



## **Bluejacket LLC – Bluejacketmarketing.com Privacy Policy**

### **I. INTRODUCTION**

This policy describes the types of information we may collect from you or that you may provide when you visit any of Bluejacket’s consumer facing websites that link to this policy (our “websites”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

If you do not agree with our practices, you may choose not to use our websites. By accessing or using our websites, however, you agree to this policy. This policy may change from time to time. Your continued use of our websites after we make changes is deemed to be your acceptance of those changes, so please check this policy periodically for updates.

### **II. COLLECTION OF INFORMATION**

#### **1. Information You Give to Us.**

We collect personal information from you when you submit it to us, which may include by: (1) registering on our websites; (2) signing up to receive product information; (3) contacting us; (4) participating in a website promotion or survey; (5) subscribing to a newsletter; (6) using our live chat, email, or phone number to contact us; and (7) providing feedback to us about our products and services. This information may include, for example, your name, email address, address, telephone number, date of birth, job information (title, level, role, department, company) and any information you submit to us that identifies you personally. We may combine the information we collect from you with information we receive about you from other sources, such as address update services.

You are not obliged to provide us with any personal information that we request from you. However, failure to provide such information may limit what we are able to do for you. For example, refusing to provide an address when placing an order with us may prevent us from delivering that order.

#### **2. Information We Collect About You**

As you navigate through and interact with our websites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including your IP address, browser type, operating system, and the domain name from which you accessed our websites. In addition, we may collect information about your browsing behavior, such as the date and time at which you visited our websites, the areas, or pages of the websites that you visited, the amount of time you spend viewing the websites, the number of times you return to the websites, and other clickstream data.

The information we collect automatically is statistical data that helps us (i) improve our websites and deliver a better and more personalized service, including by enabling us to determine website traffic patterns, count website visits, determine traffic sources so that we can measure and improve the performance of our websites; (ii) know which pages and content are the most and least popular; (iii) observe website search patterns to provide more intuitive navigation cues; (iv) determine user frequency and recency; and (v) improve user experience by prioritizing relevant articles, products, or services.



3. *Registering and Creating Your Account*

If our websites permit you to register or create an “account,” we will provide a button or link (“View My Account” or a similar button) with which you can review and/or update your information. Your account page may also permit you to opt in or opt out of receiving various communications.

4. *Cookies and Other Tracking Devices*

We may use “cookies” to collect information about you. A cookie is a small text file or piece of data that can be sent by a web server to your computer, which then may be stored on your computer when you access our websites. We may also use cookies to: (1) allow you to use our websites without having to re-enter your username and password; (2) enhance or personalize your usage and experience; (3) monitor website usage; (4) manage our websites; and (5) improve our websites and our products and services. Most web browser applications have features that can notify you when you receive a cookie or prevent cookies from being sent. If you disable cookies, however, you may not be able to use certain features on the Site.

We may also use web beacons on our websites, in our emails and in our advertisements on other websites. Web beacons are tiny graphic images that are used to collect information about your website visit, such as the pages you view and the features you use, as well as information about whether you open and/or act upon one of our emails or advertisements. We may also collect the URL of the website you visited immediately before coming to our websites. Web beacons help us analyze our websites visitors’ behavior and measure the effectiveness of our websites and our advertising. We may work with service providers that help us track, collect, and analyze this information.

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Opting Out/Google Ad Settings: Users can set preferences for how Google advertises to you using the Google Ad Settings page.

We may combine the information we collect through cookies and web beacons with other information we have collected from you. For more information about cookies, including links to web browser instructions for disabling and managing such tracking devices, visit <https://www.consumer.ftc.gov/articles/how-protect-your-privacy-online>.



5. Social Media Plugins

Our websites may use social media plugins (e.g., “Share to Facebook” button) to enable you to easily share information with others. When you visit our websites, the operator of the social media plugin can place a cookie on your computer, enabling that operator to recognize individuals who have previously visited our websites. If you are logged into a social media website (e.g., Facebook, LinkedIn) while browsing on our websites, the social media plugins allow social media websites to share data about your activities on our websites with other users of their social media websites. We do not control the content from the social media plugins or any third-party websites. For more information about social plugins from other social media websites, you should refer to those websites’ privacy and data sharing policies.

**III. HOW WE USE INFORMATION WE COLLECT**

We may use the information we collect from and about you for the purpose of performing our obligations under any transaction, or to take steps at your request prior to entering into a transaction. This would include, but is not limited to, using information collected from and about you to: (1) fulfill your requests for information; and (2) engage in correspondence for the furtherance of any contractual discussion.

We may also use the information we collect from and about you for the purpose of pursuing one of our legitimate interests including, but not limited to the following: (1) to respond to your inquiries; (2) to contact you with website updates, newsletters and other informational and promotional materials from us where appropriate; (3) to contact you when necessary; (4) to review website usage and operations; (5) to address problems with our websites, our business or our services; (6) to help establish and verify the identity of users; and (7) to protect the security or integrity of our websites and our business.

Depending on the features of our websites, we may use personal information to track your activities/progress on and through our websites. We may also use your personal information for the pursuance of our legitimate interests via internal reports, based on personal information, relating to promotion, research, and website content; tracking website usage so we can improve site content and functionality; formulating personalized website access based on your site use and areas of interest; contacting you about our products or services or those of others that may be of interest to you; and learning about our customers and markets.

We do not provide your personal information to unaffiliated third parties for their use in marketing directly to you. We will only send you promotional emails about new products and special offers where any legally required consent has been obtained. You may withdraw such consent and choose not to receive promotional email from us at any time by sending an email request to the contact information below. Note that this will not affect the lawfulness of any processing prior to your withdrawal.

**IV. DISCLOSURE OF INFORMATION**

We may disclose information collected from and about you as follows: (1) to our related companies and service providers, to perform a business, professional or technical support function for us (including for example processing your order, receiving payment or sending you email messages on our behalf); (2) as necessary if we believe that there has been a violation of our websites’ Terms of Use or of our rights or the rights of any third party; (3) to respond to



judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and (4) in the event that our company or substantially all of its assets are acquired, your personal information may be one of the transferred assets. We may also disclose your personal information with your express consent where consent is legally required.

We may share aggregate, non-personally identifiable information about our websites' users with third parties for any purpose. Please note that any personal information that you voluntarily submit for posting to our websites becomes publicly available and can be collected and used by others.

#### **V. PUBLIC FORUMS**

Our websites, now or in the future, may include public forums such as message boards, bulletin boards, chat rooms, or similar activities where users of our websites can communicate with one another. You should be aware that any information shared in a public forum such as a message board, bulletin board, chat room, or other forum is public information and may be seen by third parties that do not adhere to our policy.

#### **VI. DO NOT TRACK (DNT)**

Some web browsers may transmit "do-not-track" signals to websites with which the browser communicates. We do not currently respond to these signals.

#### **VII. THIRD-PARTY WEBSITES**

Our websites may contain links or references to other websites outside of our control. Please be aware that this policy does not apply to these websites. We encourage you to read the privacy statements and terms and conditions of linked or referenced websites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit personal data. **WE DO NOT CONTROL AND ARE NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL INFORMATION. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.**

#### **VIII. DATA SECURITY**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access and disclosure. The use of, and access to, your personal information by us is restricted to employees and contractors who need to know that information to provide services to you. We maintain physical, electronic and procedural safeguards to limit access to your nonpublic personal information.

Unfortunately, transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us through our websites or other electronic means. Any electronic transmission of personal information is at your own risk.

Our website is scanned on a regular basis for security holes and known vulnerabilities to make your visit to our site as safe as possible. (1) We use regular Malware Scanning. (2) Your



personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

### **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

We agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

### **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address to: (1) Send information, respond to inquiries, and/or other requests or questions, (2) Send you additional information related to your product and/or service, and (3) Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CANSPAM, we agree to the following: (1) Not use false or misleading subjects or email addresses, (2) Identify the message as an advertisement in some reasonable way, (3) Monitor third-party email marketing services for compliance, if one is used, (4) Honor opt-out/unsubscribe requests quickly, and (5) Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us or follow the instructions at the bottom of each email, and we will promptly remove you from ALL correspondence.

### **IX. CHILDREN'S PRIVACY - COPPA**

We do not knowingly collect any personal information from children under thirteen (13) years of age, and no child under that age is permitted to provide any personal information using our websites. If we discover that a child under the age of 13 years has provided us with personal information, we will delete that child's personal information from our system. Likewise, if you believe that we might have any information from or about a child under the age of 13 years, please contact us using the contact information below.

### **X. REVISIONS TO OUR PRIVACY POLICY**

We reserve the right to change this policy at any time. Any changes we make will be posted on this page. If we make material changes to how we treat your personal information, we will notify you via our websites. The date this policy was last updated/reviewed is identified below. You are



responsible for ensuring we have a deliverable email address for you, and for periodically monitoring and reviewing any updates to this policy. Your continued use of our websites after such amendments will be deemed your acknowledgement of these changes to this policy.

#### **XI. EFFECTIVE DATE OF POLICY**

This policy is effective and was last updated on 11 May 2023.

#### **XII. ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS**

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. This section on Additional Information for California Residents supplements this policy and applies solely to eligible residents of the State of California (“**consumers**” or “**you**”) as of January 1, 2020.

Any terms defined in the CCPA have the same meaning when used in this notice.

##### *1. Information We Collect & How We Use It*

Our websites collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“**personal information**”). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data.
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.



Our websites have collected the following categories of personal information from consumers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO



J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Our websites obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our websites.

**Use of Personal Information**

**We do not sell your personal information;** however, we may use or disclose the personal information we collect for the purposes described in the section above.

2. Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

<b>Personal Information Category</b>	<b>Category of Third-Party Recipients for Business Purpose Disclosures</b>
Identifiers.	Affiliates, Service Providers
California Customer Records personal information categories.	None
Commercial information.	Affiliates, Service Providers
Internet or other similar network activity.	Affiliates, Service Providers





In the preceding twelve (12) months, we have not sold any personal information.

### **Deidentified Patient Information**

We do not sell or disclose deidentified patient information exempt from the CCPA to third parties.

#### 3. *Your Rights with Regard to Your Personal Information*

The CCPA provides eligible California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### **Access to Specific Information and Data Portability Rights**

You have the right to request that we provide certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- In addition, if we sold or disclosed your personal information for a business purpose, we will also disclose:
  - The categories of personal information that we sold about you.
  - The categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom your personal information was sold.
  - The categories of personal information that we disclosed about you for a business purpose.

### **Deletion Request Rights**

You also have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.



We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

Complete the transaction for which we collected the personal information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us using the contact information below.

Only you, or an Authorized Agent (registered with the California Secretary of State) that you have 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.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.



Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

### **Response Timing and Format**

We will make our best effort to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Within ten (10) days of receiving the request, we will confirm receipt and provide information about its verification and processing of the request. We will maintain records of consumer requests made pursuant to CCPA as well as our response to said requests for a period of at least twenty-four (24) months.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable 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.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by applicable law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.



4. *Other California Privacy Rights*

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to us using contact information below.

**Contact Information**

Have questions or want more information? Please visit <https://www.bluejacketmarketing.com/contact-us> or email at [info@bluejacketmarketing.com](mailto:info@bluejacketmarketing.com).