Platform Privacy Policy

Last Updated: February 20th 2022

The Company understands that individuals value their privacy and the Company is committed to protecting it in the way they operate. The Privacy Policy ("**Policy**") explains what information we collect about you when you use our Platform, including but not limited to, how the Company handles information that may be considered personal, or personally identifiable, information ("**Personal Information**") and the choices you have in terms of collection, use and disclosure of Personal Information.

The name and domain of the Company can be found in the services email and in the user agreement between the Company and the Platform. Unless otherwise stated in the website properties or in the footer of the website, and as for My Account Information, the Company is the Controller.

Please review the Company's Platform Terms and Conditions ("**Terms**"), which govern your use of the Platform, in addition to this Policy. If you do not agree with this Policy, then you must not access or use the Platform. If you do not wish to be bound by such modifications and don't acknowledge and acceptance of the revised Policy, you must immediately stop using the Platform. Agreement to and use of the Platform prior to the change constitutes acceptance of the revised Policy.

The Privacy Policy explains:

1. The definitions in agreement by the Company's behalf of Email Opened (and all of its derivatives) and Personal Information;
2. The information the Company may collect about you through your interaction with the Platform, and its use, including certain third parties ("**Licensed Applications**");
3. Cookies and Tracking which the Company deploys and/or may deploy from time to time, and which are not controlled by the Company, unless expressly stated otherwise;
4. How the Company may use and process Personal Information that you choose to provide, or that you allow the Company to collect;
5. How the Company may disclose Personal Information that you have consented to disclose to the Company or that the Company has collected in accordance with this Policy;
6. How long the Company may store Personal Information that the Company collects or has received about you;
7. How the Company secures Personal Information in its possession or control;
8. How you may opt out of certain uses of Personal Information;
9. The Platform's stance on third party websites;
10. Your rights concerning Personal Information; and
11. How to contact the Company.

Information Collection

The Company collects various pieces of information from Users as detailed further below. The Company may combine certain information that it receives from and about you, including information collected automatically and from third parties and may process the Company's obtained data for other purposes.

INFORMATION COLLECTION

INFORMATION COLLECTED	SOURCE OF INFORMATION	PURPOSES
IP address	Automatic collection	• Location verification
Device identifiers	• Visit to Site • Use of Platform	• Content delivery optimization and improvement
Operating system and version	• Use of Platform	• Site performance improvement and administration
Internet service provider details		• Fraud prevention and detection and security
Language preferences		• Account registration, performance and administration
Referring sites		• Marketing and targeted content
Login data		• Investigation of complaints, security issues, and threat or harm
Time of visits		• Analysis and enforce the Company's rights
Duration of visits		
Name	User provides to the Company through the Platform or in opening an account or communications	• Provide Services through the Platform, Site, Licensed Applications, and any other Platform
Physical address	• Creation of User's Account	• Marketing and promotional communications
Email address	• Use of Platform	• Security monitoring
Age	• Licensed Application provider services	• Legal compliance
Account settings and preferences		• Fraud or harm prevention
Telephone number		
Payment information		
Name	User provides to the Company through the Platform or in opening an account or communications	• Provide Services through the Platform, Site, Licensed Applications, and any other Platform
Physical address		• Marketing and promotional communications
Email address		• Security monitoring
Age		• Legal compliance
Account settings and preferences		• Fraud or harm prevention
Telephone number		
Payment information		

Information Disclosure

The Company may store information the Company collects with owners, affiliates, contractors, and other parties as described above. Unless otherwise stated in the Terms or elsewhere in this Policy, the Company will not transfer all or a portion of the Company's business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation) to another party without notice to you.

INFORMATION DISCLOSURE

INFORMATION DISCLOSED	DISCLOSURE RECIPIENT	DISCLOSURE PURPOSE
IP address	Vendors	• Location verification
Device identifiers	Affiliates	• Content delivery optimization and improvement
Browser characteristics	Contractors	• Site performance improvement and administration
Operating system and version	Other parties	• Licensed Application improvement and administration
Internet service provider details		• Content delivery optimization and improvement
Language preferences		• Site performance improvement and administration
Referring sites		• Marketing and targeted content
Login details		• Investigation of complaints, security issues, and threat or harm
Time of visits		• Analysis and enforce the Company's rights
Duration of visits		• Investigation, legal counsel (i.e. review, advice, or representation), or threat of harm
		• Emergency response
		• Investigation, prevention, and enforcement of violations of the Terms or the rights of the Company's Site, Licensed Applications, or Platform
Name	Vendors	• Marketing and promotional communications
Physical address	Affiliates	• Provide Services through the Company's Site, Licensed Applications, and any other Platform
Email address	Contractors	• Content delivery optimization and improvement
Age	Other parties	• Site performance improvement and administration
Telephone number		• Licensed Application improvement and administration
Payment information		• Content delivery optimization and improvement
		• Marketing and targeted content
		• Investigation of complaints, security issues, and threat or harm
		• Analysis and enforce the Company's rights
		• Investigation, legal counsel (i.e. review, advice, or representation), or threat of harm
		• Emergency response
		• Investigation, prevention, and enforcement of violations of the Terms or the rights of the Company's Site, Licensed Applications, or Platform

Information Retention and Removal

The Company will store User's information for as long as it is necessary for the performance of Services or is otherwise both the purposes for which the information was collected and for the Company's legitimate business interests, which may also extend beyond the duration of the Company's relationship with you. The Company will delete Personal Information and records or take appropriate steps to properly de-personalize it.

Cookies and Tracking

The Company may use, receive, store, and use web files that record its User data, browser and device characteristics, and interactions with the Platform, Site, and Licensed Applications, including but not limited to, cookies, pixel tags, local shared objects, hash keys, and other tracking files (collectively, "**Cookies**"). Cookies may be used to collect information about you and your activity across the Platform, Site, and Licensed Applications, and across other sites, apps, and services that you may visit, including those that are not affiliated with the Company. Cookies may also be used to collect information about your use of the Platform, Site, and Licensed Applications, such how often you access the Platform, Site, and Licensed Applications, what you do while there, and what other sites you visited before navigating to the Platform. Some Cookies are necessary for the Platform's proper operation and some may be used by third parties.

Most Users' web browsers have settings that allow them to control whether to accept Cookies, to be notified when a Cookie is placed on their device, and to delete Cookies. Users may also be able to control the use of, or withdraw consent to, certain Cookies. Please refer to your web browser's help settings for more information. Because Cookies allow you to take advantage of some essential features of the Platform, the Company recommends that you leave Cookies activated. If you block or otherwise reject Cookies, you may not have access to many features that make your experience efficient and some of our services may not function properly.

Information Collection and Tracking

OTHER FEATURES		
FEATURE	FEATURE DESCRIPTION	FEATURE INFORMATION/OPT-OUT
Web analytics	The Company may use third-party web analytics services (such as Google Analytics) on the Platform, Site, and Licensed Applications, which use Cookies to collect and analyze information about use of the Platform, Site, and Licensed Applications and report on activities and trends. These services may also collect information about your use of other websites, apps, and online resources. You can learn about Google Analytics' practices by visiting https://www.google.com/policies/privacy/partners/. To opt out of Google Analytics cookies, visit https://tools.google.com/dlpage/gaoptout.	
Advertisements and online services	The Company may use third-party services to place ads to promote the Company's products, services, and offerings on other online services.	Digital Advertising Alliance ("**DAA**")	Learn more about interest-based ads (the Behavioral Program Principles) at http://www.aboutads.info/principles. Opt out of interest-based ads at http://optout.aboutads.info/.
		Network Advertising Initiative ("**NAI**")	Learn more about interest-based ads (the NAI self-regulatory principles for Online Behavioral Advertising) at http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work. Opt out of interest-based ads at http://optout.networkadvertising.org/?c=1.
		Mobile	Learn more about interest-based ads and opt-out options for mobile applications at http://www.aboutads.info/appchoices.
		Opting Out	Please note, even if one is able to opt out of certain kinds of interest-based advertisements, one will continue to receive non-targeted advertisements.
		Do Not Track	We have developed a tool that allows individuals to opt out of certain interest-based advertising and information collection. For more information about this tool, please see http://donottrack.us/.
		Network Boundaries	We have developed a tool that allows individuals to opt out of certain interest-based advertising and information collection. For more information about this tool, please see http://donottrack.us/.
			To learn more about opting out of such targeted advertising or to use the tool, see http://www.networkadvertising.org/managing/opt_out.asp.
			To learn more about the NAI opt-out program from mobile applications, see http://www.networkadvertising.org/mobile/index.asp.

Information Sharing

By providing the Company with User's email address, User agrees that the Company may communicate with User by sending an electronic message to that email address. Such communications may include notices about your use of the Platform and may be in connection with the performance of the Company's obligations under the Terms and other communications. User may unsubscribe by using the link provided in the Company's marketing emails or by contacting the Company.

Interactions with Other Parties, Websites, and Applications

Social media platforms	Any of The Company's Site, Services, Licensed Applications, and Platform may enable you to post Personal Information and other content to social media platforms or share Personal Information or other content (such as your username, comments, or the URL you are visiting) with other users or the public through third-party social media platforms, such as Facebook or Twitter ("**Social Media Content**"). Your use of social media platforms is governed by the privacy policy and terms of the social media platform that User uses to share Social Media Content. The Company is not responsible for how those platforms use your information. You should review the privacy policy and terms of each platform that you share Social Media Content on before doing so.
Integrations and promotions	The Company may operate sweepstakes and promotions through the Platform, Site, and Licensed Applications that may be run by third parties that may require submitting information. If User chooses to participate in such promotions, User's information may be disclosed to third parties in accordance with the promotion's rules and the Company's applicable privacy policies. The Company is not responsible for third-party use of personal information that User or any other Participant in a promotion provides to third parties.
Other services	Services on the Company's Site, Licensed Applications, and/or Platform may be hosted or otherwise rely on third-party web services and infrastructure. The Company's Privacy Policy does not apply to those third-party services, and the Company is not responsible for the privacy practices of those services and the Company has no control over how those third-party services use your information. The Company recommends that you review the privacy policies of any third-party services you use in order to find out what policies and practices they have in place. The Company is not responsible for any loss or damage that you may incur from your interaction with third-party services.
Website links	Links to other websites or applications of other parties may be provided to User on the Company's Site, Licensed Applications, and/or Platform for User's convenience. In some websites and applications of other parties, the Company's Site, Licensed Applications, and/or Platform may be found from or link to your Site. The websites and applications of other parties may have their own privacy policies and terms of use, which User should review before using them. The Company is not responsible for the privacy practices of any such other party, and is not responsible for the privacy policies or terms of use of any such other party. The Company encourages User to be aware when leaving the Company's Site, Licensed Applications, and/or Platform or if a third party collects information about User and to read the privacy policies of every website that User visits.

Information Security

The security of User's information is important to the Company, and the Company takes steps to ensure that User's information is handled securely and in accordance with this Policy. The Company implements measures to protect User's personal information from unauthorized access and accidental loss or disclosure. For example, the Company limits access to User's personal information to only those employees who need access to the information in order to perform their duties. Unfortunately, no website, Internet service, or electronic storage system is 100% secure or error-free. If you have reason to believe that your interaction with the Company is no longer secure, please immediately notify the Company in accordance with the Contact Us section below.

Children's Privacy

The Company's Site, Licensed Applications, and/or Platform are not intended for children under 13 years of age. The Company does not knowingly allow anyone under the age of 13 to create an account or provide any Personal Information. If the Company learns that it has collected Personal Information from a child under the age of 13, the Company will delete that information as quickly as possible. If you believe that a child under the age of 13 may have provided the Company with Personal Information, please contact the Company.

California Residents

California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents to annually request and obtain information free of charge about what personal information is disclosed to third parties for direct marketing purposes in the preceding calendar year. The Company does not share your personal information with third parties for their own direct marketing purposes. In addition to the rights described, User may request information about whether the Company has disclosed Personal Information to any third parties for their direct marketing purposes. To make such a request, please contact the Company. The Company will respond to any California-based User requests received at least once a year.

Contact the Company

If User have any questions about this Policy or about The Company's privacy practices, please feel free to contact the Company.

The name and address of partner can be found in the services email and in any user agreement by the Platform. Unless otherwise stated in the website properties or in the footer of the website, and as for My Account Information, the Company is the Controller.