

Website Privacy and Cookie Notice

TRACEPOINT LLC, [10300 Spotsylvania Ave. Ste. 230, Fredericksburg, VA 22408] (“TRACEPOINT,” “We,” “Us,” “Our”) takes the security and privacy of your Personal Data very seriously. This Privacy and Cookie Notice (“Notice”) describes how we process Personal Data about you that we collect through the website or application operated and controlled by us from which you are accessing this Notice (the “Site”).

Certain parts of our Site are aimed at our customers and potential customers.

1. Personal Data We Collect

- 1.1. If information can be used to identify you as an individual, such as your name or email address, we treat this information as “Personal Data.”
- 1.2. We may collect and process the following Personal Data about you:

What you give us: We collect the information that you provide to us when you interact with the Site. For example, if you contact us, we may keep a record of that correspondence. If you sign up to receive emails from us, we may collect your email address.

- 1.3. Through your use of the Site, we may also gather certain information about your use of the Site that does not identify you individually but may identify your computer or device. Generally, this information is collected through what we refer to herein as “Traffic Data.” We may collect and store such Traffic Data automatically whenever you interact with the Site. For example, we may collect your IP address, the hostname of your computer, browser information and reference site domain name every time you visit the Site. We may also collect information regarding user traffic patterns and site usage.
- 1.4. We do not use the Traffic Data to personally identify you; it is used to analyze and improve the Site and to provide our users with a fulfilling Internet experience. Please see the section below in this Notice regarding Passive Information Collection for more information about our use of cookies and other technologies.
- 1.5. We may combine your Personal Data with other information we have collected from you, whether on- or offline. We may also combine your Personal Data with information we receive about you from other sources, such as our publicly available information sources and third parties. We treat the combined information as Personal Data.

2. Security

- 2.1. We take reasonable steps to protect information about you in our possession and control, and to protect such information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Where we have given you (or where you have chosen) a password that enables you to access certain parts of this Site, you are responsible for keeping this password confidential. We ask you not to share any passwords with anyone.
- 2.2. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent

unauthorized access.

3. How We Use Personal Data

- 3.1. We use Personal Data about you in the following ways:
 - 3.1.1. If you are a Customer, to provide you with information, products or services that you request from us or that we feel may interest you.
 - 3.1.2. To notify you about changes to our Site, products, and services.
 - 3.1.3. To prevent misuse or improper use of the Site.
 - 3.1.4. To ensure that content from the Site is presented in the most effective manner for you and for your computer.
 - 3.1.5. For our business purposes, such as data analysis, audits, developing new products and features, enhancing our website, improving our products and services, identifying Site usage trends, and determining the effectiveness of our promotional campaigns.
 - 3.1.6. As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
 - 3.1.7. For any other purpose specified at the point of collection or as described in your express authorization.
- 3.2. We may use and disclose non-personal, non-individual statistics or demographic information in aggregate form without restriction.

4. Disclosure of Your Personal Data

- 4.1. We may disclose your Personal Data to third parties only in the following circumstances:
 - 4.1.1. Who help us to administer the Site (such as our Internet service providers) or to provide the services you are requesting. These third parties must at all times provide the same levels of security for your Personal Data as TRACEPOINT.
 - 4.1.2. Who are service providers that perform functions on our behalf. Examples include providing customer service, sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data, providing marketing assistance, executing customer satisfaction surveys, providing customized advertising and providing search results and links (including paid listings and links). These service providers have access to Personal Data needed to perform their functions but are contractually prohibited from using it for other purposes. Further, they must process the Personal Data in accordance with this Notice and as permitted by applicable data protection laws.
 - 4.1.3. If you are a Consumer who has registered for the Portal, as expressly permitted by the
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Authorization that you signed at the time of such registration.

- 4.1.4. In the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).
- 4.1.5. If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of TRACEPOINT or any affiliate, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. Your Rights and Choices

- 5.1. You may at all times revoke any consent or authorization given to processing your Personal Data by sending us an email or postal mail. To assert your rights and for any questions you might have, please contact us at info@tracepoint.com. We will seek to comply with your request(s) as soon as reasonably practicable. In addition, you may opt out of receiving promotional e-mails from us by following the unsubscribe instructions provided in any such messages. Please note that if you opt out of receiving promotional messages from us, this does not impact other transactional and administrative messages which you will continue to receive (such as emails relating to changes to this Notice).
- 5.2. The Site may, from time to time, contain links to and from the sites of our partner networks, advertisers and affiliates. If you follow a link to any of these sites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these third-party sites.

6. Passive Information Collection, Use, and Choices

- 6.1. As you navigate the Site, certain Traffic Data may be passively collected, meaning it is gathered without your actively providing it. This is done using the following technologies in the following ways:
 - 6.1.1 **Through your browser:** Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type and operating system type and version screen resolution, and Internet browser type and version.
 - 6.1.2 **Through your device:** If you access the Site through a mobile device or other network-connected product, certain information may be collected about that device, including your device type, network service provider, and other identifiers. We may collect unique device identifiers (such as IDFA and AID tags and UUID and UDID identifiers) associated with the device you use to access the Site.
 - 6.1.3 **Using cookies:** Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on the Site, pages visited, and language preferences. We and our service providers use this information for security purposes, to facilitate navigation, display information more effectively, and to personalize your experience while using the Site. More specifically, we use cookies to:

- recognize your computer or device to make your use of the Site easier, such as to remember your locations of interest and other preferences with the Site; and
- gather statistical information about use of the Site in order to continually improve its design and functionality, understand how individuals use it, and to assist us with resolving questions regarding it.

You can refuse our use of some or all cookies by turning off the use of cookies in your web browser. If you use your browser settings to block all types of cookies, however, you may not be able to access all or parts of our Site or functionality may be limited. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies. To learn more about cookies, please visit <http://www.allaboutcookies.org>.

- 6.1.4 **Using Monitoring Tools:** The Site may utilize pixel tags, web beacons, clear GIFs, Flash Shared Objects, HTML5 Local Storage, HTML5 Mini Databases, and other similar technologies, both on certain aspects of the Site and in HTML-formatted e-mail messages to you. These monitoring tools are used for the purpose of, among other things, compiling statistics about Site usage and response rates, and tracking the activities of users of the Site and e-mail recipients.
- 6.1.5 **IP Address:** Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many online service providers, including website operators. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.
- 6.1.6 **Analytic Tools:** We also use tools and third-party services to collect information about usage of the Site, including Google Analytics. To learn more about privacy and Google Analytics please consult the Google Analytics overview provided by Google at: <http://www.google.com/intl/en/analytics/privacyoverview.html>. Generally speaking, Google Analytics collects information on how often users visit the Site, what aspects of the Site they visit when they do so, and what other websites users visited prior to accessing the Site. You may prevent your data from being collected and used by Google Analytics by opting out through the use of the [Google Analytics Opt-out Browser Add-on](#).

Although our use of passive collection technologies may change over time as technology evolves, the above descriptions are designed to provide you with additional detail about our current approach to information collected from passive technologies.

7. Do Not Track

- 7.1. This Site does not process Do-Not-Track (DNT) headers transmitted by Web browsers. Our third-party web analytics companies collect information about your online activities over time. These third parties do not change their tracking practices in response to DNT settings in your web browser and we do not obligate these parties to honor DNT settings.

8. Information Related to Minors

- 8.1. The Site is not intended for persons under the age of 18. We do not knowingly collect Personal Data online from persons in this age group. We reserve the right to delete any information identified as having been provided by such persons at our discretion.

9. Changes to Our Notice

- 9.1. We may change this Notice from time to time. When we do, we will let you know by posting the changed Notice on this page with a new "Last Updated" date. In some cases, we may also tell you about changes by additional means, such as by posting a notice on the Site or sending an e-mail to the e-mail address we have on file for you.

10. Contact

- 10.1. If you have any questions about this Notice, please contact us at: info@tracepoint.com

Last updated: December 8, 2020