

PRIVACY POLICY

OUR PRIVACY COMMITMENT

FIRM NAME (“we,” “our,” or “Company”) is committed to respecting the privacy rights and concerns of all users (“Users”) of Company’s websites and services (“Website”). As such, we have established and implemented this Privacy Policy (“Privacy Policy”) to inform Users how we use and protect the personal information we collect (“Personal Information”).

By visiting or using the Website or the services offered through the Website (“Services”), you consent to Company’s collection, use, storage, deletion, and disclosure of information relating to you as set forth in this Privacy Policy. This Privacy Policy is subject to change at any time for any reason and without notice. Any modifications will take effect when posted. Therefore, each time you access the Website, you need to

review the Privacy Policy upon which access to and use of the Website is conditioned. By your continuing use of the Website after changes are posted, you will be deemed to have accepted such changes. This Privacy Policy is only applicable to the Website and not to any other website that you may be able to access from the Website, which may have its own data collection and use policy.

While using the Website you may have the opportunity to volunteer personally identifiable information about you and/or your business. Visitor information (ex. any information gathered by our site such as usage data) may be collected automatically while you are interacting with the many features of our Website. Unless you have opted out of allowing your personal information to be shared, we may sell and/or share your personal information with third parties for marketing purposes.

COOKIES

The Website uses cookies and similar technologies which are small files or pieces of text that download to a device when a visitor accesses a website or app. These analytics and performance cookies are used only when you acknowledge our cookie banner and are used to view site traffic, activity, and other data and/or to provide you with a personalized experience. Cookies may also be used to keep track of your login name and password, to track your visits to the Website, to personalize your experience, and improve our Website so the pages you view and other behavior may be stored by cookies on your device. These cookies contain no personally identifiable information. You may still access the Website if you set your browser not to accept cookies.

WEB ANALYSIS TOOLS

We may use web analysis tools to measure and collect anonymous session information. We use this information to monitor and analyze in a depersonalized form how users use the Website, to

provide customers with the Website, and to maintain and improve the Website. We may also collect similar information from emails we may send to you which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Website.

The personal data collected when you visit the Website include:

- Information about your browser, network, and device
- Web pages you visited prior to coming to this website.
- Search engine used to locate the Website
- Web pages you view while on the Website and how long you use them
- Your IP address

COLLECTION OF PERSONAL INFORMATION

We may collect certain personal information, including your personal and business information, tax information, mailing address, phone number, date of birth, EIN, driver's license or state identification number, financial information, and other information that may be required in order to provide you with the Website and other products and services in your area. Company also receives personal information from third parties if you link to our Website from a linked network (e.g., Twitter, LinkedIn, Facebook, etc.) ("Linked Network"), as well as information about your transactions with Company, its affiliates, participating merchants, and/or others, for example purchase price and payment arrangements. We may also receive information from a reporting agency, such as your credit history.

Our Website is not designed to attract children under the age of 13 and Company does not knowingly collect personally identifiable information from such minors.

THIRD PARTY PIXELS AND COOKIES

When you visit our Website, log in or register, or open an email from us, cookies, ad beacons, and similar technologies may be used by our online data partners or vendors to associate these activities with information they or others have about you, including your email address. We (or service providers on our behalf) may then send communications and marketing to these email addresses. You may opt out of receiving this advertising by visiting [website.com/opt-out](https://www.website.com/opt-out)

USE OF PERSONAL INFORMATION

We use your personal information to provide the Website to you, deliver products and services you request, handle your questions or issues, and send communications to you about promotions, updates, or special offers that may be of interest to you. We also share your personally identifiable information with third party advertisers that sell products or services that we believe may be of interest to you. Other uses include verifying your identity, preventing fraud, and alerting you of new products, features, or enhancements to the Website. We may

also use your email address to send you messages about the Website, as well as other general announcements.

The personal information uploaded by you, except for your social security number and driver's license number, may be shared with third parties for certain purposes. We may also use your depersonalized personal information to provide analyses of our users in the aggregate (including Analytical Data subject to the terms of this Privacy Policy) to prospective partners and other third parties.

By submitting personal information through the Website, you authorize Company to share this personal information for the purposes identified herein, and you grant us a royalty-free, worldwide, perpetual, irrevocable, and fully transferable right and license to use your personal information in connection with the creation and development of analytical and statistical analysis tools (the "Analytical Data"). We are expressly authorized to make any commercial use of the Analytical Data, including without limitation sharing the Analytical Data with third parties.

We will also share the personal information we collect from you under the following circumstances:

Feedback. You may choose to, or Company may invite you to, submit comments, bug reports, ideas, or other feedback about the Website ("Feedback"). By submitting Feedback, you agree that Company is free to use such Feedback at its discretion without any obligation to you. Company may also choose to disclose Feedback to third parties. You hereby grant Company a royalty-free, perpetual, irrevocable, transferable, sublicensable, worldwide, nonexclusive license under all rights necessary to incorporate and use your Feedback for any purpose.

Asset Transfers. If we become involved in a merger, acquisition, or other transaction involving the sale of some or all of Company's assets, User information may be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you through email and/or a prominent notice on the Site.

THIRD PARTY SERVICES' PRIVACY POLICIES

Third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner your personal information will be handled by these providers.

Certain providers may be located in a different jurisdiction or have facilities that are located in a different jurisdiction, than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are

located. As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our Website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website’s Terms of Service.

LEGAL DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information if we are required by law to do so or if you violate our Terms of Service.

ELECTRONIC COMMUNICATION; SIGNATURES

You may withdraw your consent to receive communications by following the “unsubscribe” link at the bottom of our emails. You may withdraw your consent to use an electronic signature at any time by contacting us. If you withdraw your consent, you will be unable to apply for products and services through the Website, and we will be unable to continue to process any pending applications for products and services.

HOW IS YOUR PERSONAL INFORMATION SAFEGUARDED?

While we strive to protect sensitive User information, we cannot ensure or warrant the security of any information you transmit to us or through the use of the Website and you acknowledge and agree that you provide such information and engage in such transmissions at your own risk.

Category of Personal Information	Categories of Sources From Which Personal Information Was Collected (See Section B of this Privacy Notice for additional information)	Business or Commercial Purpose for Collecting and Sharing the Category of Personal Information (See Sections C and D of this Privacy Notice for additional information)	Categories of Third Parties and Other Entities We Share Personal Information With (See Section D of this Privacy Notice for additional information)
<i>Identifiers (§1798.140 (o)(1)(A) and (B))</i> which include elements such as: (i) contact information (e.g., name, mailing address, email address, phone number); and (ii) online identifiers (e.g., Internet protocol (IP)	Directly from you From your friends or contacts (for example, if they forward you one of our articles)	To provide you with and to improve the Digital Services To communicate with you	With affiliates and subsidiaries With service providers With advertising and marketing service providers and partners

<p>address, account numbers, device identifiers such as mobile advertising IDs)</p>	<p>From cookies and similar technologies</p> <p>From third-party sites or apps, content distribution channels, and platforms</p> <p>From third-party data suppliers and business partners</p> <p>From social media platforms and similar services</p>	<p>For advertising and marketing purposes for us or third parties, including interest-based advertising</p> <p>To protect our or others' rights</p>	<p>With content measurement companies</p> <p>With social media platforms With business partners</p> <p>With government authorities as required by law or as necessary to protect our rights</p>
<p><i>Demographics</i> (§1798.140 (o)(1)(C)) which include elements such as age and gender</p>	<p>Directly from you</p> <p>From cookies and similar technologies</p> <p>From third-party sites or apps, content distribution channels and platforms</p> <p>From third-party data suppliers and business partners</p> <p>From social media platforms and similar services</p>	<p>To provide you with and to improve the Digital Services</p> <p>For advertising and marketing purposes for us or third parties, including interest-based advertising</p>	<p>With affiliates and subsidiaries With service providers</p> <p>With advertising and marketing service providers and partners</p> <p>With content measurement companies</p> <p>With social media platforms With business partners</p> <p>With government authorities as required by law or as necessary to protect our rights</p>
<p><i>Personal Information</i> under subdivision (e) of Section 1798.80 of the California Civil Code (§1798.140 (o)(1)(B)) which includes payment information (e.g., payment card number, expiration date and billing information)</p>	<p>Directly from you</p>	<p>To provide you with and to improve the Digital Services</p> <p>To protect our or others' rights</p>	<p>With affiliates and subsidiaries With service providers</p> <p>With government authorities as required by law or as necessary to protect our rights</p>
<p><i>Commercial Information</i> (§1798.140 (o)(1)(D)) which includes</p>	<p>Directly from you</p>	<p>To provide you with and to improve the Digital Services</p>	<p>With affiliates and subsidiaries With service providers</p>

elements such as transactional information (e.g., activity, subscriptions, requests, purchases, items in your cart but not completed purchases)	From cookies and similar technologies	To communicate with you For advertising and marketing purposes for us or third parties, including interest-based advertising	With advertising and marketing service providers and partners With social media platforms
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In the event that personal information you provide to us is compromised as a result of a breach of security, when appropriate we will take reasonable steps to investigate the situation, notify you, and take the necessary steps to comply with any applicable laws and regulations.

MEDIATION

You agree that, in the event any dispute or claim arises out of or relating to this Privacy Policy, you and Company will attempt in good faith to negotiate a written resolution of the matter directly between the parties. You agree that if the matter remains unresolved for forty-five (45) days after notification (via certified mail or personal delivery) that a dispute exists, all parties shall join in mediation services in Company’s state of domicile with a mutually agreed mediator in an attempt to resolve the dispute. Should you file any arbitration claims or any administrative or legal actions without first having attempted to resolve the matter by mediation, then you agree that you will not be entitled to recover attorneys’ fees, even if you would otherwise be entitled to them.

RESIDENTS OF CALIFORNIA

You must opt out of allowing your personal information to be shared.

Your California Consumer Privacy Act of 2018 (CCPA) Rights Categories of Personal Information We Collect

The California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”) requires specific disclosures for each category of personal information that we collect. The table below summarizes our general data handling practices which are more fully described in Sections B, C and D of this Privacy Notice.

		To protect our or others’ rights	With business partners With government authorities as required by
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			law or as necessary to protect our rights
<p><i>Internet or other electronic network activity (§1798.140 (o)(1)(F))</i> which includes elements such as information about how you use, access, or interact with the Digital Services such as comments, photos, videos, and other content you choose to publish on the Digital Services, information about your device, browser, or operating system</p>	<p>From cookies and similar technologies</p> <p>From third-party sites and apps, content distribution channels and platforms</p> <p>From third-party data suppliers and business partners</p> <p>From social media platforms and similar services</p>	<p>To provide you with and to improve the Digital Services</p> <p>To communicate with you</p> <p>For advertising and marketing purposes for us or third parties, including interest-based advertising</p> <p>To protect our or others' rights</p>	<p>With affiliates and subsidiaries With service providers</p> <p>With advertising and marketing service providers and partners</p> <p>With content measurement companies</p> <p>With social media platforms With business partners</p> <p>With government authorities as required by law or as necessary to protect our rights</p>
<p><i>Geolocation Data (§1798.140 (o)(1)(G))</i> which includes elements such as location information (e.g., city and state, or precise location information if location services are active on your device)</p>	<p>Directly from you</p> <p>From cookies and similar technologies</p>	<p>To provide you with and to improve the Digital Services</p> <p>To communicate with you</p> <p>For advertising and marketing purposes for us or third parties, including interest-based advertising</p> <p>To protect our or others' rights</p>	<p>With affiliates and subsidiaries With service providers</p> <p>With advertising and marketing service providers and partners</p> <p>With content measurement companies</p> <p>With social media platforms With business partners</p> <p>With government authorities as required by law or as necessary to protect our rights</p>

<p><i>Audio, Electronic, Visual, Thermal, Olfactory or Similar Information (§1798.140 (o)(1)(H))</i> which includes elements such as recordings of your calls</p>	<p>Directly from you</p>	<p>To provide you with and to improve the Digital Services</p> <p>To communicate with you</p> <p>To protect our or others' rights</p>	<p>With affiliates and subsidiaries</p> <p>With service providers</p>
<p><i>Professional or Employment Related Information (§1798.140 (o)(1)(I))</i> which includes elements such as your professional email address, phone number or other contact information if you have used such professional or employment related personal information to order a subscription, register for an account or to receive communications</p>	<p>Directly from you</p> <p>From third-party data suppliers and business partners</p> <p>From social media platforms and similar services</p>	<p>To provide you with and to improve the Services</p> <p>To communicate with you</p> <p>For advertising and marketing purposes for us or third parties, including interest-based advertising</p> <p>To protect our or others' rights</p>	<p>With affiliates and subsidiaries</p> <p>With service providers</p> <p>With advertising and marketing service providers and partners</p> <p>With content measurement companies</p> <p>With social media platforms</p>

			<p>With business partners</p> <p>With government authorities as required by law or as necessary to protect our rights</p>
<p><i>Inferences (§1798.140 (o)(1)(K))</i> which include elements such as inferences regarding your preferences or other characteristics (e.g., cooking enthusiast, travel, food, and dining)</p>	<p>Directly from you</p> <p>From cookies and similar technologies</p> <p>From third-party sites and apps, content distribution</p>	<p>To provide you with and to improve the Services</p> <p>To communicate with you</p> <p>For advertising and marketing purposes for us or third</p>	<p>With affiliates and subsidiaries</p> <p>With service providers</p> <p>With advertising and marketing service providers and partners</p> <p>With content measurement companies</p>

	channels and platforms	parties, including interest-based	With social media platforms With business partners
	From third-party data suppliers and business partners	advertising	With government authorities as required by law or as necessary to protect our rights
	From social media platforms and similar services	To protect our or others' rights	

Residents of California may have the following rights:

1. Right to know and access your personal information. Under CCPA, you have the right to:
 - Know the categories of personal information we collect and the categories of sources from which we got the information;
 - Know the business or commercial purposes for which we collect and share personal information;
 - Know the categories of third parties and other entities with whom we share personal information; and
 - Access the specific pieces of personal information we have collected about you.

To do so, please send a request to us and include your name, email address, phone number, California postal address, as well as your account information.

2. Right to deletion. In some circumstances, you may ask us to delete your personal information. To do so, send us a request and include your name, email address, phone number, California postal address as well as your subscription account number, if you have an active subscription.
3. Right to opt out of sales. We may share your personal information with third parties in ways that may constitute a “sale” under CCPA. You may request that we not “sell” your personal information on a going forward basis. To do so, either click the link “Do Not Sell My Personal Information, or send us a request and include your name, email address, phone number, California postal address as well as your member account number. If you reengage with us after opting out of the “sale” of your personal information, such as by creating a new profile, you acknowledge that your personal information may be used and shared in accordance with this Privacy Notice, including in ways that may constitute a “sale” under CCPA.
4. Right to be free from discrimination. You may exercise any of the above rights without fear of being discriminated against. We are permitted to provide a different price or rate

to you if the difference is directly related to the value provided to you by your data. We use the information you provide to make your CCPA rights requests to verify your identity, locate the personal information we may hold about you and act upon your request. We strongly recommend that you submit the email and postal address that you used when you created accounts, ordered subscriptions, or signed up for a newsletter. After you submit a CCPA rights request, you will be required to verify access to the email address you submitted. You will receive an email with a follow-up link to complete your email verification process. You are required to verify your email in order for us to proceed with your CCPA rights request. Please check your spam or junk folder in case you can't see the verification email in your inbox. If you are a California resident and have any questions regarding your CCPA rights under this Privacy Notice, please contact us.

Authorized Agents

For any of the CCPA rights, you may designate an authorized agent to make a request on your behalf. In the request, you or your authorized agent must provide information sufficient for us to verify the identity of your agent and that your agent has been properly authorized to act on your behalf; this may take additional time to fulfill your request. If you are an authorized agent working on behalf of a consumer, you will need to fill out the relevant CCPA request form listed above on behalf of the consumer with the consumer's information. Please note that the consumer you are working on behalf of must have a California postal address and will need to verify access to the email account used to submit the CCPA request in order for us to move forward with processing the request.

Minors

We do not knowingly collect or disclose personal information of minors under the age of 16, without affirmative authorization.

ADDITIONAL TERMS AND PRIVACY POLICY FOR EU CITIZENS

Under the General Data Protection Regulation (GDPR) of the European Union (EU), EU citizens are entitled to certain privacy protections regarding the use of, storing, and processing of your personal information as well as having right to be notified if personal information is stolen, copied, or accessed on an unauthorized basis.

The GDPR is a modern privacy rights framework adopted to create better transparency and control over who, how and when your personal data may be used, including the "right to be forgotten".

This section will explain how Company complies with the GDPR and how your personal data may be collected, stored, and used. We also explain under what circumstances and for what

purposes we may use your personal data, and also provide instructions on how you can “opt-out” from our using your personal data and request the removal of your personal data from our systems.

OUR BUSINESS

We provide services to United States-based businesses and potentially non-United States-based businesses and share personally identifiable information with third parties. If you share your information with us, we may share it with third parties, including sharing your information for other marketing purposes. Additionally, if you are an employee of or associated with a business customer, certain information may be considered personal data such as your business email, business mobile number, or other similar information from which your personal identity may be known. It is also customary in many instances for business associates to furnish their private or personal contact information such as private email address, home telephone number, and similar information. Even if done in the context of a business purpose, this information may be deemed personal data. Therefore, if you believe your business information discloses personal data that you do not wish disclosed, you should not give it to us. You should also ask your employer to change your business contact information to an anonymized format, such as changing your email from “my.name@mycompany” to “randomcharacters@mycompany”.

Please be advised that our business has less than 250 employees. Accordingly, we are subject to less stringent recording requirements under GDPR requirements. We are, however, not exempt from other privacy protection and reporting requirements which apply to all businesses equally.

QUESTIONS

If you have any questions about our privacy practices or this Privacy Policy, please contact us.