

WEBSITE AND DATA COLLECTION PRIVACY POLICY

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Introduction

Martino Flynn, LLC (the “**Company**,” “**we**,” “**our**,” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when: (1) you access or visit the Company website and/or blog(s) (our “**Website**”); (2) you interact with our advertising, properties, applications, or social media accounts on third-party websites, applications, and services; or (3) For and as requested by our clients, we use API-enabled programming interface applications that clients give access to client sites or client advertisements, and use various scripts to compile aggregated, de-identified data of the client’s website users or advertising recipients over various platforms and may tie any such aggregated, de-identified information you provide us or which we have collected to personal information that you provide to our client companies (“**Data Integrations**”); and, in any case our practices for collecting, using, maintaining, protecting, and disclosing that information. For our clients who use the Data Integrations, for removal of doubt, the Data Integrations allows us to download the data requested without ever having to login or interact with the client’s computer or mobile device, and consequently, we do not access metadata and other information associated with other files stored on your computer or mobile device when the Data Integrations are used.

This policy applies to information we collect:

- On our Website.
- When you interact with our advertising, properties, applications, or social media accounts on third-party websites, Applications, and services.
- Through use of our Data Integrations.

It does not apply to information collected by or provided to:

- Us offline or through any other means, including on any other website operated by the Company or any third party.
- Any third party through any software, application, or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to access or use our Website. By accessing or using the Website you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Online Privacy Protection Act (COPPA)

Our Website and our Data Integrations are not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website or the Data Integrations, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us using the “Contact Us” information at the end of this privacy policy.

When it comes to the collection of personal information from children younger than 13 years of age, the COPPA puts parents in control. The Federal Trade Commission, United States’ consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children’s privacy and safety online. Parents can review, delete, manage, or refuse with whom their children’s information is shared through contacting us directly using the “Contact Us” information at the end of this privacy policy.

Information We Collect and How We Collect It

We do not collect information by which any person may be personally identified, such as name, postal address, e-mail address, telephone number any other identifier by which you may be contacted online or offline (“**personal information**”), except that: (1) you may provide us with e-mail addresses in order to send additional information related to user products and/or services; (2) you may provide log-in or other credentials for the Data Integrations to collect de-identified aggregated

data about your website and advertisement performances; and (3) we may tie any non-personal information you provide us or which we have collected to personal information about you that we collect from other sources or you provide to us.

We collect several types of information from and about users of our Website and via Data Integrations, which may include information:

- E-mail addresses you provide to us in order to send additional information related to user products and/or services;
- For and as requested by our clients, we use Python Data Integration Applications, which are API-enabled programming interface software applications that clients give access to client sites or client advertisements, and use various scripts to compile aggregated, de-identified data of the client's website users or advertising recipients over various platforms;
- Aggregated, generalized de-identified data that is generalized to broad traits of users of our Website or via Data Integrations (such as broad age ranges of users or advertising recipients generally); and/or
- About your internet connection, the equipment you use to access our Website and similar usage details.

The information we collect from and about users of our Website and via Data Integrations is collected:

- Directly from you when you provide it to us;
- Automatically when you use the Website;

Information You Provide to Us.

The information we collect on or through our Website or our Data Integrations may include:

- E-mail addresses you provide to us in order to send additional information related to user products and/or services.
- Information that you provide by filling in forms on our Website or by giving us log-in or other credential access via our Data Integrations to analyze data about your website or advertising performance.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us via e-mail, telephone, or via text messages.
- Your responses to queries that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and/or our Data Integrations and of the fulfillment of your orders.
- Your own search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

We use information that you provide to us, including any personal information:

- To present our Website, our Data Integrations, and their contents to you.
- In order for the delivery of aggregated, non-personally identifiable analytic information using our Data Integrations as may be requested by clients.
- To send additional information related to user products and/or services.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or Data Integrations, or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.

- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website and use of our Data Integrations, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer, mobile device, and/or internet connection, including your IP address, operating system, browser type, mobile network information, device unique identifier, and the resources you access and use on our Website.
- For our clients, for removal of doubt, the Data Integrations allow us to download the data requested without ever having to login or interact with the client's computer or mobile device, and consequently, we do **not** access metadata and other information associated with other files stored on your computer or mobile device when the Data Integrations are used.

If you do not want us to collect this information, do not access or use the Website or client's websites accessible by our Data Integrations.

The information we collect through automatic data collection technologies is statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and Data Integrations and to deliver a better and more personalized service, including by enabling us to:

- Estimate audience size, age, and aggregated usage patterns.
- Store information about your preferences, allowing us to customize our Website and Data Integrations according to your individual interests.
- Speed up your searches.
- Understand and save user preferences for future visits to our Website.
- Keep track of advertisements.
- Recognize you when you return to our Website.
- Compile aggregate data about traffic and interactions in order to offer better Website experiences and tools in the future.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.
- **Web Beacons.** Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We honor Do Not Track (DNT) signals and do not track, plant cookies, or use advertising when a DNT browser mechanism is in place.

Third-Party Use of Cookies and Other Tracking Technologies.

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. We do not control

these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Google AdSense and Analytics

We may now or in the future use Google AdSense and Analytics advertising on our Website, our Data Integrations, their properties, advertisements, and social media posts. Google's advertising requirements can be summed up by Google's Advertising Policies. They are put in place to provide a positive experience for user and can be found at:

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt out of the use of the DART cookie by visiting Google's ad and content network privacy policy.

We have implemented the following:

- Remarketing with Google AdSense
- Google Display Network Impression Reporting
- Demographics and Interests Reporting

We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website and its properties, advertisements, and social media posts.

Opting out: Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt-out Browser Add-on.

Disclosure of Your Information

We may disclose aggregated de-identified information about our users, or of our client's users and advertising recipients, and any other information that does not personally identify any individual without restriction.

We may disclose personal information that you provide to us as described in this privacy policy:

- To our subsidiaries and affiliates.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website and/or Data Integrations is among the assets transferred.
- To e-mail you additional information related to user products and/or services, or otherwise to fulfill the purpose for which you provide it.
- For any other purpose expressly disclosed by us when you provide the information.
- With your consent.

We may also disclose personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or appropriately our terms of use, terms of sale, and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us.

- You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. 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, please note that some parts of this site may then be inaccessible or not function properly.

- 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. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us using the information given under the "Contact Us" heading at the end of this privacy policy.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We do not use vulnerability scanning and/or scanning to Payment Card Industry (PCI) standards because we are only interested in general information such as location and age that cannot be used to identify an individual. We never ask for credit card numbers because we don't use or need them. We use regular Malware Scanning to ensure our systems are secure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website, like message boards or user postings on blogs. The information you share in public areas may be viewed by any user of the Website or Data Integrations.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website or via our Data Integrations. 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 Data Integrations.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

California Online Privacy Protection Act (CalOPPA)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting PII from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more at:

<https://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

According to CalOPPA, we agree to the following:

- Users can visit our site or our affiliated sites anonymously.
- We will add a link to this policy on our home page or, as a minimum, on the first significant page after entering our website.
- Our privacy policy link includes the word "Privacy" and can easily be found on the page specified above.
- Users will be notified of any privacy policy changes on our privacy policy page
- Users can change their personal information by emailing us.

Fair Information Practices

The Fair Information Practices principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practices principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices: Should a data breach occur, if you have provided personal information to us and we maintain any personal information you have provided us, we will notify you within seven (7) business days of the data breach via e-mail.

We also agree to the individual redress principle, which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

CAN-SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations. We collect user e-mail addresses in order to send additional information related to user products and/or services.

If at any time you would like to unsubscribe from receiving emails, you can contact us by following the instructions at the bottom of any of our email messages and we will promptly remove you from **ALL** further e-mail correspondence.

Contact Us

If you have any questions regarding this privacy policy, you may contact us at info@martinoflynn.com .