

EMPOWERED TOGETHER PRIVACY POLICY

LAST MODIFIED: APRIL 6, 2023

This Privacy Policy (“**Privacy Policy**”) describes the types of information Empowered Together, Inc. and any of its subsidiaries or affiliates (collectively, “**Company**”, “**we**”, “**us**”, or “**our**”) collect, use, and share about you when you visit or make a purchase from our website, or when you otherwise contact or interact with us (collectively, “**Services**”). The terms “**you**” and “**your**” refers to you, the user. If you are using the Services on behalf of a business, association, or other entity, “**you**” or “**your**” will also refer to such business, association, or other entity, unless the context clearly dictates otherwise. You agree that you are authorized to consent to these terms on behalf of such business, association, or other entity, and we can rely on this. This Privacy Policy also explains how Company may use and share your Personal Information (as defined in Section 1), as well as the choices available to you.

By using/continuing to use the Services, you acknowledge you have read and understand and agree to the collection, storage, use, and disclosure of your personal information as described in this Privacy Policy, and you agree to the Terms of Service which are incorporated by reference. If you do not agree, please do not access or use the Services.

Eligibility to Use the Services

To use the Services you must be, and represent and warrant that you are, at least the age of majority in your state, province or jurisdiction of residence and competent to agree to these terms; or if you are under the age of majority in your state, province or jurisdiction of residence, you represent and warrant that your parent or legal guardian has reviewed this Privacy Policy with you and accepts them on your behalf; parents or legal guardians are responsible for the activities of their minor dependents while using the Services.

Terms of Service

If you choose to use the Services, your use and any dispute over privacy is subject to this Policy and our Terms of Service, including, but not limited to, limitations on damages and resolution of disputes.

1. PERSONAL INFORMATION WE COLLECT

Generally, we collect four (4) types of information about you: (A) information and content you give us directly; (B) information we obtain automatically when you use our Services; (C) demographic information; and (D) information we get about you from other sources. When we talk about “Personal Information” in this Privacy Policy, we are talking about any information collected in accordance with this section. Please see below for more information on each category.

A. Information and Content You Give Us Directly

- (i) **Personal Information**. Personal information such as your email address, name, phone number, address, username, password, and any other information you directly provide us on or through the Services. This includes information you provide when you register or create an account or submit a request for customer service.

- (ii) Email Correspondences. Records and copies of your email messages together with your email address and our responses, if you choose to correspond with us through email.
- (iii) Transaction Information. We or service providers working on our behalf may collect information and details about any purchase or transactions made using the Services. This includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping, and contact details. We do not collect or store payment card information ourselves; rather we rely on our payment processors to store this information as part of the Services.

B. Information We Obtain Automatically When You Use Our Services

- (i) Activity Information. Details of your uses of our Services, including the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; the time, frequency, and duration of your activities; and other information about your use of and actions of the Services.
- (ii) Equipment Information. Information such as your device's IP address, browser type, browser version, unique device identifiers and other diagnostic data. When you access the Services by or through a mobile device, we may collect the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.
- (iii) Location Information. Information about the location of your device, including GPS location, for purposes of enhancing or facilitating the Services. We may also use information about the location of the device you are using to help us understand how the Services and functionality are being used and to deliver more relevant advertising. If you do not want to share your location, you can disable location sharing in the settings on your device.
- (iv) Cookies, Pixel Tags/Web Beacons, and Other Technologies. We as well as third parties that provide the content, advertising, or other functionality of the Services may use cookies, web beacons, javascript, entity tags, HTML5 local storage, resettable device identifiers, and other technologies (collectively, the “**Technologies**”) to automatically collect information through your use of the Services. The following describes some of these Technologies we may use for this automatic data collection:
 - a) *Cookies*. A cookie is a small data file stored on the hard drive of your computer either for (1) the duration of your visit on a website ("session cookies") or (2) for a fixed period ("persistent cookies"). Cookies contain information that can later be read by a web server. We may use cookies to provide you with a more personal and interactive experience of the Services.
 - b) *Web Beacons*. Web beacons are small files that are embedded in webpages, applications, and emails (also known as "clear gifs", "pixel tags", "web bugs", and "single-pixel gifs") that collect information about engagement with our Services. For example, web beacons allow Company to track who has visited

those webpages or opened an email, to test the effectiveness of our marketing, and for other related website statistics.

- c) *JavaScripts*. JavaScripts are code snippets embedded in various parts of websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components.
- d) *Entity Tags*. Entity Tags are HTTP code mechanisms that allow portions of websites to be stored or "cached" within your browser and validates these caches when the website is opened, accelerating website performance since the web server does not need to send a full response if the content has not changed.
- e) *HTML5 Local Storage*. HTML5 local storage allows data from websites to be stored or "cached" within your browser to store and retrieve data in HTML5 pages when the website is revisited.
- f) *Resettable Device Identifiers*. Resettable device identifiers (also known as "advertising identifiers") are similar to cookies and are found on many mobile devices and tablets (for example, the "Identifier for Advertisers" or "IDFA" on Apple iOS devices and the "Google Advertising ID" on Android devices), and certain streaming media devices. Like cookies, resettable device identifiers are used to make online advertising more relevant.

This Privacy Policy does not cover the use of tracking technologies by third parties in connection with their websites. The Services may contain links, content, advertising, or references to other websites by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies or other tracking technologies to collect information about you when you interact with their content while using the Services. The information they collect may be associated with your personal information or they may collect information about your online activities over time and across different websites. Please be aware that we do not control these third parties' tracking technologies or when and how they may be used. Therefore, Company does not claim nor accept responsibility for any privacy policies, practices, or procedures of any such third party. We encourage you to read the privacy statements and terms and conditions of linked or referenced websites you enter. If you have any questions about an ad or other targeted content, you should contact the responsible provider directly.

C. Demographic Information

We may collect demographic, statistical, or other aggregate information that is about you, but individually does not identify you. Some of this information may be derived from Personal Information, but it is not Personal Information and cannot be tied back to you. Examples of such aggregate information include gender, age, race, and household income.

D. Information We Get About You from Other Sources

We may receive information about you from other sources and add it to our information, including from third-party services and organizations who have the right to provide us with such information. We protect this information according to the practices described in this

Privacy Policy, plus any additional restrictions imposed by the source of the data. These sources may include: online and offline data providers, from which we obtain demographic, interest-based, and online advertising related data; publicly-available sources such as open government databases or social networks; and service providers who provide us with information, and updates to that information, based on their relationship with you. By gathering additional information about you, we can correct inaccurate information, enhance the security of your transactions, and give you product or service recommendations and special offers that are more likely to interest you.

2. HOW WE USE YOUR INFORMATION

We may use the information we collect about you in a variety of ways, to provide our Services, for administrative purposes, and to market and advertise our Services and products.

A. We Use Your Personal Information to Provide Our Services

We may use your Personal Information to:

- (i) Provide the Services and related content to you.
- (ii) respond to comments, questions, and provide customer service.
- (iii) communicate with you about an order, purchase, or account.
- (iv) inform you about important changes to, or other news about, the Services or any related features or content.
- (v) fulfill any other purpose for which you provide Personal Information.

B. We Use Your information for Administrative Purposes

We may use your Personal Information to:

- (i) operate, maintain, improve, personalize, and analyze the Services.
- (ii) monitor and analyze trends, usage, and activities for marketing or advertising purposes.
- (iii) detect, prevent, or investigate security breaches, fraud, and other unauthorized or illegal activity.
- (iv) carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- (v) maintain appropriate records for internal administrative purposes.
- (vi) allow you to participate in interactive features on the Services.

C. We Use Your Information to Market and Advertise Our Services and Products

We may use your Personal Information to:

- (i) send promotional communications, such as information about features, newsletters, offers, promotions, contests, and events.
- (ii) share information across Services and devices to provide a more tailored and consistent experience on all Company products you use.
- (iii) develop, test, and improve new products or services, including by conducting surveys and research and testing and troubleshooting new products and features.

3. HOW WE MAY SHARE OR DISCLOSE YOUR INFORMATION

We may share or disclose aggregated or anonymized information about our users to third parties for a variety of business purposes without any restrictions, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer. The following circumstances describe in additional detail the ways we may share or disclose your Personal Information that we collect or you provide under this Privacy Policy:

A. We Disclose Your Information to Provide Our Services

- (i) Subsidiaries and Affiliates. We may share your Personal Information with our parent companies, subsidiaries, joint ventures, and affiliated companies for purposes of management and analysis, decision-making, and other business purposes, consistent with this Privacy Policy.
- (ii) Service Providers. We may share your Personal Information with our third-party service providers, contractors, and any other similar third parties that help us provide our Services. This may include service providers that help us with reservations, analytics services, or support services, such as credit card processing, website hosting, email and postal delivery, location mapping, product, and service delivery. Some of our web pages utilize framing techniques to serve content to you from our third-party providers, while preserving the look and feel of the Services. In such cases, please note that the information you provide is being provided to the third party. Service providers are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- (iii) Advertising/Marketing Service Providers. We may share your Personal Information with marketing service providers to assess, develop, and provide you with promotions and special offers that may interest you, administer contests, sweepstakes, events, or for other promotional purposes.
- (iv) Consent or to Fulfill the Purpose that Information was Provided. We may share your Personal Information to fulfill the purpose for which you provide that information, with your consent, or for any other purpose disclosed by us when you provide the information.

B. We May Disclose Your Information in the Event of a Merger, Sale or Other Asset Transfer

If we become involved in a merger, acquisition, financing due diligence, divestiture, restructuring, reorganization, bankruptcy, dissolution, sale, or transfer of some or all of our assets (whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding), or transition of Services to another provider, your Personal Information may be sold or transferred to business entities or people involved in such process.

C. We Disclose Your Information to Protect Us or Others

- (i) When Required by Law. We may share your Personal Information to comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- (ii) To Enforce Our Rights. We may share your Personal Information to enforce or apply this Privacy Policy, our Terms of Service, and other agreements, including for billing and collection purposes.
- (iii) To Protect Lawful Interests. We may share your personal information if we believe disclosure will help us protect the rights, property, or safety of Company, our users, partners, agents, and others. This may include exchanging information with other companies and organizations for fraud protection, and spam and malware prevention.

Personal Information that you post on or through the public areas of the Services (e.g., chat rooms, bulletin boards, and discussion groups) are generally accessible to, and may be collected and used by, others which may result in unsolicited messages or other contact from others. Users of the Services are encouraged to exercise caution when providing personal information about themselves in public or interactive areas.

4. YOUR PRIVACY CHOICES AND RIGHTS

You have certain choices and rights with respect to your privacy. For example, you may be able to opt out of receiving marketing messages from us, make choices regarding cookies, and exercise other privacy rights under applicable law.

A. Mechanisms to Control Your Information

- (i) Cookies and Other Tracking Technologies. You may be able to set your browser to reject cookies and certain other technologies by adjusting the appropriate settings in your browser. Each browser is different, but many common browsers have preferences that may be adjusted to allow you to either accept or reject cookies and certain other technologies before they are set or installed, or allow you to remove or reject the use or installation of certain technologies altogether. We recommend that you refer to the “Help” menu in your browser to learn how to modify your browser settings. Please note that you cannot remove Flash cookies simply by changing your browser settings. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of the Services may become inaccessible or may not function properly.
- (ii) Communications from Company. If you do not wish to have your contact information used by Company to promote our own or third-party products or Services, you can opt-out by: (1) informing us of your preference at the time you sign up for our Services, or complete any other form on or through the Services in which we collect your data; (2) modifying your user preferences in your account profile; (3) following the opt-out instructions at the bottom of any promotional emails we send you; or (4) sending an email stating your request to contact@empoweredtogether.us. Please note that we may also send you non-promotional communications, however you will not be able to opt-out of these communications (e.g., transactional communications, including emails about your account or purchases; communications regarding our Services; and communications about updates to this Privacy Policy and the Terms of Service).

- (iii) “Do Not Track”. "Do Not Track" (“DNT”) is a privacy preference you can set in certain web browsers. When you turn on this preference, it sends a signal or message to the websites you visit indicating that you do not wish to be tracked. Please note that we currently do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

B. Accessing and Correcting Your Information

In accordance with applicable law, you may have the right to:

- (i) Access Personal Information. You may access personal information about you, including: (1) confirming whether we are processing your personal information; (2) obtaining access to or a copy of your personal information; and (3) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (the "right of data portability").
- (ii) Request Correction of Personal Information. You may request correction of your personal information where it is inaccurate, incomplete, or improperly possessed.
- (iii) Request Deletion of Personal Information. You may request deletion of your personal information held by us about you. Please note: we cannot delete your personal information except by also deleting your account.

If you would like to exercise any of these rights, you may send an email to contact@empoweredtogether.us to request access to, correction of or removal of any personal information that you have provided to us. We will process such requests in accordance with applicable law.

5. HOW WE PROTECT YOUR INFORMATION

We have implemented safeguards reasonably designed to secure your Personal Information. Such safeguards include various technical, physical, and administrative security measures designed to reduce the risk of loss, misuse, unauthorized access, disclosure, or modification of your information. All information you provide to us is stored on secure servers behind firewalls.

The safety and security of your information is also dependent on you. If we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

While we have employed security technologies and procedures to assist safeguarding your Personal Information, no system or network can be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. Any transmission of Personal Information is at your own risk. We are not

responsible for circumvention of any privacy settings or security measures contained within the Services.

6. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

If you provide Personal Information through the Services, you acknowledge and agree that such Personal Information may be transferred from your current location to the offices and servers of Company and the other third parties referenced in this Privacy Policy located in the United States or other countries, which may have data protection laws that are different from the laws where you live. We use commercially reasonable efforts to safeguard your information consistent with the requirements of applicable laws.

7. PERSONAL INFORMATION RETENTION PERIOD

We keep your information for the length of time needed to carry out the purpose outlined in this Privacy Policy and to adhere to our policies on keeping records (unless a longer period is needed by law) in accordance with applicable laws. We will retain and use your information to the extent necessary to manage your relationship with us, personalize and improve your overall customer experience, strengthen the security of the Services, improve the functionality of the Services, and to comply with our legal obligations.

8. STATE PRIVACY RIGHTS

A. California Privacy Rights. The California Consumer Privacy Act ("CCPA") requires covered businesses to provide California residents with some additional information regarding how they collect, use, and share your "personal information" (as defined in the CCPA). While Company is not currently a covered business under the CCPA, we value privacy and strive to be transparent with our customers. As such, we have provided additional details below about the information we collect, how we disclose it, and how you can exercise your privacy rights under the CCPA.

The CCPA provides California residents with the right to know what categories of personal information covered businesses have collected about them and whether such businesses have disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected	Category of Third Parties Information is Disclosed to for a Business Purpose
Identifiers. A real name, postal address, Internet Protocol address, email address, or other similar identifiers.	<ul style="list-style-type: none">• Advertising partners• Service providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name, address, telephone number, employment, employment history, bank	<ul style="list-style-type: none">• Service providers

Category of Personal Information Collected

Category of Third Parties Information is Disclosed to for a Business Purpose

account number, credit card number, debit card number, or any other financial information.

Commercial information

Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- Advertising partners
- Service providers

Internet or other electronic network activity

Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.

- Advertising partners
- Service providers

Inferences drawn from other personal information to create a profile about a consumer

Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

- Advertising partners
- Service providers

Professional or employment-related information

Employment information of Customers, to provide the appropriate level of service.

- Advertising partners
- Service providers

Geolocation data

As described above, we may collect your IP address automatically when you use our Services. We may be able to determine your general location based on your device's IP address.

- Advertising partners
- Service providers

We may use any of the categories of information listed above for other business or operational purposes compatible with the context in which the personal information was collected. The categories of sources from which we collect personal information and our

business and commercial purposes for using personal information are set forth in "Personal Information We Collect" and "How We Use Your Information" above, respectively.

We may share any of the information listed above with Service providers, which are companies that we engage for business purposes to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose that is not related to our engagement.

"Sales" of Personal Information under the CCPA

California residents have the right to opt out of the "sale" of their personal information. Under the CCPA, "sale" is defined broadly and includes the transfer of personal information by a business to a third party for valuable consideration (even if there is no exchange of money).

Company does not currently "sell" personal information. Company does not have actual knowledge of any "sale" of personal information of minors under 16 years of age.

Opt-out of "Sales." California residents may opt-out of the "sale" of their personal information by contacting us as set forth in "Contact Information" below.

Additional Privacy Rights for California Residents

Non-Discrimination. California residents have the right not to receive discriminatory treatment by covered businesses for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us as set forth in "Contact Information" below and provide written authorization signed by you and your designated agent.

Verification. To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include asking you to answer questions regarding your account and use of our Services.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in "Contact Information" below. We will process such requests in accordance with applicable laws.

California Shine the Light. The California "Shine the Light" law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. If you are a California resident and would like to exercise any of your rights under the law, please contact us as set forth in "Contact Information" below. We will process such requests in accordance with applicable laws.

B. Nevada Privacy Rights. If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to sell or license that Personal Information, even if your Personal Information is not currently being sold. If you would like to exercise this right, please contact us via the information found in the “*Contact Information*” section below.

9. CHILDREN USING OR ACCESSING THE SERVICES

We are committed to protecting the privacy of children who use our Services. Company’s Services are directed at a general audience and are not targeted to children. If we learn that we have inadvertently collected or received Personal Information from an individual under the age of 13 in violation of applicable law, we will use reasonable efforts to immediately remove such information, unless we have a legal obligation to keep it. If you are a parent or legal guardian and think your child under the age of thirteen (13) has given us information without your consent, please contact us via the information found in the “*Contact Information*” section below.

10. CHANGES TO OUR PRIVACY POLICY

We reserve the right to update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons. When we do update this Privacy Policy, we will post the updates and changes on our website. We may elect to notify you of material changes by mail, email, posting of modified Privacy Policy, or some other similar manner. However, it is your responsibility to check our website regularly for changes to this Privacy Policy. Your continued use of or access to the Services following the posting of any changes to this Privacy Policy constitutes acceptance of those changes.

11. THIRD-PARTY WEBSITES AND APPLICATIONS

Our Online Services may offer links to websites or applications that are not run by us but by third parties. These third-party services, websites or applications are not controlled by us, and may have privacy policies that differ from our own. We encourage our users to read the privacy policies and terms and conditions of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for the practices of such third parties or the content of their application or website. Providing Personal Information to third-party websites or applications is at your own risk.

12. CONTACT INFORMATION

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by email at contact@empoweredtogether.us