

QuAs Solutions Privacy Policy

Last Updated: 04/10/2024

QuAs Solutions (“We” “Us” or “Our”) respects and is committed to protecting your privacy (“User” “You” “Your” or “Yourself”). This Privacy Policy describes the types of information We may collect about You and Our practices for collecting, maintaining, using, and disclosing that information. **For residents of California and other states that provide additional rights, more information about the data we collect is available in our Notice at Collection and Supplemental Notice for Residents of Certain Other States, which is found [here](#).**

We hope this will help You make an informed decision about sharing personal information with Us.

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY
2. PERSONAL INFORMATION WE COLLECT
3. HOW WE USE YOUR PERSONAL INFORMATION
4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION
5. YOUR PRIVACY CHOICES AND RIGHTS
6. SECURITY OF YOUR INFORMATION
7. DATA PRIVACY FRAMEWORK
8. OTHER INTERNATIONAL TRANSFERS
9. RETENTION OF PERSONAL INFORMATION
10. CHILDREN’S INFORMATION
11. OTHER PROVISIONS AND COMPLAINTS
12. CONTACT US
13. NOTICE AT COLLECTION AND SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS AND RESIDENTS OF CERTAIN OTHER STATES.

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us, including on our websites, mobile applications, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, mobile applications, and other offerings are collectively called the “**Services**.”

How this Privacy Policy operates with other privacy information

It is important to read this Privacy Policy in conjunction with any other privacy information that we provide through the Services. This Privacy Policy is designed to supplement, not supersede, other privacy notices.

An Important Note about the data we process for our clients: Some aspects of this Privacy Policy do not apply to the personal information that we process on behalf of our clients through their use of our Services (“**Client Data**”). Our clients’ respective privacy policies govern their collection and use of Client Data. Our processing of Client Data is governed by the contracts that we have in place with our clients any questions or requests relating to Client Data should be directed to our clients.

Access through third-party sites: If You access the Services from a third-party platform, including, without limitation, a Social Networking Site (“SNS”), You may be required to also read and accept the terms and conditions and privacy policy of that third party as we are not responsible for their privacy practices and cannot provide assurances on how they manage your personal information. You should contact such third parties directly and refer to their privacy policy to determine their privacy.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below. For residents of certain states, additional disclosures about the information we collect is available in our supplemental disclosure below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us, for example:

- **Account Creation.** We may collect personal information when you create an account, such as name, email address, business and mobile phone number, username and password, information about your company and role, and information about your use of our Services.
- **Purchases.** We may collect personal information and details associated with purchasing our services.
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you use or request information about our Services, register for our newsletters, or otherwise communicate with us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Vendors and Service Providers.** We may collect personal information from employees or representatives of vendors and service providers who provide services to us. This personal information includes name, email address, phone number, and other business and contact information necessary to provide their services.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.

- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag 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.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, adjust your consent preferences, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (see Analytics below);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies, including cross-device tracking, to deliver content, including ads relevant to your interests, on our Services, or on third-party digital properties.
- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. These technologies allow us to better understand how our Digital Services are used and to continually improve and personalize our Services.
- **Social Media Platforms.** Our Services may contain social media buttons, such as Meta, Facebook, Instagram, and Twitter, which might include widgets such as the “share this” button or other interactive mini programs. These features may collect personal information such as your IP address and which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

C. Personal Information Collected from Other Sources

Third-Party Services and Sources. We may obtain personal information about you from other sources, including through third-party services and organizations, for example, personal information our clients provide to us. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfill our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing financial information and other payment methods for products or Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Receiving services from our vendors and service providers;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

We may use your information for other legitimate business purposes as permitted by law.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in “Contact Us” below.

D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **Automated Decision Making.** We may engage in automated decision making, including profiling. For example, to create audiences for our own marketing campaigns. QuAs Solutions's processing of your personal information will not result in a decision based solely on automated processing that significantly affects you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making. If you have questions about our automated decision making, you may contact us as set forth in "Contact Us" below.
- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create. This information may not be considered personal data under applicable law.

F. Changing Purposes

We will only use your personal data for the purposes for which it was originally collected, or for a reason that's compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will establish a legal basis for doing so and notify you when appropriate.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide Our Services

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, and similar services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our company affiliates for example: for our administrative purposes, or for them to provide services to you or support and supplement the Services we provide.
- **Advertising Partners.** Through our Services, we may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g. your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising," "cross-context behavioral advertising," or "personalized advertising."
- **APIs/SDKs.** We may use third-party application program interfaces ("**APIs**") and software development kits ("**SDKs**") as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in "Contact Us" below.

We may also share your information with third parties as appropriate and permitted by law. The privacy choices you may have about your personal information are determined by applicable law and are described in Section 5 below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g. communications regarding our Services or updates to our Terms or this Privacy Policy).
- **Text Messages.** If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in "[Contact Us](#)" below.
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.
- **Phone calls.** If you receive an unwanted phone call from us, you may opt out of receiving future phone calls from us by following the instructions which may be available on the call or by otherwise contacting us as set forth in "[Contact Us](#)" below.
- **Cookies and Personalized Advertising.** You can control our use of certain cookies and Technologies in the following ways:
- **Website Cookie Controls.** When you first visit our website, you will be presented with a banner that informs you about the categories of cookies and other tracking technologies ("Technologies") used on that site and your options for controlling those technologies based on the jurisdiction applicable to your use of the website. Where applicable, you will have a choice about whether to accept or opt-out of certain cookies and technologies, the use of which may constitute a "sale" or "share" of personal information under applicable law and may be used for targeted advertising. Please note that cookies are browser and device specific. Your request to opt-out or reject the use of these Technologies will be linked to your browser identifier only. If you use a different computer, mobile device, or Internet

browser to access our sites, you will need to renew your cookie management choices. Where available, you can do so by clicking on the cookie icon that appears in the bottom left corner of our website to manage your preferences.

- **Browser and Device Controls.** You may also stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. These tools are generally available in the help section of browsers. You can also use the quick links, based on the browser type that you are using: [Edge](#), [Google Chrome](#), [Firefox](#), and [Safari](#). However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).
- **Global Privacy Control.** You may exercise your opt-out right by broadcasting an opt-out preference signal, called the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). You can learn more about the Global Privacy Control [here](#). Please note that your request to opt-out of sale/sharing will be linked to your browser identifier only. If you use a different computer or Internet browser to access our sites, you will need to renew your opt-out request.
- **Ad Industry Opt-outs.** In addition, the online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).
- Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access and Port Your Personal Information**, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the “right of data portability”).

You will not normally need to pay a fee in connection with your right of access, however, if your request is unfounded, excessive, or repetitive we may be permitted under applicable law to charge a reasonable fee.

We aim to respond to legitimate requests as quickly as possible and within one month, however, if your request is complex we may require additional time. We may need specific information from you in relation to your request (for example, to clarify which information you are interested in or to confirm your identity), and any delay in sending this to us may in turn delay our response. If this should happen, we will endeavour to notify you to keep you updated about the expected time of our reply.

- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information, please note that we may not be required to comply with your request for legal reasons. We will notify you if this is the case;
- **Request Restriction of or Object to** our processing of your personal information where the processing of your personal information: (i) is based on our **legitimate interest** for direct marketing purposes; (ii) involves processing or sharing of your sensitive personal information for certain non-essential purposes, or in contexts that require your consent; and (iii) for

profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;

- **Opt-out of Sale, Sharing for Cross-Contextual Advertising, or Targeted Advertising involving your personal information.** Some U.S. state laws provide the right to opt-out certain data sharing or “sales” for cross-contextual behavioral or targeted advertising. Although we do not “sell” your personal information as the term “sale” is typically understood, we may share your information with analytics providers and advertising networks in order to understand how visitors use our websites and serve you ads on and off our websites. You may have the right to opt-out of this “sharing” and “targeting advertising” by adjusting your privacy choices. When you first visit our website, you will be presented with a banner that informs you about your choices and the categories of cookies and other tracking Technologies used on that site and your options for controlling those technologies based on the jurisdiction applicable to your use of the website. Where applicable, you will have a choice about whether to accept or opt-out of certain cookies and technologies, the use of which may constitute a “sale” or “share” of personal information under applicable law and may be used for targeted advertising. (Please note that in some jurisdictions, such as the E.U. and U.K., the banner that appears when first visiting our Sites will ask for your consent to use certain cookies in accordance with applicable law). Please note that cookies are browser and device specific. Your request to opt-out or reject the use of these Technologies will be linked to your browser identifier only. If you use a different computer, mobile device, or Internet browser to access our sites, you will need to renew your cookie management choices.

Where available, you can do so by clicking on the cookie icon that appears in the bottom left corner of our web pages to manage your preferences. You may also stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. You can also use the quick links, based on the browser type that you are using: [Edge](#), [Google Chrome](#), [Firefox](#), and [Safari](#). However, if you adjust your preferences, our website may not work properly. Please note that cookie-based opt-outs are not always effective on mobile applications. However, you may opt out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#). You may also exercise your opt-out right by broadcasting an opt-out preference signal, called the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). Please note that your request to opt-out of sale/sharing will be linked to your browser identifier only. If you use a different computer or Internet browser to access our sites, you will need to renew your opt-out request. You can learn more about the Global Privacy Control [here](#). In addition, the online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Advertising Alliance](#).

- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws and aim to respond to legitimate requests as quickly as possible and within one month, however, if your request is complex we may require additional time. We may need specific information from you in relation to your request (for example, to clarify which

how you've interacted with us or to confirm your identity), and any delay in sending this to us may in turn delay our response. If this should happen, we will endeavor to notify you to keep you updated about the expected time of our reply.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. DATA PRIVACY FRAMEWORK

To be released

8. OTHER INTERNATIONAL TRANSFERS

Information processed by us may be transferred, processed, and stored in countries that may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistently with the requirements of applicable laws.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, we will use one of the legally sufficient safeguards to support such transfer including the Data Privacy Framework described above or the [EU Standard Contractual Clauses](#).

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

9. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

The criteria we use to determine our retention periods include but are not limited to, the sensitivity and volume of data, the risk of harm that may arise if the data were to be breached, and the purposes of processing. Additionally, we endeavour to retain all such personal information in accordance with legal requirements.

10. CHILDREN'S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

Protecting children’s privacy online is very important to us. If you are a parent or guardian and believe your child has uploaded personal information to us without your consent, and wish to have that information modified or deleted, you may contact us as described in “Contact Us” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it.

11. OTHER PROVISIONS AND COMPLAINTS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. You have the right to lodge a complaint with the Information Commissioner’s Office if you believe our processing of your personal information violates applicable law. In some cases, residents of US states may also have the right to lodge a complaint with the Attorney General in their state. We would appreciate the opportunity to resolve any of your concerns in advance of a complaint being made, so please contact us using the details in the following section with any questions or issues.

12. CONTACT US

QuAs Solutions is the controller of the personal information we process under this Privacy Policy.

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at contact@qasolutions.com

14. NOTICE AT COLLECTION AND SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS AND RESIDENTS OF CERTAIN OTHER STATES.

This Notice at Collection and Supplemental Notice is for residents of states that have adopted comprehensive privacy legislation and others that may come into effect from time to time covering personal information collected in a business or employment context, including, but not limited to, California, Colorado, Connecticut, Nevada, Utah, and Virginia (collectively, “**Applicable State Laws**”). The following table describes the categories of personal information QuAs Solutions has collected and whether QuAs Solutions disclosed that personal information for a business purpose (e.g., to a service provider).

Category of Personal Information Collected by QuAs Solutions	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers. A real name, alias, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	<ul style="list-style-type: none">• Service providers• Business partners

Category of Personal Information Collected by QuAs Solutions	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
	<ul style="list-style-type: none"> • Affiliates • Advertising networks
<p>Personal information categories A name, signature, address, telephone number, or any financial information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories.</p>	<ul style="list-style-type: none"> • Service providers • Business partners • Affiliates • Advertising networks
<p>Commercial information Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Service providers • Business partners • Affiliates • Advertising networks
<p>Internet or other electronic network activity Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Service providers • Business partners • Affiliates • Advertising networks
<p>Geolocation data Approximate physical location.</p>	<ul style="list-style-type: none"> • Service providers • Business partners • Affiliates • Advertising networks
<p>Professional or employment-related information Current or past job history or performance evaluations.</p>	<ul style="list-style-type: none"> • Service providers • Business partners • Affiliates
<p>Inferences drawn from other personal information to create a profile about a consumer Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> • Service providers • Business partners • Affiliates • Advertising networks

Sources of Personal Information We Collect

As more fully described in the section titled Personal Information We Collect, the sources from which we collect personal information include directly from you when you interact with us, automatically from you when you use our sites and services (for example through cookies and other online technologies), from

third parties (for example, from our clients) and through referrals from others.

“Sales” of Personal Information, including under California’s CCPA and Opting Out of Targeted Advertising.

For purposes of Applicable State Laws, we do not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 18 years of age as the term “sell” is commonly understood. That said, we may share information with third-party advertising partners for the purpose of promoting our Services as described above, such as for cross-context behavioral advertising and targeted advertising. To the extent that such sharing is considered a “sale” or “sharing” or disclosing for targeted advertising under California or other Applicable State Law, you may limit such sharing by:

- **Contact Us.** Contacting us as set forth in “Contact Us” below.
- **Managing Your Cookie Preferences.**

When you first visit our website, you will be presented with a banner that informs you about the categories of cookies and other tracking technologies used on that site and your options for controlling those technologies based on the jurisdiction applicable to your use of the website. Where applicable, you will have a choice about whether to accept or opt-out of certain cookies and technologies, the use of which may constitute a “sale” or “share” of personal information under applicable law and may be used for targeted advertising. Please note that cookies are browser and device specific. Your request to opt-out or reject the use of these technologies will be linked to your browser identifier only. If you use a different computer, mobile device, or Internet browser to access our sites, you will need to renew your cookie management choices. Where available, you can do so by clicking on the cookie icon that appears when you return to our Services or the “Your Privacy Choices” section above at any time link at any time to manage your preferences. You may also stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. You can also use the quick links, based on the browser type that you are using: [Edge](#), [Google Chrome](#), [Firefox](#), and [Safari](#). However, if you adjust your preferences, our website may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#). You may also exercise your opt-out right by broadcasting an opt-out preference signal, called the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). Please note that your request to opt-out of sale/sharing will be linked to your browser identifier only. If you use a different computer or Internet browser to access our sites, you will need to renew your opt-out request. You can learn more about the Global Privacy Control [here](#). In addition, the online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Advertising Alliance](#).

The categories of data we share for cross-contextual advertising and targeted advertising include:

- Online Identifiers such as IP address, marketing id, device identifiers and characteristics,
- Internet or other Electronic Network Activity, such as Browsing and Usage Information; and,
- Inferences about individual preferences, characteristics, and behaviors

Each of these categories may have been shared with advertising networks and data analytics providers for the purpose of providing targeted advertising and marketing.

Retention of Personal Information.

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data. Additionally, we endeavor to retain all such personal information in accordance with legal requirements.

Processing Sensitive Information.

Under applicable laws, you may have the right to limit the processing of sensitive personal information for certain purposes such as profiling or inferring characteristics about you. We do not process sensitive personal information for such purposes.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth in “Contact Us” above for additional instructions.

Verification. To protect your privacy, we will take steps to reasonably verify your identity before fulfilling your request. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, or to answer questions regarding your account and use of our Services. If we cannot verify your identity or authority to make a request, we may not be able to fulfill your request.

Once you have provided the required information to us, we will confirm your identity by conducting an electronic search of our internal systems to ensure the information provided by you in your request matches what we have in our systems.

To verify your identity, we may ask that you provide the following information when you submit your request:

- Your name
- Your address
- Your state of primary residence
- Your phone number
- Your email address
- Your account information
- Information about your interactions with us

Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfill your request. If we cannot successfully verify your identity, we will inform you of that fact.

We will respond to your request within the time provided for under Applicable Law. However, in certain circumstances, we may require additional time to process your request, as permitted by applicable law.

We will advise you after receiving your request if such an extension is necessary and why it is needed. If we cannot fulfill your request, our response to you will also explain the reason why we cannot fulfill your request.

We do not charge a fee to process or respond to your consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We will not discriminate against you for exercising your privacy rights.

Appeal. You may have the right to appeal our decision or response to your request. To exercise your right to appeal, you can submit an appeal request using the same method used to submit your original request, including by contacting us as set forth in “Contact Us” above.

De-Identified Information. If we create or receive de-identified information, we will not attempt to reidentify such information, except to comply with Applicable Law or in accordance with our Privacy Policy.

California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

Right for minors to remove posted content. We do not knowingly collected personal data from children, nor do we allow them to post information on our Sites; however, Where please be aware that where required by law, California residents under the age of 18 may request to have their posted content or information removed from the publicly-viewable portions of the Services by contacting us directly as set forth in “Contact Us” above.