# **PRIVACY POLICY**

This Privacy Policy is effective as of and was last updated on May 24, 2021.

This privacy policy ("Privacy Policy") is designed to inform you about the type of information that Adretreaver, LLC and its affiliates ("Adretreaver," "we," "us," or "our") may gather or collect from you in connection with your use and/or access of <a href="https://adretreaver.com">https://adretreaver.com</a> (this "Site"), or any other sites, platforms, software, or mobile applications owned and operated by Adretreaver (collectively referred to as the "Services"). It also explains the conditions under which we use and disclose that information, and your rights with respect to that information.

Please note that our practices are subject to change. We ask that you bookmark and periodically review this page to ensure continuing familiarity with the most current version of our Privacy Policy. All additions and changes apply as of the time they are posted on this Site. Please check the Effective Date above to note when this Privacy Policy was last updated.

This Site is not intended for use by individuals under the age of 18. By using this Site or submitting information to us, you consent to our collection, use and sharing of information as described in this Privacy Policy. If you are not 18 years of age or older or you do not agree with the terms of this Privacy Policy, do not provide us with any information or use any of the Services or product offered or provided on this Site.

### **Collection of Information.**

We collect both Non-Personally-Identifying Information and Personally-Identifying Information from you. "Non-Personally-Identifying Information" is information that, without the aid of additional information, cannot be directly associated with a specific person or entity. "Personally-Identifying Information," by contrast, is information such as a first and last name, telephone number, home address, or email address that, without more, can be directly associated with a specific person or entity.

- A. Non-Personally Identifying Information.
  - 1. Gathering Non-Personally-Identifying Information.

Web Browsers. Like most site operators, we gather Non-Personally-Identifying Information from you that web browsers, depending on their settings, may make available. That information includes but is not limited to your Internet Protocol ("IP") address, internet service provider, operating system, browser type, access dates and time spent using the Services, the locations of the web pages you view right before arriving at, while navigating, and immediately after leaving this Site, and other statistics.

Cookies. A "Web Cookie" is a string of information that a site stores on your computer or mobile device, and your browser provides to this Site, each time you submit a query to this Site. We or one of our third-party vendors, including Google, may use Web Cookies or similar technologies, such as web beacons, to track the pages that you visit during each Site session and help us improve and optimize your experience, help us understand how this Site is being used, to inform, recognize and set preferences, serve ads based on someone's past visits to the Site and/or to report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to your visit, access or use of the Services. To the extent third parties may place advertising or other content within Adretreaver's Services or through a promotion of Adretreaver, such third parties may utilize cookies or other technological means within the advertising to collect and utilize non-personal information. If you click on a link or advertisement for a third party, you will be redirected to the third party's website or online service. We do not have any control over these third party websites or services and we are not responsible for information collected by third parties, nor for the collection or use of information by other sites to which the Site or any promotion of Adretreaver is linked. The fact that we link to a website,

display content or any type of advertisement is not an endorsement or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security practices.

IF YOU DO NOT WISH TO HAVE WEB COOKIES PLACED ON YOUR COMPUTER OR MOBILE DEVICE, YOU SHOULD SET YOUR BROWSER TO REFUSE WEB COOKIES BEFORE ACCESSING OUR SERVICES, WITH THE UNDERSTANDING THAT CERTAIN FEATURES MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF WEB COOKIES. IF YOU REFUSE WEB COOKIES, YOU ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.

## 2. Use of Non-Personally-Identifying Information.

We analyze Non-Personally-Identifying Information gathered from users of our Services to help us better understand how the Services are being used. By identifying patterns and trends in usage, we are able to better design our Services to improve your experiences, both in terms of benefit and ease of use. We may link information gathered using Non-Personally-Identifying Information to Personally-Identifying Information.

### 3. Disclosure of Non-Personally-Identifying Information.

From time to time, we may also release the Non–Personally–Identifying Information gathered from Site users in the aggregate, such as by publishing a report on trends in the usage of our Services.

### B. Personally-Identifying Information.

# 1. Gathering Personally-Identifying Information from Site Users.

When you use or access our Services or communicate with us via the Site, you may be asked to disclose Personally–Identifying Information, including but not limited to your name, company name, email address, telephone number(s), address, date of birth, billing address, number of employees within your company, referring site, other technical information collected by the Site's servers, and other information necessary to provide you with access to our Services. We may also collect Personally–Identifying Information from you when you contact us. You may also choose to submit Personally-Identifying Information to us when you use any interactive features and services that we may make available from time to time within the Services, such as account profiles, questions and answers, blogs, polls, message boards, and forums. To the extent we provide message boards, forums, or blogs for public user postings or reviews on our Site, please be aware such information may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. We are not responsible for any personal information you choose to publicly provide.

# 2. Gathering Personally-Identifying Information from Third Party Sources.

We may also receive, license, or purchase data, including Personally-Identifying Information that you have chosen to make public, from third party sources, or allow third party companies to implement automatic tracking processes. This data may include, but is not limited to: first and last name; email address; postal address; home phone number; and cell phone number.

## 3. Use of Personally-Identifying Information.

We may use your Personally–Identifying Information in the following ways:

- o Provide the Services and make the Services accessible to you.
- Optimize, enhance, improve, and personalize the Services, user experience, and marketing efforts.
- o Administer your account.

- o Contact you for customer service related issues and important notices.
- o Send you information about new product features, promotions, reminders, or other marketing communications in connection with our Services.
- Send users promotions on behalf of a third-party. Such promotions will only be sent by Adretreaver on behalf of the third-party.
- o Respond to customer service requests and provide requested products, information, and services to users via the Site or through other online or offline channels.
- Respond to your questions and concerns.
- Conduct research and analysis.
- Allow you to participate in surveys.
- o Allow you to receive other offers from non-affiliated third party companies and marketers.
- o In connection with the operation of our Services.
- o For users to obtain information and offers for products and services offered by us as well as selected third parties.
- O Address technical or logistical issues or security threats.
- 4. Disclosure of Personally-Identifying Information to Third Parties.

We will disclose Personally-Identifying Information in the following circumstances:

- Employees, Third Party Processors and Third Party Service Providers. We will disclose Personally-Identifying Information to our employees, contractors, affiliates, distributors, dealers, vendors, suppliers, and service providers who: process Personally-Identifying Information on our behalf; participate with us in the provision or operation of the Services; provide us with other services, such as communication services, broadcasting services, or information verification services; or provide you with access to the Services.
- By Law, to Protect Rights and to Comply with Our Policies. We disclose Personally-Identifying information if: (1) required to do so by law, or in response to a subpoena or court order or request from a governmental agency or law enforcement; (2) we believe in our sole discretion that disclosure is reasonably necessary to protect against fraud, enforce or apply our Terms of Use, to protect the property or other rights of us or other users, third parties or the public at large; (3) to establish or exercise our legal rights or defend against legal claims; or (4) we believe that you have abused the service by using it to attack other systems, to gain unauthorized access to any other system, to engage in spamming, or otherwise to violate applicable laws.
- O Business Transfers; Bankruptcy. We reserve the right to transfer or disclose Personally-Identifying Information in the event we enter into negotiations to buy, sell, or merge all or a portion of our assets or if we enter into bankruptcy, reorganization, or receivership proceedings. Personally-Identifying Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by the successor entity.
- o Marketing Partners. With regards to email addresses and other Personally-Identifying Information collected, we may share such information with third parties and third party marketers and advertisers to allow them to send you email marketing communications, offer products or services that may be of interest or benefit to our you, and other communications from third party advertisers.
- We advertise utilizing Google Analytics features (e.g. (and not by way of limitation), Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager integration, Google Analytics Demographics and Interest Reporting), and social media companies (i.e. Facebook). Using the Ads Settings link (Google.com), users can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads.

• We do not sell your personal information for profit. However, sometimes we share your data with third parties in order to provide you with certain services which may be deemed a "sale" under certain data privacy laws. You may opt out of the sale of your personal information by contacting us. Please be aware we will have to verify your identity in order to complete the request.

## Limitations on Liability.

YOU ASSUME ALL RISKS ASSOCIATED WITH USING OUR SERVICES AND IN DEALING WITH OTHER USERS WITH WHOM YOU MAY COME IN CONTACT THROUGH THIS SITE. WE EXPECT THAT YOU WILL USE CAUTION AND COMMON SENSE WHEN USING THIS SITE.

YOU UNDERSTAND AND AGREE THAT ANY DISPUTE OVER PRIVACY IS SUBJECT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, AS WELL AS THE TERMS AND CONDITIONS OF OUR SERVICES (INCLUDING LIMITATIONS ON DAMAGES AND ARBITRATION). YOU AGREE THAT OUR LIABILITY FOR ANY BREACH OF THIS PRIVACY POLICY SHALL BE LIMITED TO NO GREATER THAN ONE HUNDRED DOLLARS (\$100.00) PER CLAIM, TO THE EXTENT SUCH CLAIM IS NOT OTHERWISE BARRED BY OUR TERMS AND CONDITIONS.

## Security.

We take all reasonable and appropriate measures to protect your information and personal data from unauthorized access and to limit the risk that your information may be lost, damaged or misused. However, there is always a risk in transmitting information over the internet and otherwise processing information and no security measure guarantees absolute safety or protection against intrusion. We cannot and do not guarantee or warrant the security of any information that you transmit on or through the Services or that we otherwise maintain.

#### Children.

We do not knowingly collect or retain information in connection with the Services from children under the age of 13. Adretreaver does not ask children under age 13 for personal information. If you are a parent or guardian and you have become aware that your child has used our Services or has provided us with personal information without your consent, please contact us at <a href="customerservice@adretreaver.com">customerservice@adretreaver.com</a> to arrange for deletion of any personal information we may have inadvertently collected about the child.

## **Opting Out.**

At any time, a user may opt out from receiving future offers or promotional materials from us by following the provided unsubscribe instructions within each marketing communication or by submitting a written request to the contact email listed herein. Such opting out will not apply to any communications from third parties to whom Adretreaver may have provided information regarding the user. A third parties' use of the information is subject to such parties' own privacy policies, for which we are not be responsible. Your decision to opt out of receiving marketing communications or the sale or disclosure of your personal information may impact the availability and quality of Services provided to you. However, even if you opt out of receiving marketing communications, we retain the right to send you non-marketing communications (such as information about changes to your account, our Services, Privacy Policy or Terms of Use.

#### Access to Information.

All users who provide us with their information, may modify, correct, or delete (subject to certain exceptions described herein, including but not limited to information that may support our defense against legal claims or that we are required by law to maintain within our business records) by submitting a written request to the contact email listed herein, or through your account profile (in the event such functionality has been provided).

## Updates and Changes to this Privacy Policy.

We reserve the right to revise and update this Privacy Policy at any time. Any such revisions will be effective on the date of posting to the Site, and will apply to all information collected by Adretreaver both prior to and following the effective date. Your access or use of the Services following any such revisions will be deemed your acceptance of such revisions. Users should periodically visit this page to review the current policies with regard to Information. If you do not agree or consent to these changes, do not use the Services.

# Do Not Track Signals.

We do not monitor "do not track" ("DNT") signals or similar mechanisms that may provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third party websites or online services.

# California Privacy Right.

If you are a California resident, the processing of certain personal information about you may be subject to the California Consumer Privacy Act ("CCPA") and other applicable California state privacy laws. Beginning January 1, 2020, the CCPA gives you certain rights with respect to processing of your personal information, as described under the CCPA. This Section informs you of your rights as a Californian resident and should be read in conjunction with our Privacy Policy. If you are a California resident, you may exercise the following rights regarding your personal information, subject to our verification procedures and certain exemptions:

<u>Right to Know</u>: You have the right to request that we disclose to you the categories of personal information we have collected about you and the sources from which we collect your personal information. You may also request information about how we collect, use, disclose, and "sell" personal information over the previous 12-month period.

<u>Right to Delete</u>: You have the right to request that we delete the personal information we have collected from you or maintain about you, subject to certain exceptions. Please note that requesting deletion may require the cancellation and deletion of your account which, upon completion, cannot be reversed and may impact your use or functionality of our Services.

<u>Right to Opt-Out of Selling ("Do Not Sell My Personal Information")</u>: To the extent that our disclosure of your information as described herein is considered a "sale" under the CCPA, as a California resident you have the right to opt out of our sale(s) of your personal information, as "sale" is defined by California law.

<u>Right Against Discrimination</u>: You will not be discriminated against for exercising any of your rights under the CCPA.

Please contact us at <u>customerservice@adretreaver.com</u> to exercise any of the above rights. Please be aware we will have to verify your identity in order to complete any request. If we cannot verify your identity based on the information provided, a request for a copy of your data shall be treated as a request for information and if we cannot verify your identity, a request to delete personal information may be treated as a request to opt-out of the sale of personal information. An Authorized Agent making a request on your behalf must have written documentation of their authority to act on your behalf, such as a Power of Attorney.

#### Contact Us.

Any questions regarding this Privacy Policy should be directed to <u>customerservice@adretreaver.com</u>.