. We take the security of your personal information seriously and use reasonable electronic, personnel and physical measures to protect it from loss, theft, alteration or misuse. However, please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee that only authorized persons will view your personal information. We are not responsible for third-party circumvention of any privacy settings or security measures. We cannot guarantee your data safety and hereby you accept that we are not liable for any form of attacks, intrusions, theft, and disclosure or loss related thereto. You agree that such events are beyond our control.

When we believe disclosure is appropriate, we may disclose your information to help investigate, prevent or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of Globalution Consulting LLC, our users, our employees or others; to comply with applicable law or cooperate with law enforcement; to enforce our Terms and Conditions or other agreements or policies, in response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us. We will notify you if permitted before undertaking such disclosures.

Globalution Consulting LLC reserves the right to transfer all information in its possession to a successor organization in the event of a merger, acquisition, bankruptcy or other sale of all or a portion of Globalution Consulting LLC's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred information will be subject to this Privacy Notice, or to a new privacy notice if you are given notice of that new privacy notice and are given an opportunity to affirmatively opt-out of it.

### 3. DO WE SHARE YOUR PERSONAL INFORMATION?

#### *General Provisions*

You actively and voluntarily provide Globalution Consulting LLC with correct, valid, and recent personal information from you (or other persons: See statements above) in order to enable Globalution Consulting LLC to render commissioned services for you and/or family members or to provide purchased products to you and/or family members. To render the commissioned services or to provide the purchased products, Globalution Consulting LLC may disclose your personal information to contractors, affiliates, network partners, vendors or suppliers that are assigned to carry out relevant tasks. These third parties may use your data for the rendering of (parts of) the commissioned services or for the supply of (parts of) the purchased goods, only. Globalution Consulting LLC contractually prohibits its contractors, affiliates, network partners, vendors, and suppliers from disclosing any personal information received from Globalution Consulting LLC, other than following this Privacy Notice and for the purpose intended by you. If client, for example, commissions a residence in state A then Globalution Consulting LLC, its contractors, affiliates, network partners, vendors, and suppliers are allowed to disclose your relevant personal information to the competent authorities that are responsible for the processing of residences in state A.

Globalution Consulting LLC is allowed to transfer your personal billing information (name, address, e-mail, amounts billed, etc.) to its tax lawyers, to external bookkeeping services, to its payment services for billing purposes, or to authorities for tax purposes. In all these cases, your information will be in trustworthy hands.

Globalution Consulting LLC neither owns nor controls third-party websites and applications accessible through third-party websites. Thus, this Privacy Notice does not apply to personal information provided by you to third parties via third-party websites or third-party contact channels. Before visiting a third party, or using a third-party application, whether by means of a link on the homepages, Sites, directly through the Sites or otherwise, and before you personally provide any personal information to any such third party, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for those Sites or applications. You should take those steps necessary to protect your privacy.

#### *Analytics*

We do not actively incorporate or use tracking technology on our homepages.

#### *Social Media*

We may use hyperlinks on the homepage which will redirect you to a social network if you click on the respective link. Or we redirect you from social networks to our homepages or Sites. However, when you click on a social plug-in, such as Facebook's "Like" button or Twitter's "tweet" button, or the Whatsapp-Symbol that particular social network's plugin will be activated and your browser will directly connect to that provider's servers. If you do not use these buttons none of your data will be sent to the respective social network's plugin providers. Settings regarding privacy protection can be found on the websites of these social networks and are not within our control. If you click on the Whatsapp-Button: You will exemplarily be redirected to Whatsapp and in case you contact us via this function, your phone number and other information you share with us (Whatsapp Status etc.) will be transferred to us via the Service Provider Whatsapp. Your use of Whatsapp is governed by the Privacy Policy and Terms of Whatsapp.

### *Third-Party Service Providers*

As already stated, we may share your personal information, like the ones mentioned above, with our authorized network of service providers that perform certain services on our behalf. We may also share your name, contact information and credit card information with our authorized service providers who process credit card payments. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such personal information for any other purpose. You can contact us to receive the list of providers that have received your data.

We may also use your contact info to inform you about relevant developments regarding your commissioned services or purchased products. If you don't want us to contact you anymore with contextual and relevant developments or information, please inform us about your decision via:

- Email us at [New@Globalution.net](mailto:New@Globalution.net)

## 4. MOBILE DEVICE ADDITIONAL TERMS

**Mobile Device.** If you use a mobile device to access the Sites or to contact us, we may collect device personal information (such as your mobile device ID, model and manufacturer), operating system, version, telephone number, profile picture(s), IP address, and communicated content.

**Geo-Location Personal Information.** Unless we have received your prior consent, we do not access or track any location-based personal information from your mobile device, except that it may be possible for Globalution Consulting LLC to determine from an IP address the geographical location of your point of connectivity, in which case we may gather and use such general location data.

## 5. CHILDREN

The Children's Online Privacy Protection Act ("COPPA") protects the online privacy of children under 13 years of age. We do not knowingly collect or maintain personal information from anyone under the age of 13, unless or except as permitted by law. Any person who provides personal information through the Sites represents to us that he or she is 13 years of age or older. If we learn that personal information has been collected from a user under 13 years of age on or through the Sites, then we will take the appropriate steps to cause this personal information to be deleted. If you are the parent or legal guardian of a child under 13 who is using our Sites or has transferred personal information to the Sites, please contact Globalution Consulting LLC using our contact information below to have that child's personal information deleted. Please also be aware that the use of our Sites and Company Services is not permitted for persons under the age of majority in the respective state: <https://globalution.net/Terms.pdf>

## 6. DO-NOT-TRACK NOTICE

Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. The Sites currently do respond to DNT browser signals or mechanisms.



## 7. GOVERNING LAW

Disputes over privacy issues contained in this Privacy Notice will be governed by the law of the State of New Mexico. You also agree to abide by any limitation on damages contained in our Terms of Use, or other agreement that we have with you.

## 8. PRIVACY NOTICE CHANGES

Globalution Consulting LLC may, in its sole discretion, change this Privacy Notice from time to time. Any and all changes to Globalution Consulting LLC's Privacy Notice will be reflected on this page and the date of the new version will be stated at the top of this Privacy Notice. Unless stated otherwise, our current Privacy Notice applies to all personal information that we have about you and your client account. Users should regularly check this page for any changes to this Privacy Notice. Globalution Consulting LLC will always post new versions of the Privacy Notice on the Sites. However, Globalution Consulting LLC may, as determined in its discretion, decide to notify users of changes made to this Privacy Notice via email or otherwise. Accordingly, it is important that users always maintain and update their contact information.

## 9. CONTACT

If you have any questions regarding our Privacy Notice, please contact us at:

**Globalution Consulting LLC** 5203 Juan Tabo Blvd. Suite 2b  
Albuquerque, New Mexico 87111  
UNITED STATES OF AMERICA  
Email: [New@Globalution.net](mailto:New@Globalution.net)  
Phone: +1 505 373 2327



## ONLINE RETURN POLICY

We at Globalution Consulting LLC maintain the policy that all sales are final because we only offer tailor-made services and tailor-made products. While we hope that you are completely satisfied with our services, to the extent permitted by law, we do not offer returns, merchandise credits, or exchanges. At our sole discretion, we may offer free or non-free rework if we consider it reasonable. If you have any questions about this return policy, please contact us:

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