



## PRIVACY POLICY

Effective Date: January 19, 2024

Your privacy is important to us. This Privacy Policy (the “**Policy**”) describes the types of information OverPower Marketing, LLC (the “**Company**”, “**us**”, “**we**”, or “**our**”) may collect from you or that you may provide when you visit the Website and the products, features, materials, and services we offer (collectively with the Website, the “**Services**”). This Policy also describes our policies and procedures for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on the Website and through your use of the Services generally (including when you register for an account), and through communications between you and the Website (including email, text, and other electronic messages).

This Policy does *not* apply to information collected by third parties, including any websites, services, and applications that you elect to access through the Services.

Please review this Policy carefully. By accessing or using the Services (or by clicking on “accept” or “agree” to this Policy when prompted), you agree to the terms of this Policy on behalf of yourself or the entity or organization that you represent. If you do not agree to any term in this Policy, you should refrain from further use of our Services.

### 1. Changes to Our Privacy Policy.

This Policy was last revised on the date noted at the top of this page. We may update this Policy from time to time. If we make material changes, we will post the updated Policy on this page and notify you of such changes by means of an email to the email address specified in your account, a message on the Services, or through a notice on the Website home page. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

### 2. Information We Collect.

We receive several types of information about you from various sources, including (A) information and content that you give us; (B) automatically-collected information; and (C) demographic information or other aggregate information. Each is described in detail below.

#### 2.1 Information and Content That You Give Us.

We collect personal information that you knowingly choose to disclose. This may include:

- (a) *Personal Information (or Data)*. Personal information, such as your name, address, email address, phone number, username, password, and any other information you directly provide us on or through the Services. This includes information you provide when you register or create an account, complete a questionnaire or a contest entry form, or make a request for customer service.
- (b) *Correspondences*. Records and copies of your email messages together with your email address and our responses, if you choose to correspond with us through email, and records of your phone number, phone calls with us, and voice messages, if you choose to correspond with us via phone.
- (c) *User Content*. Information or content you submit to be published or displayed on public areas of the Services or transmitted to other users of the Services or third parties (collectively, “**User Content**”). Your User Content is posted and transmitted to

others at your own risk. The Company cannot control the actions of other users of the Services with whom you may choose to share your User Content. Therefore, we cannot and do not guarantee that your User Content will not be viewed by unauthorized persons.

- (d) *Transaction Information.* Information about any purchase or transactions made on the Services. This includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping, and contact details.
- (e) *Search Queries.* Your search queries on the Website.

## 2.2 *Information We Collect Automatically.*

We may use a variety of technologies to collect certain information about your equipment, browsing actions, and patterns whenever you interact with the Services, including:

- (a) *Activity Information.* Details of your visits to our Services, including the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; the time, frequency, and duration of your activities; and other information about your use of and actions on the Services.
- (b) *Equipment Information.* Information about your computer and internet connection, including your computer operating system, IP address, browser type, and browser language.
- (c) *Location Information.* Information about the location of your device, including GPS location, for purposes of enhancing or facilitating the Services. We may also use information about the location of the device you are using to help us understand how the Services and functionality are being used and to deliver more relevant advertising.

The gathering of this information may be used for maintaining the quality of the Services we provide, as well as providing overall general statistics related to the use of the Services. The technologies we use for this automatic data collection may include:

- (a) *Cookies.* A cookie is a small data file stored on the hard drive of your computer either for only the duration of your visit on a website (“session cookies”) or for a fixed period (“persistent cookies”). Cookies contain information that can later be read by a web server. We may use cookies to provide you with a more personal and interactive experience on the Services.
- (b) *Web Beacons.* Web beacons (also known as “clear gifs”, “pixel tags”, “web bugs”, and “single-pixel gifs”) are small files that are embedded in webpages, applications, and emails. Web beacons allow the Company, for example, to track who has visited those webpages or opened an email, test the effectiveness of our marketing, and compile other related website statistics.
- (c) *JavaScripts.* JavaScripts are code snippets embedded in websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components.
- (d) *Entity Tags.* Entity Tags are HTTP code mechanisms that allow portions of websites to be stored or “cached” within your browser and validates these caches when the website is opened, accelerating website performance since the web server does not need to send a full response if the content has not changed.
- (e) *HTML5 Local Storage.* HTML5 local storage allows data from websites to be stored or “cached” within your browser to store and retrieve data in HTML5 pages when the website is revisited.



- (f) *Resettable Device Identifiers*. Resettable device identifiers (also known as “advertising identifiers”) are similar to cookies and are found on many mobile devices and tablets (e.g., the “Identifier for Advertisers” or “IDFA” on Apple iOS devices and the “Google Advertising ID” on Android devices), and certain streaming media devices. Like cookies, resettable device identifiers are used to make online advertising more relevant.

This Policy does not cover the use of tracking technologies by third parties. The Services may contain links, content, advertising, or references to other websites by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies or other tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your personal information or they may collect information about your online activities over time and across different websites. Please be aware that we do not control these third parties’ tracking technologies or when and how they may be used. Therefore, the Company does not claim nor accept responsibility for any privacy policies, practices, or procedures of any third party. We encourage you to read the privacy statements and terms and conditions of linked or referenced websites you enter. If you have any questions about an ad or other targeted content, you should contact the responsible provider directly.

### *2.3 Demographic Information.*

We may collect demographic, statistical, or other aggregate information that is about you, but individually does not identify you. Some of this information may be derived from personal information, but it is not personal information and cannot be tied back to you. Examples of such aggregate information include gender, age, race, household income, and political affiliation.

### *2.4 Information from Other Sources.*

We may receive information about you from other sources and add it to our account information. We protect this information according to the practices described in this Policy, plus any additional restrictions imposed by the source of the data. These sources may include online and offline data providers, from which we obtain demographic, interest-based, and online advertising related data; publicly-available sources such as open government databases or social networks; and service providers who provide us with information, or updates to that information, based on their relationship with you. By gathering additional information about you, we can correct inaccurate information, enhance the security of your transactions, and give you product or service recommendations and special offers that are more likely to interest you.

## **3. How We Use Your Information.**

We may use the information we collect about you in a variety of ways, including:

- (a) to provide the Services and its content to you;
- (b) to respond to comments and questions, and provide customer service;
- (c) to fulfill the purpose for which you provide such information, or fulfill any other purpose disclosed by us when you provide the information;
- (d) to communicate with you about your order, purchase, account, or subscription;



- (e) to inform you about important changes to, or other news about, the Services or any of its features or content;
- (f) to operate, maintain, improve, personalize, and analyze the Services;
- (g) to monitor and analyze trends, usage, and activities for marketing or advertising purposes;
- (h) to detect, prevent, or investigate security breaches, fraud, and other unauthorized or illegal activity;
- (i) to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- (j) to maintain appropriate records for internal administrative purposes;
- (k) to allow you to participate in interactive features on the Services;
- (l) to send promotional communications, such as information about features, newsletters, offers, promotions, contests, and events;
- (m) to share information across the Company's products, services, and devices to provide a more tailored and consistent experience on all Company products, services, and devices that you use;
- (n) to develop, test, troubleshoot, and improve new products, services, and features, including by conducting surveys and research, and testing and troubleshooting new products, services, and features;
- (o) in any other way we may describe when you provide the information; and
- (p) for any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

#### **4. How We Share Your Information.**

We may disclose aggregated or anonymized information about our users without any restrictions. We will not share your personal information that we collect or you provide as described in this Policy except in the following circumstances:

- (a) *With subsidiaries and affiliates for business purposes.* To our subsidiaries and affiliated companies for purposes of management and analysis, decision-making, and other business purposes.
- (b) *When we work with service providers.* To service providers, professional advisors, contractors, and other third parties that provide us with support services, such as payment processing, website hosting, information technology, sales, email and postal delivery, location mapping, product and service delivery, or analytics services, and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- (c) *When we become involved in a sale or transfer of the Company.* If we become involved with a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets (whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding), to business entities or people involved in the negotiation or transfer.
- (d) *When we are required by law.* To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- (e) *When we enforce our rights.* To enforce or apply this Policy, our Terms of Use (please see our Terms of Use documentation), and other agreements, including for billing and collection purposes.
- (f) *To help protect lawful interests.* If we believe disclosure will help us protect the rights, property, or safety of the Company, our users, partners, agents, and others. This includes exchanging information with other companies and organizations for fraud protection, and spam and malware prevention.
- (g) *To fulfill the purpose for that information or with your consent.* To fulfill the purpose for which you provide the information, for any other purpose disclosed by us when you provide the information, or with your consent.
- (h) *When we work with marketing service providers.* To marketing service providers to assess, develop, and provide you with promotions and special offers that may interest you; administer contests, sweepstakes, and events; or for other promotional purposes.
- (i) *When we work with business partners.* To third parties whom we have strategic marketing alliances or partnerships with to provide you information regarding products and services that we think will be of interest to you.
- (j) *Third-party platforms and social media networks.* To third-party platforms and social media networks, if you have enabled features or functionality that link the Services to such a platform or network (such as logging into the Services using your account with the third party).

Information that you post on or through the public areas of the Services (e.g., in chat rooms, bulletin boards, and discussion groups) is generally accessible to, and may be collected and used by, others and may result in unsolicited messages or other forms of contact from others. Users of the Services are encouraged to exercise caution when providing personal information about themselves in public or interactive areas.

## 5. Detailed Information on the Personal Information We Collect

Personal Data is collected for the following purposes and using the following services:

### 5.1 Access to third-party accounts

This type of service allows Website to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

*Facebook account access (Facebook, Inc.):* This service allows Website to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: Business Management API; Chat; Mobile Messaging on behalf of Page; Page Messaging.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

### 5.2 Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other



advertisements on Website, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside Website. For more information, please check the privacy policies of the relevant services. In addition to any opt-out feature offered by any of the services below, Users may opt out by visiting the .

*Google Ad Manager (LLC)*: Google Ad Manager is an advertising service provided by Google LLC that allows the Company to run advertising campaigns in conjunction with external advertising networks that the Company, unless otherwise specified in this document, has no direct relationship with. In order to opt out from being tracked by various advertising networks, Users may make use of [Youronlinechoices](#). In order to understand Google's use of data, consult [Google's partner policy](#).

This service uses the "DoubleClick" Cookie, which tracks use of Website and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

*Facebook Lookalike Audience (Facebook, Inc.)*: Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook, Inc. that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of Website or engagement with relevant content across the Facebook apps and services. On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this [opt-out page](#).

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#)

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

### 5.3 Analytics

The services contained in this section enable the Company to monitor and analyze web traffic and can be used to keep track of User behavior.

*Google Analytics (Google LLC):* Google Analytics is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

*Google Ads conversion tracking (Google LLC):* Ads conversion tracking is an analytics service provided by Google LLC that connects data from the Google Ads advertising network with actions performed on Website.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#)

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

*Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.):* Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on Website. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

#### 5.4 *Connecting Data*

This type of service allows the Company to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

*Zapier (Zapier Inc.):* Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: Data communicated while using the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

#### 5.5 *Contacting the User*

*Mailing list or newsletter (Website):* By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Website. Your email address might also be added to this list as a result of signing up to Website or after making a purchase.

Personal Data processed: email address.

Category of personal information collected according to CCPA: identifiers.

#### 5.6 *Handling payments*

Unless otherwise specified, Website processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Website isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

*Stripe (Stripe Inc.):* Stripe is a payment service provided by Stripe Inc. Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

#### 5.7 *Managing contacts and sending messages*





This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

*Mailgun (Mailgun Technologies, Inc.):* Mailgun is an email address management and message sending service provided by Mailgun Technologies, Inc.

Personal Data processed: email address.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: identifiers.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

*Twilio (Twilio Inc.):* Twilio is a phone numbers management and communication service provided by Twilio, Inc.

Personal Data processed: phone number.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: identifiers.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

### 5.8 Remarketing and behavioral targeting

This type of service allows Website and its partners to inform, optimize and serve advertising based on past use of Website by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists. In addition to any opt-out feature provided by any of the services below, Users may opt out by the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.



*Google Ads Remarketing (Google LLC):* Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of Website with the Google Ads advertising network and the DoubleClick Cookie. Users can opt out of Google's use of cookies for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

*Facebook Custom Audience (Facebook, Inc.):* Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of Website with the Facebook advertising network.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this [opt-out page](#).

Personal Data processed: email address and Tracker.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: identifiers; internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

*Facebook Remarketing (Facebook, Inc.):* Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of Website with the Facebook advertising network.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## 5.9 Tag Management



This type of service helps the Company to manage the tags or scripts needed on Website in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

*Google Tag Manager (Google Inc.):* Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## 6. Your Choices.

### 6.1 Mechanisms to Control Your Information.

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- (a) *Cookies and Other Tracking Technologies.* You may be able to set your browser to reject cookies and certain other technologies by adjusting the appropriate settings in your browser. Each browser is different, but many common browsers have preferences that may be adjusted to allow you to either accept or reject cookies and certain other technologies before they are set or installed, or allow you to remove or reject the use or installation of certain technologies altogether. We recommend that you refer to the Help menu in your browser to learn how to modify your browser settings. Please note that you cannot remove Flash cookies simply by changing your browser settings. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies or other tracking technologies, please note that some parts of the Services may become inaccessible or may not function properly.
- (b) *Promotional Communications from the Company.* If you do not wish to have your contact information used by the Company to promote our own or third-party products or services, you can opt out by (i) informing us of your preference at the time you register for an account, complete an order form, sign up for our newsletter, or complete any other form on or through the Services which we collect your data]; (ii) modifying your user preferences in your account profile; (iii) following the opt-out instructions in the promotional emails we send you; or (iv) sending us an email stating your request. Please note that if you opt out of receiving promotional communications from us, we may still send you transactional communications, including emails about your account or purchases.
- (c) *Disclosure of Your Information for Third-Party Advertising.* If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt out by (i) informing us of your preference at the time you register for an account, complete an order form, sign up for our newsletter,

or complete any other form on or through the Services which we collect your data; (ii) modifying your user preferences in your account profile; (iii) following the opt-out instructions in the promotional emails we send you; or (iv) sending us an email stating your request.

- (d) *Targeted Advertising.* If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt out by modifying your user preferences in your account profile. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance or the Network Advertising Initiative, both of which maintain websites where people can opt out of interest-based advertising from their members. To opt out on these pages, visit [www.AboutAds.info](http://www.AboutAds.info) and [www.networkadvertising.org](http://www.networkadvertising.org).
- (e) *Location Information.* You may be able to adjust the settings of your device so that information about your physical location is not sent to us or third parties by (a) disabling location services within the device settings; or (b) denying certain websites or applications permission to access location information by changing the relevant preferences and permissions in your device or browser settings. Please note that your location may be derived from your GPS, WiFi, Bluetooth, and other device settings. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or your device manufacturer.
- (f) *Voice Transmissions.* You may be able to adjust the settings of your device so that your voice transmissions cannot be sent to us or third parties by (a) disabling microphone and speech recognition services within the device settings; or (b) denying certain websites or mobile applications permission to access microphone and speech recognition services by changing the relevant preferences or permissions in your device or browser settings.

#### 6.2 *How We Respond to Do Not Track Signals.*

"Do Not Track" is a privacy preference you can set in most web browsers. When you turn on this preference, it sends a signal or message to the websites you visit indicating that you do not wish to be tracked. Please note that we currently do not respond to Do Not Track browser settings.

### **7. Accessing and Correcting Your Information.**

You may send us an email to request access to, correct, or remove any personal information that you have provided to us. You may also access, correct, or remove your personal information by logging into the Website and visiting your account profile page. We cannot delete your personal information except by also deleting your account.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Content from the Services or your account, copies of your User Content may remain viewable in cached and archived pages, or might have been copied or stored by other users of the Services.

## 8. California Privacy Rights.

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The provisions contained in this section apply to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the state of California, United States of America, according to the "[California Consumer Privacy Act of 2018](#)" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term “personal information“ as defined in the California Consumer Privacy Act (CCPA/CPRA).

### 8.1 *Categories of personal information collected, used, sold, or shared*

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.

- (a) *Information we collect: the categories of personal information we collect.* We have collected the following categories of personal information about you: identifiers, commercial information and internet information. We do not collect sensitive personal information. We will not collect additional categories of personal information without notifying you.
- (b) *What are the purposes for which we use your personal information?* Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.
- (c) *How we collect information: what are the sources of personal information we collect?* We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use Website. For example, you directly provide your personal information when you submit requests via any forms on Website. You also provide personal information indirectly when you navigate Website, as personal information about you is automatically observed and collected. Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.
- (d) *How we use the information we collect: disclosing of your personal information with third parties for a business purpose.* For our purposes, the word “third party” means a person who is not any of the following: a service provider or a contractor, as defined by the CPRA (CCPA amendment). We disclose your personal information with the third parties listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document. These third parties are grouped and categorized in accordance with the different purposes of processing.
- (e) *Sales of your personal information.* For our purposes, the word “sale” means any “selling, renting, releasing, disclosing, disseminating, making available, transferring

or otherwise communicating orally, in writing, or by electronic means, a consumer's personal information by the business to a third party, for monetary or other valuable consideration", as defined by the CPRA (CCPA amendment). This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like. For our purposes, the word "sharing" means any "sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged", as defined by the CPRA (CCPA amendment). Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CPRA (CCPA amendment), does not constitute a sale or sharing of your personal information.

- (f) *Your right to opt out of the sale or sharing of your personal information and how you can exercise it.* We sell or share your personal information with the third parties listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document. These third parties are grouped and categorized in accordance with the different purposes of processing. You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request. Such requests can be made freely, at any time, without submitting any verifiable request. To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document. For a simplified opt-out method you can also use the privacy choices link provided on Website. If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available here. We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request. Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

## 8.2 *Your privacy rights under the California Consumer Privacy Act and how to exercise them*

*The right to access personal information: the right to know and to portability.*

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.



You also have the right to know what personal information is sold or shared and to whom. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months. If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance – provided that this is technically feasible.

#### *The right to request the deletion of your personal information*

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on Website, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so – provided that this is technically feasible and doesn't involve disproportionate effort.

#### *The right to correct inaccurate personal information*

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

#### *The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information*

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

#### *The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)*

We will not discriminate against you for exercising your rights under the CPRA (CCPA amendment). This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.



To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

#### *How to exercise your rights*

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a minor under your parental authority.

You can submit a maximum number of 2 requests over a period of 12 months.

#### *How and when we are expected to handle your request*

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or





refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

## 9. Virginia Privacy Rights.

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The provisions contained in this section apply to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the Commonwealth of Virginia, according to the “[Virginia Consumer Data Protection Act](#)” (the “VCDPA”), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the VCDPA.

### 9.1 Categories of personal information collected, used, sold, or shared

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.

- (a) *How and when we are expected to handle your request.* In this section, we summarize the categories of personal data that we've processed and the purposes thereof. You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.
- (b) *Categories of personal data we collect.* We have collected the following categories of personal data: identifiers, commercial information and internet information. We do not collect sensitive data. We will not collect additional categories of personal data without notifying you.
- (c) *Why we process your personal data.* To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document. We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent. You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.
- (d) *How we use the data we collect: sharing of your personal data with third parties.* We share your personal data with the third parties listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document. These third parties are grouped and categorized in accordance with the different purposes of processing. For our purposes, the word “third party” means “a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller” as defined by the VCDPA.
- (e) *Sale of your personal data.* For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party” as defined by the VCDPA. Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. As specified in the “Detailed information on the processing of Personal Data”

section of this document, our use of your personal information may be considered a sale under VCDPA.

- (f) *Your right to opt out of the sale of your personal data and how you can exercise it.* You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document. We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.
- (g) *Processing of your personal data for targeted advertising.* For our purposes, the word "targeted advertising" means "displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests" as defined by the VCDPA. To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled "Detailed information on the processing of Personal Data" within this document.
- (h) *Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it.* You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document. We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

## 9.2 *Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them*

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data: the right to know. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- non-discrimination. We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with



goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

#### *How to exercise your rights*

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relates to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a minor under your parental authority.

#### *How and when we are expected to handle your request*

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **10. How We Protect Your Information.**

We take reasonable precautions to secure your personal information. We have implemented technical, physical, and administrative security measures designed to reduce the risk of loss, misuse, unauthorized access, disclosure, or modification of your information. We have put in place appropriate physical, electronic, and managerial procedures to safeguard the information we collect. All information you provide to us is stored on secure servers behind



firewalls. When you transmit highly sensitive information (such as a credit card number) through the Services, we encrypt the transmission of that information using Secure Sockets Layer (SSL) technology.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

While we have employed security technologies and procedures to assist in safeguarding your personal information, no system or network can be guaranteed to be 100% secure. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or any other Services.

#### **11. Terms of Use.**

If you choose to visit the Services, your visit and any dispute over privacy are subject to this Policy and our Terms of Use (Please view the Terms of Use document), including limitations on damages, resolution of disputes, and application of the law of the state of Florida.

#### **12. Cookie Policy.**

Website uses Trackers. To learn more, the User may consult the Cookie Policy (Please view the Cookie Policy document).

#### **13. Contact Us.**

We welcome your questions, comments, and concerns about privacy. You can contact us at:

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