

## PRIVACY POLICY

This Web site ("**Web Site**") is published and maintained by Clove Hitch Partners LLC, its affiliates and subsidiaries (referred to in this Privacy Policy as "**Clove Hitch**," "**we**," "**us**," "**our**," or other similar pronouns).

This Privacy Policy governs your use of the CloveHitchPartners.com web site (the "**Web Site**") on which it is posted. By visiting this Web Site, and/or using the products and services offered on or through this Web Site (the "**Services**"), if any, you (or the entity you represent) ("**you**" or "**your**" or other similar pronouns) agree to the terms of this Privacy Policy as may be amended from time to time without notice to you. This Privacy Policy is incorporated into, and is part of, the Web Site [Terms and Conditions](#), which governs your use of this Web Site in general.

I. YOU MAY OPT IN OR OPT OUT OF OUR SHARING OF YOUR PERSONAL INFORMATION WITH THIRD PARTIES FOR THEIR MARKETING PURPOSES BY FOLLOWING THE DIRECTIONS IN THE "RIGHT TO OPT IN AND OPT OUT" SECTION BELOW.

### **Purpose**

In connection with your use of the Web Site, we may ask you for Personal Information and we may collect certain information from you and your computer each time you visit us. "**Personal Information**" includes, for example, your name; title; home and/or business address; e-mail address; home and/or business telephone, wireless and/or fax number; credit card and other payment information; demographic information; payment history; and/or other information that may identify you as an individual or allow online or offline contact with you as an individual. This Privacy Policy explains, in general, what Personal Information and other information is collected on our Web Site, how the information is used, and with whom we may share such information.

### **Opt In and Opt Out Rights**

You have the right to "opt in" and "opt out" of certain of our uses of your Personal Information. For example, you may elect to, or elect not to: (1) receive correspondence from us or (2) have your Personal Information shared with other entities for marketing purposes. You may make this election by sending an e-mail to [jacob@clovehitchpartners.com](mailto:jacob@clovehitchpartners.com). In your e-mail, state whether: (i) you would like to opt out of receiving promotional correspondence from Clove Hitch in general, or just via e-mail or postal mail, (ii) you would only like to opt out of certain of Clove Hitch mailings, e-newsletters, e-mail alerts or other correspondence, and if so which ones, and/or (iii) you would like to elect for us not to share your Personal Information with third parties for their marketing purposes.

Regardless of whether you opt-out of receiving correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us. Requests to have us stop sharing your Personal Information

will apply as of the date we review your request, and we will not be responsible for any communications that you may receive from entities that received your Personal Information prior to the date we reviewed such request.

## II. COLLECTION OF INFORMATION

### **User-Provided Information**

We collect Personal Information from users via the Web Site, for example, through such users' activities, transactions and completion of online forms on the Web Site. Such information is collected when users register or subscribe for accounts or features on the Web Site, make online purchases, complete transactions through the Web Site, complete surveys, submit a comment or question to us, send us an e-mail, or in any other way submit Personal Information to us via the Web Site.

You may be able to send information about our products and services to your friends and family members through the Web Site. In some of these cases you may provide the e-mail address of your friend or family member to us. Such information will be treated in accordance with this Privacy Policy and applicable law.

## III. USAGE INFORMATION.

### **Cookies**

We may use "cookies" to keep, and sometimes track, information about you. Cookies are small data files that are sent to your browser or related software from a Web server and stored on your computer's hard drive. Cookies track where you travel on the Web Site and what you look at, transact and purchase and we may use them to deliver specific messages to you (for example, to announce a new feature that was added since the last time you visited the Web Site). A cookie may enable us to relate your use of our Web Site to other information about you, including your Personal Information.

Most Web browsers can be set to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. Additionally, if you have a Flash player installed on your computer, your Flash player can be set to reject or delete Flash cookies. However, refusing a cookie may, in some cases, preclude you from using, or negatively impact the display or function of, the Web Site or certain areas or features of the Web Site.

### **Clear GIFs**

We may use "clear GIFs" (aka "Web beacons" or "pixel tags") or similar technologies, in the Web Site and/or in our communications with you to enable us to evaluate Web Site usage information about visitors to the Web Site, target campaigns, upgrade visitor information, and know whether you have visited a Web page or received a message. A clear GIF is typically a one-pixel, transparent image (although it can be a visible image as well), located on a Web page or in an e-mail or other type of message, which is retrieved

from a remote site on the Internet enabling the verification of an individual's viewing or receipt of a Web page or message. A clear gif may enable us to relate your viewing or receipt of a Web page or message to other information about you, including your Personal Information.

### **IP Address and Clickstream Data**

Our server may automatically collect data about your server's Internet address when you visit us. This information, known as an Internet Protocol address, or IP Address, is a number that's automatically assigned to your computer by your Internet service provider whenever you're on the Internet. When you request pages from our Web Site, our servers may log your IP Address and sometimes your domain name. Your IP Address is used to help identify you and to gather demographic information about our clients as a whole, but does not include personally identifiable information. Our server may also record the referring page that linked you to us (e.g., another Web site or a search engine); the pages you visit on this Web Site; the Web site you visit after this Web Site; the ads you see and/or click on; other information about the type of Web browser, computer, platform, related software and settings you are using; any search terms you have entered on this Web Site or a referral site; and other Web usage activity and data logged by our Web servers. We use this information for internal system administration, to help diagnose problems with our server, and to administer the Web Site. Such information may also be used to gather demographic information, such as country of origin and Internet Service Provider. We may link this information with your Personal Information.

Any or all of these activities with regard to Web Site usage information may be performed on our behalf by our service providers, including, for example, our analytics vendor(s) and our e-mail management partner(s), if any.

### **Use of Personal Information**

We will use the Personal Information you provide to our Web Site, for example, to respond to your requests and to provide you with the services and features offered on or through our Web Site, if any. We may also use your Personal Information to maintain our internal record keeping. We may also report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account, if any, may be reflected in your credit report. We may match information collected from you through different means or at different times, including both Personal Information and Web Site usage information, and use such information along with information obtained from other sources, including third parties. We also may compare your contact information to data in our databases in order to improve the Web Site and marketing. Also, advertisements and other content displayed to you on the Web Site may be customized to your interests and preferences, based on your Personal Information and Web Site usage information, including (but not limited to) non-personally identifying information, which we may obtain from you or from other sources.

In addition, we may use your Personal Information to correspond with you, about products, services, companies and events, sponsored by us and others, that we think

might interest you. You may opt-out of receiving such correspondence from us by following the instructions in the Right to Opt In and Opt Out section above.

We also may provide visitors an opportunity to receive offers from other entities that have services and products we think might be of interest to you. Information collected on these and any other sites is subject to those sites' privacy policies. However, we will not transfer your contact information to any unaffiliated third party for the third party's marketing purposes unless you expressly direct us to do so. If you change your mind and no longer want to receive third party promotions, follow the instructions to opt out in the Right to Opt In and Opt Out section above.

We may analyze user behavior as a measure of interest in, and use of, our Web Site and e-mails, both on an individual basis and in the aggregate.

### **Sale of Personal Information**

Clove Hitch does not sell, lease or give your Personal Information to any other company, unless otherwise stated herein.

### **Service Providers**

We may use third party partners to help operate the Web Site and deliver our products and Services, and may share your information with our affiliates, service providers and other third parties that provide products or Services for or through this Web Site, if any, or for our business (such as Web site or database hosting companies, address list hosting companies, e-mail service providers, analytics companies, distribution companies, fulfillment companies, and other similar service providers that use such information on our behalf).

### **Aggregate Statistics**

We may disclose aggregate statistics regarding user behavior as a measure of interest in, and use of, the Web Site and e-mails to third parties in the form of aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

### **Compelled Disclosure**

We may disclose user information to government authorities, and to other third parties when compelled to do so by government authorities, at our discretion, or otherwise as required or permitted by law, including but not limited to in response to court orders and subpoenas. We also may disclose user information in connection with investigations or when we have reason to believe that someone is causing injury to or interference with our rights or property, other users of the Web Site, or anyone else that could be harmed by such activities.

## **Business Transfer**

Clove Hitch regards its databases of customer information (including Personal Information) as a valuable asset. In the event that Clove Hitch is, or substantially all of its assets are, acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, such databases containing Personal Information may be one of the transferred assets. In using the Services you consent to such transfer of your Personal Information.

## **Wireless Addresses**

If the e-mail address you provide to us is a wireless e-mail address, and you have elected to receive promotional messages from Clove Hitch, you agree to receive messages at such address from us, unless and until you have elected not to receive such messages by following the instructions in the Right to Opt In and Opt Out section above. You understand that your wireless carrier's standard rates apply to these messages, and that you may change your mind at any time by following the instructions in the Right to Opt In and Opt Out section above. You represent that you are the owner or authorized user of the wireless device on which messages will be received, and that you are authorized to approve the applicable charges.

## **Access Rights**

You may review and edit the Personal Information that is stored in your user account on this Web Site (e.g., your passwords and other contact information), if any, by visiting a "My Profile" or similar area of your account on this Web Site or by e-mailing [jacob@clovehitchpartners.com](mailto:jacob@clovehitchpartners.com). Upon written request, we will send you a copy of the Personal Information we have on file in your user account, if any. You may send us new or updated information at any time. We will respond to your request to access, update or delete your information as soon as practicable. Before we are able to provide you with any information, correct any inaccuracies or delete any information, however, we may ask you to verify your identity and to provide other details to help us to respond to your request.

## **Security**

Clove Hitch will take reasonable steps to protect the security and integrity of all Personal Information provided via this Web Site, including making sensitive information available to our employees and agents on a need-to-know basis. However, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.

If you contact us by e-mail or a "contact us" or similar feature on our Web Site, you should be aware that your transmission might not be secure. A third party could view information you send by these methods in transit.

You may be able to create an account on our Web Site with a username and password. If you do create a username and password, you are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any access to or use of the Web Site by you or any person or entity using your password, whether or not such access or use has been authorized by or on behalf of you, and whether or not such person or entity is your employee or agent. You agree to (a) immediately notify Clove Hitch of any unauthorized use of your password or account or any other breach of security and (b) ensure that you exit from your account at the end of each session. It is your sole responsibility to protect your password, control access to and use of your account, and notify Clove Hitch when you desire to cancel your account on this Web Site. We will not be responsible or liable for any loss or damage arising from your failure to comply with this provision.

We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your e-mail address, we may notify you by e-mail. You consent to our use of e-mail as a means of such notification. If you prefer for us to use another method to notify you in this situation, please e-mail us at [jacob@clovehitchpartners.com](mailto:jacob@clovehitchpartners.com) with the alternative contact information you wish to be used.

### **Phishing**

It has become increasingly common for unauthorized individuals to send e-mail messages to consumers, purporting to represent a legitimate company such as a bank or on-line merchant, requesting that the consumer provide personal, often sensitive information. Sometimes, the domain name of the e-mail address from which the e-mail appears to have been sent, and the domain name of the web site requesting such information, appears to be the domain name of a legitimate, trusted company. In reality, such sensitive information is received by an unauthorized individual to be used for purposes of identity theft. This illegal activity is known as "phishing."

If you receive an e-mail or other correspondence requesting that you provide any sensitive information (including your password or credit card information) via e-mail or to a Web site that does not seem to be affiliated with Clove Hitch, or that otherwise seems suspicious to you, please do not provide such information, and report such request to us at [jacob@clovehitchpartners.com](mailto:jacob@clovehitchpartners.com).

### **Consent to Worldwide Transfer and Processing of Personal Data**

When you give your personally identifiable information to Clove Hitch, it may be processed by Clove Hitch in all countries in which Clove Hitch operates or in which its affiliates operate. Each of these countries has different privacy laws that afford varying

levels of protection for your personally identifiable information. Regardless of the laws in place in these countries, Clove Hitch will treat the privacy of your information in accordance with this Privacy Policy. By providing your personally identifiable information to Clove Hitch, you consent to Clove Hitch transmission to, and processing of your information in, any jurisdiction, in accordance with this Privacy Policy.

### **Third Party "Linked-To" Web Sites**

When you are on the Web Site you may have the opportunity to visit, or link to, other sites not operated by Clove Hitch, including other Web sites operated by unaffiliated third parties. These sites may collect Personal Information about you. Clove Hitch does not control sites that are operated by these third party entities and is not responsible for the information practices of these sites. This Privacy Policy does not address the information practices of those other Web sites.

### **Changes to this Privacy Policy**

Clove Hitch reserves the right to change or update this Privacy Policy, or any other of our policies or practices, at any time, and will notify users of this Web Site by posting such changed or updated Privacy Policy on this page. Any changes or updates will be effective immediately upon posting to this Web Site. Your continued access or use of the Web Site constitutes your acceptance of the changes. Under certain circumstances, we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as posting a notice on the front page of the Web Site or sending you an e-mail.

### **Questions or Comments**

If you have any questions or comments regarding our privacy practices, you may contact us at [jacob@clovehitchpartners.com](mailto:jacob@clovehitchpartners.com). You may also send any comments, questions or concerns by mail to:

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