



September 2023

## THE WILLIAM WARREN GROUP PRIVACY POLICY

Thank you for visiting The William Warren Group's ("The William Warren Group") Internet web site ("Websites") located at the URL. This Privacy Policy details certain policies implemented throughout The William Warren Group governing The William Warren Group's collection and use of personally identifiable information about users of our Site and our services.

As a user of this site ("User"), you have the RIGHT TO KNOW about personal information that The William Warren Group collects and what it does with that information. We have adopted the following policy (the "Policy") which guides how we collect, store and use the information you provide online. Please note that this Policy applies only to sites maintained by or on behalf of The William Warren Group, and not to websites maintained by other companies or organizations to which we link. This Policy does not apply to "offline" activities or activities unrelated to the Policy unless otherwise expressly stated herein.

By accessing and using the Websites, User accepts and agrees to be legally bound by this Policy. If User does not agree with all of the terms of this Policy, User must discontinue access to and use of the Websites. The terms and conditions below are incorporated by reference into the Terms of Use Agreement of users of The William Warren Group's products and services.

The Websites contain links to other sites, including links to social media websites. Links to other websites, including social media websites, may also use cookies or other technologies to track your online activities. Your interactions with these links are governed by the policies on those websites and not The William Warren Group or The William Warren Group's Websites. The William Warren Group is not responsible for the privacy policies and/or practices on other sites. When linking to another site, a user should read the privacy policy stated on that site. Our privacy policy only governs information collected on the Websites. Links to social media websites, such as Facebook, Instagram, and Twitter, may collect information from Users, such as your IP address, your social media account information, or the webpage you are visiting. The William Warren Group may maintain pages on social media websites. Your interactions on those websites are governed by the policies of those websites and not The William Warren Group or The William Warren Group's Websites.

When The William Warren Group is contracted to submit a website to search engines, some Personally Identifiable Information (as such term is defined in this Policy) may be required by such services, for example: contact's name, company's name, email, website address, etc. The William Warren Group is in no way responsible for how this information is used beyond this point.

## INFORMATION COLLECTION

You can generally visit our Websites without revealing any personally identifiable information about yourself. However, in certain sections of this Website, we may require you to submit your personally identifiable information to us and we may invite you to submit questions, comments and request information.

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, postal address, social security number, driver's license number, birth date, credit card information, account number, and any other information that you voluntarily transmit with your communication to us that can be used to identify or could reasonably be linked to you ("Personally Identifiable Information").

The William Warren Group also logs non-personally-identifiable information, or information that is deidentified or aggregated, including IP address, profile information, aggregate User data, and browser type, from Users and visitors to the site, which cannot be used to identify Users. This data is used to manage the Websites, track usage and improve, enhance, and maintain the Websites and other services. This non-personally-identifiable information may be shared with third-parties to provide more relevant services and advertisements to members. User profile information including but not limited to members' pictures, names and contact information are displayed to The William Warren Group employees in order to facilitate User interaction in the The William Warren Group social networking community. Email addresses are used for the purposes of inviting new people to join The William Warren Group, to add Users and to send notifications related to the service. We may also use a User's email address to send updates, a newsletter or news regarding the service. Users may unsubscribe from electronic newsletters or cancel their account if they no longer wish to receive transactional emails (which do not contain an option to unsubscribe). You may also have the ability to access and update some of your Personally Identifiable Information through your account with The William Warren Group. If you have trouble accessing your account, wish to set up a new account, wish to have Personally Identifiable Information deleted, or wish to lodge a complaint please contact The William Warren Group at [info@The William Warren Group.com](mailto:info@TheWilliamWarrenGroup.com). If you request the deletion of Personally Identifiable Information, The William Warren Group will make all attempts to do so in a reasonable time period, but may retain some Personally Identifiable Information in order to comply with applicable laws, regulations, ordinances and the like.

We may also collect and group demographic and preferences information, responses to surveys and other Personally Identifiable Information that we collect from you into an aggregate, non-personally identifiable form for disclosure to our existing or potential business partners, affiliates, sponsors or other third parties. This aggregate data does not personally identify you or any other visitors to the Websites.

We may also collect general, non-personal, statistical information about the use of the Websites, such as how many visitors visit a specific page on the Websites, how long they stay on that page and which hyperlinks, if any, they "click" on. We collect this information in order to determine which areas of the Websites are most popular and to enhance the Websites for visitors. As with other aggregated data, we may disclose such data to our existing or potential business partners, affiliates, sponsors or other third parties, but this aggregate data does not personally identify you or any other visitors to the Websites.



## THE WILLIAM WARREN GROUP

MANAGEMENT. ACQUISITIONS. DEVELOPMENT.

With respect to all communications that User makes to The William Warren Group, including but not limited to feedback, questions, comments, suggestions and the like, and with regard to patterns of usage by the User (such as links accessed): (a) User shall have no right of confidentiality in its communications and The William Warren Group shall have no obligation to protect User's communications from disclosure; (b) The William Warren Group shall be free to reproduce, use, disclose and distribute User's communications without limitation; and (c) The William Warren Group shall be free to use any ideas, concepts, know-how, content or techniques contained in User's communications for any purpose whatsoever, including but not limited to the development, production and marketing of products and services that incorporate such information.

From time to time, The William Warren Group or a partner, may sponsor a societal cause or contest on one or more of the Websites. The William Warren Group may share User information such as email addresses with these partners.

### INFORMATION USE/RIGHT TO KNOW

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.

This information will only be used in direct conjunction with your account and website needs.

We use information about you for the following general purposes:

- to provide you with the products and services you request;
- to communicate with you in general;
- to respond to your questions and comments;
- to measure interest in and improve our products, services, and Websites;
- to notify you about special offers and products or services that may be of interest to you;
- to otherwise customize your experience with the Websites;
- to solicit information from you, including surveys; to resolve disputes or troubleshoot problems;
- to prevent potentially prohibited or illegal activities;
- to enforce our Terms of Use;

- to create and manage your account; respond to individual inquiries; and
- as otherwise described to you at the point of collection.

You have the right to request that The William Warren Group disclose to you what information it collects, stores and uses (both categorically and user specific), the business purpose for which we collect and use such information, and third parties that we share information with. If you want to make a request fill out the form linked here [Privacy Policy Inquiry Form](#). You may also use this toll free number 855-955-0889, make your request via e-mail at [PrivacyInquiries@williamwarren.com](mailto:PrivacyInquiries@williamwarren.com) or mail to PO 2034 Santa Monica, CA 90406. The William Warren Group reserves the right to verify the Customer's identity prior to responding to any request by asking the Customer additional questions or requesting additional information.

#### SALE OF PERSONAL INFORMATION/RIGHT TO OPT-OUT

We will not sell or intentionally distribute Personally Identifiable Information to any sources outside The William Warren Group.

Although we do not sell any of your information, you have the right to Opt-Out of the sale of personal information. If you want to Opt-Out of the sale of personal information, fill out the form linked here [Privacy Policy Inquiry Form](#). You may also use this toll free number 855-955-0889, make your request via e-mail at [PrivacyInquiries@williamwarren.com](mailto:PrivacyInquiries@williamwarren.com) or mail to PO 2034 Santa Monica, CA 90406. The William Warren Group reserves the right to verify the Customer's identity prior to responding to any request.

#### COOKIES, PIXEL TAGS AND WEB BEACONS

We and our third party service providers may use a standard technology called a "cookie" to collect information about how you use the Website. Cookies reside on your computer and help the Websites recognize your computer's browser as a previous visitor. On occasion our Websites may also set a "session cookie" which helps us administer the Websites. The session cookie expires when you close your browser and does not retain any information about you after it expires. If you do not want information collected through the use of cookies, you should be able to modify your browser preference to provide you with choices relating to cookies. If you choose to reject cookies, you may be unable to use certain services on the Websites (e.g., those services that require you to log on to the Websites in order to participate).

We and our service providers may also use so-called "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "Pixel Tags") in connection with some Websites' pages and HTML-formatted email messages to track your use of our Websites in order to provide you with more useful information and a



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more personalized experience the next time you visit. Pixel Tags do not contain any Personally Identifiable Information and allow us to count users who have visited certain pages of the Websites, to deliver branded services, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, Pixel Tags can tell the sender whether and when an email has been opened.

Ads that may appear on The William Warren Group Websites may be delivered to Users by The William Warren Group or one of our advertising partners. Our advertising partners may set cookies. These cookies allow the ad server to recognize Users' computer each time they send User an online advertisement. In this way, ad servers may compile information about where Users, or others who are using User's computer, saw their advertisements and determine which ads are clicked on. This information allows an ad network to deliver targeted advertisements that they believe will be of most interest to Users. This privacy statement covers the use of cookies by The William Warren Group and does not cover the use of cookies by any advertisers.

### THIRD PARTY ANALYTICS TOOLS

Beyond the personally identifiable information you voluntarily provide to us, The William Warren Group utilizes analytics tools including third party technologies, such as Google Analytics, to collect non-personally identifiable 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 The William Warren Group Site users for our analysis and advertising efforts.

The William Warren Group uses Remarketing with Google Analytics and Google Adwords to display relevant advertisements to users who have previously visited our Site. Referred to as remarketing or retargeting, The William Warren Group 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 The William Warren Group 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.

The William Warren Group also uses Google Display Network Impression Reporting and Google Analytics Demographics and Interest Reporting and Interest-Based Advertising to display advertisements to users based on their inferred interests and demographics. The William Warren Group does not run interest-based advertising campaigns that collect personally identifiable information.

Users may learn more about Google Analytics 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/>.

## AGGREGATE INFORMATION

The Website may track the total number of visitors to our Website, the number of visitors to each page of our Website, browser type, IP addresses, 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 aggregate information to analyze trends, administer the Website, track users' movement, and gather broad demographic information for aggregate use.

## DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION

We may provide your Personal Identifiable Information in the following circumstances: (i) to the vendors and service agencies that we may engage to assist us in providing our services to you along with the data generated by cookies and third party analytics tools and the aggregate information, for example, we engage with G5 Search Marketing, Inc. to assist us in creating and hosting this Website, provided that any such Personally Identifiable Information shared with vendors and service agents will not be used in any manner other than as necessary to perform business purposes; (ii) in response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights, to defend against legal claims; or as otherwise required by law, provided that in such cases we reserve the right to raise or waive any legal objection or right available to us; (iii) when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of our company or the Websites, our customers, or others; (iv) in connection with our Terms of Use and other agreements; and (v) in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Other than as set out above, you will be notified when Personally Identifiable Information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information. Unless you have authorized us to do so, we will not disclose Personally Identifiable Information to third-parties who may want to offer you their own products and services.



#### RETAINING INFORMATION

Any information collected, including Personally Identifiable Information, shall be retained by The William Warren Group for as long as necessary for The William Warren Group to fulfill your request, administer various programs, provide services, and/or for other business purposes.

#### CORRECTING/UPDATING OR DELETING INFORMATION.

The William Warren Group Users may modify or delete any of their personal information at any time by logging into their account or by filling out a form linked here [Privacy Policy Inquiry Form](#). If User's account has been suspended or deactivated for any reason the User must contact The William Warren Group directly. You may also use this toll free number 855-955-0889, make your request via e-mail at [PrivacyInquiries@williamwarren.com](mailto:PrivacyInquiries@williamwarren.com) or mail to PO 2034 Santa Monica, CA 90406. The William Warren Group reserves the right to verify the Customer's identity prior to responding to any request.

#### EMAIL CHOICE/OPT-OUT.

Users who do not wish to receive The William Warren Group electronic newsletters or information may unsubscribe by clicking the unsubscribe link in any email or by contacting The William Warren Group. You may use this toll free number 855-955-0889, make your request via e-mail at [PrivacyInquiries@williamwarren.com](mailto:PrivacyInquiries@williamwarren.com) or mail to PO 2034 Santa Monica, CA 90406. To stop receiving transactional emails a User must cancel their account.

#### NON-DISCRIMINATION

Users have the right not to receive discriminatory treatment by The William Warren Group for the exercise of their privacy rights.

#### AUTHORIZED AGENTS

Users may designate an authorized agent to make requests on behalf of the User concerning the User's privacy rights. The William Warren Group reserves the right to verify the authenticity of any authorization presented.

#### LINKS TO THIRD PARTY SITES

The Site may provide links to other Web sites or resources over which The William Warren Group does not have control ("External Web Sites"). Such links do not constitute an endorsement by The William Warren Group of those External Web Sites. You acknowledge that The William Warren Group is providing these links to you only as a convenience, and further agree that The William Warren Group 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.