

*July 28, 2021*

## **Privacy Policy**

This Privacy Policy describes the manner in which LeftsnRights, Inc. (“LeftsnRights,” “our,” “us” or “we”) collects, uses, maintains and discloses information collected from users (each, a “User” or “you”) of our website ([www.liqwid.com](http://www.liqwid.com)) (the “Site”), and other products, services and support offered by LeftsnRights, including without limitation our Viewable Advertising Library (VAL) technology that is placed on the webpages of various third party websites (the products, services and support together with the Site, the “Services”).

By accessing or using any of our Services, you are and shall be bound by, and you agree to the collection and use of your Personal Information (defined below) as set forth in, this Privacy Policy. If you do not agree with any part of our Privacy Policy, do not access or use our Services.

## **Transfers of Personal Information Outside the EEA**

The Personal Information that we collect from you may be transferred to, and stored at, a destination outside of the European Economic Area (“EEA”), which may provide different or less comprehensive privacy and/or security protections for the information. By submitting your Personal Information, you are agreeing to this transfer, storing or processing outside the EEA. If we transfer your information outside of the EEA in this way, we will take steps to ensure that your Personal Information is treated in accordance with this Privacy Policy.

## **Information We Collect from You**

“Personal Information” means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

**User information.** The types of Personal Information that we collect from use of the Services include, without limitation: first and last name, email address, mailing address, phone number, information you provide to us in online forms, information you provide to us when you contact us by email or telephone, payment information, login credentials, details of how you use our Services, responses you provide us in our surveys, and any other information you provide to us to purchase our Services, to receive marketing from us and for us to deliver our Services. This Personal Information may be collected when Users visit our Site, register on the Site, subscribe to our newsletter or respond to a survey, and in connection with other activities, services, features or resources we make available on or through our Services. Users may, however, visit our Site anonymously. Users may refuse to supply Personal Information, except that it may prevent them from engaging in certain Site-related activities.

**Business account information.** Personal Information also includes, without limitation, title, job function, business name, business address, business email address, and business phone number that we collect about people we serve or work with, including actual and prospective customers, contractors, vendors and other entities interested in us or our products and services, as well as information collected for payment.

## **Information We May Automatically Collect**

When you use our Services, some information is automatically collected. For example, when you visit our website, your computer's operating system, Internet Protocol ("IP") address, access times, browser type, and language, and the website you visited before our Site are logged automatically. We also collect information about your usage of and activity with our Services. Additionally, when you access our Services through a mobile device, we may automatically collect data about your device, such as geolocation (at the city level), device ID, type of device, operating system version and how you use our application, including pages you view.

### **How are "cookies" or "tracking technologies" used?**

We (or service providers and marketing customers on our behalf) may use technologies, including "cookies," "web beacons," "tags" and "scripts" to automatically collect

information from you when you use the Services. Cookies are small amounts of data that are stored within your Internet browser, which saves and recognizes your browsing habits. Web beacons are webpage elements that can recognize certain types of information on your computer or mobile device, such as the time and date you viewed a page, which emails are opened, which links are clicked, and similar information. A User's web browser places cookies on the User's hard drive for record-keeping purposes and sometimes to track information about the User. You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If you reject cookies, you may still use our Services, but your ability to use some features of our Services may be limited. Otherwise, by continuing to use our Site, you are accepting our use of these cookies that make advertising and communications more relevant to you and your interests, and further help us to improve our Services.

We partner with third parties to manage advertising on other websites, and these third parties may use technologies such as cookies to gather information about your activities using the Services and other sites in order to provide you advertising based upon your browsing activities and interests.

We may use the following types of cookies:

- **Essential cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, and to use online forms.
- **Functional cookies.** These are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name and remember your preferences. These cookies also record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and communications more relevant to your interests.
- **Analytical cookies.** These cookies allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that Users are finding what they are looking for easily.

- **Marketing/Targeting cookies.** One of our Services is to provide the Viewable Advertising Library (VAL) technology. Also, ads appearing on our Site may be delivered to Users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time it sends you an online advertisement to compile non-Personal Information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy does not cover the use of cookies by any advertisers.

**Conversion tags.** We have integrated conversion tags on our Services. These tags use cookies which were placed on your device by the display advertising service provider. When a User clicks on an ad leading to our Services, a temporary cookie is placed on the User's device. When you complete a certain action on our Services, this cookie will be recognized and a conversion will be recorded. We do not have influence on which exact data will be collected by these cookies nor do we know the full extent of the data collection. The respective display advertising network provider is solely responsible for the data collection and use of such data.

**Log files.** We gather certain Personal Information automatically and store it in log files. This Personal Information may include IP addresses, browser type, device identifier, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, and other usage data. We may combine this automatically collected log information with other Personal Information we collect about you. If you reach out to us via email, telephone or facsimile, we may also log your emails and your telephony Personal Information, such as your phone number, forwarding calls, SMS routing information and types of calls.

**Services use.** We may use technologies to automatically collect Personal Information from individuals who use our Services. We collect this Personal Information to, among other things, provide you information and benchmarking based upon your usage of the Services, which are used in analyzing trends, administering the Services, tracking Users' utilization and gathering information about our customer base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

**Mobile applications.** We may automatically collect Personal Information about the devices using our Services, such as the type of device, the version of the operating system, and the device identifier (UDID). We use analytics to allow us to better understand how our mobile Services are used by our customers. We may record Personal Information such as how often the application is used, the events that occur within the application, aggregated usage, performance data, any exceptions and the source from which the application was downloaded.

**Device information.** When you use our Services, we collect information about the devices you are using to access our websites and our Services, including without limitation information about your computer, tablet, phone, stylus, pen, or other tools. We may collect the hardware model, operating system and version, unique device identifiers, and mobile network information.

**Viewable Advertising Library (VAL).** One feature of our Services is our Viewable Advertising Library technology that is placed on our website and the webpages of various third party websites. When our technology is placed on these third party websites, a User's browser may send us various usage information of that User, including, but not limited to, the User's IP address, device information, websites visited, browser type and operating system. We may share this information with advertisers and website publishers so that these third party websites can deliver advertisements, including advertisements tailored to visitors' interests. When visitors use these third party websites, they will be subject to privacy policies and terms of use of those third party websites.

## **“Do Not Track” Requests**

Your Internet browser and mobile device may allow you to adjust your browser settings so that “do not track” (“DNT”) requests are sent to the websites you visit. Our Services do not currently recognize or respond to a DNT signal. Our third party service providers also may not respond to DNT signals.

# How We Use Collected Information

LeftsnRights may collect and use Users' Personal Information for the following purposes:

- **To provide our Viewable Advertising Library technology to our customers.** Users of our Services on third party sites will provide us Personal Information so that we can develop reports and other information that we can share with third party advertisers who will deliver advertisements, including tailored advertisements.
- **To develop, provide, and improve customer service.** Personal Information you provide helps us respond to your customer service requests and support needs. We may also use it to manage and verify your account and the identity of Users. We may use it to support your account, assist you in processing your payments, manage and verify your account and the identity of Users of the Services, contact you when necessary about your account or your use of the Services, provide you with information about us and our products and services, and otherwise maintain our business relationship with you. We may also use your Personal Information to quickly process your transactions, manage and verify your account and the identity of Users of the Services, and contact you when necessary about your account or your use of the Services.
- **To personalize User experience.** We may use Personal Information in the aggregate to understand how our Users as a group use the Services.
- **To improve and provide our Services.** We will use your Personal Information to provide the Services you register to use and may use feedback you provide to improve our products and services and otherwise provide the Services. If you use the Services through a third party, we will share your Personal Information with such third party. We may provide you with updates and notices on our Services.
- **To process payments.** We use the Personal Information Users provide about themselves to provide the Services and to process payments for and associated with the Services. We share this Personal Information with outside parties as necessary to provide the Services and to process payments.

- **To market our products and services.** We may inform you about our products, services or events and otherwise perform marketing activities. Further, we may use information for analytics purposes. We may send you information and promotional materials about our products and services as well as our company in general.
- **To run a promotion, contest, survey or other Site feature.** To send Users information they agreed to receive about topics we think will be of interest to them or to otherwise send them information and promotional materials about our products and services as well as our company in general.
- **To send periodic emails or provide informational services.** We may use your Personal Information to send information and updates pertaining to orders and the Services. Your Personal Information may also be used to respond to inquiries, questions, and/or other requests. If a User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc. If at any time you would like to unsubscribe from receiving future commercial emails, you may do so by clicking on the “unsubscribe” link or contacting us via our Site. We may also use Personal Information when delivering live or online events.
- **To prevent improper or illegal activity and to meet legal requirements.** We may use Personal Information to protect, investigate and deter against fraudulent, unauthorized or illegal activity. We may use your Personal Information to comply with legally mandated reporting, subpoenas, court orders and legal process; to enforce our Terms of Service, Services Agreement and this Privacy Policy; and as is reasonably necessary to protect against harm to us, the Services and other Users.
- **To store Personal Information locally.** Our Services may collect and store information locally on your device, including without limitation browser web storage and application data caches.
- **Other purposes.** We may use Personal Information we collect and receive for other purposes that may be described to you at the point of collection or for which you provide your consent. We may combine automatically collected information with other information, including Personal Information, we collect about you. We do this to improve Services we offer you and to improve our marketing, analytics

and functionality of our Services. We may use Personal Information for any other legal, business or marketing purposes that are not inconsistent with the terms of this Privacy Policy.

**Some specific examples of how we use cookies:** We use cookies for the following purposes:

- **To store your preferences and settings.** Settings that enable our products or services to operate correctly or that maintain your preferences over time may be stored on your device. We may save preferences, such as device (e.g., computer, laptop or mobile device) language, browser and multimedia player settings, so those do not have to be reset each time you return to the Site. If you opt out of interest-based advertising, we store your opt-out preference in a cookie on your device. Cookies can help you fill out forms on our Site.
- **For sign-in and authentication.** When you sign into one of our Services using your personal account, we store a unique ID, and the time you signed in, in an encrypted cookie on your device. This cookie allows you to move from page to page within the Site without having to sign in again on each page. You can also save your sign-in information so you do not have to sign in each time you return to the Site.
- **Security.** We use cookies to enable and support our security features, and to detect fraud and abuse of or other malicious activity on our Services and violations of our Terms of Use.
- **Storing information you provide to a website.** When you provide information, or add items to a shopping cart when shopping on our Services, we store the data in a cookie to remember the products and information you have added.
- **Social media.** Some of our Services include social media cookies, including those that enable Users who are logged in to the social media service to share content via that service.
- **Feedback.** We use cookies to enable you to provide feedback on our Services.
- **Advertising, including interest-based advertising.** We use cookies to record how many visitors have clicked on an advertisement and to record which advertisements you have seen so you don't see the same one repeatedly. We use



cookies to collect data about your online activity and identify your interests so that we can provide advertising that is most relevant to you. We may use cookies to show you relevant advertising both on and off of our Services. We may use a cookie to learn whether someone who saw an ad later visited and took an action on the advertiser's website. Our service providers may use cookies to determine whether we have shown an ad and how it performed, or provide us with information about how you interact with ads. We may also work with a service provider to show you an ad on or off of our Services, such as after you have visited a website or mobile application. You can opt out of receiving interest-based advertising from us as described in the "Managing your cookies" section of this Privacy Policy.

- **Performance, analytics and research.** We also use cookies to provide our Services. We use cookies to ensure even performance of our Services and to gather usage and performance data. For example, we use cookies to count the number of unique visitors to a webpage or service and to develop other statistics about the operations of our products. This includes cookies from us and from third-party analytics providers. We also use cookies to understand, improve and research how you use and interact with our Services.
- **Cookies that have been set in the past.** If you have disabled one or more cookies, we may still use information collected from cookies prior to your disabled preference being set; however, we will stop using the disabled cookie to collect any further information.

## Sharing of Personal Information

We may share the Personal Information we collect in connection with the Services with third parties, as described below:

**Our customers.** We may share your Personal Information with our customers, which include advertisers and website publishers. We share information about your interaction with our Services, your visits to our customers' websites and the advertisements placed on our customers' websites so that our customers can deliver advertisements, including advertisements tailored to visitors' interests. When a visitor uses these third party

websites, they will be subject to privacy policies and terms of use of the third party websites.

**Our partners.** We may share Personal Information with companies that partner with us when providing our Services. When you use our website or a website using our Viewable Advertising Library (VAL) technology, we share information that we collect from you, such as your email (in hashed form), IP address or information about your browser or operating system, with our identity partners/service providers, including LiveRamp Inc. LiveRamp returns an online identification code that we may store in our first-party cookie for our use in online, in-app, and cross-channel advertising and it may be shared with advertising companies to enable interest-based and targeted advertising. To opt out of this use, go to: [https://optout.liveramp.com/opt\\_out](https://optout.liveramp.com/opt_out).

**Publicly posted content.** If you post comments, images, and other content to a public-facing page, that information (associated with your user name) will be publicly viewable.

**Third-party analytics providers.** We may share your Personal Information with our advertising and analytics partners, such as Google Analytics. The privacy policy of these third party companies applies to their collection, use and disclosure of your information. These third parties may combine your information with the information of other consumers for purposes of conducting these studies and/or analytics. For more information about Google Analytics, including how to opt out, please go to: <https://tools.google.com/dlpage/gaoptout>. You can read about how Google uses data when you use Google's partners' sites or apps at: <https://www.google.com/policies/privacy/partners/>.

**Our service providers.** We may provide Personal Information about you to service providers that perform certain functions or services on our behalf (for example, hosting our Services, storing our data, fulfilling orders, providing products and services, managing databases, performing analyses, administering our contests and sweepstakes, collecting location data, providing location-based services, processing credit card payments, providing customer service or sending communications for us).

**Business partners.** We may share Personal Information about you with other select business partners that are not service providers, such as our sponsors, other retailers and

broadcast partners, so that they can provide you with special offers, promotional materials and other materials that may be of interest to you. We are not responsible for the privacy practices of our business partners, which may use your Personal Information for their own purposes.

**Transfer or assignment in connection with business transfers or bankruptcy.** In the event of a merger, acquisition, reorganization, bankruptcy or other sale of all or a portion of our assets, any User information owned or controlled by us may be one of the assets transferred to third parties. We reserve the right, as part of this type of transaction, to transfer or assign your Personal Information and other information we have collected from Users of the Services to third parties. Other than to the extent ordered by a bankruptcy or other court, or as otherwise agreed to by you, the use and disclosure of all transferred User information will be subject to this Privacy Policy. However, any Personal Information you submit or that is collected after this type of transfer may be subject to a new privacy policy adopted by the successor entity.

**With your consent.** We may share some or all of your Personal Information to any other third party with your affirmative consent. For instance, we display personal testimonials of satisfied customers in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you may contact us at [support@liqwid.com](mailto:support@liqwid.com).

**Legal.** We may disclose Personal Information if, in our sole discretion, we believe: (i) such information is subpoenaed or disclosure is otherwise required to comply with a court order or legal process, (ii) the information is related to a violation of our Services Agreement or Terms of Use, (iii) the information is related to any unlawful acts or acts that might endanger the general public, (iv) disclosure is permitted or required by law, or (v) disclosure would protect the security of our Services or otherwise protect our rights or allow us to take precautions against potential liability.

**Anonymized or aggregate information.** We may share aggregate or de-identified Personal Information without restriction. While this information will not identify you personally, in some instances third parties may be able to combine this aggregate information with other data they have about you, or that they receive from other third

parties, in a manner that allows them to identify you personally. If Personal Information is subject to the General Data Protection Regulation 2016/679 (“GDPR”), then the data will only be considered anonymized or aggregate information under this Privacy Policy if it has been anonymized in compliance with GDPR.

## **Accessing, Correcting, Updating, Transferring, Restricting, Deleting & Retaining Your Personal Information**

If you notice an error in your Personal Information, you may rectify such errors by updating your settings under your user profile. Upon request, we will provide you with information about whether we possess any of your Personal Information. To find out if we possess your Personal Information or to make a request to access, correct or update your Personal Information, please contact us at [support@liqwid.com](mailto:support@liqwid.com).

If you would like your Personal Information erased, restricted or transferred, or if you wish to withdraw your consent to our data collection and processing, please contact us at [support@liqwid.com](mailto:support@liqwid.com).

Upon request by email or mail (to the addresses noted below), we will provide you with reasonable access to your Personal Information, unless otherwise legally unable to do so. In addition, we will take reasonable steps to permit individuals to correct, amend, transfer, restrict or delete information that is demonstrated to be inaccurate or incomplete. We shall provide a response to your requests within 30 days of receiving such request.

We will retain your Personal Information and the Personal Information we process on behalf of our customers for as long as your account is active and your request to receive information from us has not been revoked, or as needed to provide you Services. We will retain and use this information as necessary to comply with our legal obligations, resolve disputes and enforce our rights and agreements. If you wish to cancel your account or request that we no longer use your information to provide you Services, contact us at [support@liqwid.com](mailto:support@liqwid.com).

If you delete any of your account information, we may retain certain information if required by law or for legitimate business purposes or to complete our contractual obligations to you.

If you become an inactive customer, or if we close or suspend your account, we will continue to adhere to the Privacy Policy applicable to your Personal Information, so long as we retain your Personal Information in our possession.

If your application for a job is successful, your Personal Information gathered during the recruitment process will be transferred to your human resources files subject to our internal human resources policies and procedures and retained as employment data. If your application is unsuccessful, we may, with your consent, keep your Personal Information on file for future employment opportunities. You may withdraw your consent at any time.

We may delete any or all of your Personal Information at any time without notice to you for any reason or no reason unless otherwise required by law or contract to retain it.

We may need to request specific Personal Information from you to help us confirm your identity and ensure your right to access your information (or to exercise any of your other rights). This is a security measure to ensure that your Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further Personal Information in relation to your request to speed up our response.

We will attempt to respond to any request to access your Personal Information within 30 days. It may take us longer if your request is complex or you have made multiple requests, in which circumstances we will notify you and keep you apprised of our progress.

## **Marketing/Preferences and Opting Out**

**Communications/marketing.** We would like to send you information about products and services of our and other associated companies which may be of interest to you. If you have consented to receive marketing information, you may opt out at a later date. You have a right at any time to stop us or any associated companies from contacting you

for marketing purposes. If you no longer wish to be contacted for marketing purposes, please select the “unsubscribe” link in our emails or contact us at the address given below.

**Services.** You may access your account to make changes to your account, including your preferences. We may ask you to opt-in to certain communications or to participate in forums. If you have opted-in to receiving communications or participating in forums, you may stop receiving those communications by managing your notification settings under your user profile and you may stop participating in the forums.

**Managing your cookies.** You can delete cookie files from your hard drive, or avoid them altogether, by configuring your browser to reject them or to notify you when a cookie is being placed on your hard drive. Most Internet browsers allow you to block cookies from your browser. If you do not agree to the use of these cookies, you can follow the instructions provided by your browser (usually located within the “Help,” “Tools” or “Edit” portion of the browser toolbar or options) or follow the instructions for your browser set out here: <http://www.allaboutcookies.org/>.

You can generally opt out of receiving personalized ads from third party advertisers and ad networks that are members of the Network Advertising Initiative (“NAI”) or that follow the Digital Advertising Alliance’s Self-Regulatory Principles for Online Behavioral Advertising (“DAA”), by visiting the opt-out pages on the NAI website and DAA website. Also, if you do not want to have your Personal Information used for the purpose of serving you targeted ads, you may opt out by clicking on TrustArc’s Your Advertising Choices page at <http://preferences-mgr.truste.com/> or, if in the European Union, <http://www.youronlinechoices.eu/>. Please note this does not opt you out of being served advertising. Depending upon the Services, you may continue to receive generic ads. Not all features of the Services will function as intended if you reject cookies.

## **How We Protect Your Information**

We will take reasonable precautions to protect Personal Information in our possession from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal

Information. No method of transmission over the Internet or electronic storage is 100% secure; as a result, we cannot guarantee absolute security. You acknowledge that: (a) the limitations of the Internet are beyond our control; (b) the security, integrity and privacy of information and data exchanged between you and us cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party.

In the event that we are required by law to inform you of any unauthorized access to your Personal Information, we may choose to notify you electronically, in writing, or by telephone.

## **Third Party Websites**

Users may find advertising or other content on our Site that links to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

## **California Privacy Rights**

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice that identifies the categories of Personal Information we share with affiliates and/or third parties for marketing purposes, and provides contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address:

LeftsnRights, Inc.  
299 South Main Street, Suite 1300  
Salt Lake City, UT 84111

# No Use by Children

The Services are not intended for users younger than 16. We do not knowingly collect contact information from children under the age of 16. If we become aware that a visitor under the age of 16 has submitted Personal Information, we will remove his or her information from our files.

# Changes to This Privacy Policy

LeftsnRights may update this Privacy Policy at any time. When we do, we will revise the date at top of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the Personal Information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

# Your Acceptance of These Terms

By using the Services, you signify your acceptance of this Privacy Policy and [Terms of Service](#). If you do not agree to this Privacy Policy, please do not use our Services. Your continued use of the Services following the posting of changes to this Privacy Policy will be deemed your acceptance of those changes.

# Data Protection Officer

You may reach our Data Protection Officer, Jim Rowan, by contacting him at the following address:

LeftsnRights, Inc.  
Attention: Data Protection Officer  
[support@liqwid.com](mailto:support@liqwid.com)  
299 South Main Street, Suite 1300  
Salt Lake City, UT 84111  
1-800-870-5006



# Contacting Us

If you have any questions about this Privacy Policy, the practices of our Services, or your dealings with our Services, please contact us at:

LeftsnRights, Inc.

[support@liqwid.com](mailto:support@liqwid.com)

299 South Main Street, Suite 1300

Salt Lake City, UT 84111

1-800-870-5006

If you are located in the EEA, you have the right to reach out and communicate with a supervisory authority in relation to our processing of your Personal Information, but we would appreciate the opportunity to speak with you first and resolve your issues.