

## PRIVACY POLICY

**Last Updated: May 1, 2018**

Retail Politics LLC (“Company,” or “We,” or “Us,” or “Our”) has created this privacy policy (the “Policy”) to explain our privacy practices so you will understand when and how personal information is collected, used, disclosed and protected with respect to this website (the “Site”). Individuals must be 18 years of age or older to use this Site and you warrant that you are 18 years of age or older. By using the Site, you consent to the privacy practices described in this Policy, as modified from time to time by us. Therefore, you should carefully review this policy so you understand our privacy practices.

### **Your information and how our Site makes use of it**

Our Site may collect up to two kinds of information: personal (such as your name and e-mail address) and aggregate information (such as the number of users who log on to the Site on a daily basis). As a general policy, no personally identifiable information is automatically collected from your visit to our Site. However, if you choose to participate in any promotional, e-commerce, or interactive activities offered on the Site, you may be asked to provide us with personally identifiable information about yourself (“Personal Information”). Personal Information may include your: (i) first and last name, age and gender; (ii) address; (iii) email address; (iv) phone number; (v) credit card number; and (vi) browsing and buying patterns. You can change or update your Personal Information on the Site by changing your account information.

The Personal Information you submit will be used to carry out your requests, respond to your inquiries, and to notify you (if applicable) regarding any promotions. You may always direct us by “opting-out” at the point where we ask for your Personal Information, and we will not use or share your Personal Information in order to provide you with services.

From time to time, we may collect general statistical or aggregate information. Such information can include the type of browsers being used (e.g., Microsoft Edge<sup>®</sup>, Safari<sup>®</sup>, Firefox<sup>®</sup>), the operating system you are using (e.g., Windows<sup>®</sup>, Android<sup>®</sup>, iOS<sup>®</sup> or Mac<sup>®</sup> OS), the number of users that visit a specific page on the Site and the nature and duration of such visits. This information may be used to help analyze Site traffic and improve our services. At no point, however, will the aggregated information personally identify you.

We reserve the right to disclose any personal or aggregate information if required to do so by law, including compliance with legal process served on Company, or if we believe that such action is necessary in order to: (a) to protect or defend the legal rights or property of Company, the Site, or its users; or (b) in an emergency to protect the health and safety of

the Site's users or the general public.

You should refer to the rest of this Policy to see how we use, disclose and protect this information.

### **Automatically Collected Information**

We automatically receive certain types of information whenever you interact with us. For example, when you visit the Site, our systems automatically collect your IP address and the type of browser you use. Static IP addresses are considered personal information. For mobile users accessing the Site, we automatically collect your Unique Device Identifier which is also considered personal information. However, the user cannot be recognized as a specific individual simply from a UDI or a Static IP address. Information may be automatically collected through the use of cookies or web beacons which are discussed in more detail below. We may also collect information about your browsing behavior, entry and exit points for the Site, search terms, website addresses you visit, page views, and impressions.

### **Cookies**

Cookies are small text files placed on your hard drive by a website when you visit. These files identify your computer and record your preferences and other data about your visit so that when you return to the site, the site knows who you are and can personalize your visit. In general, we use cookies to collect information so that we can determine how to improve our sites by seeing which areas, features and services are most popular, to personalize the site and improve the site experience. Most browsers automatically accept cookies as the default setting. You can modify the setting to reject cookies or to prompt you before accepting a cookie from the sites you visit by editing browser options. If you decide not to accept our cookies, you will still be able to access those parts of our site available to the general public but you may not be able to use some of the Site's features or services and you may have a less satisfactory experience.

### **Web Beacons**

Similar in function to Cookies, Web Beacons (also known as pixels) are small, transparent images that collect information such as the IP address of the requesting computer, the time for which the material was viewed, the type of web browser that retrieved the web beacon image, and the existence of cookies previously set by the Site's server. This technology helps us provide interest based advertising that may be beneficial to you. Web Beacons also provide information about your browsing activities, such as external sites you are visiting, the address of the referrer page for the site you previously visited, and the time you visited the external site.

## **Do Not Track Requests**

The Site does not respond to browser-based, Do Not Track requests or signals. Further, Company allows other parties to collect Personal Information over time and across different websites when a user accesses the Site as more fully explained below.

## **Interest Based Advertising**

We use third-party service providers to provide advertisements for our Company across the Internet. These advertising service providers may collect aggregate information about your visits and activity on our Site. The information is collected through the web beacons that we described above.

In addition to the information about your visits to our website, our service providers may also use the information about your visits to other websites to place advertisements about our services on these other websites.

We do not associate your interaction with unaffiliated sites with your identity in providing you with interest based ads. To learn more about your web choices and interest-based advertising networks, visit the [Digital Advertising Alliance](#).

## **Children's Privacy Policy**

This website is intended for use by individuals who are 18 years of age or older. Accordingly, Company does not knowingly, directly or passively collect information from individuals under the age of 18. If we create offers or services that make it appropriate to collect information from individuals under the age of 18, we will notify you of the change in this Policy.

## **USE OF PERSONAL INFORMATION**

### **Internal Use of Personal Information**

In general, we use Personal Information internally to serve our users, to enhance and extend our user relationships so our users may take maximum advantage of our services. For example, by understanding how you use our Site from your computer or mobile device, we are able to customize and personalize your experience. More specifically, we use Personal Information to provide services or to anticipate and resolve problems with our Site, or to respond to customer support inquiries, and to create and inform you of new services from Company or others that may better meet your needs. You should review the following section to understand when Company discloses Personal Information to non-affiliated third parties.

The following section describes these disclosure practices more fully:

### **Internal Analysis**

We may use information about you for our own internal statistical, design, or operational purposes, such as to estimate our audience size, measure aggregate traffic patterns, or understand demographic, customer interest, and other trends among our users. We may outsource these tasks to authorized third parties; however, the third parties may not use or disclose your personal information for any other purposes.

The Site uses Google Analytics that helps the Company understand how visitors engage and interact with our website so we can improve it. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit the Site. For more information on opting out of being tracked by Google Analytics across all websites you use, visit this [Google page](#).

### **Data Storage**

Personal Information as well as aggregate information shared with our authorized third parties may be stored on our internal equipment to which we allow access, or the data may reside on the third parties' own external equipment.

### **Business Transfers**

Information about our users and the Site is one of our most important business assets. Therefore, information about our users, including personal information, may be disclosed as part of any merger or acquisition, creation of a separate business, or sale or pledge of company assets, as well as in the event of an insolvency, bankruptcy or receivership in which personal information would be transferred as one of the business assets of the Company.

### **Protection of Company and Others**

As referenced above, we release personal information when we believe it is appropriate to comply with the law (e.g., a lawful subpoena, warrant or court order); to enforce or apply our policies; to protect our rights or property, or to protect our users from fraudulent, abusive, or unlawful use of, our Site; or if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.

### **Security of Personal Information**

We maintain administrative, technical and physical safeguards to protect against unauthorized access, use, modification and disclosure of Personal Information in our custody and control. We also are committed to employing reasonable technology in order to protect the security of our Site. However, even with the best technology, no Site is 100% secure. We will take reasonable measures which we believe are appropriate to protect your Personal Information from loss, misuse, alteration or destruction, and, where possible, will ask that any third parties to whom we may transfer such information take comparable steps to protect that security.

### **Third Party Websites**

Please be aware that we may provide links to third party websites from the Site as a service to our users and we are not responsible for the content or information collection practices of these sites. Please also note that these websites' privacy policies will differ from those of Company. Therefore, we encourage you to review and understand their privacy practices before providing them with information.

### **Network and Information Security**

You should be aware that Company has no control over the security of other websites on the Internet that you might visit, interact with, or from which you buy products or services.

### **Updating This Policy**

We may revise and update this Policy if our practices change, as technology changes, or as we add new services or change existing ones. Any changes will be posted to this document so that you will always know what information we gather and how we use it.

### **Contacting Us**

If you have any questions, comments or concerns about this Policy, please contact us at [ccopin@retailpolitics.biz](mailto:ccopin@retailpolitics.biz).