

## **PRIVACY POLICY**

Tingler, LLC (“company,” “us,” “our,” or “we”) has prepared this Privacy Statement to ensure that the viewers of our website [tinglerinsurance.net](http://tinglerinsurance.net) and all other affiliated websites and technology systems (collectively, the “Website”), and subscribers to our newsletter or other online services and products (collectively, the “Online Services”) are aware of our practices concerning information collected from users of the Website and subscribers and purchasers of Online Services (“Users”).

All information transmitted, submitted to, or acquired from, the Website shall be deemed to be the property of the company and we shall have the right to use such information for the purposes described herein to the extent that such use is consistent with applicable law.

### **1. Terms and Conditions of Use**

This Privacy Policy is governed by the Terms of Service of the Website (“Terms of Service”). Please read the Terms of Service prior to using the Website or using, registering for, or purchasing a subscription to the Online Services. By using the Website, or using, registering for, or purchasing any Online Services, User agrees to be bound by the Terms of Service and this Privacy Policy.

### **2. Information Collected**

When a User uses, registers for, or subscribes for any Online Services, or interacts with the Website in other ways, such as by submitting questions or comments, or requesting information or materials, such User acknowledges and authorizes the company to collect the following information:

User's domain name, IP address, and computer and web browser type; any information provided to the company by User through the submission of any forms, surveys and any other information received from User, including, but not limited to, email addresses regardless of whether provided by Users or otherwise acquired by us as a result of correspondence with Users, personally identifiable information, and financial and demographic information relative to Users; and any information relative to User's utilization of the Website including information relative to what web pages Users visit or access. To accomplish the foregoing or for any other reason deemed permissible under applicable law, the company may utilize "cookies" on the Website. Cookies are pieces of information that a website transfers to a user's hard drive for record-keeping purposes. The use of cookies is an industry standard and frequently used by many websites. The company may utilize cookies to recognize Users when they return to the Website. Through our use of cookies, we can customize and improve the use of the Website for Users.

### **3. Use of Information**

All information collected may be utilized to enhance a User's personal experience at the Website by enabling the company to present content believed to be tailored to each User's individual interest profile. Contact information collected from Users may be utilized to send each such User information and promotional material from the company or its affiliates, partners or other third parties who have contracted with us. Information collected from Users may also be utilized by us to improve the Website or for the purpose of (i) conducting statistical analysis, (ii) developing, improving or analyzing marketing and promotional materials, (iii) providing editorial information or feedback to our affiliates, partners or advertisers, (iv) targeted telemarketing campaigns conducted by the company, or its affiliates, partners or advertisers, (v) communicating with Users via any electronic or other means deemed reasonable by us relative to updates to, among other things, the Website, this Privacy Policy and a User's

subscription agreement, if any, as well as products or services, events, promotions, and the status of User's online orders and other Online Services. Users of the Website acknowledge and authorize the company to contact each User in accordance with the foregoing by telephone notwithstanding the fact that such User may have opted into the Federal Trade Commission's National Do Not Call or other similar registry.

#### **4. Third Party Disclosure**

To the extent any User information is provided or collected by the company in accordance with this Privacy Policy, we reserve the right to share, lease, license, sell, or otherwise disclose any information relative to any User collected by the company to third parties with or without being compensated for such disclosure. The company will utilize its best efforts to disclose a User's information only to those third parties that the company deems, in its sole discretion, to be reputable. Notwithstanding the foregoing, by utilizing the Website and/or Online Services, User hereby releases the company from any claims, damages, losses and liabilities resulting from or arising out of our disclosure of any such User's information to any third party.

Notwithstanding anything to the contrary herein, we reserve the right to release and disclose any and all information relative to any User to law enforcement or other governmental officials as the company, in its sole and absolute discretion, deems necessary to comply with any applicable law or at the request any governmental entity or agency.

#### **5. Access and Modification of Information**

To the extent required by applicable law, User may request that the company inform User about the personal information maintained by us with respect to User, and where appropriate, request that the company update, correct and/or suppress personal information about User that we maintain. We will make all required updates and

changes within the time specified by applicable law, and where permitted, may charge an appropriate fee to cover the costs of responding to such request. Please remember, if User makes such a request, the company may not be able to provide User with the same quality and/or variety of Online Services to which User is accustomed. User is permitted to remove User's personal contact information from our marketing list by utilizing the "Unsubscribe" link located at the bottom of every email sent to Users by the company To protect User's confidentiality, the company will only respond to the email address provided to us in User's request.

## **6. Information From Minors**

No information collected from children is knowingly used for any purpose whatsoever, either inside or outside the Website.

## **7. Anti-Spam Policy**

The company seeks to ensure that it and third parties with whom it provides information relative to Users comply with all applicable law relative to contact with Users. In this regard, the company will only contact Users for the following purposes:

To acknowledge the company's receipt of a User's subscription application, online order or similar transaction, or to request additional information or action from User relative to any such transaction; in response to a User inquiry regarding the status of any transaction; periodic contact expressing our appreciation for User's business or patronage; and communicating with User for those reasons described in Section 2 of this Privacy Policy.

In addition, the company has instituted the following protocols relative to electronic mail correspondence in order to facilitate our compliance with applicable law such as the Can-Spam Act, including among other things:

All emails sent to Users by the company will conspicuously identify us as the sender; the Subject of emails will accurately describe the subject matter of the contents thereof, including clearly and conspicuously stating that the e-mail message is an advertisement if applicable; email message will contain an “Unsubscribe” link located at the bottom thereof, which will allow the User to opt out of getting email from us in the future; and a current physical mailing address will be contained in all email communications, where the User can send suggestions, complaints or other correspondence.

## **8. Information Security**

The company implements security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of User’s information. We restrict access to personal information to our business partners who may need such information in order to operate, develop or improve Online Services. Persons receiving such information are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

## **9. Amendment**

We reserve the right to amend our Privacy Policy at our sole discretion and at any time. You should review the Privacy Policy periodically to check for amendments. We will not post notice of modifications and additions to these terms. Changes will not apply retroactively and will become effective immediately after they are posted. However, changes addressing new functions for an Online Service or changes made for legal reasons will be effective immediately.