

PRIVACY NOTICE

Last Update:

This Privacy Notice describes how we collect, use, and disclose Personal Information in connection with your use of our websites, mobile applications, and related webpages (collectively, "Websites") as well as third parties. It also describes how we share, disclose or sell your Personal Information with and to service providers, contractors and third-parties to provide you the products and services you have requested throughout Website as well as to operate our services, run our Websites, or perform other business activities (collectively, "Services"). Please read this Privacy Notice carefully to understand how we will treat your Personal Information. If you do not agree with our policies and practices, do not use the Websites or Services.

1. INFORMATION WE COLLECT.

We may collect information that personally identifies, relates to, describes, or is capable of being associated with you (collectively "Personal Information"), including:

- **Identifiers**, which may include your name, physical address, email address, phone number, mobile number or other similar identifiers.
- **Commercial and Customer information**, which may include your visiting one of our client's websites, purchase of products or services from us or third parties, profile information relating to your interests, internet usage, search history, feedback information, communication preferences, customer service and communication history.
- **Internet or other electronic network activity information**, which includes your IP address, log data, analytics data, device ID, and other data collected through pixels, cookies, web beacons, JavaScript, and similar technologies on our and third party websites. This may also include your browsing history, search history and your interaction with a website, app, or advertisement.
- **Geolocation data**, when we collect your IP address we collect your general geographic location when viewing our website. If you provide your address in response to a prompt, then we collect then we collect your precise geo collection.
- **Audio, electronic, visual, or similar information**, where permitted by law, we may record phone calls between us or our customer service providers. We may also implement technology on our website which tracks and captures your browsing and use of Services while on our website.
- **Professional or employment-related information**, when verifying your identity, including the business or organization you are employed by or represent, your title with that business or organization, and information relating to their role with the business or organization.
- **Demographic information**, which may include your age and date of birth.
- **Inferences drawn from other Personal Information or data**, means we use all of the information we and third parties collect from you to draw an inference about interests and preferences you would like us to use based on our and third-party's analysis of your trends and this may include making a profile of you which includes all information we or they have collected.

2. HOW WE COLLECT INFORMATION.

Generally, we collect Personal Information directly from you when you visit our Website and provide information when prompted or fill out our registration form or survey or contact us directly. We also collect your information automatically when you visit our Website. We also collect information about you from third-parties, contractors and service providers.

A. Information You Provide To Us. We may collect Personal Information directly from you when you provide it to us through the Websites or Services. This may include the information you provide in response to our request or prompt. We may also receive information from you when you contact us with questions or concerns.

B. Information Automatically Collected. When you visit or interact with the Websites, we may use a variety of technologies such as pixels, cookies, clear GIFs, pixel tags, log files, JavaScript, web beacons, and other technologies or third-party services which automatically or passively collect Personal Information about you and your interactions with Websites. We may also automatically collect the following information about you:

Cookies, Pixel Tags/Web Beacons, and Analytics Information. We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the Services. Technologies are essentially small data files placed on your device that allow us and our partners to record certain pieces of information whenever you visit or interact with our Services.

- **Cookies.** Cookies are small text files placed in device browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects information about engagement on the Services. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.
- **Analytics.** We may also use Google Analytics and other service providers to collect and process analytics information on our Services. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google’s collection and processing of data generated by your use of the Site by going to <https://tools.google.com/dlpage/gaoptout>

Computer or Device Information: We automatically collect your Internet Protocol (“IP”) address or other unique identifier or information from the computer, mobile device, tablet you use to access the Websites, including but not limited to your browser type, device type, system type, and the domain name from which you accessed the Websites.

Usage Information: We may collect information about your use of the Websites, including the date and time you visit the Websites, the content, areas or pages of the Websites that you visit, the website or app from which you navigated to the Websites, the page or app you visit after leaving the Websites, the amount of time you spend viewing or using the Websites, the number of times you return to the Websites, as well as other click-stream or usage data, and whether you open, forward, or click-through an email or display ad to the Websites. For legal compliance purposes, we may also capture or record your interactions with the Website to confirm that your information was submitted to us.

Third-party Providers: We use third-party service providers to support our Websites. Some of these service providers may use technology such as pixels, cookies, web beacons, pixel tags, log files, Flash cookies, or HTML5 cookies to receive, collect, and store information on your computer for later access and usage.

Use of Third-Party Analytics and Technologies: We use various ad services provided by Google that connect the activity on our Website with their advertising network and they may use cookies that collect information regarding certain patterns in your browsing history.

To opt-out of this tracking, please see <https://support.google.com/ads/answer/2662922?hl=en>. We also participate in all of Google's Analytics Advertising. This includes: (i) Remarketing with Google Analytics; (ii) Google Display Network Impression Reporting; (iii) Google controlled Campaign Manager integration; and (iv) Google Analytics Demographics and Interest Reporting. Google uses cookies to track activity performed by Google Analytics and its AdWords or DoubleClick cookie. To opt-out please see <https://tools.google.com/dlpage/gaoptout/>. We also use Google Analytics which is an analysis service. Google utilizes the data collected through its cookies to track and examine the use of this site, to prepare reports on its activities, and to share them with other Google services. You may opt-out of the Google Analytics service using Google's Browser Add-on here <https://tools.google.com/dlpage/gaoptout/>.

Information from Third-Party Websites or Services: If you link to us through a third-party website, email, or service, such as a social media account, we may automatically receive certain information about you based on your registration and privacy settings on those third-party websites or services. This may include, but may not be limited to, your name, username, demographic information, updated address or contact information, location, interests, and online activity.

Site Recordation Technology. We use site visit recordation technology to memorialize site visits, including technology provided by third parties, including Jornaya's Lead ID or Active Prospect's TrustedForm, as applicable. We use LeadID and/or TrustedForm to independently document users' consent to be contacted. We use LeadID and/or TrustedForm to independently document users' consent to be contacted. The LeadID and/or TrustedForm Script is embedded on our website and collects the following information when you interact with the page(s) where the script is present: page URL, mouse movements and clicks, contact information inputted by the user, a snapshot of the page, including IP address of the user's computer, time on the page, date and time that the LeadID and/or TrustedForm Script was loaded, as well as the date and time of the various user interactions with the page, and HTTP headers from the user's browser ("[Data Collection Pages](#)"). For more information about ActiveProspect's data use and collection policies and practices, please review the ActiveProspect Privacy Policy, located at <https://activeprospect.com/privacy-policy/>. For more information about Jornaya's data use and collection policies and practices, please review the Jornaya Privacy Policy, located at <https://www.jornaya.com/consumer-privacy-policy/>.

C. Information Collected From Third Party Sources. We may acquire Personal Information from other sources as follows:

- **Service Providers:** We use third-party service providers to support our Websites and Services and business processes including without limitation, identifiers, internet and electronic network activity, general geo location, and inferences.
- **Third-parties:** We obtain Personal Information about you from third-party sources, including commercially available sources, data aggregators and public databases as well as companies that license or sell your information to us. This information may include your name, general geographic information, IP Address, and publicly-observed data.

D. Combining Information. We may combine the Personal Information we receive from you, Third Parties and information we automatically collect through the Websites and/or Services, as well as information collected from other online or offline sources, including from third-party sources. This will

provide us with a profile of you which we may be able to use for provision of our services to you as well as identify other products and services that may interest you.

3. HOW WE USE YOUR INFORMATION.

A. Use of Information. We use the Personal Information we collect from and about you for any of the following business purposes:

- To provide our Websites and/or Services to you and to our clients.
- To analyze, improve, operate, and maintain our Websites, Services, and systems, or develop new products, services, or marketing.
- To obtain and pass information, products, or services that you have requested or may be of service or interest to you from us to third parties, and this includes passing your information on to our clients who provide the products and services to communicate with you directly.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you, us, our clients or service providers or third-parties, involving the services or products you or they have requested.
- To provide you and other users with customized content, targeted offers, and advertising on the Websites, or across other websites, mobile applications, social media, or online services, or via direct mail, email, and/or telemarketing regarding offers, contests, events, news, programs, and other related and unrelated services and products that we believe may be of interest to you.
- To determine the effectiveness of our marketing programs including use of your data in an aggregated non-specific format for analytical and demographic purposes. Pursue legitimate interests, such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention and measure interest and engagement in the Services;
- Develop of new products and services or improve our products and Services and ensure internal quality control and safety;
- Verify individual identity when necessary, carry out audits or prevent prohibited or illegal services or security protocols; Communicate with you about activities on the Services and changes to our agreements and prevent and prosecute potentially prohibited or illegal activities;
- Comply with our legal obligation.

C. How We Use Your Information for Interest-Based Advertising. We may use third-parties to measure and target advertisements on our behalf that are tailored to your online interests or improve our marketing efforts. To facilitate these activities, we allow these third-parties to use cookies, web beacons, pixel tags, and similar technologies to collect certain data and other information about your online activity. We also may display interest-based ads through social media platforms or websites. These tools allow us to personalize our ads based on your shopping experience, without having to share your Personal Information with these social media platforms.

4. WHO WE DISCLOSE, SHARE, AND SELL YOUR PERSONAL INFORMATION TO. We may disclose, share, and sell your Personal Information as described below.

- A. Third-party Product and Service Providers.** We disclose, share, and sell your Personal Information to third-parties to provide the product and service you have requested through your registration on our Website and Services.
- B. Parent and Affiliated Companies.** We may disclose and share your information with our parent company and its subsidiaries for business and operational purposes.
- C. Service Providers.** We disclose and share your information to third-party contractors and other service providers that we use to support our business, Websites, and Services.
- D. Sale or Transfer of Business or Assets.** We may disclose, share, and sell your Personal Information as part of our sale of assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. If we file for bankruptcy or reorganization information we have collected about you may be considered our asset and may be included in the assets transferred.
- E. Marketing Vendors and Other Third-parties.** We may disclose, share, or sell your information to third-parties who provide display and/or email services or other third-party vendors we use who provide cookies, pixel tags, web beacons, clear GIFs, or other similar technologies for our and third-parties use on and to manage and improve our advertising campaigns.
- F. Compliance with Laws.** We may disclose your Personal Information to comply with any court order, law, or legal process, including responding to any subpoenas, judicial processes, or government or regulatory requests and investigations. We may disclose and share your Personal Information to third-parties to assist us in compliance with Laws.
- G. Enforcing Our Rights.** We may disclose and share your information to enforce or apply our terms of service or other agreements, including for billing and collection purposes, with clients, third party service providers and other third-parties or contractors who provide you with the product or service which you have requested or to protect the security of our Websites, servers, network systems, and databases and enforce our contractual rights with these parties..
- H. Acquisition or Merger.** We may disclose, share, sell and otherwise transfer your Personal Information to a third-party who acquires any or all of our business, whether such acquisition is by way of merger, consolidation, or purchase of all or a substantial portion of our assets.
- I. Aggregate or Anonymous Non-Personal Information.** We may disclose, share, or sell aggregate, anonymous, or de-identified non-personal information to third-parties for their marketing or analytics uses.

5. YOUR CHOICES AND OPTING OUT.

- A. Cookies, Tracking Options, and California Do Not Track Disclosures.** We, third-parties, and service providers place Cookies and Tracking Technology on parts of our Website. You may decline or adjust these technologies through your device or Internet browser settings to limit certain tracking or to decline cookies. Please note that by doing so, you may not be able to use certain features on our Websites or take full advantage of all of our offerings. Please refer to your device's settings or your Internet browser's "Help" section for more information on how to delete and/or disable cookies or to control your tracking preferences. Please note that our Websites may not recognize "do not track" requests or headers from some or all browsers. Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- B. Interest-Based Advertising.** You have choices for receiving more relevant advertising on the Websites or across other websites and online services, to learn more about these choice please see relevant articles at <http://www.aboutads.info/choices/>, <http://www.networkadvertising.org/choices/> or for your mobile device, please see <http://www.aboutads.info/appchoices>. If you wish to prevent your

data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available at <https://tools.google.com/dlpage/gaoptout/>. Your mobile device may also allow you to adjust your privacy and advertising settings to control advertising. Even if you opt-out, you still may receive advertising from us that is not customized based on your Service or usage information, or advertising from other third-parties.

C. Unsubscribing from Our Marketing Communications. We provide our customers, as well as individuals referred by our customers, with the opportunity to opt-out of having their information used for purposes not directly related to placement, processing, fulfillment, or delivery of a product or service. To opt-out of marketing communications or to request to be added to our Do Not Call List or Do Not Mail List, you may do so here: <https://optconsumerprivacy.com>. If you receive marketing communications from one or more of our affiliates or subsidiaries, you must opt-out individually from each of the brands from which you are receiving brand-specific marketing communications.

D. Third-Party Communications. Any third-parties to whom we have disclosed, shared, or sold your information may have their own privacy policies which describe how they use and disclose your information and your choices. We encourage you to visit the websites of those third-parties.

6. CHILDREN'S PRIVACY.

We do not direct market our Websites to children under the age of 16. We do not knowingly collect any Personal Information from children under the age of sixteen. If we learn that a child under the age of sixteen has provided personally identifiable information to the Websites, we will use reasonable efforts to remove such information from our files.

7. DATA SECURITY.

We use reasonable industry-accepted technology and controls to protect your information and data from disclosure to unauthorized third-parties. This includes firewalls, secured facilities, and logged and limited access. Although mostly effective to prevent disclosure, no guarantee can be given that all information you provide to us will not be accessed by unauthorized persons. Thus, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Any transmission of information, communications and data to us or through our Website is at your own risk.

8. CHANGES TO OUR PRIVACY NOTICE.

We reserve the right to make changes to this Privacy Notice including collection, use, sale and sharing of your Personal Information. We do not provide notice of changes except through our posting on this page. We use your information only in the manner described in this Privacy Notice at the time you register your information with us. Please be sure to review this policy each time you communicate or register with us for the latest policy. Your continued use of the Websites and/or Services after we post a change in the Privacy Notice means you accept those changes.

9. CONTACT INFORMATION.

To ask questions or comment about this Privacy Notice and our privacy practices, contact us at: <https://optconsumerprivacy.com>

10. CALIFORNIA RESIDENT RIGHTS.

A. California "Shine the Light" Disclosure. The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we disclose certain categories of Personal Information (as defined in the Shine the Light law) to third-parties for their direct marketing purposes. Please submit your information at: <https://optconsumerprivacy.com>

B. California Consumer Privacy Act of 2018. This **Privacy Notice for California Residents** supplements the information contained in our primary Privacy Notice and applies solely to all visitors,

users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and as amended by the California Privacy Rights Act ("CPRA"). Any terms defined in the CCPA and CPRA have the same meaning when used in this Notice. The CCPA and CPRA are collectively referred to as the "CCPA" for purposes of this Notice.

C. Additional Personal Information Disclosures.

- **Additional Disclosures on Sales, Sharing, or Targeted Advertising.** As further described in the Privacy Notice, we may "sell" or "share" your Personal Information (as those terms are defined by the CCPA to third-parties, subject to your right to opt-out of those sales.

In the last 24 months, we sold, shared (for cross-context behavioral or targeted advertising purposes), or disclosed the Personal Information (for the purposes described in our Privacy Notice) as follows:

- Third-party Business (clients) and Marketing Companies: Identifiers, Commercial information, Internet, or other electronic network activity information, Geolocation data.
- Online Advertising Networks, Social Networks, and Analytics Providers: Identifiers, Commercial information, Internet, or other electronic network activity information, Geolocation data.

We also disclose Personal Information to third-parties at your direction or upon your request, in connection with a service or product you have requested or received; for our corporate business transaction; or to comply with legal or contractual obligations; as described in our Privacy Notice. In the last 12 months, we may have disclosed each category of Personal Information for these purposes.

De-identified Information. We may receive or process Personal Information to create, de-identified data that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain de-identified data, we maintain and use the data in de-identified form and not attempt to reidentify the data except as required or permitted by law.

D. California Privacy Choices. If you are a resident of California, and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

- **RIGHT TO KNOW.** The right to confirm whether we are processing Personal Information about you and to obtain certain personalized details about the Personal Information we collected about you, including:
 - The categories of Personal Information collected;
 - The categories of sources of the Personal Information;
 - The purposes for which we collected the Personal Information;
 - The categories of Personal Information disclosed to third-parties, and the categories of recipients to whom we disclosed the Personal Information;
 - The categories of Personal Information shared for cross-context behavioral or targeted advertising purposes, and the categories of recipients to whom we disclosed the Personal Information for those purposes; and
 - The categories of Personal Information sold, and the categories of third-parties to whom we sold the Personal Information.

- **RIGHT TO CORRECT.** The right to correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information, and the purposes of processing the Personal Information.
- **RIGHT TO DELETE.** The right to have us delete the Personal Information we maintain about you, subject to additional exemptions.
- **RIGHT TO CONTROL SENSITIVE PERSONAL INFORMATION.** The right to exercise control over our collection and processing of Sensitive Personal Information.
- **RIGHT TO OPT-OUT OF SALE OR SHARING OF PERSONAL INFORMATION** The right to direct us not to “sell” your Personal Information to third-parties for monetary or other valuable consideration. You also have the right to direct us not to use your Personal Information for automated decision-making or profiling for certain purposes. The exception to this Right is our ability to disclose, share and sell your Personal Information to the third parties who provide to you the services and products you requested at registration.
- **RIGHT TO PORTABILITY.** The right to obtain a copy of your Personal Information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- **RIGHT AGAINST DISCRIMINATION OR RETALIATION.** You have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights.
- **HOW TO EXERCISE YOUR RIGHTS.** Submit your request to exercise one of the privacy rights identified above, as follows:
 - By visiting: <https://optconsumerprivacy.com>; or
 - Call [1-888-302-8476](tel:1-888-302-8476)

Before processing your request, we will need to verify your identity and confirm you are a resident of California. In order to verify your identity, we will generally either require the successful authentication of your email, or the matching of sufficient information you provide us to the information we maintain about you in our system. As a result, we require requests to include first and last name, phone number, email, street address, city, state, and zip code. We may at times need to request additional Personal Information from you, taking into consideration our relationship with you and the sensitivity of your request.

We will process requests to opt-out of sharing or sales within 10 business days, subject to any applicable exceptions and extensions permitted by law. We will process all other privacy requests within 45 days, subject to any applicable exceptions and extensions permitted by law.

In certain circumstances, we may decline a privacy rights request, particularly where you are not a resident of California, or where we are unable to verify your identity or we are required to retain the information for legal compliance with an applicable statute, rule or regulation.

E. Submitting Authorized Agent Requests. In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent’s authority to act on your behalf. In order to verify the authorized agent’s authority, we generally require evidence of either: (i) a valid power of attorney; or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the documentation provided and your state of residency, we may still need to separately reach out to you or the California

Resident to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

F. Retention of Personal Information. We retain Personal Information as long as is reasonably necessary to fulfill the purpose for which it was collected, as required by an applicable law, rule, regulation or contractual provision. We will retain your Personal Information for the purposes of commercial marketing to you until you request we cease further efforts to provide you such offers or in the event you request deletion of your Personal Information. To determine the appropriate duration of the retention of Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of Personal Information, and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations. As such, we retain Personal Information for as long as you continue to use our Websites and/or services for the purposes explained in our Privacy Notice. When you discontinue the use of our Websites or services, we will retain your Personal Information for as long as necessary to comply with our legal obligations, to resolve disputes and defend claims, as well as, for any additional purpose based on the choices you have made, such as to receive marketing communications. In particular, we will retain Personal Information provided, including complaints, claims, and any other Personal Information provided during the duration of your agreement with us for the services until the statutory limitation periods have expired and the necessary for the establishment, exercise, or defense of legal claims.

Once retention of the Personal Information is no longer necessary for the purposes outlined above, we will either delete or de-identify the Personal Information or, if this is not possible (for example, because Personal Information has been stored in backup archives), then we will securely store the Personal Information and isolate it from further processing until deletion or de-identification is possible.