

PRIVACY NOTICE

Effective Date: [September 13, 2022]

This privacy notice ("**Privacy Notice**") describes the privacy practices that Sancerra Management, LLC. ("**Sancerra**," "**we**," "**us**," or "**our**") follows when collecting and using information about you on our website (www.sancerra.com), (collectively, the "**Site**"). We ask that you please read this Privacy Notice before using the Site. It describes what information we gather from you and others who visit or use the Site, how we use that information, and what we do to protect it. When you access or use the Site, certain information, including your Personal Information (as defined below), may be collected, transferred, processed, stored, and in certain circumstances, disclosed as described in this Privacy Notice.

Capitalized terms used but not defined in this Privacy Notice have the definitions provided in our **Terms of Use** ("**Terms**"). Provisions within the Terms may affect this Privacy Notice with respect to your use of the Site, so please review the Terms prior to using the Site.

BY PROVIDING US WITH YOUR OR OTHERS' PERSONAL INFORMATION, YOU EXPRESSLY CONSENT TO THE INFORMATION HANDLING PRACTICES DESCRIBED IN THIS PRIVACY NOTICE AND YOU ACKNOWLEDGE AND CONFIRM THAT YOU HAVE PERMISSION TO PROVIDE US WITH ALL PERSONAL INFORMATION PROVIDED. IF YOU DO NOT AGREE WITH THIS PRIVACY NOTICE OR OUR TERMS, PLEASE DO NOT ACCESS OR USE THE SITE.

1. INFORMATION WE COLLECT.

We collect data to provide the products and services you request on the Site, ease your navigation on the Site, communicate with you, and improve your experience using the Site. Some of this information is provided by you directly to us, such as when you create an account. Some of the information is collected through your interactions with the Site or third-party websites and applications. We collect such data using technologies like Cookies (as defined below) and other tracking technologies, error reports, and usage data collected when you interact with our Site.

The following table summarizes the categories of personal information we have collected and/or disclosed for a business purpose in the past twelve months:

Category	Examples	Collected
A. Identifiers	A real name, Internet Protocol address, e-mail address, or other similar identifiers	Yes
B. Personal Information listed under Cal. Civ. Code §1798.80(e)	A name, telephone number, e-mail address, job title, organizational affiliation.	Yes
C. Protected classification characteristics under California or Federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, or medical.	No

D. Commercial information	Your preferences regarding marketing communications.	No
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or other similar network activity	Browsing history, search history, information on interactions with a website, application, online content or advertisement.	Yes
G. Geolocation data	Physical location from your device or rough location generated based on IP address.	Yes
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information	Job Title and employer information	No
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, abilities, and aptitudes.	No

In more detail, the data we collect depends on the products, services, and features of the Site that you use, and includes the following:

1.1 Personal Information.

In general, we collect any information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer (“**Personal Information**”) that you submit to us in the process of creating or editing your account and user profile on the Site or that you submit to us voluntarily through your use of the Site.

We may also collect Personal Information from third parties, product vendors, and other partners. Our collection of this information allows us to provide you with our products and services and communicate with you in accordance with our Terms.

1.2 Automatically Collected Usage and Device Information.

Similar to other websites, we use tracking technologies to automatically collect certain technical information from your web browser, mobile, or other device when you visit the Site. This data may include, but is not limited to, your IP address, browser type and language, referring/exit pages and URLs, other browser history, platform type, number of clicks, landing pages, the pages you requested and viewed, the amount of time spent on particular pages, and the date and time of your visits. Our collection of this data, described in more detail below, allows us to provide more personalized high-quality services to you and to track usage of the Site.

A. Cookies. We automatically derive and collect certain data based on your interactions with us on the Site using cookies and similar technologies (collectively, “**Cookies**”). Our collection of data through Cookies includes information about your browser and Site usage patterns, which may include your IP address, browser type, browser language, referring/exit pages and URLs, pages viewed, links clicked, whether you opened an email, and information about the device you use to access the Site. Our collection of this information allows us to improve your user experience in various ways, such as to personalize our display of the Site to you, to “remember” whether or not you are signed in, and to provide better technical support to you. **Please note:** If you restrict, disable or block any or all Cookies from your web browser or mobile or other device, the Site may not operate properly, and you may not have access to certain services or parts of the Site. We will not be liable for any interruption in, or inability to use, the Site or our services, or degraded functioning thereof, where such are caused by your settings and choices regarding Cookies.

B. Pixels (aka web beacons/web bugs/java script). We may use Pixels to automatically record certain technical information about your interactions with us when you visit the Site or otherwise engage with us, to help deliver Cookies on our Site, or count users who have visited the Site or used our services. We may also include web beacons in our promotional e-mail messages or newsletters to determine whether you open or act on them for statistical purposes. “**Pixels**” are tiny graphics (about the size of a period at the end of a sentence) with unique identifiers used to track certain online actions, movements and related information of Site users. Unlike Cookies, which are stored on a user’s computer hard drive, Pixels are embedded invisibly on web pages or in HTML-based emails. The data we receive through Pixels allows us to effectively promote the Site to various populations of users, and to optimize external advertisements about the Site that appear on third-party websites.

1.3 Location Information.

We may collect precise geolocation data from you or your device. We also collect and use information about your general location (e.g., your state of residence) and can infer your approximate location based on your IP address in order to track our general Site usage or to tailor any pertinent aspects of your user experience to the region where you are located.

2 THIRD-PARTY ANALYTICS PROVIDERS.

We may use Google Analytics and other third-party analytics providers (“**Analytics Providers**”) to collect information about Site usage and the users of the Site. Analytics Providers use

Cookies in order to collect demographic and interest-level information and usage information from users that visit the Site, including information about the pages where users enter and exit the Site and what pages users view on the Site, time spent, browser, operating system, and IP address. Cookies allow Analytics Providers to recognize a user when a user visits the Site and when the user visits other websites. Analytics Providers use the information they collect from the Site and other websites to share with us and other website operators' information about users including age range, gender, geographic regions, general interests, and details about devices used to visit the Site and other websites and purchase items.

3 HOW WE USE YOUR INFORMATION.

3.1 General.

We may use or disclose the Personal Information identified above for one or more of the following business purposes ("**Business Purpose**"):

- To fulfill or meet the reason you provided the information (e.g., to send you product and service information).
- To personalize and develop our Site and the services we provide to you, and improve our offerings.
- To provide certain features or functionalities on the Site.
- For marketing and promotions, including to check your eligibility for competitions and to contact you in the event that you win.
- To create, maintain, customize, and secure your account with us.
- To provide you with support, to communicate with you and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your experience and to deliver content and product and service offerings, products, and services relevant to your interests, including offers and advertisements through third-party sites, and via email (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Site, services, databases, other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Site and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To prevent illegal activity, fraud, and abuse.
- As described to you when collecting your Personal Information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our users is among the assets transferred or liquidated.

3.2 Emails.

When you provide us with your email address we may, subject to applicable law, use your email address to send you Site-related notices (including any notices required by law, in lieu of communication by postal mail), updates, news, and marketing messages. For example, when you register, you will receive a welcome email. If the Site or our services are temporarily unavailable, we may also send you an email.

Email communications you receive from us will generally provide an unsubscribe link or instructions allowing you to opt out of receiving future emails or to change your contact preferences. If you have an account with us, you can also change your contact preferences by updating your contact information within your account settings. Please remember that even if you opt out of receiving marketing e-mails, we may still send you important service information related to your account and the Site. If you correspond with us by email, we may retain the content of your email messages, your email address, and our responses.

3.3 Non-Personally Identifiable Information.

We may use non-personally identifiable information, such as anonymized and/or aggregated Site usage data, in any manner that does not identify individual users for the purpose of improving the operation and management of the Site, including to develop new features, functionality, and services, to conduct internal research, to better understand Site usage patterns, to resolve disputes, to troubleshoot problems, to fulfill user requests, or for security and compliance purposes. Any non-personally identifiable information that is combined with Personal Information will be treated by us as Personal Information.

4 OUR INFORMATION SHARING PRACTICES.

When we disclose Personal Information for a Business Purpose, we enter into a contract that describes the purpose and requires the recipient to keep that Personal Information confidential and use only for performance of the contract, and not for any other purpose. We will not sell your information, including any Personal Information to any third party, but we may share it with third parties in the circumstances described below.

4.1 Business Purposes.

We disclose Personal Information for the Business Purposes more fully described in [Section 3](#) and to the following categories of third parties:

- Analytics Providers.
- Other third-party marketing service providers.
- Affiliated persons or third-party service providers assisting us in the operation, management, improvement, research and analysis of the Site. Affiliated persons or our third-party service providers may augment, extend, and combine non-personally identifiable information with data from additional third-party sources in order to assist us with the above. Use of information by affiliated persons and third-party service providers will be subject to this Privacy Notice or an agreement that is at least as restrictive as this Privacy Notice.

4.2 Legal Requirements.

We reserve the right to disclose all information collected via the Site, internally, to affiliates, or to third parties, for any lawful purpose or to prevent harm to us or others. For example, and without limitation, in our discretion, we may disclose information to government regulators, law enforcement authorities, or alleged victims of identity theft. We will notify you in the event of a government or legal request for your information unless otherwise prohibited by law.

4.3 Organizational Transitions.

If we should ever transfer or restructure the operational ownership of the Site, such as through a merger with another entity or a reorganization of all or a part of our operational responsibilities or assets, we may disclose, transfer, assign our rights, and/or delegate our duties to your information without notice and consent, including to prospective or actual recipients or acquiring entities. Should this occur, we will require any third party receiving your Personal Information as described under this subsection to be contractually required to provide the same level of privacy compliance as provided by us under this Privacy Notice.

4.4 Disclaimer.

We cannot ensure that all of your Personal Information will be disclosed only in the ways described in this Privacy Notice. For example, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your Personal Information that they collect from the Site. Even with the most rigorous information security standards, no transmission of data over the internet can be 100% secure.

5 YOUR CHOICE AND OPTIONS RELATING TO OUR COLLECTION.

You can choose not to provide Personal Information. You may always decline to provide your Personal Information to us. Registering for an account is not required to access some of our online content. If you choose not to provide certain Personal Information to us, some of your experiences may be affected (for example, we cannot send you our newsletter if you do not provide your email address).

5.1 You May Decline Other Requests.

We use your Personal Information as needed for the purposes for which it was collected or where you have consented to our use of such information. If you do not wish to provide information to us or do not wish to consent to the uses described in this Privacy Notice, please do not use the Site, or supply information to us.

5.2 Online Tracking Choices.

Most web browsers are initially set up to accept Cookies, but you can reset your browser to refuse Cookies or to indicate when a Cookie is being sent. However, some features and services of the Site (particularly those that require sign-in) may not function properly if your Cookies are disabled. Similarly, if you choose to delete session objects from the Site, you may not be able to access or use all or part of the Site or benefit from some or all of the information or features and services offered.

Some web browsers incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have the user’s online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about that browser’s user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operations, including the Site, do not respond to DNT signals.

6 ACCESSING AND UPDATING YOUR PERSONAL INFORMATION.

We do not review for accuracy or update your information regularly, but encourage you to access, review and update your Personal Information at any time. To request a copy of your Personal Information and data or for assistance regarding canceling your account, contact us at contact@sancerra.com. We will respond to your request as soon as reasonably possible after verifying your authority to make such requests.

7 SAFETY AND INFORMATION SECURITY MEASURES.

7.1 Security.

We use certain physical, managerial, and technical safeguards designed to preserve the security of your information that we maintain in connection with your use of the Site. For example, we encrypt all data with secure sockets layer (SSL) or similar technologies when we transmit your data. This, however, does not guarantee that your information may not be accessed, disclosed, altered, or destroyed by any breach of our physical, technical or managerial safeguards. In the event that any of your Personal Information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and will notify you, as appropriate, in accordance with pertinent laws and regulations.

7.2 Storage.

We or our third-party hosting providers store Personal Information in operating environments that are safeguarded against public or unauthorized access and protected from internal access with physical and technical security measures. While these measures are helpful to safeguard your Personal Information after we receive it, no transmission of data over the internet is 100% secure.

8 NOTICE TO USERS OUTSIDE THE UNITED STATES.

Please be aware that we are headquartered in the United States. The Site is governed by United States law. If you are using any of our products or services from outside of the United States, your information may be transferred to, stored, and processed in the United States where our servers may be located. The United States might not offer the same level of privacy protection as the country where you reside or are a citizen. BY USING THE SITE, COMMUNICATING WITH US VIA MAIL, EMAIL OR TELEPHONE, OR OTHERWISE PROVIDING INFORMATION TO US, YOU CONSENT TO THE TRANSFER TO, AND PROCESSING OF, YOUR INFORMATION IN THE UNITED STATES.

9 THE GENERAL DATA PROTECTION REGULATION (“GDPR”).

Residents of the European Economic Area (“EEA”) may be entitled to rights under the GDPR. If you qualify, these rights are summarized below.

If you request to exercise your rights under the GDPR, we may require verification of your identity before we respond to any such request. If you are entitled to these rights, you may exercise the following rights with respect to your Personal Information that we collect and store:

- the right to withdraw consent to data processing at any time;
- the right of access to your Personal Information;

- the right to request a copy of your Personal Information;
- the right to correct any inaccuracies in your Personal Information;
- the right to erase your Personal Information;
- the right to data portability, meaning to request a transfer of your Personal Information from us to any other person or entity as chosen by you;
- the right to request restriction of the processing of your Personal Information; and
- the right to object to processing of your Personal Information.

You may exercise these rights free of charge. These rights will be exercisable subject to limitations as provided for by the GDPR. Any requests to exercise the above-listed rights may be made to: contact@sancerra.com. If you are an EEA resident, you have the right to lodge a complaint with a Data Protection Authority about how we process your Personal Information at the following website: https://edpb.europa.eu/about-edpb/board/members_en.

10 CALIFORNIA CONSUMER PRIVACY ACT OF 2018 (“CCPA”)

If you are a California resident, you have certain privacy rights under California law, including the California Consumer Privacy Act of 2018 (“CCPA”). As relevant to this Site, these are: (1) the right to know what personal information is collected, disclosed or sold; (2) the right to request deletion of personal information; and (3) the right to non-discrimination.

Right to Know. You have the right to request details on what personal information we have collected about you. The categories of personal information we collect are listed in this Privacy Policy under the heading “Information Collected.” You can request a copy of your personal information by emailing us your request at contact@sancerra.com. Although we do not sell your data, we may share your information with others for legitimate business reasons as listed in this Privacy Policy under the heading “Our Information Sharing Practices.”

Right to Request Deletion. You have the right to request that we delete any personal information, unless an exception applies such as when we need to keep data to meet legal obligations, fix security flaws, or investigate Terms of Service violations. When we receive a verified request, we will delete your personal information and will direct our service providers to do so as well. To submit a request for deletion, you may e-mail us at contact@sancerra.com.

Right to Non-Discrimination. We will not discriminate against you for exercising any of your rights under the CCPA. Unless permitted by the CCPA, we will not deny you our services, charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties, provide you a different level or quality of services, or suggest that you may receive a different price or rate for services or a different level or quality of services.

11 CALIFORNIA SHINE THE LIGHT LAW.

California Civil Code § 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed Personal Information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with “California Privacy Rights” in the subject line to contact@sancerra.com.

12 CALIFORNIA MINORS.

While the Site is not intended for anyone under the age of 18, if you are a California resident who is under age 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at contact@sancerra.com. When requesting removal, you must specify the information you want removed and provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you do not follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. Removal of your information from the Site does not ensure complete or comprehensive removal of that information from our systems or the systems of our service providers. We are not required to delete information posted by you; our obligations under California law are satisfied so long as we anonymize the information or render it invisible to other users and the public.

13 CHANGES TO THIS PRIVACY NOTICE.

Because our privacy practices and privacy law necessarily evolve over time, we reserve the right to revise this Privacy Notice from time to time in our sole discretion, upon notice to you such as by posting updated Privacy Notice on the Site, sending you an email to your account email, or by any other reasonable means. You should periodically review this Privacy Notice to ensure that you are familiar with the most current version. Your continued use of the Site after the Effective Date posted above will constitute your acceptance of the updated Privacy Notice.

14 PRIVACY QUESTIONS AND CONTACT INFORMATION.

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your information described in this Privacy Notice, your choices and rights regarding such use, or wish to exercise your rights under California law in [Section 10](#) and [Section 11](#), please do not hesitate to contact us at:

E-mail: contact@sancerra.com