

## PRIVACY POLICY

**Updated: April 2023**

This Privacy Policy (“Privacy Policy”) explains how The Wisdom Group LLC (the “Company” or “we” or “us”) collects, uses, and shares your information when you use our website or apps and any other features, technologies, software, products, or services offered by the Company (collectively, the “Services”). By accessing and using any of our Services, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Service.

This Privacy Policy applies to our Services that link to or reference this Privacy Policy. This Privacy Policy does not apply to websites or applications maintained by third parties that we may link to or that may be accessible to you through our Services.

## INFORMATION WE COLLECT

To provide you the Services, we collect the categories of information described below.

- Information you provide us when using our Services;
- Information we collect automatically;
- Information we get from advertisers, third parties, and offline sources; and
- Any other information you choose to provide to us.

Most of the data collection and uses described in this Privacy Policy are necessary in order for us to be able to provide you the Services. If you do not agree to this Privacy Policy, we will not be able to provide you usage of the Services. Some of the data collection and uses are not strictly necessary for us to provide the Services, but they are related, and our basis for such collection and processing is for legitimate interests we may have, such as to analyze and improve the Services as explained in more detail below. If you want to know how to exercise your rights to manage or delete the personal information we may have about you, please review “YOUR CHOICES” below.

### **Information You Provide Us When Using Our Services.**

- **Account Information.** When you sign up to become a user of our Services, we collect personal information you choose to provide us, which may include your name, address, email, and phone number. We may also ask you for, or you may choose to provide, additional information, such as age or gender that will be associated with your Services account. All of this information that may identify, relate to, describe, reference, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device is called “Personal Information”. Personal

information does not include: (a) Publicly available information from government records; (b) De-identified or aggregated consumer information; or (c) Information excluded from the California Consumer Protection Act, such as: (i) 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) or clinical trial data; (ii) 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.

- **User Content.** We collect the content, communications and other information you provide when you use our Services, including when you sign up for an account, create or share content, and message or communicate with others (collectively, "User Content"). For example, we review the text and/or image content of your posts, replies, chat messages, and collect metadata regarding such messages that may collect the identity of the user and any users they communicate with. All posts of contents and replies are public and are publicly displayed (for information deleting content, please see "YOUR CHOICES" below). User Content may be viewed, shared and modified by our users, us and others for commercial or personal purposes (consistent with the rights and licenses in our **Terms of Service**). We collect information you choose to upload, sync or import from a device (such as an address book or call log or SMS log history), which we use for things like helping you and others find people you may know. Please keep in mind that if you include information that could identify you in any content you share or post, people who see it may determine your identity. the Company does not post chat messages publicly but, as with any message that you send via any service, the recipient might do so.

- **Your Purchase Transactions.** If you make any purchases or engage in any other financial transactions through our Services, we collect information necessary to process the transaction. This includes payment information, such as your credit card or payment account information; authentication information; and billing, shipping and contact details.

### **Information We Collect Automatically When Using Our Services.**

- **Location Information.** Many features of the Services will not work unless you provide us with some information about your location. If you consent to the collection of location information (e.g. if you permit your mobile device to send us your latitude and longitude), we will collect and use this information both while you are directly using the Services and in the "background" (i.e. at times when you are not directly using the Services). For example, we or our advertising partners may show you content or posts from people around you or places you frequently visit, notifications of things happening around you in real time, or advertisements from businesses near your location. If you do not permit your mobile device to provide us with location information, or location information is not available from your device for technical reasons, we may use your IP address or information about the WiFi

SSID from which you access the Services to determine an approximate geographic location for your device. For more details about how you may control the collection of location information, please see “YOUR CHOICES” below.

- **Usage Information.** We collect information about your use of the Services, including access times, pages viewed, user and content interactions and other information about your interactions with our Services, as well as with other users, hashtags, and groups across our Services.

- **Device Information.** We collect information from and about the devices and browsers you use that integrate with our Services. For example, we collect device type, which may include the hardware model, operating system and version, browser type and language, IP Address, plugins, app and file names and types, battery and signal strength, available storage space, unique device identifiers and mobile network information (which is treated as personal information in some jurisdictions, but which we use only to identify your geographic area and to comply with applicable laws), information you give us access to through device settings such as photos, camera, or GPS location, identifiers associate with cookies, web beacons or other technologies that may uniquely identify your device or browser. We may combine this information across different devices you use. For example, we use information collected about your use of our Services on your phone to better personalize the content (including ads) or features you see when you use our Services on another device, such as your laptop or tablet, or to measure whether you took an action in response to an ad we showed you on your phone on a different device.

- **Information Collected by Cookies and Other Tracking Technologies.** Like most websites and applications, we and our service providers use cookies, web beacons and other technologies to collect information. Cookies are small data files stored on your hard drive or in device memory that help us and our service providers to, among other things, improve our Services and your experience by seeing which areas and features of our Services are popular. Most web browsers are set to accept cookies by default. For more information about cookies and how to disable them, please see “YOUR CHOICES” below. Keep in mind that removing or rejecting cookies could affect the availability and functionality of some Services.

### **Information We Get From Advertisers, Third Parties, and Offline Sources.**

We may receive information about you from advertisers, app developers, and publishers, or other online or offline sources with whom you interact and who have the rights to provide us with your information. For example, advertisers, publishers, and other third parties may share how you interact with their ads, websites, or apps, how you use their services, or what purchases you make. This information may be provided whether or not you are logged in to the Company Product at the time. We may combine such information with the information you have provided to us in order to provide and improve our Services. We require each of these advertisers,

publishers, or other third parties to have lawful rights to collect, use and share your data before providing any data to us.

### **Any Other Information You Choose To Provide To Us.**

You may provide other information directly to us. For example, we may collect information when you fill out a form, update your account, interact with the Services, apply for a job at our company, communicate with us via third-party social media sites, request customer support or otherwise communicate with us.

### **Collection and Use of Special Categories of Personal Data.**

The following special categories of personal data may be considered sensitive under the laws of your jurisdiction and may receive special protection:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic data.
- Biometric data.
- Data concerning health.
- Data concerning sex life or sexual orientation.
- Data relating to criminal convictions or offences.

## **HOW WE USE YOUR INFORMATION**

We use your information to:

- **Communicate with you.** We use your information to communicate with you by call, text, email, or mail. We may share with you information about our Services, or other products that we think may interest you. We may respond to your inquiries and let you know about our policies and terms. If we email you, our email will always identify us or our Services. You may unenroll at any time by selecting “unsubscribe” in our emails.
- **Provide and improve our Services.** Information you provide or we collect from you may be used to personalize the Services that are unique and relevant to you. For example, we use your connections, preferences, interests and activities to enhance your experience with our Services. We use location information to personalize and improve our Services, including ads for you. We also use this information, along with how you use and interact with our Services, and the people, places, or things you’re connected to and interested in on and off of our Services.

- **Enhance the safety and security of our Services.** We use collected information to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Services, promote safety and security, and comply with legal requirements. For example, we use data we have to investigate suspicious activity or violations of our terms or policies.
- **Develop, Test, Improve, Maintain Our Services.** We use collected information to test, develop, and troubleshoot issues with, or to improve upon or maintain our Services. This may include information we collect from surveys or research, in addition to other collected information.
- **Monitor and analyze trends and provide analytics.** We use information to monitor and analyze trends and usage of our Services. We may also use collected information to help advertisers measure engagement and effectiveness of their ads, and how people interact with them or their services. See [How We Share Information](#) below for more details.
- Remember that information collected through cookies and other tracking technologies is used along with other collected information for the purpose outlined in this Privacy Policy, including remembering your settings and choices and assessing and improving our Services.

## HOW WE SHARE INFORMATION

We may share the information we have about you in the following ways:

- **With Public or Others Using The Service.** Any content, comments, or other communications posted to any of the Services is public and, as a result, can be seen by anyone, on or off our Services, including if they don't have an account. This includes your username at the time the content was posted, the text and image contents of your post and the geographic location in which you posted your post or content. For some of our Services, a username will be randomly assigned to you that you may change or delete at any time. Your username is publicly displayed when you interact with the Services, such as when you post information or content or send a chat message to another user. Please keep in mind that if your username contains your real name or is the same as how you identify yourself on other online services, people who see it may determine your identity.
  - It is possible for public content to be accessed, downloaded, or shared through third-party services such as search engines, APIs, apps, websites, and by other services that integrate with our Services.

- When you use any chat messaging function to directly contact another user, the recipient of your chat message will see your username and the contents of your message. The recipient may also choose to disclose your chat messages to others.

- If you post any User Content to the Services, other users may be able to see certain information related to your location. For example, other users may be able to see whether you are or were within a certain proximity of their current location or if you frequent similar locations.

- If you invite others to try our Services via SMS, email or otherwise, those individuals may see your name, phone number, email address or other contact information.

- For some of our Services, people can see signals telling them whether you are active on our Services, including whether you are currently active or when you last used our Services.

- **With Social Sharing Services.** The Services may offer social sharing features and other integrated tools, which let you share posts with other media. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

- **With Advertisers.** To perform analytics and deliver relevant content and advertising, we may allow others to collect information about how you use our Services. For example, these entities may use cookies, device identifiers and similar technologies to collect information about your computer or device, the content that interests you, the places you visit, and the time you spend using different parts of our Services.

- For more information about online advertising, or to opt out of having your web browsing information used by participating companies for behavioral advertising purposes, please visit the **Digital Advertising Alliance Consumer Choice Page**, the **Trust Arc Preference Manager**, the **Google Ad Settings Page** and the **Facebook Ad Choices Page**. Your mobile device also may include a feature (“Limit Ad Tracking” on iOS or “Opt out of Interest-Based Ads” on Android) that allows you to opt out of having certain information collected through our mobile application used for behavioral advertising purposes.

- **The information we share with advertisers and the information you provide directly to such advertisers is subject to each advertiser’s own privacy policy. Please read each advertiser’s privacy policy to learn more about their information**

**collection practices and the choices you can make about how they collect and use your personal information.**

- |  |
|--|
| • <a href="#">Facebook advertising</a> |
| • <a href="#">Google ads</a>           |

· **With Service Providers and Other Third Parties.** We may also share information as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants and other service providers who need access to such information to help us provide, protect, or maintain the Services;
- With measurement services to measure and optimize the performance of our Services, and to deliver more relevant ads, including for advertisers and other third-party websites and apps;
- With third parties offering goods and services for sale in our Services, who can receive your public information and additional information you provide them, including the information required to complete your transaction such as payment, shipping, and contact information.
- Aggregated, non-personally identifiable, de-identified information (i.e. information about you and other users collectively, but not specifically identifiable to you) may be shared with third parties that provide services to us or perform business purposes for us to optimize advertisers' and other third-parties' ability to reach their target audience and markets;
- With third party service providers helping us to enforce our policies if we suspect your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of the Company or others, including to investigate, remedy, or enforce our **Terms of Service**;
- With law enforcement, government agencies, or in response to legal requests if we have a good faith belief that disclosing the information is necessary to comply with a law, regulation, legal process, or governmental request (e.g. subpoenas, court orders, government audits, etc.). This may include responding to requests from outside the US when we have a good faith belief a response is required and involves a user in that other jurisdiction;

- To help us detect or prevent fraud, which may include sharing device, usage, and other information we have about you;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among the Company, and its current and future parents, affiliates, subsidiaries, and other companies under common control and ownership, as permitted by applicable law, we may share information about you among the various Services in order to provide you a more consistent and optimal experience and to enforce our policies.
- With your consent or at your direction.

### **THIRD-PARTY CONTENT, LINKS, AND INTEGRATIONS**

As noted above, our websites, webforms and mobile application will contain third-party content, links, and integrations. For example, when you use our Services you may be presented with content and links to an advertiser's website to learn more about their products and services. Through these integrations, you will be providing information to an advertiser, other third parties, as well as to us. We are not responsible for how an advertiser and such other third parties collect or use your information. As always, we encourage you to read the privacy policies of every advertiser and third-party service that you visit or use.

### **HOW LONG WE KEEP YOUR INFORMATION**

How long we keep your information depends on the type of information, the purpose for which it is used, how sensitive it is, and other similar factors. For example, we keep your information:

- That you submit through our Services (like your name, phone number, address, email address, etc.) until you ask us to delete it.
- For the length of time reasonably needed to fulfill the purposes outlined in this Privacy Policy (including for as long as need to provide you with our Services), unless a longer retention period is required or permitted by law.
- For as long as necessary to investigate and resolve disputes and/or enforce our rights and agreements, including if your account is disabled for violation of our policies.
- Indefinitely if it is aggregated, anonymized, and de-identified (i.e., not capable of identifying you).



- In our backup or disaster recovery systems for a limited period of time or as required by applicable law.

If you ever decide to stop using our Services, you can ask us to delete your information (see “YOUR CHOICES” to learn more). Keep in mind, while our systems are designed to carry out our deletion automatically, we cannot promise or guarantee that deletion will occur within a specific timeframe. Also, there may be legal requirements to keep and not delete your information when you make a deletion request to us. This means we may suspend deletion of or not delete your information if we receive valid legal process asking us to preserve your information, if we receive reports of abuse or other **Terms of Service** violations, or if your use of our Services or your information is flagged by our automated systems for abuse or other **Terms of Service** violations.

## **HOW WE KEEP YOUR INFORMATION SECURE**

The security of your personal information is very important, and we take a number of steps to safeguard it. For example, we have implemented technical and organizational security measures that are designed to help protect your information from unauthorized access, disclosure, use, and modification. We also maintain physical, electronic, and procedural safeguards that comply with or exceed federal standards to guard your information, and we anonymize or expunge data when it is no longer necessary to provide Services to our users or substantiate records for an advertiser. From time-to-time, we review our security procedures to consider appropriate new technologies and methods.

Even so, despite our efforts, no security measures are perfect, impenetrable, or 100% secure. We cannot ensure, and do not warrant or guarantee, that the information you transmit to us will remain secure, nor do we guarantee that this information will not be accessed, disclosed, altered, destroyed or used in an unauthorized manner. These are the risks of being online and conducting business online.

Of course, if we learn of a security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on our Services if a security breach occurs. Depending on where you live, you may have a legal right to receive a notice of a security breach in writing. If you have any questions about the security of your information, please contact us at: 302-306-2426

## **YOUR CHOICES**

We want you to be in control of your information, so we provide you with the following tools to exercise control over the information we have about you. Keep in mind that each option is subject to applicable legal limitations. Additionally, because your privacy is important to us, we

will ask you to verify your identity/request or provide additional information before we let you exercise your choices over the information we have about you. We may also reject your request for several reasons, including, by way of example only, if the request risks the privacy of other persons or is unlawful.

- **Access and Portability.** You can access and receive a copy of the information we have about you by emailing [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com) and requesting “Access My Information.”
- **Correction or Modify (also known as rectification).** You can correct or modify the information we have about you by emailing [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com) and requesting “Correct or Modify My Information.”
- **Deletion (also known as erasure).** If for some reason you ever want to delete the information we have about you, simply email [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com) and request “Delete My Information.” Please see the below sections for Account Information, Location Information, Cookies and Other Technologies for additional information regarding deletion of such information.
- **Revoke Consent or Object to Processing.** You can revoke the consent you gave to us or object to our processing of the information we have about you by emailing [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com) and requesting “Revoke My Consent or Object to Processing of My Information.” If you are seeking to unsubscribe to our emails or change your communication preferences, see below.
- **Marketing and Communication Preferences.** If you wish to unsubscribe to any email communications we send to you, simply select “unsubscribe” in the emails. If you wish to unsubscribe to any text messages we send to you, text “STOP” in reply to any text message you receive from us. If you wish to unsubscribe or change/update any communication preferences with us including calls or mail, email [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com) and request “Marketing and Communication Preferences”. Please note that we only control our own mailing and marketing lists/subscriptions and policies. Third parties that maintain their own marketing lists may send communications that advertise our Services. You must contact these parties directly in order to stop receiving their communications.
- **Cookies and other Tracking Technologies.** To learn more about your choices and how to exercise control over the information we collect from you automatically using cookies and other online tracking technologies, read Cookies and Other Technologies.

If you have any questions or need assistance email us at [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com)

- **Deleting Account Information.**

Your contents and posts remain public, if they were posted publicly, so long as you or we do not delete them from the Services. You may choose to delete your individual posts or contents at any time and we will then remove them from the Services. However, it is important to note that your deleted posts or contents may remain in storage in our systems for a limited period of time for legal, business, safety, or system backup reasons, and they may remain accessible in cached and archived pages of the Services or elsewhere if others have chosen to copy or save them. Search engines and other sites may also index and cache content on our Services. You may have to contact these third-party sites or search engines directly to delete your cached information, subject to their policies and procedures.

If you wish to delete your account, please contact us by using the “Email Support” link in settings from inside the applicable Product, or by emailing us at: [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com). Remember that information that others have shared about you is not part of your account and will not be deleted.

As explained above, even after a deletion request, we may retain certain information as required by law, for legitimate business purposes, or for the safety of the Company (including its users) and others. We may also retain cached or archived copies of information about you for a certain limited period of time.

#### · **Deleting Location Information.**

When you first download or open any of our mobile application Services or access certain features of the Services, you will be asked to consent to the collection of location information from your mobile device or platform. If you consent to the collection of this information but later wish to withdraw your consent, you may do so at any time by either changing the settings on your mobile device or deleting our mobile application Services from your device.

#### · **Opting Out Of Cookies And Other Technologies.**

Most web browsers are set to accept cookies by default but also give you the option to manage and/or disable cookies and other online tracking technologies. To opt-out of the use of these technologies, you can usually change your browser options to stop accepting cookies or to prompt you before accepting cookies. Keep in mind that not all devices and browsers are the same so the methods for disabling cookies on one browser may not be the same for different browsers or devices and may change at any time. Opting out of cookies and other tracking technologies may not preclude advertising networks from which you have not opted out from displaying customized advertising. In addition, opting out will not prevent any advertising network from displaying advertising that is not customized to you and your interests and, consequently, may be less relevant to you. You will need to make these choices on each browser and device you may use to visit our Services.

When you elect to opt-out of cookies for a particular Service, an opt-out cookie is placed on your device. Then when you visit the same Service, the opt-out cookie tells the Service you opted out. This means that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services, including preventing your consent choices from being stored. As a result, we may not know about, or be able to honor, your election to opt-out. We encourage you to refer to the relevant instructions for your particular device or browser to learn how to manage cookies and other tracking technologies. For more information on how to disable cookies on the most common browsers, we've assembled the following information for you below:

Browser Name	Instructions	Source
Google Chrome	<ul style="list-style-type: none"> <li>• At the top right, click “:” icon, and then Settings.</li> <li>• At the bottom, click Advanced.</li> <li>• Under “Privacy and security”, click Site settings and then Cookies.</li> <li>• Turn Allow sites to save and read cookie data on or off.</li> </ul>	<a href="#">Google Support</a>
Apple Safari	<p>On Mac:</p> <ul style="list-style-type: none"> <li>• Safari &gt; Preferences, click “Privacy”</li> </ul> <p>On iOS:</p> <ul style="list-style-type: none"> <li>• Settings &gt; Safari, then turn on “Block All Cookies”</li> </ul>	<a href="#">Apple Support</a>
Mozilla Firefox	<ul style="list-style-type: none"> <li>• Click the menu button “☰” and select “Preferences”.</li> <li>• Select the “Privacy &amp; Security” panel and go to the “Cookies and Site Data” section.</li> </ul>	<a href="#">Mozilla Support</a>
Microsoft Edge	<ul style="list-style-type: none"> <li>• More button “...” &gt; Settings.</li> <li>• Select “View Advanced Settings”.</li> <li>• Under “Privacy and security”, click Site settings and then Cookies.</li> <li>• Under “Privacy and Services” &gt; “Cookies”</li> </ul>	<a href="#">Microsoft Support</a>

• **Other Options for Disabling Online Tracking.** Blocking cookies in your browser may not prevent cross-site tracking of your online activity using other online tracking technologies. In addition to managing your cookie settings for your browser, you can opt-out

of tracking directly with the businesses that operate the tracking technologies. To opt-out of certain analytic tracking by our service providers visit the links below:

Service Provider	Helpful Links
Google Analytics	<a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
Bing	<a href="https://about.ads.microsoft.com/en-us/resources/policies/personalized-ads">https://about.ads.microsoft.com/en-us/resources/policies/personalized-ads</a> <a href="http://choice.microsoft.com/">http://choice.microsoft.com/</a>

• **Do Not Track.** Some web browsers may transmit “do not track” signals (go [here](#) to learn more). Web browsers may incorporate or activate these features differently, making it unclear if users have consciously activated them. As a result, we do not take steps to respond to such signals.

• **EUROPEAN VISITORS – COOKIES NOTICE.**

In connection with the EU General Data Protection Regulation (GDPR) applicable in the European Economic Area (EEA) and the UK-GDPR applicable in the UK, we eliminate or limit the use of cookies and similar technologies with visitors from the EEA and the UK (excluding our corporate website available at <http://www.thewisdomgroup.com>, which continues to use cookies for all users with proper consent as explained below). Specifically:

- If you visit a third-party site that uses our Services, we will not place any cookies on your device unless you have provided your consent and been provided with notice of our privacy practices and your ability to opt-out at any time. We will not seek your consent to use cookies in this instance, though the advertiser or their website publisher may do so.
- If you visit one of our Services, we will only place limited third-party cookies, such as those made available for analytics purposes by Google and Bing. In this case, we will seek your consent to use these third-party cookies and will only do so after you indicate your consent. If you do not consent, then no cookies will be written to your device.
- If you are visiting our corporate website, <http://www.thewisdomgroup.com>, for the first time, or the first time after we make a material change, we will seek your consent to use cookies.
- If you do not consent, you will still be able to use our Services, but certain functionality may be limited. To enable this feature, we use third-party tools to determine your geographic location; if these tools indicate that you are in the EEA, then we treat

your visit as above. If you feel that you are subject to GDPR, but we have nonetheless used cookies in connection with your visit without consent (which may be due to a failure of the third party geolocation tools, your use of a proxy server, your location outside of the EEA at the time of your visit, or some other factor beyond our control) please notify us through our email, [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com), and make sure to include any relevant details so that we can ensure proper treatment of your data under GDPR.

## **WHERE INFORMATION IS PROCESSED & STORED**

The Company is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. These data transfers are performed only for the purposes described in this Privacy Policy and are necessary to provide the Services to you globally. We utilize standard contract clauses, rely on the European Commission's adequacy decisions about certain countries, as applicable, and obtain your consent for these data transfers to the United States. For EEA visitors, please read the "EUROPEAN VISITORS – COOKIES NOTICE." section above to learn more about our use of cookies and other technology for visitors from EEA, as well as the "VISITORS OUTSIDE THE UNITED STATES" section below.

## **PRIVACY RIGHTS FOR CALIFORNIA, NEVADA, AND EEA**

This Privacy Notice supplements the information contained in this Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California, the State of Nevada, or are a citizen of a European Economic Area (EEA) Member State. Please review the applicable sections below to learn more about your privacy rights and how to exercise them.

### **CALIFORNIA RESIDENTS**

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice. This Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. Where noted in this Notice, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("B2B personal information") from some of its requirements.

- **Uses and Disclosure of Your Information.** For more information on what information we collect, including the sources we receive information from, please review the above section "INFORMATION WE COLLECT." We collect and use these categories of personal

information (or personal data) for the business purposes described in the sections “HOW WE USE YOUR INFORMATION” and “HOW WE SHARE INFORMATION” including to provide, manage and improve, our Services.

· To help you further understand what categories of information we collect, the chart below shows specific categories of personal information and whether we have or have not collected such information from Service users within the last twelve (12) months:

Category	Examples	Collected
<b>A. Identifiers.</b>	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.	
<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	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.	

<b>C. Protected classification characteristics under California or federal law.</b>	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).	
<b>D. Commercial information.</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	
<b>E. Biometric information.</b>	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.	
<b>F. Internet or other similar network activity.</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	
<b>G. Geolocation data.</b>	Physical location or movements.	
<b>H. Sensory data.</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	
<b>I. Professional or employment-related information.</b>	Current or past job history or performance evaluations.	



<b>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)).</b>	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.	
<b>K. Inferences drawn from other personal information.</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	

· **Access To Specific Information And Data Portability Rights.** California residents have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. You have the right to request the following:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information was collected;
- The categories of third parties with whom we share that personal information.
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose;
- The business or commercial purpose for collecting or selling that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - § Sales: identifying the personal information categories that each category of recipient purchased; and
  - § Disclosures for a business purpose: identifying the personal information categories that each category of recipient obtained.

To exercise this right, please see “Exercising Access, Data Portability, And Deletion Rights.” below. Once we receive and confirm your verifiable consumer request meets the requirements explained in the section “Exercising Access, Data Portability, And Deletion Rights.,” we will provide the requested information. Keep in mind, if we do not have information that permits us to verify your identity, we may deny your request to access data.

· **Deletion Request Rights.** California residents have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. To exercise this right, please see Exercising Access, Data Portability, and Deletion Rights below. Once we receive and confirm your verifiable consumer request meets the requirements explained in the section Exercising Access, Data Portability, and Deletion Rights, 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 good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, 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.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it;
- If we do not have information that permits us to verify your identity, we may deny your request to delete.

· **Exercising Access, Data Portability, And Deletion Rights.**

- **Make a verifiable consumer request.** To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either completing our Data Access & Erasure Form or by emailing us at: support@sponsorthisnewsletter.com. 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. 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 are an authorized representative; and
- 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.

For instructions on exercising sale opt-out rights, see Personal Information Sales Opt-Out and Opt-In Rights.

- **Response timing and format.** We endeavor to respond to a verifiable consumer request within forty-five (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. 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 verifiable consumer request's receipt. 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 usable 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 any California resident for exercising any of your CCPA rights. Unless permitted by the CCPA, 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.

#### **Personal Information Sales Opt-Out And Opt-In Rights.**

Under California law, if you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is at least 13 but not yet 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the "Do Not Sell My Personal Information" Section of our website. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by: Accessing 'Personal Data Consent' in 'Settings' on applicable Product being used.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

**Other California Privacy Rights.** California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. Requests can be made no more than once per calendar year. To make such a request, please contact us at the email or address below and specify "Shine the Light Request." We will respond to your request within thirty (30) days of receiving it.

Email: [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com)

Postal Address:

The Wisdom Group LLC

4307 S LEONARD SPRINGS RD  
BLOOMINGTON, IN 47403  
Attn: Privacy Team

## **NEVADA RESIDENTS**

Subject to certain exceptions, some of our data sharing practices may be considered a “sale” of your personal information under Nevada Revised Statutes 603A. Nevada residents may opt-out of the “sale” of personal information covered under the statute, by exercising your cookie consent options as detailed in Cookies and Other Technologies or by emailing your request to [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com).

## **VISITORS OUTSIDE THE UNITED STATES**

This Privacy Policy is intended to cover collection of information on our Services from residents of the United States. The data protection and other laws of the United States might not be as comprehensive as those in your country. Where permitted by applicable law, we may transfer the personal data we collect about you to other jurisdictions other than where you reside that may not be deemed to provide the same level of data protection as your home country for the purposes set out in this Privacy Policy.

By visiting or using our Services in any way, you acknowledge and agree that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy, regardless of the laws of your country of residence.

To the extent the laws of another jurisdiction apply to your data or use of our Services, we will comply with such laws. For example, for European Visitors, read the “**EUROPEAN VISITORS – COOKIES NOTICE.**” section of Cookies and Other Technologies to learn more about our use of cookies and similar technologies with visitors from the EEA.

## **RESIDENTS OF COLORADO, CONNECTICUT, VIRGINIA AND UTAH**

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please email [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com).

### **EU Visitors**

If you are an EU citizen or UK citizen, you may have additional rights under the EU General Data Protection Regulation or the UK-GDPR (collectively, the “GDPR”) with respect to your Personal Data, as outlined below. For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. We will be the controller of your Personal Data processed in connection with the Services. Note that we may also process Personal Data of our customers’ end users in connection with our provision of certain Services, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data. If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at: 1-302-306-2426

The legal bases for which we collect and use the information described above depends on what the information is and why we collected it. The four bases upon which we rely include:

- **Contract.** This means we need the information to perform our contracted Services with you. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require that data.
- **Legitimate Interests.** This means we have a legitimate interest that does not outweigh your privacy rights. When we collect and process information based on our legitimate interests, we consider how we can accomplish what we need to in a way that is the least obtrusive on your privacy. For example, it is in our interest to protect your safety and security in the Services, so we collect and use information that has been flagged by users or requested by law enforcement; to make sure you are satisfied with how the services work, troubleshoot technical problems or develop new features, we collect and use

information about how you and others use the services and to respond to your service inquiries, we collect and use information in that request and, if relevant to the inquiry, information about how you access and use the services.

- **Legal Obligation.** We may need to use your personal information to comply with a law enforcement preservation request, subpoena, or other legal process or to protect the rights of other users.
- **Consent.** If we have no other legal basis for collecting or using your information, we will ask you for consent for a specific purpose. If we do, you have the right to withdraw consent at any time. Withdrawing your consent will not apply to any processing conducted in reliance on lawful processing bases other than consent.

In addition to other rights detailed in the policy (such as requesting deletion, correction or updating of your personal information), EU and UK citizens have certain rights regarding your personal information, including:

- **Right to Object or Restrict Processing.** You have the right to object to or restrict our use of your personal information for direct marketing purposes or under certain circumstances when the legal bases for using your information is based upon our legitimate interest. If you wish to object to our use of your information, you can send us a request to delete your account by sending an email to: [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com)
- **Right to Access or Erasure.** You have the right to have your personal data erased and no longer processed. You also have the right to access the Personal Data we have collected about you. You can send us a request to delete your account or access your information by completing our Data Access & Erasure Form or by sending an email to: [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com). Upon receiving the request, we will make a reasonable effort to delete your personal information from the Service and from our internal network within a reasonable period of time as long as we are not obligated to preserve your information due to things like law enforcement preservation requests, subpoenas, investigations, litigation, or otherwise meet any of our other legal obligations. We may also retain depersonalized information after deletion.
- **Withdrawal of Consent.** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data if such use or disclosure is necessary to enable you to utilize some or all of the Services. You can exercise your right to withdraw consent by completing our by sending us an email to: [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com)
- **Data Portability.** You can exercise your right to export your personal data by completing our Data Access & Erasure Form or by sending us an email to: [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com)

- **File a Complaint.** You have the right to complain to the data protection authority located in your Member State. To find contact details, [click here](#).

As explained above, personal data collected in the EU or UK may be transferred to, and/or stored at, a destination outside of the EU and/or UK and processed by employees operating outside of the EU and/or UK who work for us, one of our business partners, or service providers. We have implemented sufficient GDPR compliant procedures to secure the transfer of your personal data to the United States. We utilize standard contract clauses, rely on the European Commission's adequacy decisions about certain countries, as applicable, and obtain your consent for these data transfers to the United States.

## **CHILDREN'S INFORMATION**

The Children's Online Privacy Protection Act ("COPPA") requires that online service providers obtain parental consent before they knowingly collect personally identifiable information online from children who are under 13. We do not knowingly collect or solicit personally identifiable information from children under 13.

Additionally, we do not knowingly collect or solicit personal data from anyone under the age of 16 in countries subject to the EU GDPR, unless exempted by individual country exceptions.

If you are under 13, or 16 where applicable, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under the required minimum age, we will delete that information as quickly as possible. If you believe that a child under the required minimum age may have provided us personal information, please contact us at: 1-302-306-2426

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this Privacy Policy, we will post a notice to our Services and will update the notice's effective date. We will give you an opportunity to review the changes before they go into effect. Your continued use of the Services following notice of the changes constitutes your acceptance of the changes, so we encourage you to review the Privacy Policy whenever you use our services. If you do not agree to the updated Privacy Policy, you may delete your account(s).

## **CONTACT INFORMATION**

If you have any questions or comments about this Privacy Policy, please contact us at:

Email: [support@sponsorthisnewsletter.com](mailto:support@sponsorthisnewsletter.com)



Postal Address:

The Wisdom Group LLC  
4307 S LEONARD SPRINGS RD  
BLOOMINGTON, IN 47403  
Attn: Privacy Team