# WEBSITE PRIVACY POLICY

Bigelow Family Holdings, LLC d/b/a Mettle Ops, together with its subsidiaries and affiliates (collectively, "Mettle Ops", "we" or "us"), has adopted this Privacy Policy to inform you of its policies and practices regarding information collected from websites owned or operated by Mettle Ops (the "Site"). Your use of the Site constitutes your acceptance of this Privacy Policy and your consent to the practices it describes. Please review this Privacy Policy periodically, as we may update it from time to time. Each time you visit the Site, or provide us with information, you are, by doing so, accepting the practices described in this Privacy Policy at that time.

### APPLICATION

This Privacy Policy applies only to information gathered on and through the Site and does not apply to any other information or websites not owned or operated by METTLE OPS or information collected by Mettle Ops by other means.

#### **SUMMARY**

We value your privacy and, unless otherwise stated in this Privacy Policy, will not sell or share your personal information with third parties without your consent. This section gives a brief overview of our data collection and use policies. Please see below for a more detailed discussion of each topic.

We collect the following information:

- Personal information that you provide us on a voluntary basis.
- Information that your browser routinely shares with websites.
- Information that your mobile device shares when you access the site from a mobile device.

We use and disclose the information we collect for the following purposes:

- To provide you information about products and services that you request or that may interest you.
- To help us improve our Site, understand its users and their preferences, and to market our services.
- To protect our business interests or the rights of others, when required by law, to cooperate with law enforcement, or in connection with the sale or merger of all or part of our business.

The Site uses the following tracking technologies:

• Cookies and other similar technology track movement across our website and keep track of our users and their preferences.

*Other details about our practices:* 

- Although the Site may contain links to other websites, this policy applies only to websites owned and operated by Mettle Ops.
- We use your personal information only for the purposes for which it is collected and consistent with this policy, and we retain your information only as long as permitted by applicable law.
- We may update this policy from time to time, but we will allow you to opt in to any material changes in how we use your previously collected personal information.

# **COOKIE POLICY & DECLINING COOKIES**

As is commonly done on websites, this Site may use cookies and similar technology to customize your Site experience and keep track of those using the Site. A "cookie" is a small text file containing alphanumeric characters that is stored on your computer and uniquely identifies your browser. You consent to our cookies if you continue to use our Site. However, you have the ability to accept or decline cookies. Most Internet browsers enable you to erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. If you do not wish to allow cookies, please disable cookies by changing your browser settings before continuing to use this Site. Please be aware that some of the Site's functions or features may not work properly without cookies.

Specific uses of cookies on this Site are described in more detail below.

### INFORMATION WE COLLECT AND HOW THE INFORMATION IS USED

### Information related to interaction with our site and services

What information is collected? We collect the personal information you provide, such as when you ask questions through the Site, opt-in to Site features, post content, or enroll to receive our products or services. Additionally, we log usage data when you visit or otherwise use our Site, such as when you view or click on content or ads, perform a search, or share information from other users.

How is this information collected? This information is collected when you give it to us and as you interact with our Site and services. When you use our Site, opt-in to certain features, enroll for our products or services, post content, or otherwise communicate with us or others in connection with our Site, you are creating personal data that we collect. We also collect information related to the general use of our Site using log-ins, cookies, device information, and IP addresses to identify and log your use. The cookie and mobile device policies are discussed further below.

How is this information used and shared? This information is used and shared to provide you with our services, facilitate interactions between users, customize your experience with our Site, and to communicate with you about products and services that may interest you. Additionally, we may use the information we have about you to provide and personalize some of the Site's features or services (such as ads) including with the help of automated systems and inferences we make, so the Site can be more relevant and useful to you and others. However, we do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you. We may use your personal information collected through the Site to provide you information about products and services that we believe you may be interested in. You will always be given the opportunity to unsubscribe or opt out of receiving further communications or marketing emails by following the unsubscribe instructions in the email communication.

### Information related to browser and analytics data

What information is collected? Like many other websites and applications, and regardless of which section of the Site you are visiting, we may record information that your browser routinely shares, and we may automatically track certain information based upon your behavior on an anonymous, aggregate basis ("Aggregate Information"). This information may include, for example, the URL that you have just come from (whether this URL is on our Site or not), the URL you go to next (whether this URL is on our Site or not), your computer's browser information, mouse clicks, mouse movements, scrolling activity, and text that is typed and your IP address. Aggregate Information that is collected through the Site may be collected via Google Analytics.

How is this information collected? This information is collected as a result of your browser sharing the information with us through the use of web beacons and cookies. Web beacons (also known as an action tags, clear gifs or pixel tags) are pixel images embedded in a website page used to transparently collect information. If you are simply browsing on this Site, the cookies that we use last only about as long as your session on this Site. We may allow business partners who provide services to this Site to place cookies on your computer that assist us in analyzing usage data. For example, we use Google Analytics to provide us with demographic information about our visitors and to help us analyze how people use our website. Our third-party service providers include Google Analytics, Squarespace, and Mailchimp. To learn more about how these providers use cookies, please visit their respective websites to review their privacy policies. We do not allow these business partners to collect your personal information from this Site except as may be necessary for the services that they provide.

How is this information used and shared? This information is used to keep track of users and their preferences and to provide analysis about the visitors to our Site. Specifically, cookies are used to keep track of users and the services they have collected. Web beacons (or similar technology) help us track the effectiveness of our communications. For example, we may use a web beacon to count the number of visits to the pages of this Site.

In addition to the cookies utilized on this Site by us, Mettle Ops may allow trusted third parties, such as LinkedIn and Google Ads, to place advertisements for our products and services on sites and applications operated by others. These third parties may use cookies and web beacons to measure the effectiveness of our ads and to determine the display of content and advertising to you based on your interests both on our Site and other sites and applications that you may visit. To support this interest-based advertising solution, we and the companies we have contracted with may use anonymous information about your visits to our and other websites and applications. The information collected and used by this process is always anonymous and does not enable any third party to identify you individually. You can learn more about interest-based advertising and opt out of such advertising from certain companies at aboutads.info.

Use of Google Services: The Site is enabled with a number of Google Services, such as Google Analytics and other associated tools. As such, the Site will collect information consistent with the terms of Google's Privacy Policy (https://policies.google.com/technologies/partner-sites), which could include but is not limited to the collection of device-specific information, log information, location information and cookie-related information as described in the Google Privacy Policy. Because the Site is enabled with add-on Google services, Google will have access to information that is collected by the Site in conjunction with these services, and may use such information to improve these services. We will use such information, to the extent available by way of Google Analytics, to better understand the use of the Site and topics of interest among Site visitors and to enhance the personalized user experience of the Site. We may also use these Google services to advertise on third party websites (including Google) to previous visitors of our website to provide advertising targeted to suit the interests and preferences of Site visitors. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. For example, you may see certain ads on this Site or other websites because we contract with Google and other similar companies to target our ads based on information we or they have collected, including information that was collected through automated means (such as cookies and web beacons). These companies also use automated technologies to collect information when you click on our ads, which helps track and manage the effectiveness of our marketing efforts. Users may opt out of Google's use of cookies and may opt out of Google Analytics by visiting the Google Opt-Out page at www.google.com/settings/u/0/ads/authenticated?hl=en, and you may and edit or opt-out your Google Display Network ads' preferences at http://www.google.com/ads/preferences/.

Statistical analyses of the information: We may use an analytics provider to help us gather Aggregate Information. We do not and will not attempt to associate this data with personally identifiable data unless required to do so to cooperate with law enforcement activity or other governmental request or to comply with law. We may use this information to gain a better understanding of the users of our Site, to improve our Site, and to improve our services and product offerings. Currently, we use Google Analytics and Squarespace Analytics to perform such functions. Depending on the type of browser and device that you use, you may have the ability to control the type of information that these providers use, and you may opt-out of having made your activity on the Site available to Google Analytics by installing the Google Analytics opt-out browser add-on as described above. We reserve the right to license or sell Aggregate Information about the visitors to and users of our Site, but this information will not be individually identifiable.

# Geographic information collected from mobile devices

What information is collected? We may operate a version of this Site and applications specifically designed to work with mobile devices. The mobile Site and applications may include a feature that uses geographic location information.

How is this information collected? This information is provided by your mobile device.

How is this information used and shared? We do not collect or store your geographic information except to temporarily provide this Site. Your geographic information may be used to identify services in your vicinity in which you may be interested.

# Other ways we may collect, use and share your information

Information shared with our business partners and processors: We may use business partners to help us design and operate the Site, provide services to support the Site, or otherwise process your information. For example, we may hire a company to run certain website applications, help us analyze our data, or send information on our behalf about products and services in which you may be interested. Unless otherwise indicated at the time we collect your information, if we allow our business partners to access the personal information we collect, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Privacy Policy. A list of our current business partners that have access to certain personal information we collect is available upon request.

Business operations, law enforcement and legal actions: We may release your information without prior notice when we believe it is appropriate to prevent fraud; to comply with law or to cooperate with law enforcement activity or other governmental request; to respond to subpoenas, court orders or administrative agency requests for information; to enforce our policies; to protect the rights, property and safety of our business and of others; or when required or otherwise permitted by law. For example, we may share information with law enforcement to reduce the risk of fraud or if someone uses or attempts to use our site for illegal reasons. If there is a sale or merger of our organization, we may also transfer the information we have collected in connection with such sale or merger.

### TRANSFERS OF INFORMATION

Any information you provide to us through the use of the Site may be stored, processed, transferred among, and accessed from the United States and other countries which may not guarantee the same level of protection of personal information as the one in which you reside. However, we will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is kept. If you have questions about cross-border transfers, please contact us as detailed below.

### **DATA RETENTION**

We typically retain your personal information related to marketing activities for as long as you accept marketing communications from us, and we will securely delete such data in accordance with and to the extent permitted by applicable law upon request. For personal information that we collect and process for other purposes, we typically retain such personal information for no longer than for the period necessary to fulfill the purposes outlined in this policy and as otherwise specified in applicable record retention policies and procedures. We may retain your personal information even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our terms and conditions, or fulfill your request to "unsubscribe" from further messages from us. We will retain de-personalized information after your account has been closed or we have otherwise deleted your personal information.

# CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION

You are not required to provide all of the personal information identified in this policy to use our Site or to interact with us offline, but certain functionality will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to respond to your request, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

### HOW WE PROTECT YOUR PERSONAL INFORMATION

We maintain technical and organizational measures to protect the integrity of this Site and the personal information we collect from you from loss, misuse, alteration or unintentional destruction. However, we cannot provide absolute assurances against, and will not be liable for, any breaches of data security or confidentiality due to system failures or unauthorized access by third parties, or other causes beyond our reasonable control.

# ADDITIONAL POLICIES AND PRACTICES

### Children

Our Site is not directed at children under the age of 13 and we will not knowingly collect information about children under the age of 13. If you are under the age of 13, please do not submit your personal information. If you are a parent who believes that we have collected information about a child under age 13, please contact us as detailed below and we will be happy to delete the information.

# **California Privacy Rights**

For California residents: We may share your personal information with affiliated third parties, some of which do not share the Mettle Ops name, for their direct marketing purposes, including its affiliate Pacesetter Operations Group, L.L.C. d/b/a NUDG. As these categories of affiliate are considered unaffiliated parties under California law, you may request information about our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us as detailed below. Please include your name and email address in such request.

#### **Do-Not-Track**

At this time the Site does not recognize automated browser signals regarding tracking mechanisms, which may include "do not track" instructions. However, you can change your privacy preferences regarding the use of cookies and similar technologies through your browser or mobile device.

#### Links

The Site may contain links to other sites. We are not responsible for the privacy practices or content of those linked sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each web site to which we may link that may collect personally identifiable information.

# **VERIFYING, CHANGING, AND DELETING YOUR INFORMATION**

If you have an issue with your information that we have collected, you can contact us as detailed below and ask us to change, update or fix your information in certain cases, particularly if it is inaccurate. You can also request that we erase or delete all or some of your personal information or otherwise object to, limit, or restrict the use of such information (if we have no legal right or legitimate business interest in retaining such information).

#### CHANGES TO THIS POLICY

We reserve the right to change this policy. If we do change this policy, we will post the revised version on the Site, and if we are going to change this policy in a way that would permit us to make additional uses of your personal information that we have already collected, we will obtain your affirmative, express consent before using your information in a materially different way.

#### **CONTACT US**

If you have any questions or comments about our policies and practices, please contact us using the contact information below. You may also file a complaint or ask to review any of the information that we have retained about you, how we have used it, or to whom we have disclosed it at any time by contacting us.

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