

# Privacy and Cookie Notice

Last Updated: [May 26<sup>th</sup>, 2020]

Keystone Technologies, LLC ("Keystone Technologies," "we," "us" or "our") takes the security and privacy of your personal information very seriously. This Privacy and Cookie Notice ("Notice") describes how we process personal data about you that we collect through certain of our software programs and applications (each, a "Platform"). This Notice does not apply to information that we collect offline, such as by telephone, facsimile, postal mail, personal delivery, or other offline means or media. By accessing and using the Platform, you agree to the terms and conditions of this Notice.

## 1. Personal Data We Collect

1.1 "Personal Data" is information that identifies you as an individual, such as: name, email address, postal address, telephone number, email address, credit card and other payment account numbers.

1.2 We may collect and process the following Personal Data about you:

1.2.1 If you register to maintain an account with us, we will collect the information that you voluntarily provide when registering, which will include your username and password;

1.2.2 We may also ask you for information when you report a problem with the Platform;

1.2.3 If you contact us, we may keep a record of that correspondence;

1.2.4 Information that you provide in order to benefit from a particular feature or participate in a particular activity, such as when you sign up to receive emails from us or sign up for a newsletter; and

1.2.5 If you choose to submit a product review, we collect any Personal Data you include in your review.

1.3 Through your use of the Platform, we may also gather certain information about your use of the Platform that does not identify you individually but may identify your computer or device. Generally, this information is collected through what we refer to herein as "Traffic Data." We may collect and store such Traffic Data automatically whenever you interact with the Platform. For example, we may collect your IP address, the hostname of your computer, browser information and reference site domain name every time you visit the Platform. We may also collect information regarding customer traffic patterns and site usage. We may also receive similar data from our business partners, including online advertising networks, and from social media platforms, such as Facebook, Twitter, YouTube, Pinterest, and Instagram, subject to your registration and privacy settings with such third-party social media platforms. This Traffic Data does not, however, contain anything that can personally identify you; it is used to analyze and improve the Platform and to provide our users with a fulfilling Internet experience. Please see the Section below in this Notice regarding Passive Information Collection for more information about our use of cookies and other technologies.

1.4 We may combine your Personal Data with other information we have collected from you, whether on- or offline, including, for example, your purchase history or Traffic Data. We may also combine your Personal Data with information we receive about you from other sources, such as our affiliates, publicly available information sources, and third parties. We treat the combined information as Personal Data.

1.5 We may inform you of other Personal Data collected by or through the Platform at the point of collection.

## **2. How We Use Personal Data**

- 2.1 We use Personal Data for the purposes described in this Notice and as otherwise described to you at the point of collection. Specifically, we may use Personal Data from or about you in the following ways:
- 2.1.1 To ensure that content from the Platform is presented in the most effective manner for you;
  - 2.1.2 To provide you with information, products or services that you request from us or that we feel may interest you;
  - 2.1.3 To carry out our obligations arising from any contracts entered into between you and us;
  - 2.1.4 To allow you to participate in interactive features of our Platform, when you choose to do so;
  - 2.1.5 To personalize our advertising, marketing communications, shopping experiences, and promotional offers and to deliver promotions and offers to you that we think may interest you;
  - 2.1.6 To notify you about changes to our Platform, products, and services;
  - 2.1.7 To create and manage your personal account with Keystone Technologies;
  - 2.1.8 To prevent misuse or improper use of the Platform;
  - 2.1.9 To communicate with you and respond to your inquiries;
  - 2.1.10 If you sign up for our email list or other promotional messages, to send you messages about products, offers, or events that we think might be of interest to you;
  - 2.1.11 If you have enabled your device to receive push notifications from us, to deliver promotional and transactional messages;
  - 2.1.12 To send you surveys regarding your satisfaction with our services, products and overall experience in connection with Keystone Technologies;
  - 2.1.13 For our business purposes, such as data analysis, audits, developing new products and features, enhancing our website, improving our products and services, identifying Platform usage trends, and determining the effectiveness of our promotional campaigns;
  - 2.1.14 As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain; and
  - 2.1.15 for any other purpose specified at the point of collection.
- 2.2 We may use non-personal, non-individual statistics or demographic information in aggregate form without restriction, and we may share such information with our marketing partners, advertisers or other third-parties for analytics purposes.

## **3. Disclosure of Your Personal Data**

- 3.1 We may disclose your Personal Data to any member of our affiliates and subsidiaries for the purposes described in this Notice.

3.2 We may disclose your Personal Data to third parties:

- 3.2.1 Who are service providers that perform functions on our behalf. Examples include fulfilling orders, delivering packages, processing credit card payments, providing customer service, sending postal mail and e-mail, analyzing data, providing marketing assistance, and providing customized advertising.
- 3.2.2 In the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).
- 3.2.3 If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation or to respond to legal process such as a subpoena, warrant, or court order; in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safety of Keystone Technologies or any affiliate, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- 3.2.4 We disclose Traffic Data as described in Sections 6 (Passive Information Collection, Use, and Choices) and 7 (Interest Based Advertising) of this Notice.

3.3 If you choose to submit a review, please note that any information you submit as part of the review will be visible to any other visitors to the Platform. We are not responsible for any Personal Data you include in such review or for any use of such information by any Platform visitor.

#### **4. Your Rights and Choices**

You may opt out of having information that we can verify is your Personal Data and that is within our control prospectively retained by us or used by us for certain purposes by sending us an email at [info@keystonetech.com](mailto:info@keystonetech.com). In the subject field, type "Opt Out" and provide us your name and the e-mail, phone or postal address. We may require additional information from you to verify your identity and identify the information within our systems that is your Personal Data. We will seek to comply with your request(s) as soon as reasonably practicable. We may need to retain your Personal Data for certain purposes permitted by law, including if required by law or legal process. In addition, you may opt out of receiving promotional e-mails and text messages from us by following the unsubscribe instructions provided in any such messages. Please note that if you opt out of receiving promotional messages from us, this does not impact other transactional and administrative messages which you will continue to receive (such as emails relating to billing and payment information or changes to this Notice). If you have registered for an account with us, you may delete the account at any time by sending us an email at [info@keystonetech.com](mailto:info@keystonetech.com).

#### **5. Third Party Websites**

5.1 We are not responsible for the privacy practices of other online services, including other websites, advertisers, payment processors, and social media. It is your sole obligation to review and understand the privacy practices and policies of third parties. We do not control the use of cookies or the collection of information by these third parties, nor how they manage such information. The availability of, or inclusion of a link to or interface with, any third-party service on the Platform does not imply endorsement of it by us or by our affiliates. Your use of those other sites and services is subject to the privacy policies of those sites and services, and not this Notice.

5.2 If you choose to use Face ID to access your account, please note that Keystone Technologies is only notified that the authentication was successful. Keystone Technologies cannot access Face ID or the data associated with your face that is used by Face ID. The processing of facial recognition data by your cellular phone or mobile device is governed by the policies of your cellular phone company.

#### **6. Passive Information Collection, Use, and Choices**

6.1 As you navigate the Platform, certain Traffic Data may be passively collected, meaning it is gathered without your actively providing it. This is done using the following technologies in the following ways:

- 6.1.1 **Through your browser:** Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type and operating system type and version screen resolution, and Internet browser type and version.
- 6.1.2 **Through your device:** If you access the Platform through a mobile device or other network-connected product, certain information may be collected about that device, including your device type, network service provider, and other identifiers. We may collect unique device identifiers (such as IDFA and AID tags and UUID and UDID identifiers) associated with the device you use to access the Platform.
- 6.1.3 **Using cookies:** Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on the Platform, pages visited, and language preferences. We and our service providers use this information for security purposes, to facilitate navigation, display information more effectively, and to personalize your experience while using the Platform. More specifically, we use cookies to:
- recognize your computer or device to make your use of the Platform easier, such as to remember your locations of interest and other preferences with the Platform;
  - gather statistical information about use of the Platform in order to continually improve its design and functionality, understand how individuals use it, and to assist us with resolving questions regarding it;
  - select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Platform and on other websites, applications, and online services that you use; and
  - track consumer responses to online advertisements.

Most browsers are initially set up to accept cookies. Your browser may allow you to block or limit cookies. You will need to do this on each browser and device that you use. Blocking cookies may result in loss of some functionality on the Platform. To learn more about cookies, please visit <http://www.allaboutcookies.org>.

- 6.1.4 **Using Monitoring Tools:** The Platform may utilize pixel tags, web beacons, clear GIFs, Flash Shared Objects, HTML5 Local Storage, HTML5 Mini Databases, and other similar technologies, both on certain aspects of the Platform and in HTML-formatted e-mail messages to you. These monitoring tools are used for the purpose of, among other things, measuring the success of our marketing campaigns, compiling statistics about Platform usage and response rates, and tracking the activities of users of the Platform and e-mail recipients.
- 6.1.5 **IP Address:** Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits the Platform, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many online service providers, including website operators. We use IP Addresses for purposes such as calculating Platform usage levels, helping diagnose server problems, and administering the Platform.
- 6.1.6 **Location-Based Features:** We may collect the physical location of your device and use it to provide you with personalized location-based services or content. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. In some instances, you may be permitted to allow or deny such use of your device's location, but if you choose to deny such use, we may not be able to provide you with the applicable personalized services or content. In all other instances, you affirmatively consent that we may receive, use, share and transfer information about the physical location of your device in accordance with this Notice.

Although our use of passive collection technologies may change over time as technology evolves, the above descriptions are designed to provide you with additional detail about our current approach to information collected from passive technologies.

## **7. Interest Based Advertising**

7.1 We may collect information about your online activities on our Platform to provide you with advertising about products and services tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our ads are served. This Section of our Notice provides details and explains how to exercise your choices.

7.2 You may see certain ads on other websites because we work with advertising partners (including advertising networks) to engage in remarketing and retargeting activities. Our advertising partners allow us to target our messaging to users through demographic, interest-based and contextual means. These partners track your online activities over time and across websites, including our Platform, by collecting information through automated means, including through the use of third-party cookies, web server logs, and web beacons. They use this information to show you advertisements that may be tailored to your individual interests. The information our advertising partners may collect includes data about your visits to websites that participate in the relevant advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Platform and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts. For example, we utilize certain of our ad partners' targeted advertising services to show you our ads on other websites based on your prior visits to our Platform and other online activity.

7.3 Provided that a company participates in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising, you may opt out of ad network interest-based advertising generally through the Network Advertising Initiative website or by visiting <http://www.aboutads.info/choices/> (web-based advertising) or <http://www.aboutads.info/appchoices> (for mobile advertising). To learn more, please visit the websites operated by the Network Advertising Initiative and Digital Advertising Alliance at [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices). Opting-out does not mean that you will stop receiving ads from us. It means that you still stop receiving ads from us that have been targeted to you based on your visits and browsing activity across websites over time.

## **8. Do Not Track**

This Platform does not process Do-Not-Track (DNT) headers transmitted by Web browsers. Our third-party web analytics companies collect information about your online activities over time. These third parties do not change their tracking practices in response to DNT settings in your web browser and we do not obligate these parties to honor DNT settings.

## **9. Social Media**

Some aspects of the Platform may allow you to interface with other websites, social media, and other online services, such as Facebook. We will diligently work to identify these aspects of the Platform to you, for example, by identifying them with the applicable third-party logos or trade names. By using these interfaces, you will allow us to access information about you from those other online services, including information and other content that you submit to those online services. If you interface with the Platform through your social media account, we may contact you or enable you to share your experience and content via your social media account, which information may be publicly viewed by other users of those services. For a description on how such social media services and other third-party platforms, plug-ins, integrations, and applications handle your information, please refer to their respective privacy policies and terms of use, which may permit you to modify your privacy settings with that service or platform.

## **10. Security**

The security of your Personal Data is important to us and we are committed to handling that information carefully. We use reasonable and appropriate organizational, technical, and administrative measures to protect Personal Data under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you have with us has been compromised), please immediately notify us of the problem.

## **11. Information Related to Minors**

The Platform is not intended for persons under the age of 18. We do not knowingly collect Personal Data online from persons in this age group. We reserve the right to delete any information identified as having been provided by such

persons at our discretion.

## **12. Data Retention**

We generally retain Personal Data for so long as it may be relevant for the purposes identified in this Notice or at the time the information is collected, unless a longer period of time is required by law.

## **13. Changes to Our Notice**

We may change this Notice from time to time. When we do, we will let you know by posting the changed Notice on this page with a new "Last Updated" date. In some cases, we may also tell you about changes by additional means, such as by posting a notice on the Platform or sending an e-mail to the e-mail address we have on file for you.

## **14. How to Access, Correct, or Update Your Information**

You can access or modify your information and modify your preferences by contacting us as indicated in the "Contact" Section below.

## **15. California**

California Civil Code Section 1798.83 (also known as the "Shine The Light" law) permits users who are California residents to request and obtain from us once a year, free of charge, information about the Personal Data (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. Alternatively, businesses may have in place a policy not to disclose Personal Data of customers to third parties for the third parties' direct marketing purposes unless the customer has opted-in to such information sharing. Accordingly, we will not share your Personal Data with third parties other than our affiliates for the third party's own direct marketing purposes unless you opt-in, for example by checking a consent check box when providing us with your information.

## **16. Contact**

If you have any questions about this Notice, please contact us at [info@keystonetech.com](mailto:info@keystonetech.com).