# **Privacy Policy**

At The Avalanche Workshop LLC ("Avalanche"), we recognize that privacy is important. This Policy applies to all of the products, services, websites and apps offered by Avalanche (collectively, Avalanche's "Services"). Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using Avalanche's Services, you agree to this Policy.

### Information we collect and how we use it:

We offer a number of Services that do not require you to register for an account, sign a contract, or provide any personal information to us. In order to provide our full range of Services, we may collect the following types of information:

- Information you provide When you sign up for any Avalanche Service that requires registration, we ask you for personal information (such as your name and email address). For certain Services and under certain contracts, we also request credit card or other payment account information which we maintain in encrypted form on secure servers. We may combine the information you submit under your account with information from other Avalanche Services in order to provide you with a better experience and to improve the quality of our Services.
- Cookies and user information When you visit Avalanche's website, we may send one or more cookies a small file containing a string of characters to your computer that uniquely identifies your browser. We may also automatically collect such information as usage details and IP addresses as you navigate Avalanche's website. We use cookies to improve the quality of our Service by storing user preferences and tracking user trends, such as how people search. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Avalanche features and Services may not function properly if your cookies are disabled.
- Log information When you use Avalanche's website, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- **User communications** When you send email or other communication to Avalanche, we may retain those communications in order to process your inquiries, respond to your requests and improve our Services.

Avalanche only processes personal information for the purposes described in the applicable Privacy Policy or privacy notice for specific Services. In addition to the above, such purposes include:

- Providing and presenting our products and Services to users and clients;
- Auditing, research and analysis in order to maintain, protect and improve our Services;

- Developing new Services;
- To fulfill any other purpose for which you provide it;
- In any other way we may describe when you provide the information; and
- For any other purpose with your consent.

This Policy does not apply to information collected by Avalanche offline or through any other means, including on any other website operated by any third party, or by any third party, including through any application or content that may link to or be accessible from Avalanche's Services.

# **Choices for personal information**

When you sign up for a particular Service that requires registration, we ask you to provide personal information. If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

If we propose to use personal information for any purposes other than those described in this Policy or in the specific Service notices, we will offer you an effective way to opt out of the use of personal information for those other purposes. We will not collect or use sensitive information for purposes other than those described in this Policy or in the specific Service notices, unless we have obtained your prior consent.

You can decline to submit personal information to any of our Services, in which case Avalanche may not be able to provide those Services to you.

### **Information sharing**

Avalanche only shares personal information with other companies or individuals outside of Avalanche in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.
- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable terms of service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of Avalanche, its users or the public as required or permitted by law.

If Avalanche becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

Please contact us at the address below for any additional questions about the management or use of personal data.

## **Information security**

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to Avalanche employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to Avalanche. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures.

### **Data integrity**

Avalanche processes personal information only for the purposes for which it was collected and in accordance with this Policy or any applicable Service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

## **Enforcement**

Avalanche regularly reviews its compliance with this Policy. Please feel free to direct any questions or concerns regarding this Policy or Avalanche's treatment of personal information by contacting us through this web site or by writing to us at The Avalanche Workshop LLC, c/o Privacy Matters, 602 Boozer Lane, Hillsborough, New Jersey, 08844. When we receive formal written complaints at this address, it is Avalanche's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Avalanche and an individual.

### Changes to this policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Policy changes on this page and, if the changes are significant, we

will provide a more prominent notice (including, for certain services, email notification of Policy changes). Each version of this Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive for your review. Your continued use of Avalanche's Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

If you have any additional questions or concerns about this Policy, please feel free to contact us any time through this web site or at The Avalanche Workshop LLC, c/o Privacy Matters, 602 Boozer Lane, Hillsborough, New Jersey, 08844.