

## **TwinPearlz Consulting Company Privacy Policy**

Last updated: January 1, 2021

This Privacy Policy describes how TwinPearlz Consulting Company, a TwinPearlz Production Company, LLC (“we” or “us”) collects, uses, and shares your personal information when you use our website [www.twinpearlzconsulting.com](http://www.twinpearlzconsulting.com) (the “Site”).

### **Topics:**

- Personal information we collect
- How we use your personal information
- How we share your personal information
- How we store your data
- Email marketing
- Behavioral advertising
- Your data protection rights
- Third party websites
- Changes
- Contact Us

### **Personal information we collect**

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically collected information as “Device Information”.

We collect Device Information using the following technologies:

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons”, “tags”, and “pixels” are electronic files used to record information about how you browse the Site.

We use Device Information for:

- **Functionality:** To recognize you on our website and recognize your previously selected preferences, including your preferred language and your location.
- **Advertising:** To collect information about your visit, the content you viewed, the links you followed, and information about your web browser, device, and IP address. We sometimes share limited aspects of this data with third parties for advertising purposes.

You can set your browser not to accept cookies, and the website above tells you how to remove cookies from your browser. Some of our website features may not function if you disable cookies. Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

We also collect data you provide to us directly. We refer to the data you provide as "Provided Information." We collect and process data you provide when you:

- Register online or place an order for any of our products or services
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email
- Provide information on our subscription list

The Provided Information we collect may include:

- Personal identification information (name, email address, phone number, etc.)
- Billing information (billing address, shipping address, payment information, including credit card numbers, etc.)

When we talk about "Personal Information" in this Privacy Policy, we are talking both about Device Information and Provided Information.

### **How we use your Personal Information**

We use the Provided Information that we collect generally to fulfill any orders placed through the Site (including processing your payment information, delivering products, and providing you with invoices and/or order confirmations). Additionally, we use Provided Information to:

- Communicate with you;
- Screen our orders for potential risk or fraud; and
- When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

### **How we share your Personal Information**

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we use Google Analytics to help us understand how our visitors use the Site - you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout.>]

The types of third parties with whom we might share elements of your Personal Information include:

- Payment processors engaged by us to securely store and handle payments information, such as credit or debit card information
- Providers of email management and distribution tools
- Providers of security and fraud prevention tools and services,
- Providers of data aggregation and analytics software services that allow us to effectively monitor and optimize our site

We may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

### **How we store your data**

We securely store your data within our server that houses our website.

We use commercially reasonable security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of information stored on our servers. Of course, no computer network or data transmission on the internet can be guaranteed to be 100% secure and so you submit your information at your own risk.

We will maintain your Personal Information for our records unless and until you ask us to delete this information.

### **Email Marketing**

If you make a purchase on this Site and/or opt in to receive emails, you agree to receive email communications from this site, including but not limited to newsletters, site updates, promotions, and other announcements and correspondence. We are not responsible for the receipt of any such emails. You are responsible for ensuring that our email address(es) are not blocked or forwarded to your spam folder.

You have the right at any time to stop us from contacting you for marketing purposes. If you opt to unsubscribe from receiving emails, you understand that you may no longer receive information or updates from this Site, including promotions.

## **Behavioral advertising**

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by using the links below:

- Facebook: <https://www.facebook.com/settings/?tab=ads>
- Google: <https://www.google.com/settings/ads/anonymous>
- Bing: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at <http://optout.aboutads.info/>.

## **Your data protection rights**

If you are a European resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. Under certain conditions, you may also have the right to restrict or object to our processing of your data, and to request that we transfer your Personal Information to another organization. If you would like to exercise any of these rights, please contact us through the contact information below.

Additionally, if you are a European resident, we note that we are processing your information to fulfill contracts we might have with you (for example if you make an order through the Site), or otherwise to pursue our legitimate business interests listed above. Please note that your information will be transferred outside of Europe, including to Canada and the United States.

## **Third Party Websites**

Our privacy policy applies only to our website. We are not responsible for the data collection, privacy practices or policies of any third-party site to which we may provide a link or that may link to our site. We encourage you to read the privacy statement and terms of use of other sites.

## **Changes**

We may update this privacy policy from time to time to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

## **Complaints**

Please contact us if you have any complaints about how we use your Personal Information so we can resolve the issue whenever possible. Residents of the European Union also have the right to lodge a complaint with your local data protection regulator, such as the Information Commissioner's Office in the UK.

### **Contact us**

For more information about our privacy practices, if you have questions, or if you would like to exercise your data protection rights, please do not hesitate to contact us.

Email us: [inquiries@twinpearlzconsulting.com](mailto:inquiries@twinpearlzconsulting.com)

Call us: 202-640-0003 or 202-750-0598