

# Privacy Policy

Aquia Financial, LLC ("us", "we", or "our") operates (the "Site"). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site. We have created this privacy policy (this "Privacy Policy") because we know that you care about how information you provide to us is used and shared. This Privacy Policy applies to our information collection and use practices: (i) online when you visit any of our websites, including, without limitation, [www.AquiaFinancial.com](http://www.AquiaFinancial.com), (the "Websites"); and (ii) offline when you provide information to us.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Service.

## Acceptance of Terms

By visiting any of our Websites, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Service, both of which govern your use of the Websites. By providing us information offline, you are also agreeing to the terms of this Privacy Policy.

## The Information We Collect

In the course of operating the Websites and/or interacting with you, we will collect (and/or receive) the following types of information.

### 1. Personal Information.

When you sign up to receive any of our newsletters, respond to a survey, register for a class, sign up for consultation, or purchase any product or service, you may be required to provide us with personal information about yourself, such as your name, address, email address, and phone number. We do not collect any personal information from Visitors when they use the Websites unless they provide such information voluntarily, such as by registering or sending us an email or signing up for a newsletter. All information we collect and/or receive under this section is collectively called "Personal Information."

#### *Derivative Data*

Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site.

#### *Disclosure of Your Personal Information*

We disclose your Personal Information to certain third parties with whom we have a direct or indirect business or contract relationship, to provide the products and services you have requested.

When you request other services, we will provide your personal data to third parties with whom we arrange for those services to be provided. We may also disclose information to third parties that provide administrative or processing services for us, for example, printing, mailing, and/or payment processing.

Aquia Financial' use of third parties to provide services to you (e.g., payment services) is subject to the terms of use and privacy policies of those third-party websites and such third parties are responsible or liable for their use of your personal data.

We may also disclose Personal Information collected on this Website, in accordance with applicable law, to assert or defend our rights and property, to prevent harm to others, to collect a debt, or in response to legal processes such as subpoenas. We may also provide (or reserve the right to provide) Personal Information to credit reporting agencies and to cooperate with law enforcement authorities and other governmental authorities consistent with applicable laws.

If you have consented to our doing so, we may also share your personal data with third parties in order that they may offer you information about their goods and services.

Because non-personal information does not personally identify you, we may use or disclose such information for any purpose. In some instances, we may combine non-personal information with Personal Information (such as embedding e-mail addresses in cookies). If we do combine any non-personal information with Personal Information, the combined information will be treated by us as Personal Information in accordance with this Policy.

Based upon your specific relationship(s) with Aquia Financial, we may disclose your Personal Information in ways described in more detail in one or more Other Agreements.

#### *Financial Data*

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase, order, return, exchange, or request information about our services from the Site or our mobile application. We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processors, including, without limitation, [Amazon Payments,] [Authornize.Net,] [Braintree Payments,] [Chargify,] [Dwolla,] [Google Checkout,] [Paypal,] [SafeCharge,] [Stripe,] [WePay,] [2Checkout,] [other], and you are encouraged to review their privacy policy and contact them directly for responses to your questions.

#### *Facebook Permissions*

The Site and our mobile application may by default access your Facebook basic account information, including your name, e-mail, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, checkins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page.

#### *Data From Social Networks*

User information from social networking sites, such as [Apple's Game Center, Facebook, Google+, Instagram, Pinterest, Twitter], including your name, your social network username, location, gender, birth date, e-mail address, profile picture, and public data for contacts, if you connect your account to such social networks.

#### *Third-Party Data*

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Site permission to access this information.

### **2. Order Information.**

When you place an Order, you must provide us with certain information about the products and services you are seeking to purchase. Such information is collectively called the "Order Information."

### **3. Billing Information.**

When you wish to purchase a product or service, you will be required to provide certain information in addition to the Personal Information and Order Information noted above. Such information may include a debit card number, credit card number, expiration date, billing address, activation codes, and similar information. Such information is collectively called the "Billing Information." Although we will have access to the Billing Information, it will also be collected and processed by our third-party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use.

### **4. Other Information.**

In addition to the information noted above, we may collect additional information (collectively, the "Other Information"). Such Other Information may include:

- a. From You. Additional information about yourself that you voluntarily provide to us (e.g., via a survey or consultation)
- b. From Your Activity. Information that we automatically collect when you use the Websites, including, without limitation:

IP addresses, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; browser type and language; referring and exit pages and URLs; date and time; amount of time spent on particular pages; what sections of the Websites you visit; and similar data; and

Information about your device, including the type of device; universally unique ID ("UUID"); advertising identifier ("IDFA"); MAC address; operating system and version (e.g., iOS, Android or Windows); carrier and country location; hardware and processor information (e.g., storage, chip speed, camera resolution, NFC enabled); network type (WiFi, 3G, 4G, LTE); and similar data.

- c. From Cookies. Information that we collect using "cookie" technology. Cookies are small packets of data that a website stores on your computer's or mobile device's hard drive so that your computer will "remember" information about your visit. As with many other sites, this Website may use "cookies" or other technologies to help us deliver content specific to your interests, to process your inquiries or requests, and/or to analyze your visiting patterns. Cookies, by themselves, will not be used by Aquia Financial to disclose your individual identity. This information identifies your browser, but not you, to our servers when you visit this Website. If you want to disable the use of cookies or remove them at any time from your computer, you can disable or delete them using your browser (consult your browser's "help" menu to learn how to delete cookies), however, you must enable cookies to access certain information

on this Website. Note that in limited instances, such as when you create an online account or request one of our other services, cookies may contain and be associated with the Personal Information we collect.

We may also collect data by using “pixel tags,” “web beacons,” “clear GIFs” or similar means (collectively, “pixel tags”) that allow us to know when you visit this Website. Through pixel tags, we obtain non-personal information or aggregate information (i.e., your IP address, the areas of this Website you visit, your operating system, your browser version and the URL you came from) which can be used to enhance your online experience and understand traffic patterns

We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the Websites. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Websites may not function properly.

d. Third-Party Analytics. We use third-party analytics services (such as Google Analytics) to evaluate your use of the Websites, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Websites and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Websites, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Websites.

e. From Other Sources. We also may collect or receive information from third parties, such as Facebook and/or other third-party social media sites.

### **Information Collected by or Through Third-Party Advertising Companies**

We may use third-party advertisers to serve or track advertisements on other websites. Please note that these third parties also may use cookies, pixel tags and other technologies to, among other things, enable such third parties to record which ads your browser has loaded and which site pages you may have been viewing when the ads were delivered or accessed. Use of such third-party sites is subject to the terms of use and privacy policies of those third parties. Aquia Financial does not control the use of this technology or the resulting information and is not responsible for any actions or policies of such third parties.

### **How We Use Your Personal Information**

We use your Personal Information to:

- Complete any registration or other transactions you request online
- Improve this Website
- Improve our products and services, and identify, develop, and offer new or expanded products and services
- Personalize your experience on this Website, and customize the content and/or format of the pages you visit
- Notify you about updates, products, services, and/or special offers from Aquia Financial, its affiliates, and selected third parties
- Ask you to participate in brief surveys
- Generate aggregate statistical studies and conduct research related to our products and services and the use of this Website
- Based upon your specific relationship(s) with Aquia Financial, we may use your Personal Information in ways described in more detail in one or more Other Agreements.

### **Accessing and Modifying Personal Information and Communication Preferences**

If you have registered for the Websites, you may access, review, and make changes to your Personal Information, Billing Information, and certain Other Information by following the instructions found on the Websites. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing emails. Customers cannot opt out of receiving transactional emails related to their account or their Orders. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

### **How We Use and Share the Information**

We use the Personal Information, the Order Information, the Billing Information, and the Other Information (collectively, the “Information”) to provide our services; to process Orders; to administer our rewards and promotional programs; to maintain and

improve our Websites and services to you; to solicit your feedback; and to inform you about our products and services and those of our third-party marketing partners.

**We may also use and/or share Information as described below.**

- We will access, use, and share the Information as required to process your Orders and provide support to you.
- In order to provide our services and administer our rewards and promotional programs, we may share the Information (excluding the Billing Information) with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.
- With your permission, third-party applications or services may access your Personal Information. We use standard OAuth (open authorization) to enable you to give permission to share your Personal Information with other websites and services, such as Facebook and Twitter (e.g., when you agree to a pop-up requesting you to allow another application to access your account information). We also use OAuth to allow us to share information about you that is stored by us without sharing your security credentials.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, Order fulfillment, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- In an ongoing effort to better understand our Visitors, customers, and our products and services, we may analyze the Order Information and Other Information in aggregate form in order to operate, maintain, manage, and improve the Websites and/or our products and services. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.
- We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of Aquia Financial, LLC or others.

**By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

**Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

**Marketing Communications**

With your consent, or with an opportunity for you to withdraw consent, we may share your (type??) information with third parties for marketing purposes, as permitted by law.

**Information You Share**

Please keep in mind that whenever you voluntarily make your Personal Information available to third parties — for example on message boards or web logs; through email; during webinars, classes, telephone conferences, or coaching calls; or in comment or chat areas — that information can be seen, collected, heard, and/or used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

**How We Protect the Information**

We take reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the Information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Websites may not be secure, and you should therefore take special care in deciding what information you send to us via email.

## **Important Notice to Non-U.S. Residents**

It is important to note that the Websites and their servers are operated in the United States. If you are located outside of the United States, please be aware that any Information you provide to us will be transferred to the United States. By using the Websites and by providing us Information when using our services, you hereby irrevocably consent to this transfer and our use of the Information and data provided by you in accordance with this Privacy Policy.

## **Children**

We do not knowingly collect Personal Information from children under the age of 13 through the Websites. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the Websites without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

## **California Residents**

We do not monitor, recognize, or honor any behavioral advertising opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

Under California Law SB 27, California residents have the right to receive, once a year, information about third parties with whom we have shared Personal Information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of Personal Information shared. If you are a California resident and wish to make such a request, please send an e-mail to [admin@Aquia Financial.com](mailto:admin@Aquia Financial.com) include the phrase "California Privacy Request" in the subject line, and provide us with your name, address and e-mail address. We will respond to you within thirty (30) days of receiving such a request.

## **External Websites**

The Websites may contain links to third-party websites. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

## **Changes to This Privacy Policy**

Aquia Financial reserves the right to change this Policy to respond to new laws, regulations, technology, or for other business reasons. Please check this Website from time to time to review any such changes. By accessing the Websites and/or using our services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

## **Governing Law and Jurisdiction**

You agree that any claim, action or proceeding arising out of this Policy, or your use of this Website, shall be governed by and construed in accordance with the laws of the United States and the State of Georgia, without regard to principles of conflict of laws. Any claim, action or proceeding related to this Policy will be resolved exclusively in the state or federal courts located in the State of Georgia and you consent to the jurisdiction of those courts.

## **E-mails and Communications**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Site
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

If you no longer wish to receive correspondence, e-mails, or other communications from third parties, you are responsible for contacting the third party directly.

## **How to Contact Us**

If you have questions about this Privacy Policy, please contact us via email at [admin@Aquia Financial.com](mailto:admin@Aquia Financial.com) with "Privacy Policy" in the subject line.