

## Privacy Policy

This is the privacy policy ("Privacy Policy") that governs how we, Ad-Venture.IO Ltd. ("**Ad-Venture**", "we", "our" or "us"), use Personal Information (defined below) that we collect, receive and store about individuals in connection with the use of the website [www.reflectiz.com](http://www.reflectiz.com), and any other website that we operate (each, together with its sub-domains, content and services, a "Site").

- 1. Introduction.** We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the Site. "**Personal Information**" means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information.
- 2. Terms of Use.** This Privacy Policy forms part of our Terms of Use which is available at <https://www.reflectiz.com/wp-content/uploads/2018/01/Reflectiz-Website-Terms-of-Use-Clean-October-31-2017.pdf> ("**Terms**"). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.
- 3. Consent and Modification.** By using the Site, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Site. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on the Site, and your continued use of the Site thereafter means that you accept those changes.
- 4. What Personal Information We Collect and How We Collect It.** We do not currently require you to provide Personal Information in order to have access to general information available on the Site. But, we do receive and/or collect Personal Information from you in the following ways:
  - 4.1. 'Contact Us' Information.** If you send us a "Contact Us" request, whether by submitting an online form that we make available or by sending an email to an email address that we display or by sending on-line message in the Site, you may be required to provide us with certain information such as your name, company name, phone number and email address.
  - 4.2. Downloaded Files.** If you wish to download certain content that is available for download from the Site you may be required to provide us with certain information such as your name, company name and your position.
  - 4.3. Resume Submission.** If you wish to apply for a job presented on the Site, you may be required to provide us your resume.
  - 4.4. Cookies and Other Tracking Technologies.** Our Site may utilize "cookies", anonymous identifiers and other tracking technologies in order to for us to provide our Site and present you with information that is customized for you. A "cookie" is a small text file that may be used, for example, to collect information about activity on the Site. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept and/or remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.
  - 4.5. Google Analytics.** The Site may use a tool called "Google Analytics" to collect information about use of the Site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics to maintain and improve the Site and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of

Service, available at <http://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

5. **Publicly Available Information.** Any content that you post on or via the Site ("**User Submissions**") may be publicly available to other Site users, and may also be accessed and used by people off the Site. The notices and tools that we provide on the Site are intended to inform you which information will be made publicly available. If you publish your contact information in any User Submissions, you may receive unsolicited messages from other users of the Site or the public. We, therefore, encourage you only to post information that you are sure you want to be accessible to anyone.
6. **The Way We Use Personal Information.** If you submit or we collect Personal Information through the Site, then we may use such Personal Information in the following ways:
  - 6.1. We will use your Personal Information to provide and improve our Site and to contact you in connection with the Site and certain programs or offerings that you may have registered for.
  - 6.2. We may use your designated email address to: (i) send you updates or news regarding the Site and our products; (ii) respond to a "Contact Us" or administrative request; and/or (iii) to contact you with respect to job offers that we may find relevant to you.
  - 6.3. We may transfer your Personal Information to our subsidiaries or affiliated companies for the purpose of storing or processing such information on our behalf. Such information may be transferred to other countries. We require that these parties agree to process such information in compliance with our Privacy Policy.
  - 6.4. We may share your Personal Information with our third party service providers and partners, including hosting companies, but only to assist us with our business operations and to provide our Site to you and other users. Such information may be transferred to other countries. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Information.
  - 6.5. We may disclose your Personal Information or any information you submitted via the Site if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of [Client Name], our users, yourself or the public.
7. **Use of Anonymous Information.** We may use Anonymous Information (as defined below) or disclose it to third party service providers in order to improve our Site and enhance your experience with the Site. We may also disclose Anonymous Information (with or without compensation) to third parties, including advertisers and partners. "**Anonymous Information**" means information which does not enable identification of an individual user, such as aggregated information about the use of our Site.
8. **Opting Out.** You may choose not to receive future promotional, advertising, or other Site-related emails from us by selecting an unsubscribe link at the bottom of each email that we send. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any "Contact Us" request as well as administrative emails that are necessary to facilitate your use of the Site.
9. **Choice.** At all times, you may choose whether or not to provide or disclose Personal Information. If you choose not to provide mandatory Personal Information, you may still visit parts of the Site, but you may be unable to access certain options, offers, and services that involve our interaction with you.
10. **Access/Accuracy.** To the extent that you do provide us with Personal Information, we wish to maintain accurate Personal Information. If you would like to delete or correct any of your other

Personal Information that we may be storing, you may submit an access request by sending an email to [info@reflectiz.com](mailto:info@reflectiz.com). Your email should include adequate details of your request.

11. **Children's Privacy.** The Site is not structured to attract children under the age of 13 years. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 13 years. If we learn that we have collected Personal Information from a child under 13 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at [info@reflectiz.com](mailto:info@reflectiz.com).
12. **Security.** The security of Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially reasonable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Service, you can contact us at [info@reflectiz.com](mailto:info@reflectiz.com).
13. **Merger, Sale or Bankruptcy.** In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information in connection with the foregoing events.
14. **California Privacy Rights.** California Civil Code Section 1798.83 permits our customers who 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 [info@reflectiz.com](mailto:info@reflectiz.com). Please note that we are only required to respond to one request per customer each year.
15. **Our California Do Not Track Notice.** We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer's online activities over time and across different web sites when a consumer uses the Site.
16. **Commitment.** We are committed to protecting your privacy. Protecting your privacy online is an evolving area, and we are constantly evolving our Service to meet these demands. If you have any comments or questions regarding our Privacy Policy, or your Personal Information that we may be storing and using, please contact us at [info@reflectiz.com](mailto:info@reflectiz.com).

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