

# Website Privacy Policy

Coombs Marketing, LLC  
11086 Deep Cove Drive  
Charlotte, NC 29708 (USA)

This update to our Privacy Policy was posted on September 20, 2019 by Coombs Marketing, LLC, a South Carolina limited liability company, referred to herein as Coombs Marketing.

## Definitions

"Non-Personal Information" (NPI) is information that is in no way personally identifiable and that is obtained automatically when you access our Website with a web browser.

"Personally Identifiable Information" (PII) is non-public information that is personally identifiable to you and obtained for us to provide you with a product or service. PII may include information such as your name, address, email address, phone number, location data, an online identifier, and/or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

## Our Commitment to Your Privacy

Our Privacy Policy tells you what PII we may collect from you, how we may process your PII, how you can limit our use of your PII, and your rights to obtain, modify and/or delete any PII we have collected from

you. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our Website.

Coombs Marketing is committed to the security and privacy of all our customers. We take your privacy seriously, and we will work with you to ensure that you have an enjoyable online experience.

## Information We Collect

### ***Information you Provide Us***

We collect personal information when you request information about our services and products, interact with our Website forms/bots or customer service representatives, request delivery of white papers or other information, schedule an event or otherwise voluntarily provide such information through our Website or otherwise. This information includes the following categories:

1. Your Personal Contact Information, such as name, phone number and email address
2. Coombs services and products you may be interested in purchasing, including possible scopes of work and fee ranges
3. Your Company Information, including company website domain/URL, whether you represent a marketing agency, whether your company is a current customer of certain of our business partners

Generally, you will have control over the amount and type of information you provide to us when using our Website.

As a visitor to our Website, you can browse our Website to find out more about us. You are not required to sign in or provide us with any PII as a visitor.

### ***Information Collected Automatically***

When you use our Website, we automatically collect certain information by the interaction of your mobile device or web browser with our Website.

### ***Cookies***

Like many other websites, we use “Cookies.” A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to identify the areas of our Website that you have visited. We also use cookies to enhance your online experience by eliminating the need to log in multiple times for specific content. Finally, we may use Cookies to personalize the content that you see on our Website or to customize marketing and other information we provide to you.

### ***Other Automatically-Gathered Information***

We may automatically record information when you visit our Website, including the URL, IP address, browser type and language, and the date and time of your visit. We use this information to analyze trends among our users to help improve our Website or customize communications and information that you receive from us. If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our Website.

## ***Google Analytics Privacy Policy***

Our Website uses “Google Analytics” to collect information about the use of our Website. Google Analytics collects information such as how often users visit our site, what pages they visit when they do so, and what other sites they used prior to coming to our site. We use the information we get from Google Analytics to improve our Website, services and products. Google Analytics collects only the IP address assigned to you on the date you visit our site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit our site, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to our site is restricted by the Google Analytics Terms of Use. <http://www.google.com/analytics/terms/us.html>. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. <https://tools.google.com/dlpage/gaoptout>

## ***Do Not Track Settings***

Some web browsers have settings that enable you to request that our Website does not track your movement within our Website. Our Website does not obey such settings when transmitted to and detected by our Website. However, this does not change our compliance in any other way with our Privacy Policy.

## How Information is Used

When we use or process personal data about you, we do so only as necessary to provide the services and products you use (e.g., to meet our contractual and legal obligations), or otherwise with your consent, to comply with applicable law, or to fulfill other legitimate interests of you or us as described in this Policy. Through our Website, you will be provided with the choice of which types of communications you will receive with us, and the ability to change those choices whenever you want. Some of the more common, specific uses of your information are described below.

### ***Providing Requested Services and Products; Fulfilling Contractual Obligations***

We may use PII to provide the services and products you've requested or to otherwise perform any contract we may have with you, including communicating with you about the scope of work, payment or other related topics. When you buy a product or service from us on our Website, or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out that contract, we must process the information you give us. Some of this information may be PII, and we may use it in order to do any of the following:

- verify your identity for security purpose
- provide you with suggestions and advice on products and services
- provide our products and services, which includes updating, securing and troubleshooting, as well as providing support. We also may provide your PII to third party service partners, agents or subcontractors that

provide services that support our business relationship with you (i.e. payment processors, website-hosting companies, third party content platforms, etc.), but those third parties will only receive information necessary to provide the respective services and are not permitted to use personal data they receive from us for any other purpose.

- improve, personalize and develop our services and products

We process this information on the basis that there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We will continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### ***Information we process with your consent***

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our Website or ask us to provide you more information about our business, including job opportunities and our products and services, you provide your consent to us to process information that may be PII.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

When we communicate with you about our business, we will use the contact information you provided to us to discuss technical issues, new

products and services, and other information of interest to you. We may also send you emails with useful industry information, promotional information about our business or offers from us or our affiliates. You have a choice about whether or not you wish to receive communications from us. If you do not want to receive any or certain communications from us, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our Website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected third party service providers who we believe may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us using the contact information at the end of this Policy, using unsubscribe instructions provided in communications, or changing your elections

within our Website. However, if you do so, you may not be able to use our Website or our services further.

### ***Legally Required Releases of Information***

We may be legally required to disclose your PII, if such disclosure is (a) required by subpoena, law, or other legal process; (b) necessary to assist law enforcement officials or government enforcement agencies; (c) necessary to investigate violations of or otherwise enforce our Legal Terms; (d) necessary to protect us from legal action or claims from third parties including you; and/or (e) necessary to protect the legal rights, personal/real property, or personal safety of our company, customers, third party partners, employees, and affiliates.

### ***Other Legitimate Interest***

We may process information or use it to communicate with you on the basis that doing so is necessary to achieve a legitimate interest, either to you or to us. Where we use your information on this basis, we do so after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would consider it reasonable to do so

For example, we may process your data or communicate with you for any of the following purposes:



- advertising and marketing to you, which includes sending promotional communications, targeting advertising, and presenting you relevant offers based on information you provide or our prior dealings

- operating our business, which includes analyzing our performance, meeting our legal obligations, developing our workforce, and doing research

- record-keeping for the proper and necessary administration of our business

- responding to customer complaints or service requests

- responding to unsolicited communications from you to which we believe you would expect a response

- protecting and asserting the legal rights of any party

- insuring against or obtaining professional advice that is required to manage business risk

- protecting your interests where we believe we have a duty to do so

We will continue to use this information for this purpose until the legitimate interest no longer exists or such use is not necessary to achieve the legitimate interest.

### ***Our use of re-marketing***

Re-marketing involves placing a cookie on your computer when you browse our Website in order to be able to serve to you an advertisement

for our products or services when you visit some other website. We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

### ***Disclosures to Successors***

If our business is acquired or merges, in whole or in part, with another business, we retain the right to transfer your PII to the new business. The new business would retain the right to use your PII according to the terms of this Privacy Policy, as updated or as changed by the new business, subject to applicable law. You will have the opportunity to opt-out of any such transfer if we determine that the new business has privacy policies that differ materially from ours or that do not comply with applicable law.

## **Obtaining, Changing or Deleting Your Information**

### ***Access to your personal information***

You may review certain information that we hold about you by signing in to your account on our Website. To obtain a copy of all information we maintain about you, you may send us a request using the contact information at the end of this Policy or, if available, through a tool on our Website. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### ***Remove or Change your Information***

If you wish us to remove or change PII that you have provided us, you may contact us at the contact information at the end of this Policy or, if available, through a tool on our Website. This may limit the service we can provide to you.

### ***Verification of your Information***

When we receive any request to access, edit or delete PII, we will first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **Retention Period for Personal Data**

Except as otherwise mentioned in this Policy, we keep your PII only for as long as required by us:

- to provide you with the services or products you have requested, or otherwise to perform or enforce a contract between us;
- to continue to provide the best possible user experience to visitors who return to our website to collect information and educational materials
- to comply with other law, including for any period demanded by tax authorities; or
- to support a claim or defense in any court or in any legal, regulatory or administrative proceeding.

## Our Security Policy

Our Website is hosted in the USA and we conduct all of our business from our office located in the USA. Accordingly, the information which you provide to us may be transferred to countries outside the European Union. By submitting your personal data, you're agreeing to the transfer, storing and processing of your data outside of the European Union. Your data may be transferred to countries that do not have the same data protection laws as the country from which you initially provided the information.

We have taken steps to build our Website using sophisticated encryption and authentication tools to protect the security of your PII. When we collect your PII through our Website, we will encrypt your PII before it travels over the Internet using industry standards as establishing for conducting secure online transactions. We also use industry standard technologies such as secure routers and fire walls to make sure that your PII is safe. Unfortunately, we cannot fully guarantee secure data transmission over the Internet because of its nature.

Once we receive your PII, we have industry standard security measures in place to protect against the loss or misuse of your PII, though again, we cannot fully guarantee against such loss or misuse. We strongly urge you to protect any password you may have for our Website and not share it with anyone. You should always log out of our Website when you are done using it, especially if you are sharing a computer with someone else or are using a computer in a public place.

## Limitation of Liability

You assume the sole risk of transmitting your information as it relates to the use of this Website, and for any data corruptions, intentional interceptions, intrusions or unauthorized access to information, or of any delays, interruptions to or failures preventing the use this Website. In no event shall Coombs Marketing be liable for any direct, indirect, special, consequential or monetary damages, including fees, and penalties in connection with your use of materials posted on this Website or connectivity to or from this site to any other site.

## Protecting Your Child's Privacy

We follow the Children's Online Privacy Protection Act (COPPA). Even though our Website is not designed for use by anyone under the age of 18, we realize that a child may attempt to access our Website. We do not knowingly collect PII from a child. If you are a parent or guardian and believe your child is using our Website, please contact us. We may ask for proof of identification before we remove any information to prevent malicious removal of account information. If we discover on our own that a child is accessing our Website, we will delete the information as soon as we discover it, we will not use the information for any purpose, and we will not disclose the information to third parties. You acknowledge that we do not verify the age of our users nor do we have any liability to do so. If you are a child, please seek the permission of a parent or guardian before accessing our Website.

## Our Email Policy

We comply with the federal CAN-SPAM Act. You can always opt out of receipt of further email correspondence from us or our affiliates. We will not sell, rent, or trade your email address to any unaffiliated third-party without your permission (except in the sale or transfer of our business).

## Other Websites

Our Website may contain links to other websites. You understand that these websites are not under our control and are not subject to our Privacy Policy. These websites will likely have their own privacy policies, and we urge you to read those policies before using the website. We have no responsibility for these websites and provide links to these websites solely for your convenience. You acknowledge that your use and access of these other websites is solely at your own risk. It is your responsibility to check the privacy policies of these other websites to see how they treat your personal information.

Our services sometimes include preparing or recommending content for customers' websites that are built, hosted and/or maintained using a third party's content management system or other facilities, but Coombs Marketing does not host or control the content or operation of any customer websites. Coombs Marketing is not responsible for drafting, posting and/or enforcing our customers' privacy policies or determining whether the customers' policies or practices comply with applicable law. We are in no way responsible or liable for the collection and use of

personal information by our customers from their websites or otherwise resulting from our marketing services.

## Changes to Our Privacy Policy

We reserve the right to change this privacy policy at any time. If our company decides to change this Privacy Policy, we will post those changes on our Website so our users and customers are always aware of what information we collect, use, and disclose. In all cases, your continued use of our Website or our services and products after any change to this Privacy Policy will constitute your acceptance of such change.

## Questions about Our Privacy Policy

If you have any questions about our Privacy Policy, please contact us as follows:

By email: [info@coombsmarketing.com](mailto:info@coombsmarketing.com)

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