## **Online Privacy Policy**

# Sharpe-Mindset Online Privacy Policy (hereinafter referred to as our "Privacy Notice" or "Notice")

Updated Date: September 10, 2020

Sharpe-Mindset ("Sharpe-Mindset," "we," "us," and "our") owns and operates this application and website. This Notice describes our commitment to privacy and reflects the importance we place on earning and keeping your trust.

If you have any questions about this Notice or our privacy practices, please contact us by e-mail at info@sharpe-mindset.com, by phone at 914-979-1871, or by mail at Sharpe-Mindset, 141 Weston Street, Unit 65, Hartford, CT 06141.

#### Scope of This Notice

This Notice applies to the information we collect from or about individuals through the publicly available portions of sharpe-mindset.com (this "Application and "Site"). It does not apply to information we collect through other channels, such as over the phone or in person.

Some of the information we collect through this Application (App) and Site may be "personal information"—information that identifies you personally, alone or in combination with other information available to us. Other information may be nonpersonally identifiable, such as your IP address.

We have provided this Notice so that you will know what information we collect, how we use this information, the types of third parties with whom we may share this information, and some of the choices that are available to you.

#### Your Consent

Please take a few minutes to review this Notice before using this App and Site. By using this App you are consenting to the collection, use, and disclosure of your information as set forth in this Notice. If you do not agree to be bound by this Notice, you may not access or use this App.

This Notice is Part of Our Terms of Use

This Notice is part of the Terms of Use that govern your use of this App.

#### Your Choices

In General. We respect your right to make choices about the ways we collect, use, and disclose the information you provide on or through this App. We strive to provide choices to you at a meaningful time and in a meaningful place. This Notice describes some of your other choices, such as your choice to opt out of receiving "cookies."

Do Not Track Mechanisms. Your browser may deliver a "Do-Not-Track ('DNT') signal" to this Site. Because of the changing state of technology and indecision within the technology and marketing industries regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.

Previously Expressed Preferences. You may change previously expressed preferences regarding how we use information you provide on or through this App and Site. For example, if you have provided your contact information and receive periodic emails from us, you may decide to stop receiving those emails by clicking the "unsubscribe" link in an email's footer. You may be able to change other preferences through an account you create on this Site to the extent that we provide that option to our visitors. Otherwise, please contact us using the information provided above.

# This Notice May Change

This Notice describes our current policies and practices with regard to the information we collect through this Site.

We are continually improving and adding to the features and functionality of this App and Site and the services we offer through this Site. As a result of these changes (or changes in the law), we may need to update or revise this Notice. Accordingly, we reserve the right to update or modify this Notice at any time, without prior notice, by posting the revised version of this Notice behind the link marked "Privacy Policy" in the dropdown box of this App.

Your continued use of this Site after we have posted the revised Notice constitutes your agreement to be bound by the revised Notice. However, we will honor the terms that were in effect when we gathered information from you. You may access the current version of this Notice at any time by clicking the link marked "Privacy Policy" in the dropdown box of this App.

#### Types of Information We Collect

Information You Manually Provide. We collect the information you manually provide (using your keyboard, mouse, or touchscreen) when you use this App and Site. For example, we collect the information you provide when you complete a contact form, reach out to us with questions, or otherwise interact with this App and Site. Some of the information you manually provide may be personal information, such as your name and contact information.

Information from your browser or device. We collect information that is sent to us automatically by your web browser and/or mobile device. This information typically includes your IP address, the name of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. The information we receive may depend on your browser or device settings.

The information we receive from your web browser and device is not, in and of itself, personally identifiable. Generally, we use this information in the aggregate to help us improve this Site and make it more compatible with the technology used by our visitors. However, we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you.

Information Collected by Cookies and Other Technologies. We use "cookies," web beacons, and other technologies to collect information. For example, we may use these technologies to collect information about the ways visitors use this Site/App—which pages they visit, which links they use, and how long they stay on each page. We also use these technologies to support certain features of this App/Site. For example, we use these technologies to personalize your experience when you use this Site and to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits.

The information we collect using cookies and similar technologies is not, in and of itself, personally identifiable, but we may link it to personal information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit this Site/App, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

How We Use Personal Information Collected Through This App and Site Generally, we use the information we collect through this Site/App:

to provide the information, products and services you request;

to provide you with effective customer service;

to provide you with a personalized experience when you use this App/Site;

to contact you with information and notices related to your use of this App/Site;

to contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);

to invite you to participate in surveys and provide Feedback to us (in accordance with any privacy preferences you have expressed to us);

to improve the content, functionality and usability of this App and Site;

to better understand your needs and interests;

to improve our products and services;

to improve our marketing and promotional efforts:

for security, credit or fraud prevention purposes; and

for any other purpose identified in any other applicable agreement between you and us. Information About Third-Party Cookies

In addition to the cookies we deliver to your computer or mobile device through this App and Site, certain third parties may deliver cookies to you for a variety of reasons. For example, we use Google Analytics, a web analytics tool that helps us understand how visitors engage with our App and Sites. To learn more about Google Analytics, click here.

Other third parties may deliver cookies to your computer or mobile device for the purpose of tracking your online behaviors over time and across nonaffiliated websites and/or delivering targeted advertisements either on this Site or on other websites.

You have choices about the collection of information by third parties on our Sites. For example, if you don't want information about your visit to this Site sent to Google Analytics, you may download an Opt-out Browser Add-on. Please note that the Add-on does not prevent information from being sent to us.

In addition, if you would like to opt-out of having interest-based information collected by certain entities during your visits to this Site or other websites, please email us. You will be directed to an industry-developed website that contains mechanisms for choosing whether each listed entity may collect and use data for online behavioral advertising purposes. It may be that some of the third parties that collect interest-based information on this Site do not participate in the industry-developed opt-out website, in which case the best way to avoid third-party tracking of your online behaviors may be through your browser settings and deletion of cookies.

How to Access, Update or Correct Your Information

If you have created an account on this App/Site, you may be able to access, update or correct your information through your account settings. Otherwise, you may need our help. Please contact us using the information provided above. We will respond to you within a reasonable time and, in any case, within the time limits established by applicable law. We may ask you for additional information to verify your identity. In most cases, we will provide access and correct or delete any inaccurate information you discover. In some cases, however, we may limit or deny your request if the law permits or requires us to do so or if we are unable to verify your identify.

## Steps We Take to Safeguard your Personal Information

We maintain reasonable administrative, physical and technological measures to protect the confidentiality and security of information you submit on or through this App/Site. Unfortunately, no website, server or database is completely secure or "hacker proof." We therefore cannot guarantee that your information will not be disclosed, misused or lost by accident or by the unauthorized acts of others.

#### How We Share Your Information

With Third-Party Vendors. We may share information collected through this Site with third-party vendors who act for us or on our behalf. For example, we use third-party vendors to design and operate this App and Site; to conduct surveys; and to help us with our promotional efforts. These third-party vendors may need information about you to perform their functions.

In Aggregate or De-identified Form. We use information collected through this App to create a compiled, aggregate view of usage patterns. We may share aggregate information with third parties so they can better understand our user base. We may also share with third parties information about how particular individuals use this App, but only when the data has been deidentified cannon reasonably be re-identified. ("Individualized Data"). Individualized Data is not personally identifiable, but it does reflect the usage patterns of a particular Site user, as opposed to App users collectively. We may provide basic demographic information (gender and age) in conjunction with providing Individualized Data. Third parties typically use this information for analytical purposes and to market their own products and services.

As Part of a Business Transfers. Your information may be transferred to successor organization if, for example, we transfer the ownership or operation of this App to another organization or if we merge with or are acquired by another organization, or if we liquidate our assets and sell them individually. If such a transfer occurs, the successor organization's use of your information will still be subject to this Notice and the privacy preferences you have expressed to us.

To Comply with Laws and Protect Our Rights and the Rights of Others. We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of this App; to enforce or apply our online Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

As Described in any other Applicable Notice. We reserve the right to disclose your information as described in any privacy notice posted on a page of this Site and App where you provide that

information. By providing your information on that page you will be consenting to the disclosure of your information as described in that privacy notice.

As Described in a Click-Through Agreement. We reserve the right to disclose your information as described in any click-through agreement to which you have agreed.

## Children Under the Age of Thirteen

We are proud of this Site and we strive to ensure that it does not offend people of any age. However, this Site is not intended for children or minors under the age of thirteen years without the permission of a parent or guardian. If you believe that a child has submitted personal information on or through this Site without the consent and supervision of a parent or guardian, please contact us using the information provided above so that we can take appropriate action. We are in compliance with Children's Online Privacy Protection Rule ("COPPA").

#### Links to Other Sites

This App and Site may contain links to websites operated by other organizations, including websites operated by our third-party service providers and other third parties. This Notice does not apply to information collected on any of these third-party websites. When you access third-party websites through a link on this Site, please take a few minutes to review the privacy notice posted on that site.

#### Governing Law

This Notice shall be governed under the laws of the State of Connecticut United States of America without regard to its conflicts of law provisions.