

## Purpose

The purpose of this Privacy Policy ("Privacy Policy" or "Privacy Notice") is to summarize the ways in which Clear Link Technologies, LLC, our affiliates, and all of our brand names and branded services (collectively "Clearlink", "we", "our", "us"), collects, maintains, and uses the personal information of users of this website ("Site"), who contact our customer service representatives, fill out online order forms or information request sheets, download and use browser extensions or applications created by us, and provide information to our sales agents ("user", "you", "your"). Please feel free to contact us by email at [privacy@clearlink.com](mailto:privacy@clearlink.com) or by mail at Clear Link Technologies, LLC Privacy Department, 42 Future Way, Draper, UT 84020 with any questions or concerns about this Privacy Notice or the information we gather about you.

## How We Collect Your Information

We gather information about you when you interact with our services, including when you use our websites, contact our customer service representatives, fill out online order forms or information request sheets, download and use browser extensions or applications created by us, and provide your information to our sales agents (collectively, "Customer Information"). We also use cookies and pixel tags to track your usage of our websites. We also use online order forms and information request sheets to obtain information from you that is necessary to process your orders and provide you with requested information. When you call the numbers on our websites and speak with our customer service representatives, we collect information provided during calls to ensure the best quality of service and the correct processing of your orders.

Customer Information we gather about you may contain personally identifiable information. For an explanation of how we use Customer Information, including personally identifiable information, please see the section below titled "How We Use Customer Information."

## Information We Collect

Below is a list of the types of Customer Information that we may collect as you interact with our services:

**Customer Contact Information.** Your Customer Contact Information is any information needed to contact you and fulfill your orders and requests such as your name, address, phone number, fax number, and email address.

**Private Customer Information.** Private Customer Information is that information that may be necessary to check credit and process payments. Such information includes your Social Security Number, credit card information, and banking and wiring information.

**Customer Order Information.** Customer Order Information is that information necessary to complete your orders and requests for information. Such information may include your Customer Contact Information, programming and packaging selections, your billing and shipping information, as well as other details pertaining to your order of products and services through us.

**Demographic Information.** Demographic Information is publicly available information that we may learn about you regarding such things as your age, income, home ownership, household size, etc. that helps us to provide you with better offers for products and services.

**Website Usage Information.** Website Usage Information is information that we collect, via anonymous third-party cookies, that tells us about the way you use and navigate through our websites.

**Proprietary Analytics.** This Site uses proprietary analytics systems to help improve usability and the customer experience. We may record mouse clicks, mouse movements, scrolling activity, user agent, Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, browser plug-in types and versions, browser extensions installed, browser features enabled, operating system and platform, information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as mouse clicks,

mouse movements, scrolling activity), methods used to browse away from the page, and other non-personally identifiable behavioral and non-behavioral information. You can choose to disable these features by electing to use the private browser setting and/or disabling javascript. Note, that doing so will disable other features that this Site may employ.

## Cookies

This explains how we use cookies on this website. We recommend that you read our cookies statement so that you are aware of how we use them globally and can take steps to reject or delete the cookies if you do not agree to them being used. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the Site. You can set your browser not to accept cookies, however, in a few cases some of our website features may not function as a result.

We use cookies to enable you to navigate between pages and to generally improve your user experience. We also use cookies to analyze how users interact with this Website, to enable you to share content using social media and to provide you with embedded content from third parties. We also sometimes use cookie type technologies in emails to identify how users come to this Website so that we can evaluate and measure the effectiveness of our email marketing.

We may combine information collected via cookies with information such as your IP address, the type of browser, device, and operating system, for example, to provide statistical information about visitors to the Website. Where this Website uses third-party cookies, you should check with the relevant third party to see how they use cookies.

You can find out more about cookies at <http://www.allaboutcookies.org>. The user instructions for your browser or device will explain how you can control the use of cookies on Your device.

## Cookies We Use

We use the following cookies on this Website:

- user-input cookies – cookies used to keep track of a user's input. For example, the completion of a multi-page form, or a shopping basket on an e-commerce website.

- authentication cookies – cookies used to identify a user once they have logged in to a website. Cookies used to "remember" a user to avoid the need to log in for future visits are not considered essential.

- user-centric security cookies – for example, cookies used to detect the number of failed logins to a service specifically requested by a user.

- multimedia player session cookies – cookies used to store technical information (for example network speed, quality, and buffering) needed to play video or audio content requested by the user. This might include Flash cookies.

- load-balancing session cookies used to manage server load balancing. This would fall within the first bullet above (the transmission of a communication).

- UI customization cookies – cookies used to remember preferences specifically set by a user (for example, language or display preferences set using a button or tick box) and not linked to other data such as the user's username.

- social media content sharing cookies – cookies used by social media plug-ins to identify users that are logged in to social media networks and which are used to enable them to share content using that social media network. These cookies should only persist for so long as the user is logged in or until they close their browser.

- social plug-in tracking cookies – cookies used to track the activity of logged-in users of social networks (for example, for the purposes of targeted advertising, or analytics, etc.).

- third party advertising – cookies used for third party advertising (that is, advertising served by a domain outside the website in question).

- first-party analytics –first-party Analytics cookies (for example, those used for Google Analytics) are not essential and therefore require consent.

## Categories of Cookies We Use

The cookies We use fall into the following categories:

Strictly necessary cookies. These are cookies that are required for the operation of this Website.

Analytical/performance cookies. These allow us to recognize and count the number of visitors and to see how visitors move around this Website when they are using it. This helps us to improve the way this Website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognize you when you return to this Website. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to this Website, the pages you have visited and the links you have followed. We may use this information to make this Website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Third-Party Cookies. In addition to the cookies listed above, we also use third-party cookies for performance and functional purposes, to provide additional functionality and to make it easier for you to share content on this Website. These are cookies that are set by a third party when you access this Website and are controlled by that third party.

#### Accepting and Rejecting Cookies

Where legally permissible, your continued use of a website after being presented with a cookie banner containing an opt-out link will be considered consent to the use of cookies. If legally required, you will be provided with a clear message about what cookies are used and their purpose and the cookie will not be deployed unless and until that consent is provided by you (e.g. clicking "accept" or "I agree"). Consent is not required under the Privacy and Electronic Communications Regulations for cookies that are strictly necessary. You can manage the use of cookies on this Website by clicking on the link provided in the "Opt-Out Procedures" below.

#### Apps, Browser Extensions and Other Platforms

Our Site contains links to other sites, applications, platforms, and services that may be operated in part by third parties whose privacy policies we don't control and may differ significantly from this one. For instance, information used or collected in a browser extension we created may be collected, used, and shared in the regular operation of the browser service itself in ways that we would not. Clearlink is not responsible for the content or privacy practices of any third-party services. We recommend that you read and familiarize yourself with the privacy policies of any site or service you access.

To the extent a browser extension or app we create collects and uses Customer Information and any other information, it is collected and used solely to the extent necessary to operate the extension or app. We likewise do not sell any Customer Information collected. The use of any Customer Information collected in a browser extension or app is detailed in "Use and sharing of Customer Information" below.

If you desire to limit the data collection capability or the level of access to information by any browser extension or app operated by us, you may uninstall and remove the app from your device or uninstall and remove the extension from your browser. If you wish to generally opt-out of data collection or data processing by us, you may submit a data subject access request by following the procedure outlined below in "Opt-out and Data Subject Access Request Procedures."

#### Children Under the Age of 16

Our services are not intended for children under 16 years of age, and we do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at by submitting an email request to [privacy@clearlink.com](mailto:privacy@clearlink.com), by

writing to Clear Link Technologies, LLC Privacy Department, 42 Future Way, Draper, UT 84020, or calling us at (877) 698-0218. We do not sell personal information of consumers, including consumers we know are younger than 16 years old or that we are prohibited from selling under applicable law. California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights for more information.

#### Security Measures

We have implemented a variety of encryption and security technologies and procedures to protect information stored in our computer systems from unauthorized access. We also maintain procedural safeguards that restrict access to Your Customer Information to employees (or people working on our behalf and under confidentiality agreements) who need to know Your Customer Information to provide the products and services that You request.

#### Additional PCI Requirement as a Service Provider.

We acknowledge to our customers that we are responsible for the security of cardholder data we possess or otherwise store, process, or transmit on behalf of the customer, or to the extent that we could impact the security of the customer's cardholder data environment.

#### How We Use Customer Information

We use your Customer Information to process your orders and requests and to provide you with the products and services you desire. In addition, we use information that we collect about you or that you provide to us, including any Customer Information:

To present our services and to otherwise carry out, evaluate, market, analyze, personalize, and improve our services, which may include storing your information and providing access and sharing of your information with our agents, vendors, suppliers, affiliates, third-party service providers, advertisers and other third parties.

To operate any applications or browser extensions we create, to maintain records of your use of these applications or browser extensions, and to analyze and evaluate these applications or browser extensions to determine if we should develop and/or release additional applications or extensions.

To contact you via email, SMS, and telephone calls about the Services, your account, events, services, or products that we think might be relevant or of interest to you.

For any other purpose stated in this Privacy Notice.

#### How We Share Customer Information

We may share your Customer Information with third parties to complete your purchases of products and services. The extent to which we use and share your Customer Information depends upon the nature of and purpose for which we use and share it. A summary of how we share your Customer Information with third parties is detailed in the list below. By using our services, you agree that we may transfer your Customer Information to third parties in order to fulfill the purposes for which you have provided your Customer Information.

With Third-Party Product and Service Providers. We share your Customer Information, as needed, to the third parties who provide the products and services you request. This includes sharing information we collect with third parties who provide services which are necessary to support the operation of any applications or browser extensions we operate. We also frequently act as a third-party marketer and seller of various brand name products and services, and we provide these companies with the information necessary to carry out your orders. How these companies use your Customer Information, once we have passed it on to them, is governed by their respective privacy policies and procedures.

With Third-Party Advertisers. We do not sell or share your Private Customer Information with any third parties, except with the Third-Party Product and

Service Providers described above. The ways in which such parties may subsequently use your Customer Information are governed by their own privacy policies and procedures.

To Prevent Fraud and Scams. We may share your Customer Information with third parties for the purpose of preventing fraud and scams.

With Third-Party Cookies. We allow third parties to collect anonymous information when you visit our website and to use that information to serve ads for our products or services when you visit other websites. These third parties may use anonymous information (e.g., navigational, non-personally identifiable information, click stream information, browser type, time and date, subject of advertisements clicked or scrolled over, etc.) during your visits to our website to provide advertisements about our goods and services likely to be of interest to you. These parties may use a cookie or a third-party web beacon, or other technologies, to collect this information.

For Legal and Other Purposes. We may share your Customer Information in order to:

- comply with any subpoena, court order, or legal process, including to respond to any lawful government or regulatory request.

- enforce or apply our Terms of Service.

- necessarily protect our rights and property or to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity.

New Ownership. We may share your Customer Information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets.

#### Opt-out and Data Subject Access Request Procedures

You may opt out of the following communications from us and request access to or deletion of your data through the following methods:

Email Promotions. To opt out from receiving further email communications from us regarding other offers and promotions, you may email us at [privacy@clearlink.com](mailto:privacy@clearlink.com) or write to Clear Link Technologies, LLC Privacy Department, 42 Future Way, Draper, UT 84020. If you opt out of receiving email communications, we will still be permitted to send you transactional messages. Opting out of email communications does not constitute an opt out from any other means of communications.

Data Subject Access Request. A data subject access request is the means we make available to you to exercise your data privacy rights. This includes a right to be informed of data we store about you, your right to access such data, your right to request a portable copy of such data, and your right to delete such data. To submit a data subject access request, you may call toll-free (877) 698-0218, email us at [privacy@clearlink.com](mailto:privacy@clearlink.com), or write to Clear Link Technologies, LLC Privacy Department, 42 Future Way, Draper, UT 84020. In each of the above-mentioned contact methods, to protect the privacy of you and others we will request verification of your identity. If you wish, you may authorize an agent to submit a request on your behalf. If we receive a request on your behalf, we will ask them to provide proof of your permission for them to act in your stead. To designate an authorized agent, you must provide the authorized agent with signed permission to make the request on your behalf. If your authorized agent is a business entity, then the authorized agent must be registered with the California Secretary of State to conduct business in California. We may deny a request from an authorized agent if the agent cannot provide us with signed permission from you demonstrating that the agent has been authorized by you to act on your behalf. Further, before responding to a request from an authorized agent, we will still require the authorized agent provide us with enough information so that we can verify your identity. If the authorized agent is unable to provide information sufficient to verify your identity, we may decline to process the request or we may contact you to self-verify the request and your identity. Additionally, we may contact you further to request information that will enable us to fulfill your request. In the event an overriding lawful basis for processing your personal data may exist, or certain

exemptions may apply, we may refuse your request. If we refuse Your request, we will explain the reasons why.

Third-Party Cookies. To opt out of anonymous third-party advertising cookies, visit the Network Advertising Initiative website by clicking [here](#).

#### Your California Privacy Rights

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Please note that we will not discriminate against you for exercising your rights under the CCPA. However, as noted below under "Right to Opt-Out" if you exercise your right to opt out, some of our services may not function for you, as the sharing of personal information may be critical to operation.

To exercise your right to know or your right to delete, please follow the instructions listed above in "Opt-out and Data Subject Access Request Procedures."

#### Right to Know

California residents have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale of your personal information (the "right to know"). Once we receive your request and verify your identity, we will disclose to you:

- The categories of personal information we collected about you.

- The categories of sources for the personal information we collected about you.

- The business or commercial purpose for collecting or selling that personal information.

- The categories of third parties with whom we share that personal information.

If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- sales, identifying the personal information categories that each category of recipient purchased; and

- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

You have a right to obtain a copy of the specific pieces of personal information we collected about you (also called a data portability request). Once we receive your request and verify your identity, we will provide you a copy of your personal information that is responsive to your request.

#### Right to Delete

California residents have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive your request and confirm your identity, we will review the request to see if an exception applies that allows us to retain some or all of your information. If an exception applies, we will provide you information about that exception.

We will delete or deidentify personal information not subject to one of the exceptions from our records and will direct our service providers to take similar action.

#### Right to Opt-Out

California residents have the right to opt out of the sale of their personal information. However, please know that we do not sell any Customer Contact Information or Private Customer Information that We collect.

#### Disclosure of Right to Opt-out Under Nevada Law

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to [privacy@clearlink.com](mailto:privacy@clearlink.com). However, please know we do not currently sell data triggering that statute's opt-out requirements (which require the exchange of covered information for

monetary consideration).

#### If You are a Purchaser in Washington State

Washington State requires that sales or use tax is due on certain purchases. The seller may or may not collect and remit retail sales tax on a purchase.

Washington state requires the purchaser to file a use tax return if retail sales tax is not assessed at the time of a taxable sale. If the seller to whom the purchaser is referred does not collect retail sales tax on a subsequent purchase, the seller may be required to provide information to the purchaser and the department about the potential sales or use tax liability.

This notice is provided under the requirements of L. 2017 Section 205(3). For additional information regarding whether and how to remit sales or use tax consumers may visit the Washington State Department of Revenue website at <https://dor.wa.gov/>.

#### International Users

Residents of the EEA or Switzerland are entitled to specific rights under Regulation (EU) 2016/679 of the European Parliament and of the Council of the European Union 27 April 2016 (the "General Data Protection Regulation" or "GDPR"). These rights include rights to:

Access your personal data as the term is defined by GDPR

Request deletion of your personal data

Request correction of your personal data

Restrict processing of your personal data

Object to processing of your personal data

Receive your data in a portable manner

If you have any questions about the information we have about you, desire access to your information that we have on file, believe information we have about you is inaccurate or incomplete, or wish to exercise any of your rights regarding your information please follow the instructions for submitting a Data Subject Access Request located in "Opt-out and Data Subject Access Request Procedures."

Please be aware that the information we collect through our Services may be transferred to and stored on servers in North America. By using the Site's services, you acknowledge and consent to the transfer and processing of your personal information in the United States as described in this Privacy Notice. Please be aware that the data protection laws and regulations applicable to your personal information transferred to the United States may be different from the laws in your country of residence.

#### Independent Recourse Mechanism

In compliance with the Privacy Shield Principles, Clearlink commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Clearlink at:

Toll-free phone: (877) 698-0218

Email: [privacy@clearlink.com](mailto:privacy@clearlink.com)

Postal address: Clear Link Technologies, LLC Privacy Department, 42 Future Way, Draper, UT 84020.

Clearlink has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) about unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship.

#### Changes to This Privacy Notice

We will update this Privacy Notice from time to time to reflect changes in our business. Where required by applicable law, we will provide notice to you if these changes are material. Notice may be by email to you at the last email

address you provided us, by posting notice of such changes in this Privacy Notice, on our websites or by other means, consistent with applicable law.