

## **The Services**

Through the Services, you may view information and content that is owned, licensed, or provided by the Company, its parent companies, subsidiaries and affiliates (circo.global). The Services may also include information and services provided by third parties and distributed by virtue of a license, grant or some other form of agreement with circo.global. When used in this Privacy Policy, "we", "us" and "our" mean circo.global.

## **Using the Services**

You can view the Services without providing any personal or individually identifiable information. You may also be able to set the security settings on your browser to prevent certain tracking and logging features. If you do that, the Services may be less functional for you.

There are times when you may choose to give us personally identifiable information about yourself. For example, you may wish to register, make purchases and view information, receive emails from us, receive invitations to attend events, participate in discussions, preview new products and services, or participate in special promotions. If you register to use the Services or if you conduct transactions through the circo.global website or any related mobile applications, we will collect information about the transactions you engage in and your other activities. We need certain information from you to register you, authenticate you, process your registration information and payments, and send goods to you, as necessary.

## **Privacy Policy**

We collect information when you visit, use or view our Services or otherwise voluntarily submit your information when contacting us.

## **Kinds of Information We Collect**

We may collect information that you voluntarily give us, as well as location-based information and site visitorship data as described below.

## **Personally Identifiable Information**

In order to take advantage of certain features, you may be asked to provide personally identifiable information about you that would enable someone to contact you directly. Personally identifiable information includes your email address, name, postal/ mailing address, telephone numbers, social security number, shipping and billing addresses, or persistent identifier (such as a customer number held in a cookie) which is associated with personally identifiable information, as well as other information that you may provide voluntarily. We collect such personally identifiable information that you give us so that we may view:

- the date and time you access the Services;
- your internet service provider, mobile carrier, or data services provider;
- your Internet Protocol (IP) address;
- the pages you visit;
- the products you purchase and review;
- the links you click;
- the features used;

- how and when you interact with the services;
- the content, images and advertisements you select; and
- how you arrived at the Services and where you go when you leave.

We will use the personally identifiable information we collect to provide you with specific information and services that you request, and with additional information and services that may be of interest to you. By providing your personally identifiable information, you fully understand and consent to the collection and processing of such information in the United States of America and other countries. To protect your privacy and security, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your data. While we strive to protect our user's personal information and privacy, we cannot guarantee the security of any information you disclose online, and you do so at your own risk.

We may also collect non-personal information such as your IP address and use 'cookies' on the website. The information obtained from collecting IP addresses and using 'cookies' is not personal information about you. For more information, please read the sections on IP addresses and cookies below.

#### **Location-Based Information**

We may collect information relating to your general location based on (1) information you manually provide, (2) the IP address of your computer, (3) Global Positioning System (GPS) information sent to us by your GPS-enabled device, and (4) the proximity of your laptop computer, mobile wireless device, personal digital assistant, personal communication system, or other communications device (your "Personal Communication Device") to the nearest radio tower or cell site. We may also be able to detect when your Personal Communication Device is activated as well as when and how you are using it. circo.global may collect data to verify the information you provide manually and to provide you with location-based content. We may associate Personally Identifiable Information with location-based information provided by you or your Personal Communication Device solely for our internal use and to improve your experience with the Services.

#### **Site Visitorship Data**

Site visitorship data is information about the way a website is used that is not associated with an individual's identity. We use anonymous data regarding online behavior to better understand how people use our Services. To that end, we may use aggregated, anonymous online traffic behavior along with information from third parties to track usage trends and thereby improve the Services. We may also use this aggregated, anonymous information to develop reports that we may share with third party marketing partners and affiliates. The kind of information we may collect includes:

- the date and time you access the Services;
- your internet service provider, mobile carrier, or data services provider;
- your Internet Protocol (IP) address;
- the pages you visit;
- the products you purchase and review;
- the links you click;

- the features used;
- how and when you interact with the services;
- the content, images and advertisements you select; and
- how you arrived at the Services and where you go when you leave.

Most site visitorship data is collected using data collection tools such as web beacons, cookies, embedded web links and other software (together, "Data Collection Tools"). Data Collection Tools are typically small data files or software that are sent to your browser and stored on your computer or mobile device hard drive. Most browsers and display software can be set to inform you when Data Collection Tools are being used or other tracking software is being sent to your computer or Personal Communication Device. They also provide you with the option of refusing such Data Collection Tools. However, refusing to allow the use of Data Collection Tools may, in some cases, preclude you from using, or negatively impact the display or function of, certain areas or features of the Services, including preventing you from purchasing products.

Data Collection Tools may store the information in your shopping cart and allow us to relate your use of the Services to other information about you, including your Personal Information. We may do this to improve and personalize your experience with the Services and help resolve problems you experience through your use of the Services.

#### **Do Not Track**

We do not adjust or alter our Site's data collection and use practices when receiving Do Not Track transmissions from your browser.

#### **Disclosure of Information**

circo.global will not release any personally identifiable information to third parties without your consent except as follows:

- By providing us your personally identifiable information grants circo.global, the right to use such information for the provision of Services to you and for the benefit of circo.global without restrictions for the purposes that include, without limitation, research, marketing, and content, product and lead development.
- circo.global may share information we collect with our business and third party marketing partners. If we share your information, we will request that such third parties treat your information in accordance with this Privacy Policy and refrain from disclosing or using your personally identifiable information for purposes other than for the provision of Services to you or for the benefit of circo.global. circo.global does not provide personally identifiable information to unaffiliated third parties for use in marketing directly to you. To the extent required, you hereby authorize this use of your personally identifiable information.
- We may disclose information we collect, including personally identifiable information, to third parties as required or permitted by law. For example, we may disclose information:
  - to regulators;
  - to law enforcement authorities pursuant to an official request;

- to vendors who provide us with services; and
- to companies that may acquire part or all of circo.global or an affiliated company.

circo.global is not responsible for the protection of the information you provide to other websites. You should be aware that when you voluntarily disclose personally identifiable information through other applications and websites, such information can be collected and used by others and may result in unsolicited communications.

### **Advertising**

We may use third-party companies to serve ads and provide content through the Services. These companies may use cookies and other Data Collection Tools that are not sent by us to learn about your use of the Services and other websites and apps in order to present personalized advertisements and other messages that may be of interest to you. circo.global is not responsible for such cookies and tracking software.

### **Commercial Transactions**

Circumstances may arise where, whether for strategic or other reasons, we decide to sell, buy, merge or otherwise reorganize our business. Such a transaction may involve the disclosure of personally identifiable information to prospective or actual purchasers or joint venture partners, or the receipt of it from sellers. It is our practice to seek appropriate protection for information in these types of transactions.

### **Information Security**

Whenever you enter an area of the site that carries or requires you to enter sensitive information such as your credit card details, a padlock icon will appear in the address bar of your browser, indicating that the page is secure. circo.global uses the Secure Sockets Layer (SSL) and Private Communications Technology security standards that are supported by Microsoft Internet Explorer 4.0 or later and other popular browsers. SSL encodes your personal information by encrypting credit card number, name, address, phone number, identification number and your password so that they cannot be read by unauthorized parties.

While we may provide encryption technologies and use other reasonable precautions to protect confidential information and provide suitable security, we do not guarantee that information transmitted through the Internet is secure, or that such transmissions will be free from delay, interruption, interception or error.

circo.global may implement certain physical, technological and managerial procedures to safeguard the personally identifiable information we collect. However, these procedures do not guarantee that the information will remain secure against theft or misuse.

### **Communications**

From time to time, circo.global and its affiliates may communicate with you regarding your transactions and the administration of your account, current projects, special offers, invitations to events, offers for services, new product previews and updates to the Services, press releases and announcements

concerning the services we provide, contests and sweepstakes, as well as important changes in our Terms of Use and this Privacy Policy. By providing us with your e-mail address and/or your mobile phone number, you consent to receiving such communications. If at any time you decide for any reason that you no longer wish to receive such communications, you may “opt out” of receiving them by using one of the following methods:

- Select the "opt out" or "unsubscribe" link, or follow the opt-out instructions that may be included in such communication.
- Where applicable, return to the web page(s) or service where you originally registered your preferences and follow the opt-out instructions.
- E-mail us at [support@circo.global](mailto:support@circo.global). Be sure to provide your name, e-mail address and postal address, and specific relevant information about the particular service you no longer wish to receive.

Please be aware that when you opt out of receiving communications, it may affect the services you have chosen to receive from us where accepting the communications is a condition of receiving such services. By registering as a user or purchasing products, you consent to receiving administration and transaction related communications.

### **Hyperlinks and Referrals**

Other websites accessible through the Services (through hyperlinks, advertisements or otherwise) have their own privacy policies and data collection, use and disclosure practices. Please consult their terms and conditions and privacy policies prior to use.

We do not, even periodically, review the privacy policies or terms of use of third parties and we are not responsible or liable for their privacy practices, availability or reliability of the services they may provide, or the accuracy or completeness of their content.

### **Children's Privacy**

We do not knowingly collect or distribute personally identifiable information from children under the age of 13. As one measure to ensure that we do not gather personally identifiable information from children under 13, we require that all individuals provide a valid credit card number before completing a purchase order. If you are the parent or guardian of a child under the age of 13 and believe that we have collected personally identifiable information contrary to this policy or, in the United States, the Children's Online Privacy Protection Act (COPPA), please contact us by email so that we may delete such information. You can learn more about COPPA at the United States Federal Trade Commission website:

<http://www.ftc.gov/privacy/privacyinitiatives/childrens.html>

### **Safe Harbor Data Privacy Notice**

In the US, circo.global adheres to the Safe Harbor Principles published by the U.S. Department of Commerce (the "Safe Harbor Principles") with respect to personally identifiable information it receives from the European Union. This notice outlines circo.global's general policy and practices in compliance with the Safe Harbor Principles, including the type of information to which this notice applies, how we use information, and your choices regarding our use of, and your ability to correct, your personally identifiable information. For purposes of this notice, "personally identifiable information" includes information (a) transferred from the European Union to the United States; (b) recorded in any form by us; and (c)

pertaining to a specific individual who is identified in, or is identifiable from, the data. This notice applies to all personally identifiable information we handle, including on-line (except as noted below), off-line, and manually processed data. If there is any conflict between this Privacy Policy and the Safe Harbor Principles, the Safe Harbor Principles will apply.

### **Notice and Choice**

We obtain personal information only as permitted by the Safe Harbor Principles or with the consent of the individual affected. We may ask for your consent to collect, use, and/or disclose personal information in certain ways, and you may be required to give your consent in order to use our services. To the extent permitted under the Safe Harbor Principles, we reserve the right to process personal information in the course of providing services through the Services without the knowledge of individuals involved.

### **Transfers**

circo.global will obtain assurances from its affiliates that they will safeguard personal information consistently with this Privacy Policy. If we learn that an affiliate is using or disclosing personal information in a manner contrary to this Privacy Policy, we will take steps to prevent or stop the use or disclosure.

### **Security & Enforcement**

circo.global will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction, and it will conduct compliance audits of its relevant privacy practices to verify adherence to this Privacy Policy. We cannot guarantee, in every circumstance, the security of the personal information you provide through the Services. All incoming encrypted information is routed through our firewall, which serves as a gatekeeper for our system. Only data containing the correct authorisation is permitted past the firewall. Attempts to pass the firewall are constantly monitored for suspicious activity.

### **Effective Date**

This is our most current Privacy Policy and is effective as of August 1, 2019. We reserve the right to change any of our terms and policies at any time, without notice. If we change it, we will post the then-current Privacy Policy on this page. Any changes to this Privacy Policy will be effective as of the date posted.

### **Contact Us**

If you have questions or comments about our policies, please contact [support@circo.global](mailto:support@circo.global)