

This privacy policy describes the treatment of information provided or collected on this site. We follow this privacy policy in accordance with local law in the places where we operate.

## **1. Types of Information We Collect**

We collect two basic types of information – personal information and anonymous information – and we may use personal and anonymous information to create a third type of information, aggregate information. We collect the following categories of information:

- Registration information you provide when you create an account, including your first name and surname, country of residence, gender, email address, username and password
- Transaction information you provide when you request information or purchase a product or service from us, including your postal address, telephone number and payment information
- Information you provide to us when you use our site and application, or link your profile on a third-party site or platform with your registration account
- Location information when you visit our site or use our application, including location information either provided by a mobile device interacting with our site or application (including through beacon technologies), or associated with your IP address, where we are permitted by law to process this information
- Usage, viewing and technical data, including your device identifier or IP address, when you visit our site or open emails we send

## **2. How We Collect Your Information**

- We collect information you provide to us when you request products, services or information from us, register with us, participate in other activities on our site and applications, respond to customer surveys, or otherwise interact with us. Please keep in mind that when you provide information to us on a third-party site or platform, the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this privacy policy and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications.
- We collect information through technology, such as cookies, Flash cookies and Web beacons, when you visit our sites and applications.
- We acquire information from other trusted sources to update or supplement the information you provided or we collected automatically. Local law may require that you authorize the third party to share your information with us before we can acquire it.

## **3. Use of Your Information by AceRoster.com**

AceRoster.com uses your data for the following purposes:

- Provide you with the products and services you request

- Communicate with you about your account or transactions with us and send you information about features on our site and application or changes to our policies
- Consistent with local law and choices and controls that may be available to you:
  - Send you offers and promotions for our products and services or third-party products and services
  - Personalize content and experiences
  - Provide you with advertising based on your activity on our site and application and on third-party sites and applications.
- Optimize or improve our products, services and operations
- Detect, investigate and prevent activities that may violate our policies or be illegal

#### **4. Sharing Your Information with Other Companies**

We will not share your personal information outside AceRoster.com except in limited circumstances, including:

- When you allow us to share your personal information with another company, such as:
  - Electing to share your personal information with carefully selected companies so that they can send you offers and promotions about their products and services
  - Directing us to share your personal information with third-party sites or platforms, such as social networking sites
- Please note that once we share your personal information with another company, the information received by the other company becomes subject to the other company's privacy practices.

#### **5. Your Controls and Choices**

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information. In accordance with local law, your controls and choices may include:

- You may correct, update and delete your registration account
- You may change your choices for subscriptions, newsletters and alerts
- You may choose whether to receive from us offers and promotions for our products and services, or products and services that we think may be of interest to you
- You may choose whether we share your personal information with other companies so they can send you offers and promotions about their products and services
- You may choose whether to receive targeted advertising from many ad networks, data exchanges, marketing analytics and other service providers
- You may request access to the personal information we hold about you and that we amend or delete it

You may exercise your controls and choices, or request access to your personal information, by contacting us, or following instructions provided in communications sent to you. Please be aware that, if you do not allow us to collect personal information from you, we may not be able to deliver certain products and services to you, and some of our services may not be able to take account of your interests and preferences. If you have questions regarding the specific personal information about you that we process or retain, please contact us.

## **6. Data Security, Integrity and Retention**

The security, integrity and confidentiality of your information are extremely important to us. We have implemented technical, administrative and physical security measures that are designed to protect guest information from unauthorized access, disclosure, use and modification. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable. We will retain your personal information for the length of time needed to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

## **7. Data Transfers, Storage and Processing Globally**

We operate globally and may transfer your personal information to third parties in locations around the world for the purposes described in this privacy policy. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. Additionally, when using or disclosing personal information transferred from the European Union, we abide by the Safe Harbor Principles as set forth by the U.S. Department of Commerce, use standard contract clauses approved by the European Commission, adopt other means under European Union law for ensuring adequate safeguards, or obtain your consent. We also apply the substantive requirements of the Safe Harbor Principles when transferring personal information from Australia.

## **8. Changes to this Privacy Policy**

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent.

## **9. Comments and Questions**

If you have a comment or question about this privacy policy, please contact us. Our site and application may contain links to other sites not owned or controlled by us and we are not responsible for the privacy practices of those sites. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your personal information.

Notice to California Residents: If you are a California resident, you may have certain additional rights. California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information to third parties for the third parties' direct marketing purposes. California Business and Professions Code Section 22581 permits registered users who are minors to request and obtain deletion of certain posted content.

## **Definitions**

Aggregate Information. Aggregate information means information about groups or categories of guests, which does not identify and cannot reasonably be used to identify an individual guest.

Anonymous Information. Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual guest.

Application. Application means a program or service operated by us (or on our behalf) that may be displayed on various online, mobile or other platforms and environments, including those operated by third parties, which permits us to interact directly with our guests.

Children. Children means individuals who we have identified are not of legal age to consent to the collection and processing of their personal information. In the United States and Latin America, the term “children” refers to individuals under 13 years of age.

IP Address. An IP address is associated with the access point through which you enter the Internet, and is typically controlled by your Internet Service Provider (ISP), your company, or your university. We may use IP addresses to collect information regarding the frequency with which our guests visit various parts of our sites and applications, and we may combine IP addresses with personal information.

Notice. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on our sites and applications, or by other means, consistent with applicable law.

Personal information. Personal information means information that identifies (whether directly or indirectly) a particular individual, such as the individual’s name, postal address, email address and telephone number. When anonymous information is directly or indirectly associated with personal information, this anonymous information also is treated as personal information.