

# AUSTRALIAN TERRIER CLUB OF AMERICA

## Privacy Policy

Rev 1, May-6-2022



The Australian Terrier Club of America (“the ATCA” or “we”) respects the privacy of its Site’s users (“User” or “you”) and is committed to protect its Users’ personal information. We believe that you have a right to know our practices regarding the information we may collect and use when you use our content website (the “Site”). Please read the following carefully to understand the ATCA’s views and practices regarding your personal information and how the ATCA will treat it.

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### 1. Who we are

In this policy, references to the ATCA, or to “we”, “site”, or “us” are to the Australian Terrier Club of America., which is a registered company in the state of New Jersey, U.S.A. Individuals wishing to contact us about data protection issues may do so by writing to us at the above address or by emailing us at [atcawebmaster23@gmail.com](mailto:atcawebmaster23@gmail.com).

### 2. Your acknowledgment of this policy

This Privacy and Cookie Policy (“Privacy and Cookie Policy”) details how your Personal Information collected via the Site is used and processed by the ATCA. BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, YOU ACKNOWLEDGE THAT YOU ARE OR HAVE HAD THE OPPORTUNITY TO BECOME AWARE OF AND AGREE (IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED) TO THIS PRIVACY AND COOKIE POLICY AND THE ATCA’S PRACTICES DESCRIBED THEREIN, INCLUDING THE PROCESSING (INCLUDING COLLECTING, USING, DISCLOSING, RETAINING OR DISPOSING) OF YOUR INFORMATION UNDER THE TERMS OF THIS POLICY.

### **3. Which information may we collect about Users?**

We collect from Users of our Site, two types of data and information:

3.1. Non-personal Information. The first type is non-identifiable and anonymous information. Non-Personal Information, which is being gathered, consists of technical information and behavioral information that does not pertain to a specific individual (“Non-Personal Information”). You may access and browse the Site without disclosing personal information, although, like most websites, we passively collect certain Non-Personal Information from your devices, including: technical information such as the type and version of your device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity and the type and name of your device and/or browser, etc.; and behavioral information which may include the User’s clickstream on the Site, the activities of the User on the Site and additional information of a similar nature (collectively, “Technical and Behavioral Information”). We may also use third-party service providers such as Quantcast and Google Analytics to obtain detailed analytics on the device and the User’s behavior on the Site. Please note that we or our third-party service providers will collect such Technical and Behavioral Information by using certain technologies such as Cookies (as further detailed below under Section 12 “Cookies and Similar Technologies”).

3.2. Personal Information. The other type of information we collect is individually identifiable information. To put it simply, this information identifies an individual or is of a private and/or sensitive nature, such as your contact information (“Personal Information”), including:

3.2.1. Personal Information which is provided voluntary:

- Communications with the ATCA: Personal Information you provide us as part of any communications with the ATCA, by any means, including by approaching our customer services.

- **Contact Details:** when you provide us with your contact details via the Contact Form on the Site, we will ask you to provide us some or all of the following details: full name, e-mail address and title. A free text message may also be provided. You may also voluntarily join our mailing list by providing us with your email address.

### 3.2.2. Personal Information collected via technology:

- **Geolocation data:** while using the Site we will access, collect, process, monitor and/or remotely store "geolocation data", including through the collection of IP addresses and other similar information to determine your location for the purpose of providing a localized version of our Site and for security purposes.
- **Technical and Behavioral Information:** to the extent that the Technical and Behavioral Information detailed above under Section 3.1 will be linked to or associated with a specific individual then such information will be considered as Personal Information.
- **Identifiers:** such as Internet Protocol (IP) address, your Unique Device Identifier (UDID), mobile advertising identifiers (such as Apple IDFA's and Android Advertising identifiers) or another unique identifiers.
- **Data collected for sending push notifications:** Subject to your consent to receive push notifications, we, via our service providers, will collect all or part of the following information: mobile advertising identifiers (such as Apple IDFA's and Android Advertising identifiers), email addresses, IP address, device push token, precise location (e.g., GPS-level) data, network information, language, time zone, product preferences, and privacy preferences. Such information will be used for cross-app, cross-device, and other interest-based advertising, analytics and market research.

### 3.2.3. Information from other sources: We also obtain information from other sources. The categories of sources from which we collect information, and have collected from in the past 12 months, include:

- Publicly available sources, including data in the public domain.
- Data brokers, from which we purchase data to supplement the data we collect.
- Social networks with which you interact.
- Business partners that offer co-branded services, sell or distribute products, or engage in marketing or advertising activities.

### 3.3. Please note:

- We may cross-reference Personal Information with other Personal Information we have about you and any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.
- We use third-party tracking services and usage logs, to track and analyze data

from Users of the Site and for purposes of security and fraud prevention. We may also use cookies to gather information regarding your use of the Site and the information for which you searched and accessed.

#### **4. How do we collect information about our Users?**

There are two main methods we use to collect information:

4.1. We collect information through your entry, connection, access and/or use of the Site. In other words, when you access or use the Site, we are aware of your usage of the Site, and may gather, collect and record the information relating to such usage. For example, when you use the Site, we gather your Technical and Behavioral Information.

4.2. We collect information which you provide us voluntarily. For example, we collect Personal Information that you provide via the Contact Form on our Site. We will inform you prior to collecting your Personal Information if it is requested on a voluntary basis and the consequences of not providing voluntary Personal Information.

#### **5. What are the purposes of the collection and processing of information?**

5.1. Non-personal Information is processed in order to:

- Enhance the User's experience on the Site;
- Create statistical information and learn about the preferences of Users and general trends on the Site (e.g., understand which features are more popular than others); and
- Keep the Site safe and secured and for prevention of fraud.

5.2. Personal Information is processed in order to:

- Enable the operation of the Site;
- Display, deliver and develop direct marketing;
- Add your contact details to our mailing list for the purposes of providing you with special offers, promotions and information from us and from our select third parties by email and/or web-browser notification (having first obtained your consent and subject to your right to opt-out of marketing messages at any time by following the instructions in such message, by changing your browser settings for push notifications or by contacting us at: [atcawebmaster23@gmail.com](mailto:atcawebmaster23@gmail.com)).
- Tailor advertising to your interests, including advertising displayed on our Site, advertising displayed on third party websites and mobile applications, and offers and advertising you may receive offline or as push-notifications, from us or from third parties;
- Personalize your experience on the Site (e.g. geolocation data shall be used to provide you with a localized version of the Site (where available));

- Ensure that content on the Site is presented in an optimal way for you and for your device (e.g. tablet, mobile phone);
- Send you by email and/or through web-browser notification updates, notices, announcements, and additional information related to the ATCA including with respect to changes made to our Site's terms of use and privacy policy;
- Conduct internal operations, including troubleshooting, data analysis, testing, market research, measuring and analyzing visitor traffic and for statistical purposes;

#### 5.3 Keep the Site safe and secured and for prevention of fraud and crime;

- Comply with our legal obligations and in order to be able to protect our rights and legitimate interests, including in order to improve the Site;
- Maintain our data processing records and general administrative purposes;
- Email tracking – we may use tracking technology within the email we may send you in order to improve interactions with you and to better understand whether our emails were opened and read, and such tracking may include capturing the time and date in which you opened our email messages and the type of device you use to open such emails.

#### 5.4. Note to our Users in the EU: In order for the ATCA to process your Personal Information, as detailed herein, such processing must be justified by a "basis" for processing. Please note that the Personal Information processing activities detailed herein may be justified on the basis that:

- the processing is based on your consent - where you provide us with your consent to contact you for marketing, to receive push notifications purposes, to tailor advertising to your interests or when we use cookies to collect information about your use of the Site, you will be asked to consent to such activities before we can process such information. If you choose not to give us your consent for such processing activities, or if you decide later to remove your consent, this may affect our ability to provide you with the services available on our Site;
- the processing is necessary for performance of a contract or in order to take steps prior to entering into a contract - usually your Personal Information will be provided to us because you are interested in engaging with the ATCA in order to view and use our Site. As such, we rely on this basis for processing activities that are required in order enable you to use the Site and to let you know of changes to our Site's terms of use and privacy policy;
- the processing is necessary to comply with a legal obligation - we may process your Personal Information for disclosure of information to authorities; and
- the processing is in our legitimate commercial interests - subject to your interests and fundamental rights, under our legitimate interest in offering the public comfortable, personalized and safe access to our Site, we shall process all other Personal Information processing activities described herein, such as the processing of your Personal Information in order to personalize the Site, assisting

us to prevent crime and fraud, our internal operations, maintaining records and email tracking. We may also use the information contained in certain cookies and other such files or tags for our legitimate interests in a safe and user-friendly presentation of our Site.

5.5. Note to non-EU Users: BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, YOU CONSENT TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION AS SPECIFIED HEREIN.

## **6. Sharing Personal Information with Third Parties**

6.1. The ATCA respects your privacy and will not disclose, share, rent, or sell your Personal Information to any third-party, other than as permitted under this Privacy and Cookie Policy.

6.2. In addition to using the information collected by us for the purposes described under Section 4 above, we may also share your information in the following cases:

- **ATCA Personnel:** Personal Information that we collect, and process may be transferred to or accessed by personnel of ATCA for the sole purpose of enabling the operation of the Site and to contact you (as detailed in Section 5 above). Please note that all ATCA personnel that will have access to your Personal Information are under an obligation of strict confidentiality with respect to such Personal Information.
- **Service Providers:** we share Personal Information with vendors, commercial software providers, consultants and data processors who perform services on our behalf, including without limitation, companies that provide analysis, advertising retargeting and behavioral advertising services, messaging services and services which host the Site. Please note that we may collect, hold and manage your Personal Information through a third party's cloud-based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction. For more information regarding our Service Providers, please refer to Section 10 below.
- **Business Partners:** We share Personal Information with our partners in connection with offering co-branded services, selling or distributing products, or engaging in marketing or advertising activities.
- **Promotions:** Our promotion may be jointly sponsored or offered by other parties. When you voluntarily enter a promotion, we share information as set out in the official rules that govern the promotion as well as for administrative purposes and as required by law (e.g., on a winners list). By entering a promotion, you agree to the official rules that govern that promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other entities to use your name, voice

and/or likeness in advertising or marketing materials.

- In addition, we may share Personal Information in the following cases:
  - (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request;
  - (b) to enforce this Privacy and Cookie Policy or any other agreement or terms of service between you and the ATCA, and to defend against any claims or demands asserted against us by you or on your behalf;
  - (c) to detect, prevent, or otherwise address fraud, security or technical issues;
  - (d) to protect the rights, property, or personal safety of the ATCA, its Users or the general public; and
  - (e) when the ATCA is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of the ATCA (while such acquired company or investor may be located in countries outside of your jurisdiction).

6.3. For avoidance of doubt, the ATCA may transfer and disclose Non-personal Information to third parties at its discretion including without limitation for statistical, analytical and research purposes and for customization, developing and improvement of our Site.

## 7. Your Rights

7.1. The ATCA acknowledges you have the right to access and change the Personal Information we collect and process. If you wish to access or to correct, amend, or delete Personal Information, please send us an email to: [atcawebmaster23@gmail.com](mailto:atcawebmaster23@gmail.com) and we will respond within a reasonable time frame, but in any event no later than permitted by applicable law.

7.2. Note to our Users in the EU: We hereby inform you of the following rights (by virtue of EU law), in respect of your Personal Information:

- Right to access: you may have the right to request a review of your Personal Information held by the ATCA.
- Right to rectification: if the Personal Information processed by the ATCA is incorrect, incomplete or not processed in compliance with applicable law or this Privacy and Cookie Policy, you may have the right to have your Personal Information rectified.
- Right to erasure: under certain conditions, you may be entitled to require that the ATCA will delete or "block" your Personal Information (e.g. if the continued processing of those data is not justified).
- Right to Portability: you may have the right to transfer your Personal Information between data controllers (i.e. to transfer your Personal Information to another entity).
- Right to object to or withdraw consent: where that lawful basis for processing

your Personal Information is either "public interest" or "legitimate interests", those lawful bases are not absolute, and you may have a right to object to such processing. If the processing of your Personal Information is based on your consent, you have the right to withdraw your consent to such processing at any time.

- The right to restrict processing: under certain circumstances, you may have the right to object to the processing of your Personal Information due to your particular situation.
- Right to lodge a complaint: you have the right to lodge a complaint before the relevant data protection authority or supervisory authority of your jurisdiction. To exercise these rights, where applicable, please contact us by sending an email to: [atcawebmaster@gmail.com](mailto:atcawebmaster@gmail.com).

## **8. Location of Your Data**

8.1. The information collected from you by the ATCA, as detailed in this Privacy and Cookie Policy, may be transferred to, and stored at, servers which may be located in countries outside of your jurisdiction and in a country that is not considered to offer an adequate level of protection under your local laws. It may also be processed by the ATCA and its suppliers, service providers or partners' staff operating outside your country. The ATCA is committed to protecting your Personal Information and will take appropriate steps to ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy and Cookie Policy. Such steps include putting in place data transfer agreements or ensuring our third-party service providers comply with the ATCA's data transfer protection measures.

8.2. Note to our Users in the EU: If you are located in the EU, you have a right to request further information regarding the data transfer mechanisms used by us with respect to data transfers to third countries. In order to keep your Personal Information safe, we apply strict safeguards when transferring it outside of the EEA, which may include the following:

- Transferring your personal information to countries approved by the European Commission as having adequate data protection laws, such as Israel;
- Entering into standard contracts that have been approved by the European Commission and which provide an adequate level of high quality protection, with the recipients of your Personal Information;

8.3. BY SUBMITTING YOUR PERSONAL INFORMATION THROUGH THE SITE, YOU ACKNOWLEDGE, AND AGREE, IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED, TO SUCH TRANSFER, STORING AND/OR PROCESSING OF PERSONAL INFORMATION.

## **9. Minors**

The Site is intended for Users over the age of sixteen (16). Therefore, the ATCA does not intend and does not knowingly collect directly Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site.

## **10. Third-Party Service Providers and Third-Party Software**

10.1. While using the Site we may be using third-party service providers, who may collect, store and/or process your information, as detailed in this Privacy and Cookie Policy.

10.2. Note, that we collect, hold and/or manage your Personal Information through the ATCA's authorized third-party vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates).

10.3. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

10.4. Such third-parties service providers include without limitation the following categories of service providers:

- Tracking Service Providers (ex. Google Analytics and Facebook Ad Networks);
- Ad Networks (ex. Google, OpenX, Appnexus, Verizon Media and Amazon);
- Traffic Data Providers (ex. Quantcast);
- Email Marketing Systems (ex. Earnware, SendInBlue, and ActiveCampaign);
- Marketing platforms, (ex. Taboola, Outbrain, Gemini, Facebook and Snapchat);
- Analytics Services (ex. Google Analytics and Quantcast);
- Push Notification Services (ex. Pushnami and Powerinbox);

Please read such third-party service providers' terms of use and privacy policies to understand their privacy practices.

## **11. Links to Third-Party Websites**

Certain links provided in the Site permit Users to leave our Site and enter non-ATCA sites or services. Those linked sites and services are provided solely as a convenience to you. Those linked sites and services are not under the control of the ATCA, and it is not responsible for the availability of such external sites or services and does not endorse and is not responsible or liable for any content advertising, products, services or other information on or available from such linked sites and services or any link contained in a linked site or service. The ATCA reserves the right to terminate any link

at any time. You further acknowledge and agree that the ATCA shall not be responsible or liable, directly, or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such linked sites or resource. Most of such linked sites and services provide legal documents, including terms of use and Privacy and Cookie Policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, inter alia, in order to know what kind of information they are collecting.

## **12. Cookies, Tracking and Similar Technologies**

12.1. What are cookies? Cookies are small text files which are stored on, and accessed from, your computer or mobile device when you visit the Site or a page on the Site. We use cookies, web beacons, pixels, clear gifs, action tags and other similar tools (collectively, "Cookies") on our Site to recognize your device from those of other Users of the Site, to improve the Site's performance, to deliver a better and more personalized service according to the User's individual interests and the device or browser used, to track Users' use of the Site, to gather information about the Users' approximate geographic location (e.g. city) to provide localized content, to prevent fraud and/or abuse, to estimate our audience size and usage pattern and perform other analytics, to allow integration of the certain features of the Site with certain social networks, to develop our Site, to serve cross-app, cross-device, and other interest-based advertising. In this Privacy and Cookie Policy, reference to "Cookies" includes cookies and all other files that collect information in a similar manner. Please note that most Cookies do not collect information that identifies you and will instead collect more general information such as how Users arrive at and use our Site, or a User's general location.

12.2. How long will Cookies stay on my device? Most of the Cookies we use are erased from your device immediately after your browser session terminates ("Session Cookies"). Other Cookies remain saved on your device and enable us to recognize your device in the event of a later visit to our Site ("Persistent Cookies"). Persistent Cookies allow us to make our Site more user-friendly, effective and safe and to record your acceptance of our cookie policy detailed herein. Please note that the data collected through Cookies will not be kept for longer than is necessary to fulfil the purposes mentioned above.

12.3. First and third-party Cookies - First-party Cookies are Cookies that belong to us and that we place on your device. Third-party Cookies are Cookies that another party, which provides us a service, places on your device through your use of our Site. For example, to administer our Site and for research purposes, we have contracted third-party service providers to track and analyze statistical

usage and volume information from our Site Users. Third-party Cookies may also be placed on your device by our business partners so that they can use them to advertise products and services to you elsewhere on the Internet and/or mobile applications.

12.4. Do we track whether users open our emails? Our emails may contain a single "web beacon pixel" which enables us to verify whether our emails (and any links or advertisements within the email) are opened. We may use this information to determine whether our emails are of interest to Users, to approach Users who do not open our emails and verify whether they wish to continue receiving them and to inform our advertisers in aggregate of the audience size for their advertisements. Please note that such "web beacon pixel" will be deleted once you delete the email from your email account. If you do not wish the "web beacon pixel" to be downloaded to your device at all, please set your email account settings to receive emails from us in plain text rather than HTML.

12.5. What sort of Cookies does our website use? Generally, our Cookies perform the following functions:

- Essential Cookies – those Cookies are essential to navigate around the Site and use its features. For example, they allow us to remember your Cookie preferences and to verify if something is not working properly, so we can fix it quickly.
- Analytical and Performance Cookies – those Cookies are used to analyze how use performance Cookies to keep track of which pages are frequently visited and from what locations our Users come from. We might also use these Cookies to highlight Site services that we think will be of interest to you based on your usage of the Site. We generally use third party Cookies to perform these services, for example, Google Analytics.
- Functionality Cookies - those Cookies allow us to operate the Site in accordance with your preferences when browsing the Site. For example, such Cookies may recall your customization preferences, such as your preferred text size, fonts, languages and other parts of the Site that are alterable.
- Targeting and Tracking Cookies – those Cookies collect information about your activities on our Site and other websites, to provide you:
  - (i) Interest-based advertising or Online Behavioral Advertising, for which Cookies are placed on your device by our third party service providers to collect your web browsing activity and group together your interests in order to provide you with targeted advertisements which are more relevant to you when you visit our Site (please note that your web browsing activity history can be used to deduce certain demographic information which relate to you, such as your age and gender); and
  - (ii) Retargeting, which enables our advertising partners to show you advertisements selected based on your online browsing activity on other

websites, thus allowing companies to advertise to people who previously visited their website. We may allow our third-party service providers to use Cookies on the Site for the purposes identified above, including collecting information about your online activities over time and across different websites. For more information on the development of user-profiles and the use of targeting/advertising Cookies, please see [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

- Social Networking Cookies - those Cookies are used so that Users can interact with the content of different social platforms (Facebook, Twitter, Pinterest, etc.) which are generated specifically for individual users of these social networks. The conditions of use regarding these cookies and the information collected is regulated by the privacy policy of the corresponding social platform.

#### 12.6. Can a Site User block Cookies?

- Most devices and browsers will allow you to erase Cookies from your device's hard drive, block acceptance of Cookies, or receive a warning before a cookie is stored. However, if you block or erase Cookies, your experience of the Site may be limited. Please note that unless you block the acceptance of Cookies, the Site will utilize Cookies upon your use of the Site (all unless it is required by applicable law to provide a separate consent to use such Cookies, and in which case we will use such Cookies only after we receive your separate consent to such use and subject to your right to withdraw such consent at any time). For detailed instructions regarding the blocking of Cookies, please refer to your browser 'help', 'tool' or 'edit' section or

see <http://www.allaboutcookies.org/manage-cookies/>. If you want to remove previously stored Cookies, you can manually delete the Cookies at any time. However, this will not prevent the Site from placing further Cookies on your device unless and until you adjust your settings as described above.

- Do Not Track - Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to "Do Not Track" signals. For more information on "Do Not Track," visit <http://www.allaboutdnt.com>.

- Opting out of performance Cookies - It is possible to opt-out of having your browsing activity within the Site recorded by performance Cookies. Please note that we use Google Analytics as our service providers in order to track Users' activities on the Site, including by use such services' persistent Cookies. Google provides a browser-add on which allows users to opt-out of Google Analytics across all websites, which can be downloaded here: <https://tools.google.com/dlpage/gaoptout>.

- Opting out of target advertising Cookies - The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital

Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit (i) for website targeted ads from DAA participants <https://www.aboutads.info/choices>; and (ii) for targeted ads from NAI participants <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services). You can also visit the Internet Advertising Bureau’s consumer advice site at <http://www.youonlinechoices.com/uk/your-ad-choices>, which will provide you further information, a list of all Cookies that are currently set on your device and instruction on how to opt-out of each of them. You may opt-out of Google Display Network at <https://support.google.com/> and type into the search bar “opt out of google display network” and fill out the applicable form online.

- To opt out of us sharing your hashed email address for Matched Ads, please contact us at [atcawebmaster@gmail.com](mailto:atcawebmaster@gmail.com) and specify that you wish to opt out of Matched Ads. We will remove your email address from any subsequent lists shared with ad partners for purposes of Matched Ads.
- To opt-out of the sharing of this information with LiveRamp on a people-based level, please click here ([https://liveramp.com/opt\\_out/](https://liveramp.com/opt_out/))

### **13. Security**

13.1. We take appropriate measures to maintain the security and integrity of our Site and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures.

13.2. Your Personal Information is hosted on Google’s cloud servers, which provide advanced strict security standards (both physical and logical).

13.3. Some of the security measures that we employ include, without limitation: highly secure services design and implementation using state of the art encryption and architectures mechanisms, restriction of access to your Personal Information to individuals who need access to it in order to process it on the ATCA’s behalf and implementation of a secured permission management and auditing system using specific and proprietary firewall and network access filtering as well as security group mechanisms. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur.

13.4. The ATCA will comply with applicable law in the event of any breach of the security, confidentiality, or integrity of your Personal Information and will inform you of such breach if required by applicable law.

13.5. TO THE EXTENT THAT THE ATCA IMPLEMENTED THE REQUIRED SECURITY MEASURES UNDER APPLICABLE LAW, THE ATCA SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION INCLUDED IN THE PERSONAL INFORMATION.

#### **14. Data Retention**

ATCA will retain the Personal Information for as long as we are comfortable that it is accurate and can be relied upon. Personal Information which is no longer required for the purpose for which it was initially collected will be deleted unless we have a valid justification to retain it which is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

#### **15. Changes to the Privacy and Cookie Policy**

The ATCA reserves the right to change this Privacy and Cookie Policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the Site or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our Site or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy and Cookie Policy are effective as of the stated "Last Revised" and your continued use of the Site on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

#### **16. Have any Questions?**

If you have any questions (or comments) concerning this Privacy and Cookie Policy, please send us an email to the following address: [atcawebmaster23@gmail.com](mailto:atcawebmaster23@gmail.com) and we will make an effort to reply within a reasonable timeframe.

#### **17. Additional Disclosures for California Residents**

These additional disclosures apply only to California residents. The California Consumer Privacy Act of 2018 (“CCPA”) provides additional rights to know, delete and opt-out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise rights.

17.1. Notice of Collection. In the past 12 months, we have collected the following categories of personal information enumerated in the CCPA:

- Identifiers, including name, email address, device push token and online identifiers (such as IP address).
- Customer records, including contact details.
- Characteristics of protected classifications under California or federal law, including gender.
- Commercial or transactions information, including records of products or services purchased, obtained, or considered.
- Internet activity, including browsing history, network activity, search history and interactions with the Site, email or advertisement.
- Geolocation data.
- Inference drawn from the above information about your predicted characteristics and preferences.

For further details on information we collect, including the sources from which we have received information in the past 12 months, review the “What information do we collect?” above. We collect and use these categories of personal information for the business purposes described in the “How do we use the information we collect?” above.

17.2. Sale of Personal Information. Under the CCPA, “sell” is defined broadly, and some of our data sharing practices may be considered a “sale.”, including the use of your Personal Information for advertising purposes. We disclose the following categories of personal information for commercial purposes: identifiers, characteristics, commercial or transactions information, internet activity, geolocation data, and inferences drawn. Please review the “Sharing of Information” section in our Privacy and Cookie Policy for further details about the categories of parties with whom we have shared information in the past 12 months.

17.3. Right to Know and Delete. You have the right to know certain details about our data practices in the past 12 months. In particular, you may request the following from us:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold;

- The categories of third parties to whom the personal information was disclosed for a business purposes or sold;
  - The business or commercial purpose for collecting or selling the personal information; and
  - The specific pieces of personal information we have collected about you.
- In addition, you have the right to delete the personal information we have collected from you.

To exercise any of these rights, please submit a request through our [atcawebmaster23@gmail.com](mailto:atcawebmaster23@gmail.com). In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete.

#### 17.4. Right to Opt-Out.

To the extent ATCA sells your personal information as the term “sell” is defined under the CCPA, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out by sending a “Do Not Sell My Personal Information” to \_\_\_\_\_.

#### 17.5. Authorized Agent.

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.

#### 17.6. Right to Non-Discrimination.

You have the right not to receive discriminatory treatment by us for the exercise of any of your rights.

#### 17.7. Shine the Light.

Users who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at [atcawebmaster23@gmail.com](mailto:atcawebmaster23@gmail.com) and specify that you are making a “California Shine the Light Request.” We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

#### 17.8. Minors.

The ATCA does not knowingly “sell,” as that term is defined under the CCPA, personal information of minors under 16 years old who are California residents. If

you are a California resident under 16 years old and have inadvertently provided us with Personal Information, please email us at [atcawebmaster23@gmail.com](mailto:atcawebmaster23@gmail.com).