

## **PRIVACY PRACTICE STATEMENT**

**EFFECTIVE DATE: March 01, 2018**

THESE POLICY AND PRACTICE TERMS SUPPLEMENT EXISTING AGREEMENTS TO WHICH INFOCHIP AND CUSTOMER HAVE AGREED AND THESE TERMS ARE INCORPORATED WHERE REFERENCED IN SUCH EXISTING, VALID AND ENFORCEABLE AGREEMENTS.

### **InfoChip – Privacy Practice Statement**

InfoChip believes that understanding what our customers want for products, services and information is an important part of building an interesting and useful on-line environment and the applications designed for download and use on mobile or other digital communication devices. InfoChip wants to contribute to providing a safe and secure environment for you if you choose to become an interactive participant on this Site and a subscriber to or user of InfoChip's products and/or services.

You acknowledge because you are accessing and using this Site that you have read, understood and agreed to the terms and conditions of this Privacy Practice Statement and expressly consent to the practices described herein below.

InfoChip has designed its Site with this belief in mind, and has created this page so that you have easy access to information about InfoChip's privacy practices. At any time, however, InfoChip may change its privacy practice and privacy practice statement. In the event InfoChip does so, InfoChip will post these changes here so that you will always know what information InfoChip will gather, how InfoChip might use that information and whether InfoChip will disclose the information to anyone. Your continued use of this Site constitutes acceptance of these changes. Notwithstanding the foregoing, we are not required to provide you any notice about any changes and you waive the right to receive any notice; and as a result, you are obligated to check this Site frequently for any changes.

### **Your California Privacy Rights:**

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our customers who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to:

InfoChip – Contact Information

**By EMail:**            **support@infochip.com**  
**By Phone:**        877.747.2448  
**By Mail:**          7670 Woodway Dr.  
                         Suite 380  
                         Houston, TX 77063

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### **What information does InfoChip collect online?**

When you visit InfoChip's Site and/or subscribe to or use InfoChip's products and/or services, InfoChip asks you to provide information by filling out and submitting an online form. This information may include your name, account name, billing address, cell phone number, wireless email address, physical location, mailing address, Internet e-mail address and, in the case of service and/or product transactions, your credit card number. InfoChip asks for this information so that InfoChip can provide to you your selected products and/or services. The information is stored in InfoChip's customer file in a secure environment separate from the Site. You can always choose whether or not to disclose any or all of the information requested; however, certain information is required for subscribing to or using our services and/or products.

InfoChip may also occasionally send details about our sales, new products, new partnerships, special offers, market expansion and promotions to the e-mail address you provide.

Additionally, InfoChip automatically gathers certain usage information like the number and frequency of visitors to the Site or the number and type of customers that access and obtain InfoChip's product and/or service offerings. Such information may also include demographic information such as date of birth, age or gender. InfoChip only uses and analyzes such information in the aggregate, not at the individual level, to make improvements to its Sites and to its product, goods and service offerings. Therefore, any individual and personal information, such as your name and e-mail address, is not included in this analysis.

Information provided when users establish an account, such as their email address, username, password, and other contact information provided, as well as information they provide in connection with their other digital device account, such as a profile picture. If a user is a customer, we may also collect their information about how they use and interact with InfoChip, and when they use their digital devices to view product or service offerings and purchase products or services.

Information related to a user's purchase of goods and services by using a credit/debit card, billing address, the goods and services purchased, and other related transaction information.

Information about a user's Internet connection, browser, or computer/device, IP address or digital device ID, and information on how they use and interact with digital devices, such as pages or features they access.

If a user links their social media profiles and accounts on this Site or other digital devices through social media networks (e.g., by clicking a Facebook "like" button), information may be made available to, and collected by InfoChip, through those social media profiles and accounts. In addition, if a user elects to connect their third party devices or third party applications (collectively "Third Party Apps") to this Site or digital devices in order to utilize certain features and functionalities, we may collect information from such Third Party Apps.

If a user accesses via a mobile device this Site through an application or accesses this Site from other external devices or sources, InfoChip applies these privacy practices to the foregoing.

The user acknowledges that this Site is for the provision of services described on the Site and the privacy issues described herein are applicable to member subscribers of the InfoChip platform services.

### **Information We Collect:**

- We collect the information you give us in order to provide you products and services, inform you about our products and services, to provide you access to particular tools and service, to send you personalized emails or secured messages pertaining to your use of the services or product and to fulfill your product and service requests.
- Administer your account.
- We may work with consumer marketing companies to help us better target our services and product communications to you.
- Statistically analyze user behavior and activity.
- Conduct research and measurement activity.
- We do use cookies and other Internet technologies including web beacons, to manage our Site and e-mail programs, and to personalize your interactive experiences.
- When you access our Site, we will log your IP address in our web server logs. We also collect related information such as browser type, operating system, and Web pages visited to help manage our Site.

#### **What sort of information will InfoChip not collect?**

Unless you provide it, InfoChip will not collect or know your name or e-mail address. InfoChip does not follow your browsing path outside of the Site.

#### **"Cookies" or Web Beacons sent from the Site and Our Use of Them.**

A cookie is a small file stored on your computer by a Site to give you a unique ID. Cookies help make it easier for you to use the Site, and they help InfoChip provide you with the information you need — when and where you need it.

A cookie generated by a Site contains no information about you. It contains only a numeric ID that, for example, allows you to retrieve your order form or other associated information so that you can check on the level of service to which you have subscribed and/or products which you have ordered. InfoChip encourages you to update your information periodically so that InfoChip may provide you with the best possible online service.

InfoChip also uses web beacons (single-pixel graphic files also known as "transparent GIFs") to access cookies and to count users who visit the Site or open our HTML-formatted email messages. Another example of information that we automatically collect as you navigate the Site is information about your computer's connection to the Internet. This information allows us, among other things, to improve the delivery of our web pages to you and to measure traffic on the Site.

In keeping with InfoChip's standard policy on customer information, InfoChip analyzes data gathered via cookies and web beacons only in aggregate, not at the individual customer level.

#### **How does InfoChip use the information it collects?**

InfoChip may use the information it collects to improve the Site, enhance InfoChip's product and/or service offerings, bring you new product and/or service offerings and meet your needs related to your use of the Site and/or products and/or services.

In the end, InfoChip hopes this information will help InfoChip tailor its communications and/or products and/or services to your particular needs so that you receive more of what you want from InfoChip and its products and/or services and less of what you don't want. If you subscribe to or use InfoChip's products and/or services and/or visit the Site, InfoChip will periodically supply you with information about InfoChip's products and/or services. If you do not wish to receive this information, please e-mail InfoChip at the contact below with instructions to disengage you from the receipt of such information.

#### **How We Use Personal Information:**

- We use personal information to deliver products/services, or to carry out the transactions you have requested.

- We use the information collected to send communications to you, such as your transactions status (e.g., member or subscription confirmations), information about products and services available from InfoChip and its corporate affiliates, promotional offers, and surveys.
- We use the information to customize, analyze, and improve our products, services (including our Site), technologies, communications and relationship with you.
- We use the information to enforce our conditions of payment for membership or subscriptions, Site terms and/or separate contracts (if applicable) with you.
- We use information to prevent fraud and other prohibited or illegal activities.
- We use information for transaction fulfillment.
- We use information to communicate special offers, promotions and information about our products or services.
- We use information to send newsletters, announcements, reminders and other opportunities.
- We use your information to send out product alerts, product pricing change alerts, product or service availability alerts and associated InfoChip information.
- We use information to administer your account.
- We use information to provide you access to certain tools and services.
- We use the information to respond to your inquiries, including personalized emails.
- We use information to obtain feedback.
- We use information to statistically analyze user behavior and activity.
- We use the information to conduct research and measurement activities.

#### **How does InfoChip use e-mail or messages?**

InfoChip will send one email or message to confirm each subscription, registration or membership to which you elect, and InfoChip may occasionally use e-mail addresses or messages for promotion of services or products, or other items of interest to our users. If you receive an e-mail or message from InfoChip that you would rather not receive, please e-mail InfoChip at the contact below with instructions to disengage you from the receipt of such information. Please note that InfoChip does not sell or share email addresses with other companies, except as indicated below.

InfoChip encourages you to email support@infochip.com with your questions or comments. InfoChip reads every email it receives.

#### **What information may InfoChip share with others?**

If you provide InfoChip with your name or e-mail address, InfoChip may make these available to other companies who want to tell you about their products. (If you prefer that InfoChip not share this information, please e-mail InfoChip at the contact below with instructions to disengage you from the receipt of such items.) In delivering this information, InfoChip may group you with other customers who have bought similar services and/or products, but InfoChip will not provide any personal details about you.

InfoChip may also provide aggregate information (never information about you personally) to InfoChip's business partners for the purposes of enhancing InfoChip product and/or service offerings to you.

**Protecting Personal Information:** We understand the importance of ensuring that your personal information is secure and protected. We use a variety of security technologies and procedures to help protect personal information from unauthorized access, use, and disclosure.

InfoChip utilizes a payment arrangement and/or service as indicated on the Site (including the checkout page) that is consistent with reasonable industry standards for obtaining and processing payments and engages in practices as recommended by the payment administrator and/or processor. The use of this arrangement and/or service is to facilitate privacy concerns regarding payment information used and processed at this Site.

#### **Disclosing Personal Information:**

- We may share your personal information with corporate affiliates to carry out transactions you request or to make our business or that of our corporate affiliates more responsive to your needs.
- We may share your personal information with business partners that help InfoChip carry out transactions you request or that help InfoChip to customize, analyze and/or improve our communications or relationship with you, and then only with business partners who share InfoChip's commitment to protecting your personal information. We may also share your information in the event of a merger, reorganization or sale of InfoChip.
- We may disclose your personal information in connection with law enforcement, fraud prevention, or other legal action as required by law or regulation, or if InfoChip reasonably believes it is necessary to protect InfoChip, its customers or the public or as it relates to any user understandings in connection with this Site or any agreement with InfoChip or to enforce any tangible or intangible property rights and interests or for any other property, health or safety reasons or threats of any person of which we become cognizant as a result of interaction with this Site, including fraud or your identity verification.
- We employ other parties to carry out certain functions or operations on our behalf, who are authorized to use the information solely for our purposes (e.g., web site developers, analyzing user data).
- We may share information with Social Networks when users interact with this Site or other digital devices (e.g., clicking the “like” button on Facebook) or Third Party Apps.
- Except as described above, we will not disclose your personal information to other third parties unless you have provided consent.

#### **What information will InfoChip not share with others?**

InfoChip will not share, sell or trade e-mail addresses, which are personal to you, and that are collected as part of a survey, with others. Except to verify credit card information to complete your registration, service and/or product transaction, InfoChip will not use or release to others any credit card or financial information for any purpose. For privacy purposes, all information relating to our customers is stored on a highly secure server that is not accessible via the Internet.

Third-party web sites, apps or other digital devices are not under our control except to the extent that you use the foregoing to access the Site. The foregoing have their own privacy notices independent of this Site and the privacy practice described herein applies to this Site only when accessed via digital devices.

#### **How to contact INFOCHIP with questions or comments:**

InfoChip is always happy to answer your questions and listen to your comments, and InfoChip offers several options for you to contact us.

#### **Choices for Your Site Interactions:**

- You may instruct InfoChip to stop sending you certain promotional materials (e.g., e-mail messages, newsletters) by following the unsubscribe instructions provided in our materials; or you can selectively opt out of certain mailings without affecting your use of the Site.
- Click below to unsubscribe from (opt out of) direct mail, telephone, fax, message or e-mail communications.
- You may choose to view or edit your personal information that has been stored online by visiting the account section of the Site. For the security of your account, you will be required to sign in with your login ID and password.
- You may contact InfoChip to determine the types of personal information that we process and to correct or update your personal information.
- Note, this Privacy Practice Statement is specific to the United States. Privacy practices vary from country to country, and you will be responsible for knowing local country privacy requirements and compliance therewith. InfoChip shall not be liable for privacy compliance outside the United States.

#### **Security of Your Personal Information and Retention of Your Personal Information:**

We take what we believe to be reasonable precautions and have implemented managerial and technical procedures to try to protect the security of data and information, including personal information. However, we cannot guarantee against any loss, misuse, unauthorized disclosure, or alteration or destruction of data or personal information. You provide your personal information to us at your own risk. You acknowledge that: (1) there are security and privacy limitations in computer systems and on the Internet, including any type of digital communication or mobile devices, which are beyond our control; (2) the security, integrity, and privacy of any and all information and data exchanged between you and us through the Site, including personal information, cannot be guaranteed; and (3) any such information and data, including personal information, may be viewed or tampered with by a third party while such information or data is being used, transmitted, processed, or stored.

We keep your personal information only as long as we need it for the purposes for which it was originally collected (or to which you have subsequently consented) or for other legitimate purposes (such as regulatory compliance), or as permitted by applicable law.

BY SUBMITTING YOUR PERSONAL INFORMATION TO US, YOU ARE CONSENTING TO THE PROCESSING OF YOUR PERSONAL INFORMATION IN THE UNITED STATES OR IN ANY OTHER COUNTRY IN THE WORLD AND TO OUR USE OF YOUR PERSONAL INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. IF YOU ARE SUBMITTING PERSONAL INFORMATION OF THIRD PARTIES TO US, YOU WARRANT AND REPRESENT YOU HAVE THEIR CONSENT TO PROVIDE THEIR PERSONAL INFORMATION TO US AND WILL HOLD US HARMLESS FROM AND AGAINST CLAIMS BY SUCH INDIVIDUALS RELATING TO OUR PROCESSING AND USE OF SUCH PERSONAL INFORMATION WITHIN THE TERMS OF THIS PRIVACY POLICY.

**CONTACT: Any questions, clarifications, changes to personal information or opt out needs, or any other concerns regarding this Privacy Practice Statement, please contact:**

InfoChip– Contact Information

**By EMail:**            **support@infochip.com**  
**By Phone:**        877.747.2448  
**By Mail:**          7670 Woodway Dr.  
                         Suite 380  
                         Houston, TX 77063

This Policy is subject to revision by InfoChip at any time. If a Policy Change is made, InfoChip will notify the designated representative of Customer.