

## **Privacy Policy**

Effective date: June 30, 2020

At Widgets, Inc., we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data.

Remember that your use of Widgets, Inc.'s Services is at all times subject to our [Terms of Service](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Service.

### **What this Privacy Policy Covers**

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations.

### **Personal Data**

We collect Personal Data about you from the following categories of sources:

1. You: when you provide information directly to us.
  - When you create an account or use our interactive tools and Services.
  - When you send us an email or otherwise contact us.
  - If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as

applicable.

2. Vendors

- We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.

3. Social Networks

- If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

### **How We Share Your Personal Data**

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a "sale" of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Security, spam, and fraud prevention consultants and providers.
  - Analytics providers.
- **Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include:
  - Ad networks.
  - Marketing partners and providers.
- **Business Partners.** These parties partner with us in offering various services. They include:

Businesses that you have a relationship with.

Companies that we partner with to offer joint promotional offers or opportunities.

### **Legal Obligations**

We may share any Personal Data that we collect with third parties in conjunction with any of the activities required to meet our legal requirements or any Commercial or Business Purpose.

### **Business Transfers**

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (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.

### **Data that is Not Personal Data**

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

### **Tracking Tools, Advertising and Opt-Out**

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "Cookies") to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze

trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data- usually text files - placed on your computer, tablet, phone or similar device when you use that device to access our Services.

We use the following types of Cookies:

**Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.

**Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services.

**Retargeting/Advertising Cookies.** Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled "Information about Interest-Based Advertisements."

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each

new Cookie in a variety of ways.

### **Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services, and for an additional two years or until we receive a request to delete it. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

### **Personal Data of Children**

We do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible.

### **Nevada Resident Rights**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

## **European Union Data Subject Rights**

### **EU Residents**

If you are a resident of the European Union ("EU"), United Kingdom, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation (the "GDPR") with respect to your Personal Data, as outlined below.

### **Personal Data Use and Processing Grounds**

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

Contractual Necessity: We process the following categories of Personal Data as a matter of "contractual necessity", meaning that we need to process the data to perform under our Terms of Service with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.

- Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:

Profile or Contact Data

Device/IP Data

Web Analytics

Geolocation Data

- Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data.

## **EU Data Subject Rights**

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at [support@widgets.inc](mailto:support@widgets.inc).

**Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by logging on to your account.

**Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by logging on to your account.

**Erasure:** You can request that we erase some or all of your Personal Data from our systems.

- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

## **Changes to this Privacy Policy**

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any material changes by placing a notice on the Widgets, Inc. website, by sending you an email and/or by some other means.

## **Contact Information**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at: Widgets, Inc., 20 Cortlandt St, Fl 12, New York, NY 10007