

Privacy Policy

THE BUSINESS ("THE BUSINESS," "our," "us," or "we") respects user and member privacy. We believe providing the best protection of their information reasonably possible is our responsibility. Subject to applicable laws, any information you submit to us will not be used in any manner to which you have not consented. This Privacy Policy ("Privacy Policy") outlines more specifically what information THE BUSINESS may collect from you and how that information may be used after it is collected. We want to assure you that your Personally Identifiable Information and Non-Personally Identifiable Information will be respected and we will take steps to ensure that such information will be used in ways that are in compliance with this Privacy Policy and applicable laws. This Privacy Policy relates to any Personally Identifiable Information and Non-Personally Identifiable Information collected, stored, owned, or used by THE BUSINESS; this includes, but is not limited to, the collection of information through the THE BUSINESS website (the "Website") and any service or feature offered therein, including but not limited to the portal and any promotions that may be open from time to time.

This Privacy Policy does not apply to any other websites, mobile applications, social media platforms, email lists, or any other information collected, owned or stored by any entity other than THE BUSINESS or through any other means other than the Website.

Generally, use of our website may require you to provide information such as your name, company name, email address, address, telephone number, credit-card number and other relevant data. This information is used by us to identify you and provide you with support, services, mailings, sales, marketing, billing, and in order to meet our obligations to you.

Information Collected

THE BUSINESS may collect two (2) types of information from you: (1) Personally Identifiable Information and (2) Non-Personally Identifiable Information:

1. Personally Identifiable Information. Personally Identifiable Information refers to the types of information that can be used to identify or contact a single person, or to aggregate disparate pieces of information into one data picture of a single individual. The types of Personally Identifiable Information collected by THE BUSINESS may include:

- (i) *Contact Information.* This includes but is not limited to your first and last name, company name, company address, phone number, fax number, date of birth, email address, website, and social media links.
- (ii) *Other information.* All other information that can be used to identify a specific individual.

2. Non-Personally Identifiable Information. Non-Personally identifiable information is information that cannot be used to identify a specific individual, but we believe is

nonetheless worthy of respect and reasonable protection. While THE BUSINESS does analyze the Website logs to monitor the flow of traffic to the Website and make improvements to content, and those logs do contain Non-Personally Identifiable Information, no attempt to link individual log entries to specific Website visitors is made by us. The types of Non-Personally Identifiable Information collected by THE BUSINESS either by virtue of your visiting the Website or through your own submission may include:

- (i) Internet Protocol (IP) address, Unique Device Identified (UDID), and protocol information;
- (ii) Browser language and browser agent;
- (iii) Domain Name System (DNS) requests;
- (iv) Browsing history, limited only to the time spent on the domain, time and date of the visit, number of clicks, and referring link from which the user came;
- (v) Hypertext Transfer Protocol (HTTP) headers and application information, system date, full request, status, and content length;
- (vi) Operating System, and/or
- (vii) Similar behavioral, usage, and/or device information.

How Information is Collected

THE BUSINESS does not collect personally identifiable information about you through the Website without your knowledge, action or without informing you of such collection. However, your information is requested, collected and stored through your use of specific features of the Website. In the course of your visiting and interacting with the Website, we may collect Non-Personally Identifiable Information and Personally Identifiable Information about you from the following sources:

- Information we receive from you through forms you complete or contacts you make with us, or information we receive from you, personally, through the use of the Website, including, but not limited to your use of the portal, email newsletter registration, the "Contact Us" form or in conjunction with any promotion.
- Information we receive from your device through the use of the Website.
- Information we receive from our partners, service providers, payment processors, or other members.
- Information we receive from our partners in conjunction with your submission of an application for an available position.
- Information we receive from other sources.

We may collect Non-Personally Identifiable Information from you, with your implicit consent by virtue of using the Website, in the following ways:

HTTP Cookies. As is true of virtually all dynamic websites on the internet, the Website uses "cookies" (i.e., a small file that the Website writes to a user's device) to help track your usage of the Website, including what advertising you have seen and whether you have logged in. Cookies are used to "remember" settings you choose to enable on the Website and to record your browsing activity on the Website. Neither the Website, nor

the cookies, can read any data off of your device outside of our cookies; this includes any cookies saved by other websites. If you wish to not receive a cookie following your visit to the Website, you must disable cookies globally or for the Website specifically through your web browser. Similarly, you can delete all of the cookies you have saved through your web browser. Consult your web browser's documentation for assistance.

Web Beacons. A web beacon is an embedded image, usually invisible, in a website that is used purely to determine whether a user has accessed the website. The intent is to track who is reading a given website, when they are reading it, and from what device they are reading it from. The use of web beacons is commonplace, but it does mean a third party server will receive your internet protocol address, the type of web browser you are using, and the existence of any cookies previously saved to your device from earlier visits. The owner of the third party server can store all of the information, assign it a unique tracking token, and monitor your behavior on the website over a long period of time.

Unique Identifiers. Over the course of your visiting and utilizing the Website, we may assign you a unique identifier to keep track of your future visits and usage. We use the identifier to gather aggregate demographic information and form a snapshot of who our users are as a whole, and we use it to personalize the information you see on the Website and, at times, the information you receive from us via our mailing list. We keep this information purely for our own internal use, and this information is not shared with others, nor is an effort made to connect a unique identifier with an individual person's identity.

Use of Information Collected

Information we collect and aggregate about our users is used for a few purposes:

1. To provide you with information regarding the products, services or offerings you request.
2. To improve our products, services and offerings.
3. To communicate with you about our products, services and offerings.
4. To respond to your submission of your contact information and resume in conjunction with a job opportunity.

Status as Data Controller or Data Processor

We process Personally Identifiable Information both as a Data Processor and as a Data Controller, as defined by the GDPR.

Storage of Financial Information

The Website does not store any of your personal financial information. Processing of any financial transactions is done through a portal, in conjunction with our partner. Information submitted for the purpose of making use of the portal is subject to the privacy policies and practices of said partner.

When Information Is Disclosed

Your Non-Personally Identifiable Information or Personally Identifiable Information may be disclosed when required by law, or when we believe that such disclosure is necessary to comply with a legal process, enforce this Privacy Policy, respond to claims that any materials or information provided by you violates the rights of a third party, or to protect the rights, property, or safety of THE BUSINESS, its members, or the public.

We do all that we reasonably can to ensure Personally Identifiable Information that is disclosed to us by our users and members is secure. We may provide Non-Personally Identifiable Information or Personally Identifiable Information to our affiliates and other businesses or persons for the purposes of (1) processing such information on our behalf, and (2) promoting our services or the services of our affiliates and partners, as permitted by applicable privacy law. We require that these third parties agree to process your information in compliance with this Privacy Policy or in a similar, industry-standard manner, in compliance with applicable privacy laws, and we use reasonable efforts to limit their use of such information and to use other appropriate privacy and security measures. The use of your information by a business partner may be subject to that party's own Privacy Policy, and you should always read and understand the Privacy Policies of any entity to which you submit information.

We may share your Non-Personally Identifiable Information with third parties to illustrate Website user usage patterns for any advertisement campaigns we may run, content we produce, the Website's functionality, and the services we provide.

We must reserve the right to disclose Non-Personally Identifiable Information and Personally Identifiable Information to shield ourselves from liability, to investigate and defend any third party claims or allegations, to assist law enforcement agencies, to protect the security of the Website, and to protect the rights, property and safety of THE BUSINESS, its members and users. We cannot make any representations regarding your information in the event THE BUSINESS ceases business activities, is sold, acquired or otherwise merges with another company, the Website is shut down, the server is compromised, or the domain name expires. We cannot and will not be responsible for any breach of security by any third party or for any actions of any third party on the site that, despite our best efforts, receives any of the information that is disclosed to us.

Informed Choice Non-Disclosure

You are always free to opt-out of any of our services that necessitate the exposure of your Non-Personally Identifiable Information or your Personally Identifiable Information, however, you cannot opt-out of our use of information about you in connection with your merely visiting the Website or viewing this Privacy Policy.

Information from California Residents

California law permits California residents to request information from a business regarding the use of certain categories of Personally Identifiable information for the purposes of direct marketing. California residents that use the Website may request this

information by sending an email to COMPLIANCE@YOURBUSINESS.COM or a letter to the attention of _____ care of THE BUSINESS, AND ITS ADDRESS. If requesting by email, please include your name used on the Website. If requesting by mail, please include your name and your postal address.

Information from Underage Persons

The Website is intended for use by adults. We do not collect any Personally Identifiable Information from any person that are known to be under the age of thirteen (13) without permission from a parent or guardian. If we learn that we have collected Personally Identifiable Information from a child under the age of thirteen (13), we will delete that information as quickly and completely as possible.

Information from European Union Users

By using the Website and providing us with your information, you authorize us to collect your information, use and store your information outside of the European Union ("EU"). All transfers of data within the European Economic Area (EEA) will be done in accordance with the data processing requirements of the GDPR.

International Transfers of Information

Personally and Non-Personally Identifiable Information may be processed, stored, and used outside of the country in which you are located. Data privacy laws vary across jurisdictions, and different laws may be applicable to your data depending on where it is processed, stored or used.

Privacy on Third Party Sites

The Website may contain links to any number of other websites, including links to various third party service providers, used for the purposes of providing information or processing your requests. THE BUSINESS is not responsible for the privacy practices or the content of any of those websites. Please check those websites for privacy policies and read them thoroughly prior to using their website.

"Do Not Track"

Your browser may permit, or may even default, to transmitting a "Do Not Track" header to websites and online services you visit. There is currently no industry standard for what a website can, or should, do when a user transmits such a header. As a result, the Website, along with most other sites, does not recognize or modify its behavior as a result of the receipt of a "Do Not Track" header.

Social Networking Features

From time to time the Website will contain "buttons" that link to various social networking platforms. Additionally, THE BUSINESS may maintain presences on various social networking platforms, which enable you to interact with us. These interactions range from communicating directly with THE BUSINESS to "sharing" or "liking" content posted by THE BUSINESS.

If you opt-in to using the social networking aspects of the Website, information you post or provide access to may be displayed on the Website, on the social networking platform, or elsewhere. Similarly, if you post information on a third party platform in a way that references THE BUSINESS, your post and the content or images in that post may be published on the Website in accordance with the terms of this Privacy Policy or the privacy policies of the third party platform. By linking to us on a social networking platform, we may be able to find out more information about you, your connections to other users, and any other biographical information you share publically on the social networking platform.

Any information we collect, store, or control remains subject to this Privacy Policy. However, any information collected and stored by any third party, including social networking platforms, remain subject to those third parties' privacy practices.

Prizes, Promotions and Surveys

From time to time THE BUSINESS may conduct surveys or hold sweepstakes, contests, or other promotions that necessitate requesting Non-Personally Identifiable Information and Personally Identifiable Information for the purposes of administering the surveys or promotions, determining the winners, and awarding prizes. THE BUSINESS collects and stores this information, such as name, mailing address, date of birth, email address, and possibly additional information, in a manner that is appropriate to the sensitivity of the data and is used only to fulfill your request. The information collected for the purposes of surveys and promotions may be merged with other information THE BUSINESS already knows, such as your answers to any surveys or questions sent in conjunction with the promotion.

Your Consent to this Privacy Policy

By submitting Personally Identifiable Information or by visiting the Website, you consent to the collection, storage and use of information by us as specified elsewhere in this Privacy Policy or as we otherwise deem appropriate, unless you inform us otherwise. If we decide to change this Privacy Policy, we will update the Privacy Policy on the Website but may not otherwise draw your attention to it. Each time you provide information to us, or we receive information from you, following any amendment to this Privacy Policy, you will be signifying to us your assent to and acceptance of the revised terms for all information already collected and information that will be collected from you subsequently. We may use comments, information, feedback and correspondence that you may submit in any manner that we deem appropriate without any notice or any compensation to you.

EFFECTIVE AS OF:
LAST UPDATED: