

[CLIENT] Privacy Policy

This Privacy Policy was last updated: [REDACTED]

Thank you for visiting [CLIENT'S] ("[CLIENT]" or "we") Internet web site ("Site") located at the URL [www.\[REDACTED\].com](http://www.[REDACTED].com). This Privacy Policy details certain policies implemented throughout [CLIENT] governing [CLIENT]'s collection and use of personally identifiable information about users of the Site and our services.

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1. Privacy Policy Updates

[CLIENT] may need to update this Privacy Policy from time to time. If so, [CLIENT] will post its updated Privacy Policy on the Site along with a change notice on the Site. [CLIENT] may also send registered users of our services a notice that this Privacy Policy has been changed. [CLIENT] encourages you to review this Privacy Policy regularly for any changes. Your continued use of

this Site and/or services and/or your continued provision of personally identifiable information to us after the posting of such notice will be subject to the terms of the then-current Privacy Policy.

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO DETERMINE HOW TO IMPLEMENT REQUIREMENTS FOR REGULAR PRIVACY POLICY UPDATES.]

2. Information Collection

In certain sections of this Site, we may require you to submit your personally identifiable information to us, and we may invite you to submit questions, comments and request information. In addition to any personal information that you may voluntarily provide, the Site collects information using cookies and other third-party tools. Please refer to the sections below on “Cookies” and “Third Party Analytics Tools” and “Third Party Advertising Tools” for more information about the information these tools collect and use.

Due to the nature of some of our services, you may provide us with personally identifiable information such as your name, email address, username, password, address, phone number, and other contact information **[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO INCLUDE ANY OTHER TYPE OF INFORMATION THAT IS COLLECTED]** that you voluntarily transmit with your communication to us.

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO ENSURE THAT THE CATEGORIES OF PERSONAL INFORMATION THAT YOU MENTION HERE ALIGN WITH THE CATEGORIES YOU IDENTIFY IN THE CCPA SECTION BELOW.]

3. Information Use

We may use your personally identifiable information to deliver our services or information you have requested, verify your authority to enter certain password protected areas of the Site, verify that you are a customer or prospective customer, send you information that you have signed up to receive, notices about our products and/or services that you have used or that may be of interest to you and notices about events, and improve the content and general administration of the Site and our services.

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO ADJUST THIS SECTION TO REFLECT YOUR PRACTICES]

If you are a user of our services, we may use your personally identifiable information to provide the services to you.

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO ENSURE THAT THE USES OF PERSONAL INFORMATION THAT YOU DESCRIBE HERE ALIGN WITH THE CATEGORIES YOU IDENTIFY IN THE CCPA SECTION BELOW.]

4. Children's Privacy

[CLIENT] recognizes the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. Neither the Site nor our services are intended for children under the age of 16. **[CLIENT]** does not target its services or this Site to children under 16. **[CLIENT]** does not knowingly collect personally identifiable information from children under the age of 16.

[MESSAGE TO CLIENT: CLIENT CANNOT COLLECT AGE INFORMATION ON THE SITE AND IF CLIENT DOES COLLECT AGE, YOU MUST DELETE AND NOT USE INFORMATION FROM A USER UNDER THE AGE OF 16. THE CCPA CONTAINS ADDITIONAL AGE-RELATED RESTRICTIONS. PLEASE SEE THE CALIFORNIA PRIVACY SECTION BELOW. WORK WITH YOUR COUNSEL TO ACCURATELY ADJUST THIS SECTION.]

5. **Cookies**

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

On the Site, we use session cookies to make it easier for you to navigate the Site by remembering your locale preferences and to improve and track the overall Site experience. For the Site, we set a persistent cookie to authenticate your login and authorization to use the services. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on the Site. If you reject cookies, you may still use the Site, but your ability to use some areas of the Site may be limited.

6. **Third Party Analytics Tools**

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO ADJUST THIS SECTION TO REFLECT YOUR PRACTICES]

Beyond the personally identifiable information you voluntarily provide to us directly, **[CLIENT]** utilizes analytics tools including third party technologies, such as Google Analytics, to collect information utilizing cookies. Certain types of information, including geolocation, device type, onsite website usage and behavior, demographic data, and purchase history, is collected and aggregated across **[CLIENT]** Site users for our analysis and advertising efforts.

7. **Third Party Advertising Tools**

[CLIENT] uses Google Analytics and Google Ads and similar types of technologies to display relevant advertisements to users who have previously visited the Site. Referred to as remarketing or retargeting, **[CLIENT]** may utilize previous session information to serve display advertisements to you on the Site and based on such session information Google may set a cookie and serve ads to you on third party websites on the Google Display Network. Third party vendors such as Google may display **[CLIENT]** ads on websites across the Internet. Aggregated user data may be utilized to create remarketing/retargeting "lists," or groups of users with similar onsite behaviors or demographics. **[CLIENT]** also uses Google tools to display advertisements to users based on their inferred interests and demographics.

Users may learn more about Google's use of cookies by visiting the Google Privacy and Terms page at <http://www.google.com/policies/>. You may opt out of being tracked by Google Analytics by i) Turning off cookies in the preferences settings in your browser ii) Downloading the Google Analytics opt-out browser add on available at: <https://tools.google.com/dlpage/gaoptout/> iii)

Opting out of user interest and demographic categories in the Settings for Google Ads feature to manage or opt out of Google interest based ads at: or iv) Managing cookies used for online advertising across multiple companies at the US-based Network Advertising Initiative at <http://www.networkadvertising.org/choices/>.

8. Usage Information

We automatically collect information about your interactions with the Site, including information about the device you use to interact with and/or access the Site, such as: IP address, access dates and times, information about your approximate location (as determined through your IP address), hardware and software information, mobile, computer or hardware device information (e.g., operating system version, Hardware model, IMEI number and other unique device identifiers, MAC address, and device settings), device event information, and crash data. This information allows [CLIENT] to understand how you've used the Site (which may include administrative and support communications with us or whether you have clicked on links to External Web Sites), and other actions you have taken in connection with your use of the Site. We automatically collect log data when you access and use the Site, even if you have not created an account or logged in.

9. Aggregate Information

We may collect and track the total number of visitors to the Site, the number of visitors to each page of the Site, External Web Sites (defined below) linked to and other aggregated data collected through our services and we may analyze this data for trends and statistics in the aggregate but such information will be maintained, used and disclosed in aggregate form only and it will not contain personally identifiable information. We may use such information for purposes such as analyzing trends, administering the Site, and to understand how users interact with the Site.

10. Disclosure of Personally Identifiable Information

We may provide your personally identifiable information and the data generated by cookies and third party analytics tools and the aggregate information to the vendors and service agencies that we may engage to assist us in providing our services to you. For example, we engage with G5 Search Marketing, Inc. to assist us in creating and hosting this Site.

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO INCLUDE ANY OTHER DISCLOSURES OF PERSONAL DATA]

We will disclose your personally identifiable information if we reasonably believe we are required to do so by law, regulation or other government authority or to assist in any investigation, to protect our or our users' rights or to enforce our terms of use. We will not sell your personally identifiable information to any company or organization except we may transfer your personally identifiable information to a successor entity upon a merger, consolidation or other corporate reorganization in which [CLIENT] participates or to a purchaser of all or substantially all of [CLIENT]'s assets to which this Site relates.

11. Links to Third Party Sites

The Site may provide links to other Web sites or resources over which [CLIENT] does not have control ("External Web Sites"). Such links do not constitute an endorsement by [CLIENT] of those External Web Sites. You acknowledge that [CLIENT] is providing these links to you only as a convenience, and further agree that [CLIENT] is not responsible for the content of such External Web Sites. Your use of External Web Sites is subject to the terms of use and privacy policies located on the linked to External Web Sites.

12. Security

We may employ industry standard procedural and technological measures that are reasonably designed to help protect your personally identifiable information from loss, unauthorized access, disclosure, alteration or destruction. [CLIENT] may use, without limitation, firewalls, password protection, secure socket layer, and other security measures to help prevent unauthorized access to your personally identifiable information.

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO INCLUDE OTHER SECURITY MEASURES OR ADJUST BASED ON SECURITY MEASURES USED OUTSIDE OF THE SITE]

13. Privacy Notice for California Residents

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL TO DETERMINE IF THIS SECTION APPLIES TO YOUR BUSINESS.]

This section supplements the information provided in the Privacy Policy above and applies only to visitors and users who are residents of the state of California.

If you have questions or concerns about any of the information provided in this Privacy Notice for California Residents, please contact us using the information provided in the "Contact Us" section of this Privacy Policy below.

Personal Information We Collect

For purposes of this section "personal information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include:

- information that is lawfully made available from federal, state, or local government records;
- de-identified or aggregated information; and
- information excluded from the scope of the California Consumer Privacy Act of 2018 ("CCPA") such as health or medical information covered under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and financial information covered under the Fair Credit Reporting Act ("FCRA") or Gramm-Leach Bliley Act ("GLBA").

In the last twelve (12) months, we have collected the categories of personal information described in the table below.

[MESSAGE TO CLIENT: REFER TO THE RELEVANT SECTIONS OF THE CCPA AND WORK WITH YOUR COUNSEL TO COMPLETE THE INFORMATION BELOW.]

Category	Examples	Collected
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<p>1. Identifiers</p>	<p>Real name (such as first name and last name); alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<p>Yes [MESSAGE TO CLIENT: You collect this information through the G5 Services]</p>
<p>2. Customer Records Information</p>	<p>Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.</p>	<p>Yes [MESSAGE TO CLIENT: You collect this information through the G5 Services]</p>
<p>3. Characteristics of protected classifications under California or federal law</p>	<p>Age (forty (40) years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital or familial status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information), medical conditions, political affiliations or activities, status</p>	<p>[MESSAGE TO CLIENT: Insert Yes or No based on whether you collect this category.]</p>

	as a victim of domestic violence, assault, or stalking.	
4. Commercial information.	Records of products or services purchased, personal property, or other purchasing or consuming histories or tendencies.	[MESSAGE TO CLIENT: Insert Yes or No based on whether you collect this category.]
5. Biometric information.	Fingerprints, facial or hand imagery, voice recordings from which an identifier template can be extracted, keystroke patterns, gait patterns, sleep, health, or exercise data.	Yes [MESSAGE TO CLIENT: You likely collect voice recordings through the G5 Services
6. Internet or other similar network activity information	Browsing history, search history, information regarding consumer's interaction with a website, application, or advertisement.	Yes [MESSAGE TO CLIENT: You collect this information through the G5 Services
7. Geolocation data	GPS coordinates or other location tracking information.	Yes [MESSAGE TO CLIENT: You collect this information through the G5 Services]
8. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes [MESSAGE TO CLIENT: You collect this information through the G5 Services
9. Professional or employment-related information	Employer, employment history, resumes and CVs, background checks, and other employment-related information.	[MESSAGE TO CLIENT: Insert Yes or No based on whether you collect this category]
10. Education information	Records maintained by an educational agency or institution that pertain to a student, such as grades and transcripts.	[MESSAGE TO CLIENT: Insert Yes or No based on whether you collect this category]
11. Inferences	Inferences drawn from any of the categories described above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes,	Yes [MESSAGE TO CLIENT: You collect this information through the G5 Services]

	intelligence, abilities, and aptitudes.	
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The table below describes the sources for each category of personal information we collect, the business and/or commercial purposes for which we use each category of personal information, and the third parties with whom we share each category of personal information we collect. **[MESSAGE TO CLIENT: INSERT THE APPROPRIATE SOURCES, BUSINESS OR COMMERCIAL PURPOSES, AND THIRD PARTIES TO COMPLETE THE REQUIRED INFORMATION BELOW.]**

Category	Sources	Business or Commercial Purposes	Third Parties Shared With
1. Identifiers	<ul style="list-style-type: none"> • Directly from consumers • Website cookies • Website analytics providers <p>[MESSAGE TO CLIENT: LIST HERE AND IN THE SECTIONS BELOW ADDITIONAL CATEGORIES OF SOURCES OF PERSONAL INFORMATION. G5 HAS ALREADY INCLUDED CATEGORIES RELATED TO THE G5 SERVICES]</p>	<ul style="list-style-type: none"> • To fulfill specific consumer requests • To enhance the website experience • For marketing purposes <p>[MESSAGE TO CLIENT: LIST HERE AND IN THE SECTIONS BELOW CATEGORIES OF BUSINESS OR COMMERCIAL PURPOSES. G5 HAS ALREADY INCLUDED CATEGORIES RELATED TO THE G5 SERVICES]</p>	<ul style="list-style-type: none"> • Website providers • Analytics providers • Advertising providers • Telephone service providers <p>[MESSAGE TO CLIENT: LIST HERE AND IN THE SECTIONS BELOW ADDITIONAL THIRD PARTY CATEGORIES RECEIVING THE INFORMATION. G5 HAS ALREADY INCLUDED CATEGORIES RELATED TO THE G5 SERVICES]</p>
2. Customer Records Information			
3. Characteristics of protected classifications under California or federal law			
4. Commercial information.			
5. Biometric information.	<ul style="list-style-type: none"> • Telephone calls 	<ul style="list-style-type: none"> • To fulfill your requests 	<ul style="list-style-type: none"> • Telephone service providers

		<ul style="list-style-type: none"> • For internal training • For marketing • For analysis 	<ul style="list-style-type: none"> • Analytics providers
6. Internet or other similar network activity information	<ul style="list-style-type: none"> • Website cookies • Website analytics providers 	<ul style="list-style-type: none"> • To enhance the website experience • For marketing purposes 	<ul style="list-style-type: none"> • Website providers • Advertising providers
7. Geolocation data	<ul style="list-style-type: none"> • Directly from consumers • Website Cookies • Website analytics providers • Advertising providers 	<ul style="list-style-type: none"> • To analyze website traffic • For marketing purposes 	<ul style="list-style-type: none"> • Website providers • Analytics Providers • Advertising providers
8. Sensory data			
9. Professional or employment-related information			
10. Education information			
11. Inferences	<ul style="list-style-type: none"> • Website analytics providers • Advertising providers 	<ul style="list-style-type: none"> • For marketing purposes 	<ul style="list-style-type: none"> • Analytics Providers • Advertising providers

Personal Information We Disclose

a. *Sale of Personal Information*

We [sell/do not sell] personal information.

[MESSAGE TO CLIENT: IF YOU SELL PERSONAL INFORMATION, LIST THE CATEGORIES OF PERSONAL INFORMATION SOLD.]

b. *Disclosure of Personal Information for Business Purposes*

We disclose the following categories of personal information for business purposes: identifiers, biometric information, internet or other similar network activity information, geolocation data, and inferences.

[MESSAGE TO CLIENT: IF YOU DISCLOSE ADDITIONAL PERSONAL INFORMATION FOR BUSINESS PURPOSES, LIST THE CATEGORIES OF PERSONAL INFORMATION DISCLOSED.]

We do not sell personal information of minors under the age of sixteen (16) years of age without affirmative authorization.

Your Rights

If you are a resident of the state(s) identified above, you have specific rights regarding your personal information. This section describes your rights and how to exercise them.

a. *Right to Know About Personal Information Collected, Disclosed, or Sold*

You have the right to request that [CLIENT] disclose to you what personal information we collect, use, disclose, and sell. You may exercise this right following the methods described under the subsection titled “Exercising Your Rights” below.

b. *Right to Delete Personal Information*

You have the right to request that [CLIENT] delete personal information we may hold about you. You may exercise this right following the methods described under the subsection titled “Exercising Your Rights” below.

Please be aware that we may not always be able to delete your personal information. For example, there may be business or operational reasons why we need to retain personal information. If we deny your request to delete personal information, we will inform you of the basis for our denial in our response to you.

c. *Right to Opt-Out of Sale of Personal Information*

You have the right to opt out of the sale of your personal information.

[MESSAGE TO CLIENT: SELECT AN OPTION FROM BELOW DEPENDING ON WHETHER YOU SELL PERSONAL INFORMATION.]

[OPTION 1] [Because we do not sell personal information, this right does not apply to [CLIENT].]

[OPTION 2] [You may exercise your right to opt-out of the sale of personal information by using one of the other methods described under the subsection titled “Exercising Your Rights” below]. If you use an authorized agent to exercise an opt-out request on your behalf, we will require the following form(s) of proof [MESSAGE TO CLIENT: DESCRIBE FORMS OF PROOF THAT WILL BE REQUIRED]. Please see the subsection titled “Exercising Your Rights” below for information regarding how you can designate an authorized agent.]

[MESSAGE TO CLIENT: WORK WITH YOUR COUNSEL AND MODIFY THIS SECTION TO REFLECT THE METHODS YOU WILL USE TO ENABLE CONSUMERS TO OPT-OUT OF THE SALE OF PERSONAL INFORMATION.]

d. *Right to Non-Discrimination*

You have the right to not receive discriminatory treatment from [CLIENT] for exercising any of your rights described under this “Your Rights” section. This means we will not treat you differently for exercising any of the rights described above.

Exercising Your Rights

You may exercise each right once every twelve (12) months. To exercise your rights, you must submit a verifiable request to us. To submit a verifiable request, please follow the methods described below:

[MESSAGE TO CLIENT: DESCRIBE HERE THE METHODS BY WHICH THE CONSUMER CAN EXERCISE THEIR RIGHTS. THIS MAY INCLUDE SENDING AN EMAIL, USING A TOLL-FREE PHONE NUMBER, AND/OR SUBMITTING A WEB FORM. PROVIDE LINK TO WEB FORM IF APPLICABLE.]

To verify your request we will [MESSAGE TO CLIENT: DESCRIBE HERE THE PROCESS USED FOR VERIFYING THE REQUEST—THIS MAY INCLUDE ID VERIFICATION OR REQUIRING THE CONSUMER TO PROVIDE CERTAIN PIECES OF INFORMATION].

You may designate an authorized agent to submit a request on your behalf. To designate an authorized agent [MESSAGE TO CLIENT: DESCRIBE HERE HOW A CONSUMER CAN DESIGNATE AN AUTHORIZED AGENT TO SUBMIT A REQUEST FOR THEM—THIS MAY INCLUDE SUBMITTED A SIGNED AUTHORIZATION LETTER OR SOME OTHER METHOD OF AUTHORIZATION].

We will respond to your rights request within forty-five (45) days from the date we receive it. In some cases, we may require additional time to complete your request and will inform you if additional time is needed. Where additional time is needed, we may take up to a maximum of ninety (90) additional days to complete your request.

Financial Incentives

[CLIENT] [does/does not] offer financial incentives or price or service differences in exchange for the retention or sale of personal information.

[MESSAGE TO CLIENT: IF YOU OFFER FINANCIAL INCENTIVES OR PRICE OR SERVICE DIFFERENCES OF ANY KIND, PROVIDE THE REQUIRED INFORMATION FOR NOTICE OF FINANCIAL INCENTIVES IN THIS SECTION. WORK WITH YOUR COUNSEL TO DETERMINE IF YOU ARE OFFERING FINANCIAL INCENTIVES AND ENSURE YOU ARE PROVIDING THE REQUIRED INFORMATION.]

[Metrics]

[MESSAGE TO CLIENT: IF YOUR BUSINESS SELLS, BUYS, OR DISCLOSES FOR A COMMERCIAL PURPOSES THE PERSONAL INFORMATION OF MORE THAN 4 MILLION CONSUMERS, INCLUDE INFORMATION REQUIRED UNDER CCPA DRAFT REGULATIONS §999.317(g). WORK WITH YOUR COUNSEL TO DETERMINE IF THIS REQUIREMENT APPLIES TO YOU.]

14. Notice to Users Located Outside of the United States

This Site and the services on this Site are targeted for users in the United States of America only. Any information you enter on this Site may be transferred outside of your home country to the United States of America, which may not offer an equivalent level of protection to that required of your home country's data protection laws.

Contact Us

If you have any questions regarding this Privacy Policy please contact us via email at _____ or by phone at _____.

[MESSAGE TO CLIENT: PLEASE ENSURE THAT THE CONTACT METHODS PROVIDED HERE WILL BE PREPARED TO RECEIVE COMMUNICATIONS CONCERNING YOUR PRIVACY POLICY AND THAT THE PHONE NUMBER PROVIDED IS TOLL FREE.]