Privacy Policy

At <u>www.krameradvantage.com</u> (Kramer Agency, Inc." "we," or "us"), we know You are concerned about Your privacy, so we developed this Privacy Policy to explain how we collect, use, and disclose your personal information.

By registering with Kramer Agency and/or using this site (the "Site"), You are accepting the policies and practices described in this Privacy Policy. Each time You visit the Site or provide us with information You agree that You are consenting to our use and disclosure of the information that You provide, and consenting to receive emails or otherwise be contacted, as described in this Privacy Policy. This Privacy Policy is incorporated into the Kramer Agency Terms of Use. If a term is capitalized and not defined in this Privacy Policy, it is defined in the Kramer Agency Terms of Use.

YOUR PERSONAL INFORMATION MAY BE PROCESSED BY US IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED STATES) WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.

When we use the phrase "Personal Information" in this Privacy Policy, we mean information about You that is personally identifiable to You, like Your name, address, e-mail address, or phone number, as well as other non-public information that is associated with the foregoing and your Account. When we use the phrase "Non-Personal Information" in this Privacy Policy, we mean information that is not associated with or linked to Your Personal Information. Non-Personal Information does not enable identification of or contact with, individual persons.

Children. The Site is not directed to children and children are not eligible to use our Services. Protecting the privacy of children is very important to us. We do not collect or maintain Personal Information from people we actually know are under 18 years of age, and no part of our Site or Service is designed to attract people under 18 years of age. If we later learn that a user is under 18 years of age, we will take steps to remove that user's Personal Information from our databases and to prevent the user from utilizing the Site and the Service. **How we collect Information.** Kramer Agency collects information from our users at several different points on our Web site. We collect the following Personal Information that you submit to us voluntarily in an Account or Order, as described below. We may also request optional information to support Your access to the Site or Services. For example, when You sign up to receive information about products or services that may be of interest to You, we may collect Your email address and other information related to your request. When You communicate with us by sending us an email, or otherwise complete online forms, surveys or contest entries, we will collect any information that is contained in Your communications with us. We may store this information on behalf of our users as necessary to fulfill our obligations to our users. You can choose not to provide us with certain information, but this may limit the features of the Site or Services You are able to use. We do all of this to help us in our effort to help You with Your virtual telecommunication needs and to offer You other services as applicable.

Orders. When you register with us or otherwise establish an Account with us, we request Personal Information from you on our order form. You must provide contact information (such as name, email, shipping address, password of Your choosing, and information about Your virtual marketing needs or other related information) and financial information (such as credit or debit card number, expiration date and/or other payment information). This information is used for billing purposes and to fill your orders. If we have trouble processing an order, the information is used to contact you.

Information Use. Information collected is used only for setting up service and conveying information about user accounts and upcoming features and benefits of Kramer Agency programs.

Information Collected via Technology. As You use the Site or Services, certain information may also be passively collected and stored on our or our service providers' server logs, including your Internet protocol address, browser type, and operating system. We also store your Non Personal Information that we collect through cookies, log files, clear gifs, and/or third parties to create a profile of our users. A profile is stored information that we keep on individual users that details their viewing preferences. Consequently, collected information is tied to the users personally identifiable information to provide offers and improve the content of the site for the user. This profile is used to tailor a user's visit to our Web site, and to direct pertinent marketing promotions to them. We do not share your profile with other third parties.

Cookies and Web Beacons. A cookie is a piece of data stored on the user's computer tied to information about the user. Usage of a cookie is in no way linked to any personally identifiable information while on our site. We use cookies on this site. 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 provide You with a more personal and interactive experience with the Site or Services. Persistent Cookies can be removed by following Your Internet browser help file directions. If You choose to disable Cookies, some areas of the Site or Services may not work properly. We may contract with several online partners to help manage and optimize our Internet business and communications. For example, we may use the services of a marketing company to help us measure the effectiveness of our advertising and how visitors use our Site. To do this, we may use web beacons, clear GIFs and cookies provided by our marketing company on this Site. The information collected helps us learn things like what kinds of customers our Site attracts, which of our products most interest our customers, and what kinds of offers our customers like to see.

We may also enable advertisers and ad servers to promote third-party products and/or services by placing advertisements on the Site. These advertisers and ad servers may use Cookies and/or "Web Beacons" (which are usually small, transparent graphic images) in order to monitor information related to served advertisements. Clicking on such advertisements will direct You to the website of a third-party and the advertiser. This Privacy Policy does not cover the privacy practices of any advertisers or ad servers.

Log Files Like most standard Web site servers we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information. We use several tracking utilities and third-party services that use log files and javascript calls to analyze user movement.

We also use navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of Your visit and the solutions and information for which You searched and viewed, or on which of the advertisements displayed on the Site You clicked. This type of information is collected to make the Site or Services and solutions more useful

to You and to tailor the experience with the Site or Services to meet Your special interests and needs.

Communications from the Site

Special Offers and Updates

We send all new members a welcoming email to verify password and username. Established members will occasionally receive information on products, services, special deals, and a newsletter. Out of respect for the privacy of our users we present the option to not receive these types of communications. Please see the Choice and Opt-out sections.

Blog. If a user wishes to subscribe to our blog, we ask for contact information such as name and email address. Out of respect for our users privacy we provide a way to opt-out of these communications. Please email info@krameradvantage.com.

Service Announcements. On rare occasions it is necessary to send out a strictly service related announcement. For instance, if our service is temporarily suspended for maintenance we might send users an email. Generally, users may not opt-out of these communications, though they can deactivate their account. However, these communications are not promotional in nature.

Customer Service. We communicate with users on a regular basis to provide requested services and in regards to issues relating to their account we reply via email or phone, in accordance with the users wishes.

Sharing

Legal Disclaimer. Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our Web site.

Third Party Advertisers. Kramer Agency DOES NOT share, sell, rent or trade Web site usage information about users with any third party. Kramer Agency may share your Non Personal Information in non identifiable aggregate form, but never call records or usage statistics to partners who have signed a non-disclosure agreement for the sole purpose of establishing a partnership agreement. This data may include customer name and address.

Service Providers. We partner with service providers for the purpose of providing the Services. When the user signs up for these particular services, we share user id information that is necessary for Azure to provide these services. We also partner with Azure web services as our web hosting provider. Azure Web Services have access to network information. We may partner with financial and billing third parties solely for the purposes of processing payments for Services that you elect to purchase.

Business Transitions. In the event Kramer Agency goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, users Personal Information will, in most instances, be part of the assets transferred.

Links. This Web site contains links to other sites. Please be aware that we, Kramer Agency, are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every Web site that collects personally identifiable information. This privacy statement applies solely to information collected by this Web site.

Surveys & Contests. From time-to-time our site requests information from users via surveys or contests. Participation in these surveys or contests is completely voluntary and the user therefore has a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information (such as zip code). Contact information will be used to notify the winners and award prizes. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site. Users personally identifiable information is not shared with third parties unless we give prior notice and choice. Though we may use an intermediary to conduct these surveys or contests, they may not use users personally identifiable information for any secondary purposes.

Testimonials. We post customer testimonials on our web site which may contain personally identifiable information such as the customer's name. We do obtain the customer's consent prior to posting the testimonial to post their name along with the testimonial.

Security. This Web site takes every precaution to protect our users information. When users submit sensitive information via the Web site, their information is protected both online and off-line.

When our registration/order form asks users to enter sensitive information (such as credit card number), that information is encrypted and is protected with the best encryption

software in the industry – SSL. While on a secure page, such as our order form, the lock icon on the bottom of Web browsers such as Mozilla Firefox and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when users are just surfing.

While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user-information off-line. All of our users information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to personally identifiable information. Finally, the servers that store personally identifiable information are in a secure environment.

Address Verification. We use Authorize.net to verify a user's address for credit card authentication purposes.

Correcting/Updating/Deleting/Deactivating Personal Information. If a user's personally identifiable information changes (such as zip code, phone, email or postal address), or if a user no longer desires our service, we provide a way to correct, update or delete/deactivate users Personal Information. This can usually be done through contacting us at info@krameradvantage.com or using the provided contact information.

How to limit the ability of others to see your information. You need to be careful when disclosing information about yourself, because Your information that You provide may reveal Your identity. It is up to You to make sure You are comfortable with the information You choose to provide us. YOU DO NOT HAVE TO PROVIDE ANY PERSONAL INFORMATION OF ANY KIND TO US, BUT YOU UNDERSTAND THAT YOU MAY NOT BE ABLE TO ACCESS SOME PORTION OF THE SITE OR USE SOME OF OUR SERVICES UNLESS YOU DO, AND YOU UNDERSTAND THAT WE WILL BE UNABLE TO PERFORM A PRIMARY PURPOSE OF THE SERVICES THAT YOU ARE ASKING US TO PERFORM UNLESS WE USE AND DISCLOSE PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

Notification of Changes. If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to info@krameradvantage.com

Contact Information. If users have any questions or suggestions regarding our privacy policy, please contact us at:

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http://www.KramerAdvantage.com

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