

## DeVito Verdi Privacy Policy

**Last Updated and Effective as of: October 21, 2020**

DeVito Verdi, Inc. (“DeVito Verdi”, “we”, “our” or “us”) understands that privacy is important to our users. Protecting your private information is our priority. This Privacy Policy below discloses our practices regarding information collection and usage for <https://devitoverdi.com> (the “Website”) and any websites, apps, content, communications or services that we provide (collectively, the “Services”), unless another applicable privacy policy is posted on that Service.

### **Overview:**

- We collect Personally Identifiable Information (as defined below) from users of our Website and Services when it is voluntarily provided to us and use it for the purposes for which it was provided (see **Information We Collect Directly From You**).
- We automatically collect information from users of our Website and Services for our advertising and analytical purposes (see **Information We Collect From You Automatically**).
- We will not use or share your Personally Identifiable Information with anyone except as described in this Privacy Policy.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you should not use the Website or the Services. By accessing or using the Website or Services, you agree to this Privacy Policy. If you have questions, you can always contact us using the information in the section below titled **Contact**.

### **Information We Collect Directly From You:**

We may collect information, including Personally Identifiable Information, when you provide such information to us directly, such as when you send us an email or contact us through our Website. Your provision of your Personally Identifiable Information to us is completely voluntary. “Personally Identifiable Information” is information that specifically identifies you. We do not collect Personally Identifiable Information unless you submit that information to us. Categories of Personally Identifiable Information we collect directly from you include identity data (e.g. your name, company name), and contact data (e.g. email address, telephone number). We may also collect other information that you directly provide us including marketing and communications data (e.g. your preferences in receiving marketing from us and the content of your messages to us).

### **Information We Collect Automatically:**

DeVito Verdi, our service providers or our third party partners may also automatically collect information from you when you visit our Website and use our Services through cookies and other tracking technologies. Such information does not directly identify you as an individual and may include:

- **Cookies and Similar Technology**  
We may store some information on your device or device hard drive as a cookie or similar type of file (such as clear gifs, web beacons, tags, and similar technologies that work on mobile devices) to collect data related to usage of the Website or our other Services. "Cookies" are pieces of information that may be placed on your computer by a website for the purpose of

collecting data to facilitate and enhance your communication and interaction with that website. Such data may include, without limitation, the address of the websites you visited before and after you visited the Website, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Website you visit and what links you clicked on, the region where your device is located, and geo-IP data. We may use cookies to customize your visit to the Website, for other purposes to make your visit more convenient and to enable us to enhance our Services. We or a third party platform with whom we work (including Facebook, LinkedIn and Google) may also use cookies or other tracking technologies to help us offer you products or services that may be of interest to you and to deliver relevant advertising when you visit this Service, or when you visit other websites or applications. We may also use these technologies to measure the performance of such advertising.

- **Clickstream**

As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as "clickstream data," can be collected and stored by a website's server. Clickstream data can tell us the type of computer and browsing software you use and the address of the website from which you linked to the Website. We may collect and use clickstream data as a form of aggregate information to anonymously determine how much time visitors spend on each page of our Website, how visitors navigate throughout the Website and how we may tailor our web pages to better meet the needs of visitors. This information will be used to improve our Website and our Services.

- **Site Analytics**

We may work with third-party service providers who use the technologies described in this section to conduct website analytics to help us track and understand how visitors use our Website. One such provider is Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how users use the Website. The information generated by the cookie about your use (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on activity for its staff and providing other services relating to web page activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You may refuse the use of cookies by selecting the appropriate settings in your browser. By using the Website and accepting cookies, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Please refer to the Google Analytics' currently available opt-outs for the web, found at <https://tools.google.com/dlpage/gaoptout/>.

## **How We Use Your Information**

We use Personally Identifiable Information and other information as described herein for the following purposes:

- to contact you about and to provide you with our Services,
- to personalize your experience with us including by presenting products or offers tailored to you,
- to respond to your direct inquiries,
- to add you to our mailing lists and send you emails from time to time, and

- for any additional purposes that you specifically consent to.

We also reserve the right to supplement your Personally Identifiable Information with information we gather from other sources which may include information we gather from online and offline sources. Finally, we reserve the right to use and disclose information that is not Personally Identifiable Information in any manner permitted by law except as otherwise provided in this Privacy Policy.

#### **Non-Personally Identifiable Information:**

As noted above, we may collect information that is not Personally Identifiable Information (“Non-Personally Identifiable Information”). We may aggregate or de-identify Personally Identifiable Information so that the information does not personally identify you or anyone else, such as by using Personally Identifiable Information to calculate the percentage of our customers who live in a particular area. Because Non-Personally Identifiable Information, including aggregate or de-identified information, does not personally identify you, we may collect, use and disclose Non-Personally Identifiable Information for any purpose permitted by law. In some instances, we may combine Non-Personally Identifiable Information with Personally Identifiable Information. If we combine any Non-Personally Identifiable Information with Personally Identifiable Information, the combined information will be treated by us as Personally Identifiable Information.

#### **How We Share Your Information**

Besides using your information ourselves, we may send your information, including Personally Identifiable Information, to other companies, affiliates and third parties in the following instances:

- *Service Providers.* We may share your information with third parties who may use it to provide us services such as website hosting, data analysis, infrastructure provision, information technology services, customer service and management, e-mail delivery services, auditing, anti-fraud monitoring and advertising or marketing services. These third parties may have access to Personally Identifiable Information that is necessary to perform their functions.
- *Legal Compliance and to Defend Our Rights.* We may disclose your information as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- *Business Transfers.* We may share your information with third parties in connection with a corporate restructuring, acquisition or divestiture.
- *Aggregated or Non-Personally Identifiable Information.* We may share aggregated information or Non-Personally Identifiable Information with unaffiliated third parties, such as business partners, manufacturers, distributors and retailers, in a form in which the shared information will not contain nor be linked to any Personally Identifiable Information, to improve and enhance your experience using the Website and Services and for our market research activities.

We will not sell your Personally Identifiable Information to any third party not affiliated with us without your consent except in connection with a business transfer as described above. We also do not disclose your information to third parties for their direct marketing purposes.

Please note that if you specifically consent to additional uses of your information, we may use your information in a manner consistent with that consent.

### **Interest-Based Advertising**

We may ourselves, or with third party vendors, use information we collect or vendor information to deliver targeted advertising to you when you visit other websites or use our Website or interact with our Services. Cookies, clickstream data, and other similar technologies described above may be used in this process. For example, if you are searching for information on a particular product, we or our vendor may cause an advertisement to appear on other websites you view with information on that product. This form of advertising, sometimes called “behavioral advertising,” which enables us and our vendors to know your interests in connection with the delivery of that specific ad. We believe that such advertising is helpful because you will see advertisements that are relevant to your interests. However, if you would like to opt out of these interest-based advertisements, please follow the opt-out process described below under “**Opt-Out.**”

### **Cross Device Matching**

We use Non-Personally Identifiable Information to facilitate cross device association. We or our third party vendors analyze device activity data using a mathematical tool known as a “probabilistic algorithm” to determine if you have interacted with content across multiple devices and to match such devices. In connection with this analysis, we may rely on Non-Personally Identifiable Information (including demographic, geographic and interest-based data) from third parties such as data vendors, pursuant to their own privacy policies or we may use the Non-Personally Identifiable Information we collect in conjunction with such third party data. Based on this data, we may then display targeted advertisements across devices that we believe are associated and may provide other services to our advertisers such as tools, analyses, data and insights to see how their website or mobile applications are used and to further enable the display of targeted advertisements to you, including across your devices. Our advertisers may also provide us with deterministic data about you that may be used to supplement our probabilistic data. Based on this data, we may then display targeted advertisements across devices that we believe are associated and may provide other services to our advertisers such as tools, analyses, data and insights to see how their website or mobile applications are used and to further enable cross-device targeting and analysis. In order to restrict our use of certain cross-device data, you may opt out in accordance with this section or the “**Opt Out**” section below.

### **Security**

The security of your information is very important to us. We attempt to provide for the secure transmission of your information from your computer to our servers by utilizing encryption software. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and DeVito Verdi, or information stored on the Website, our Services or our servers, will be free from unauthorized access by third parties such as hackers and your use of the Website or Services demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to

your Personally Identifiable Information. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the **Contact** section below.

### **Data Retention**

We will retain your information for as long as your account or inquiry is active or as needed to provide you with the Website or Services and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your information, we may continue to retain and use anonymous or aggregated data previously collected. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

### **Protection for Children**

Our Website and Services are intended for ages 18 and over. We do not knowingly collect Personally Identifiable Information from minors. When we become aware that Personally Identifiable Information (or other information that is protected under applicable law) from a child under 13 (or such other age as may be restricted under local law) has been collected, we will use all reasonable efforts to delete such information from our database. If you believe we might have any Personally Identifiable Information from or about a child under 13, please contact us at [info@devitoverdi.com](mailto:info@devitoverdi.com).

### **Other Websites and Social Networking Services**

As a convenience to you, we may provide links to third party websites, apps or services from within the Website or Services. We are not responsible for the privacy practices or content of these third party sites, and by providing a link we are not endorsing or promoting such third party sites. When you navigate away from our Website or Services, you do so at your own risk. We encourage you to read the policies and terms of every website, app or service you visit.

The Website or Services may integrate with social networking services. We do not control such services and are not liable for the manner in which they operate. While we may provide you with the ability to use such services in connection with our Website or Services, we are doing so merely as an accommodation and, like you, are relying upon those third party services to operate properly and fairly.

You should be aware that Personally Identifiable Information which you voluntarily include and transmit online in a publicly accessible blog, social network or otherwise online may be viewed and used by others. We are unable to control such uses of your Personally Identifiable Information, and by using such services you assume the risk that the information provided by you may be viewed and used by third parties.

### **Opt-Out**

To opt-out of any future promotional messages from us, you should send an unsubscribe request to us at [info@devitoverdi.com](mailto:info@devitoverdi.com). We will process your request within a reasonable time after receipt.

The online advertising industry provides a service through which you may opt-out of receiving targeted ads from certain data partners and other advertising partners that participate in self-regulatory programs. You can opt-out of targeted advertising from certain providers that participate in the Digital

Advertising Alliance (DAA) program at [www.aboutads.info/consumers](http://www.aboutads.info/consumers). Other providers are members of the Network Advertising Initiative, and you can opt-out of interest-based advertising by those members by visiting <http://optout.networkadvertising.org/>. Please note that by opting out, you will continue to see generic advertising that is not tailored to your specific interests and activities. To be clear, cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted out on your device browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device.

If you want to stop or restrict the placement of cookies or flush any cookies that may already be on your computer or device, please refer to and adjust your web browser preferences. Further information on cookies is available at [www.allaboutcookies.org](http://www.allaboutcookies.org). By deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Website or some of its functionality may be affected.

Please note that, unless required by law, we do not respond to or honor “do not track” (a/k/a/ DNT) signals or similar mechanisms transmitted by web browsers.

### **Nevada Privacy Rights**

If you are a Nevada resident, you have the right to request that we do not sell your covered information (as those terms are defined in N.R.S. 603A) that we have collected, or may collect, from you. We do not sell your covered information, however, if you would like to make such a request you may do so by contacting us at [info@devitoverdi.com](mailto:info@devitoverdi.com).

### **Changes to policy:**

We reserve the right, at our discretion, to change, modify, add, or remove portions from this policy at any time, provided that any such modifications will only be applied prospectively. Your continued use of the Website or Services following the posting of any changes to this policy means you accept such changes.

### **Contact:**

For questions or concerns relating to privacy, we can be contacted at: [info@devitoverdi.com](mailto:info@devitoverdi.com).

### **Site Maintenance:**

Our Website is maintained in the United States of America. If you are located outside the U.S., by using the Website, you authorize the export of your information to the USA and its storage and use as specified in this policy.