

CRESTWOOD TECHNOLOGY GROUP

PRIVACY POLICY

Last Updated: June, 2020

1. Acceptance of Privacy Policy

Welcome to Crestwood Technology Group (“CTG,” “we,” “our,” or “us”) and our Privacy Policy (“Privacy Policy”). This Privacy Policy is important and affects your legal rights, so please read carefully.

By accessing or using <https://www.ctg123.com/> and any related websites and services (collectively, the “Site”), or by placing an order for our products in any medium, you agree to be bound by this Privacy Policy and all of the terms incorporated herein by reference. This Privacy Policy describes the types of personal information we collect from you, whether from the Site or otherwise, and how we collect, use, and share that information.

Our processing of personal data, such as your name, address, e-mail address, or telephone number, shall be undertaken consistent with the requirements of applicable privacy laws. The purpose of this Privacy Policy is to provide to customers, potential customers, vendors, users, and potential users of our Site information, and any other third parties about the nature, scope, and purpose of the personal data we collect, use, and process, and to advise data subjects of their rights. Whether we serve as a data controller or processor of personal information, we have implemented numerous technical and organizational measures to ensure the protection of personal data processed through the Site or otherwise processed by us. However, Internet-based data transmissions may in principle have security gaps, so please understand that absolute protection is not assured.

By using the Site or otherwise interacting with us, you accept and expressly agree to our practices surrounding the collection, use, and sharing of personal information provided by you in the manner described in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, you cannot, and we do not authorize you to, access, browse, or use the Site or place an order for our products.

2. Information We Collect

2.1 Personal Information We Collect Directly from You

We receive personal information directly from you when you voluntarily provide us with such personal information, including, without limitation, the following:

- **Personal Data** (such as your name, email address, username, telephone number, postal address, payment card, and billing and contact information), including when you sign up to receive information or services from us or participate in social media accounts involving CTG;
- **Commercial Information** (such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- **Internet or other Similar Network Activity** (such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement);
- **Geolocation Data** (such as your physical location or movements); and
- **Other Identifying Information That You Voluntarily Choose To Provide To Us**, including without limitation unique identifiers such as passwords, password hints, and similar security

information used for authentication and account access, and personal information in messages that you send to us and/or provide to our customer service team.

We may also collect additional information, which may be personal information, as otherwise described to you at the point of collection or pursuant to your consent. You may still access and use some portions of the Site if you choose not to provide us with any personal information, but features of the Site that require your personal information will not be accessible to you.

2.2 Information from Third Party Sources

Some third parties, such as our business partners and service providers, provide us with personal information about you. For example, if you interact with a third-party service when using our Site, such as if you use a third party service to log-in to our Site (e.g., Facebook or Google), or if you share content from our Site through a third party social media service, the third party service will send us certain information about you if the third party service and your account settings allow such sharing. The information we receive will depend on the policies and your account settings with the third-party service. You understand the information transmitted to us is covered by this Privacy Policy; for example, the basic information we receive from Facebook about you. Please note, however, that we will comply with the privacy policies of the corresponding social media platform and we will only collect and store such personal information that we are permitted to collect by these social media platforms. By way of further example, we collect personal information using Twitter social plugins, LinkedIn advertising, LinkedIn social plugins and Twitter advertising.

2.3 Information We Automatically Collect When You Use Our Site

In order to access and use certain areas or features of the Site, you consent to our collection and use of certain information about your use of the Site through the use of tracking technologies or by other passive means. Your consent to our access and use of this “passively collected” information includes, but is not limited to, the domain name of the website that allowed you to navigate to the Site, search engines used, the internet protocol (IP) address used, the length of time spent on the Site, the pages you looked at on the Site, other webpages you visited before and after visiting the Site, the type of internet browser you have, the frequency of your visits to the Site, and other relevant statistics. For example, we also may automatically collect certain data when you use the Site, such as: (1) IP address; (2) domain server; (3) type of device(s) used to access the Site; (4) web browser(s) used to access the Site; (5) referring webpage or other source through which you accessed the Site; (6) geolocation information; and (7) other statistics and information associated with the interaction between your browser or device and the Site (collectively, “**Traffic Data**”). Depending on applicable law, some Traffic Data may be personal information.

3. How We Collect Information

We collect information (including personal information and Traffic Data) when you use and interact with the Site, and in some cases from third party sources. Such means of collection include:

- When you use the Site’s interactive tools and services;
- When you voluntarily provide information in free-form text boxes through the Site or through responses to surveys, questionnaires and the like;
- If you use a location-enabled browser, we may receive information about your location and mobile device, as applicable;
- Through cookies, web beacons, analytics services and other tracking technology (collectively, “**Tracking Tools**”), as described below; and

- When you use the “Contact Us” function on the Site, send us an email or otherwise contact us.

4. Tracking Tools, Behavioral Advertising, and Opt-Out Options

4.1. Tracking Tools

We may use tools outlined below in order to provide our Site to, advertise to, and to better understand users.

- **Cookies:** Our Site use Cookies to keep track of your preferences and to deliver content specific to your interests. For instance, when we use a cookie to identify you, you would not have to log in more than once, thereby saving time while on our site “Cookies” are small computer files transferred to your computing device that contain information such as user ID, user preferences, lists of pages visited and activities conducted while using the Site. We use the following cookies to improve or tailor the Site, customize advertisements by tracking navigation habits, measuring performance, and storing authentication status so re-entering credentials is not required, customize user experiences with the Site, and for analytics and fraud prevention. You can manage or disable cookies at any time by adjusting your privacy preferences regarding the use of cookies and similar technologies through your browser. For more information on cookies, including how to control your cookie settings and preferences, visit <http://www.allaboutcookies.org>.
- We use the following cookies on the Site:

Category	Name	Use
<i>Strictly Necessary Cookies</i>	<ul style="list-style-type: none"> • SERVERID 	These cookies are necessary to offer the basic functionalities of our Site, to deliver the services the users have requested, and to remember a user’s cookie settings.
<i>Performance cookies</i>	<ul style="list-style-type: none"> • _ga • _gat • _gid 	These cookies are associated with Google Universal Analytics. They collect information about how users use a website, such as recording visitor numbers and demographics. These cookies don’t collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. They are only used to improve how a website works.
<i>Persistent cookies</i>		

<i>Functionality cookies</i>		
<i>Administrator cookies</i>		
<i>Analytic cookies</i>	<ul style="list-style-type: none"> • Google Analytics • Heap Analytics 	These cookies collect data to help us understand how our visitors use the Sites and how we can improve the Sites.

Although we directly use certain cookies, be aware that some cookies are placed by a third party on your device and provide information to us and third parties about your browsing habits (such as your visits to our Site, the pages you have visited, and the links and advertisements you have clicked). These cookies can be used to determine whether certain third-party services are being used, to identify your interests, and to serve advertisements relevant to you. We do not control third party cookies.

For more information pertaining to CTG’s use of cookies, please visit https://www.ctg123.com/wp-content/uploads/2021/08/ctg_cookie_policy_august2021.pdf

- **Web Beacons:** “Web Beacons” (a.k.a. clear GIFs or pixel tags) are tiny graphic image files embedded in a web page or email that may be used to collect information about the use of our Site, the websites of selected advertisers and the emails, or special promotions or newsletters that we send. The information collected by Web Beacons allows us to analyze how many people are using the Site, using selected publishers’ websites or opening emails, and for what purpose, and also allows us to enhance our interest-based advertising (discussed further below).
- **Web Service Analytics:** We may use third-party analytics services in connection with the Site, including, for example, to register mouse clicks, mouse movements, scrolling activity, and text typed into the Site. We use the information collected from these services to help make the Site easier to use and as otherwise set forth in Section 5 (How We Use Your Information). These analytics services generally do not collect personal information unless you voluntarily provide it and generally do not track your browsing habits across web services that do not use their services.
- **Mobile Device Identifiers:** As with other Tracking Tools, mobile device identifiers help CTG learn more about our users’ demographics and internet behaviors in order to personalize and improve the Site. Mobile device identifiers are data stored on mobile devices that may track mobile device and data and activities occurring on and through it, as well as the applications installed on it. Mobile device identifiers enable collection of personal information (such as media access control, address and location) and Traffic Data.

4.2. Behavioral Advertising

We may use a type of advertising commonly known as interest-based or online behavioral advertising. This means that some of our partners use Tracking Tools (such as cookies, pixel tags, and web beacons) to collect information about a user's online activities to display CTG ads to the user based on the user's interests ("**Behavioral Advertising**"). Such partners may include third-party service providers, advertisers, advertising networks or platforms, traffic measurement service providers, marketing analytics service providers, and other third-party service providers (collectively, "**Advertising Service Providers**"). Other Tracking Tools used by our partners may collect information when you use the Site, such as IP address, mobile device ID, operating system, browser, web page interactions, geographic location, and demographic information, such as gender and age range. These Tracking Tools help CTG learn more about our users' demographics and internet behaviors.

4.3. Options for Opting out of Cookies and Mobile Device Identifiers

Some web browsers allow you to reject cookies or to alert you when a Cookie is placed on your computer, tablet, or mobile device. You may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept CTG cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Site.

- You may opt out of receiving certain cookies and certain trackers by visiting the Network Advertising Initiative ("**NAI**") opt out page or the Digital Advertising Alliance ("**DAA**") opt out page, or by installing the DAA's AppChoice app (for iOS; for Android) on your mobile computing device. When you use these opt-out features, an "opt-out" Cookie will be placed on your computer, tablet, or mobile computing device indicating that you do not want to receive interest-based advertising from NAI or DAA member companies. If you delete cookies on your computer, tablet, or mobile computing device, you may need to opt out again. For information about how to opt out of interest-based advertising on mobile devices, please visit <http://www.applicationprivacy.org/expressing-your-behavioral-advertising-choices-on-a-mobile-device>. You will need to opt out of each browser and device for which you desire to apply these opt-out features.
- Even after opting out of Behavioral Advertising, you may still see CTG advertisements that are not interest-based (i.e., not targeted toward you). Also, opting out does not mean that CTG is no longer using Tracking Tools — CTG still may collect information about your use of the Site even after you have opted out of Behavioral Advertising and may still serve advertisements to you via the Site based on information it collects via the Site.

This Privacy Policy does not cover the use of cookies and other Tracking Tools by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that some cookies placed by third parties can continue to track your activities online even after you have left our Site.

4.4. How We Respond to Browser "Do Not Track" (DNT) Signals

Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a "Do Not Track" ("**DNT**") or similar feature that signals to web services that a visitor does not want to have his/her online activity and behavior tracked. If a web service operator elects to respond to a particular DNT signal, the web service operator may refrain from collecting certain personal information about the browser's user. Not all browsers offer a DNT option and there is currently no industry consensus as to what constitutes a DNT signal. For these reasons, many web service operators, including CTG, do not proactively respond to DNT signals. For more information about DNT signals, visit <http://allaboutdnt.com>.

5. How We Use Your Information

We may use information (including information that has been de-identified and/or aggregated) to better understand who uses the Site and how we can deliver a better user experience.

We use information, including personal information, to provide the Site and to help improve the Site, to develop new services, and to market or advertise through our third-party marketing partners (for example, to display CTG ads on other web services). Specifically, such use may include:

- Providing you with the products, services and information you request;
- Responding to correspondence that we receive from you;
- Contacting you when necessary or requested;
- Providing, maintaining, administering, or expanding the Site, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Site, and other products and services we offer;
- Posting testimonials related to our services; provided we will obtain your specific consent to use any personal information in such testimonials.
- Customizing or tailoring your experience of the Site, which may include sending customized messages or showing you Sponsored Results;
- Notifying you about certain resources or services we think you may be interested in learning more about, including information related to updates or new features for products or services;
- Sending you marketing and promotional communications, including without limitation information about CTG, newsletters, invitations to special events, and/or announcements that may interest you;
- Sending emails and other communications that display content that we think will interest you and according to your preferences;
- Combining information received from third parties with information that we have from or about you and using the combined information for any of the purposes described in this Privacy Policy;
- Showing you advertisements, including interest-based or online behavioral advertising;
- Using statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;
- Fulfilling our legally required obligations, such as preventing, detecting, and investigating security incidents and potentially illegal or prohibited activities;
- Resolving disputes;
- Protecting against or deterring fraudulent, illegal, or harmful actions; and
- Enforcing our Privacy Policy, Terms of Use and other agreements.

6. How We Share Your Information

In certain circumstances, and in order to perform the Site, we may share certain information that we collect from you, as described in this section:

- **No Sale of Personal Information:** We do not sell your personal information to third parties. We may share your personal information with our service provider partners to customize or display our advertising.
- **Partners:** We may share your personal information and/or Traffic Data with our service provider partners who perform operational services (such as hosting, billing, fulfillment, data storage, security, insurance verification, web service analytics, marketing campaigns, or ad serving) and/or who make certain services, features, or functionality available to our users.

- **Cross Device Matching:** To determine if users have interacted with content across multiple devices and to match such devices, we work with partners who analyze device activity data and/or rely on your information (including demographic, geographic, and interest-based data). To supplement this analysis, we also provide de-identified data to these partners. Based on this data, we may then display targeted advertisements across devices that we believe are associated or use this data to further analyze usage of the Site across devices.
- **Shipping:** We sometimes may use an outside shipping company to ship orders, and a merchant bank to bill users for goods and services. These companies do not retain, share, store or use personally identifiable information for any secondary purposes beyond filling your order.
- **Lawful Orders:** At our sole discretion, we reserve the right to disclose information to law enforcement or other government officials if it is demanded in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability.
- **Business Transfers:** We may transfer your personal information to another company in connection with a proposed merger, sale, acquisition, or other change of ownership or control by or of CTG (whether in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.
- **Protection of CTG and Others:** We also may need to disclose your personal information or any other information we collect about you if we determine in good faith that such disclosure is needed to: (1) comply with or fulfill our obligations under applicable law, regulation, court order or other legal process; (2) protect the rights, property, or safety of you, CTG or another party; (3) enforce the Agreement or other agreements with you; or (4) respond to claims that any posting or other content violates third-party rights.
- **Other Information:** We may disclose information that is neither personal information and/or has been de-identified and/or aggregated at our discretion.

7. Storage and Security of Information

The security of your personal information is important to us. We endeavor to follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and in storage.

We may store and process your information in the United States. We maintain industry standard backup and archival systems. Although we make good faith efforts to store personal information in a secure operating environment that is not open to the public, we do not and cannot guarantee the security of your personal information. If at any time during or after our relationship we believe that the security of your personal information may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we will endeavor to notify you as promptly as possible under the circumstances. If we have your e-mail address, we may notify you by e-mail to the most recent e-mail address you have provided us. If you receive a notice from us, you can print it to retain a copy of it. To receive these notices, you must check your e-mail account using your computer or mobile device and email application software. **You consent to our use of e-mail as a means of such notification. If you prefer for us to use the U.S. Postal Service to notify you in this situation, please e-mail us at service@ctgnow.com.** Please include your address when you submit your request. You can make this election any time, and it will apply to notifications we make after a reasonable time thereafter for us to

process your request. You may also use this e-mail address to request a print copy, at no charge, of an electronic notice we have sent to you regarding a compromise of your personal information.

8. Your Choices

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features. If you do not want to receive certain communications from us, please let us know through the “unsubscribe” feature included in our communications, or by submitting a written request to CTG at service@ctgnow.com.

You can request access to, or deletion of, your personal information that we collect and maintain through our Services by contacting us at service@ctgnow.com with “Request for Privacy Information” on the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response.

9. Notice to California Residents

For California residents, in addition to the information identified above in Section 2.1 (Personal Information We Collect Directly from You), please be informed that we may collect the following categories of personal information from you:

- Categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e): A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

We may use or disclose the personal information we collect for one or more of the following purposes:

- Provide you with the products and services you request from us;
- Process user-requested transactions, including online bill payment;
- Communicate with you about your account or transactions with us and send you information about features on the Site;
- Communicate with you about changes to our policies;
- Personalize content and experiences on our Site;
- Send you newsletters, offers, and promotions for our products and services, third party products and services, or special events by email or other media; and
- Optimize or improve our products, services, and operations.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

In some circumstances, the California Consumer Privacy Act (“CCPA”) affords California residents certain rights, including:

- the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months;
- the right to opt of sale of your personal information to a third party; and
- the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

Although CTG may not fall within the jurisdictional requirements of the CCPA, we are providing you with an option to request this information or action by emailing us at service@ctgnow.com.

10. How Long We Retain Your Information

We retain personal information about you for as long as necessary to provide you access to or other services described on the Site. In some cases, we retain personal information for longer, if doing so is necessary to comply with our legal obligations, resolve disputes, collect fees owed, prevent fraud, enforce the Agreement, or as otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

11. Information Provided on Behalf of Children and Others

The Site is not intended for use by children and children under the age of 13 are prohibited from using the Site. CTG does not knowingly collect any information from children and the Site is not directed to children. If you are under 13, please do not attempt to register for the Site or send any personal information about yourself to us.

By accessing, using and/or submitting information to or through the Site, you represent that you are not younger than age 13. If we learn that we have received any information directly from a child under age 13 without his/her parent's written consent, we will use that information only to respond directly to that child (or his/her parent or legal guardian) to inform the child that he/she cannot use the Site, and we will subsequently delete that information. If you believe that a child under 13 may have provided us personal information, please contact us at service@ctgnow.com.

If you are between age 13 and the age of majority in your place of residence, you may use the Site only with the consent of or under the supervision of your parent or legal guardian. If you are a parent or legal guardian of a minor child, you may, in compliance with the Agreement, use the Site on behalf of such minor child. Any information that you provide us while using the Site on behalf of your minor child will be treated as personal information as otherwise provided herein.

If you use the Site on behalf of another person, regardless of age, you agree that CTG may contact you for any communication made in connection with providing the Site or any legally required communications. You further agree to forward or share any such communication with any person for whom you are using the Site on behalf.

If you are under 16 years of age and reside in the European Union, you must provide an email address for your parent or legal guardian, and before you can access or use the Site, we must receive your parent's or legal guardian's express consent. You will not receive access or the ability to use the Site, and we will not collect additional personal information from you, until we receive your parent's or legal guardian's consent. Your parent or legal guardian may revoke consent at any time, and we will take reasonable steps to delete all personal information collected from you. We will also provide your parent or legal guardian with the ability to request to review your personal information, prohibit further collection of your personal information, and delete, or instruct the deletion of, your personal information.

12. Notice to non-U.S. Users

As the Internet is a global environment, collecting and processing personal information may involve the transmission of this data internationally, including into and/or outside of the United States. Therefore, by communicating electronically with us, you acknowledge and agree to your personal data being processed in this way. Specifically, if you are located outside of the United States, please be aware that by using the Site, your personal information may be transferred to the United States or other third-countries, the privacy laws of which may be deemed by your country to have inadequate data protection. If you are located outside of the United States and voluntarily submit personal information to us, you thereby consent to the general use of such information as provided in this Privacy Policy and to the transfer of that information to, and/or storage of that information in, the United States or other third-countries.

If you reside in the European Union, you have certain rights under the European Data Protection Regulation (“**GDPR**”), including:

- the right to be informed of the personal information we collect and how we process and use that data;
- the right to request access to your personal information;
- the right to request that inaccurate personal information be rectified, or completed if incomplete;
- the right to request erasure of your personal information;
- the right to restrict our processing or use of your personal information;
- the right to obtain and reuse your personal information for your own purposes;
- the right to object to our processing or transferring your personal information;
- the right to withdraw your consent for us to use your personal information; and
- the right to lodge a complaint with a supervisory authority under the GDPR.

We have a legitimate interest in collecting and processing your information for the purposes we have outlined in this Privacy Policy and so that we can optimize your experience with the Site. We retain and store your personal information only for as long as we have a legitimate business purpose to do so and in accordance with our data retention policies and this Privacy Policy.

In response to receiving a request for one of the rights set forth above, we will timely comply with the request within the time periods set forth in the GDPR for each right. Several of the above rights are not absolute and apply only in certain circumstances. CTG will comply with requests for those rights as set forth in the GDPR. We are intent on resolving any issues relating to our handling of your personal information, and you may contact us at any time regarding any questions or concerns. We do not make any decisions about you based on automated processing of your personal information.

13. Other Web Services

The Site contains links to or embedded content from third party web services. A link to or embedded content from a non-CTG web service does not mean that we endorse that web service, the quality or accuracy of information presented on the non-CTG web service or the persons or entities associated with the non-CTG web service. If you decide to visit a third-party web service, you are subject to the privacy policy of the third-party web service as applicable and we are not responsible for the policies and practices of the third-party web service. We encourage you to ask questions before you disclose your information to others.

You may have arrived at the Site from, or began your use of the Site at, a third-party web service, including a third-party web service that links to CTG or embeds CTG content. The presence of such links or content on third party web services does not mean that we endorse that web service, the quality or accuracy of information presented on the non-CTG web service or the persons or entities associated with

the non- CTG web service. You may be subject to the privacy policy of the third-party web service and we are not responsible for the policies and practices of any third-party web service. In addition, the policies and practices of third parties do not apply to your information, including personal information, obtained pursuant to this Privacy Policy.

14. Updates and Changes to Privacy Policy

The effective date of this Privacy Policy is set forth at the top of this webpage. We will notify you of any material change by posting notice on this webpage. Your continued use of the Site after the effective date constitutes your acceptance of the amended Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices. Any amended Privacy Policy supersedes all previous versions. **IF YOU DO NOT AGREE TO FUTURE CHANGES TO THIS PRIVACY POLICY, YOU MUST STOP USING THE SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES.**

15. Contact Us

If you have any comments, concerns or questions about this Privacy Policy, please contact us at **service@ctgnow.com**.