



## WEBSITE PRIVACY POLICY

This policy tells you about how we use and protect your personal information.

### Scope

This Privacy Policy describes how we handle your personal information for our services on the Cleverley & Associates websites. It applies generally to the CleverleyAssociates.com website and content and other related websites where this policy appears in the footer of the page. Some Cleverley & Associates-branded websites or websites we operate may be governed by separate privacy policies. The policy that applies on any of our domains or subdomains is always the policy that appears in the footer of each website. By using the Cleverley & Associates website you expressly consent to our collection, storage, use of your personal information as described in this Privacy Policy.

### Collection

You can browse our sites without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. If you choose to provide us with personal information, you consent to the transfer and storage of that information on our servers located in the United States.

We may collect and store the following personal information:

- email address, physical contact information;
- transactional information based on your activities on the sites (such as purchase and content you generate or that relates to your account);
- shipping, billing and other information you provide to purchase or ship an item;
- other information from your interaction with our sites, services, content and advertising, including computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- additional information we ask you to submit to authenticate yourself or if we believe you are violating site policies (for example, we may ask you to send us an ID or bill to verify your address, or to answer additional questions to help verify your identity);

### Marketing

We don't sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from other companies and use it to improve and personalize our services, content and advertising. If you don't wish to receive marketing communications from us, simply contact us at 888.779.5663 or unsubscribe from our marketing service by following the directions provided with the communication or advertisement.

### Use

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, and customized experience. You agree that we may use your personal information to:

- provide the services and customer support you request;
- prevent potentially prohibited or illegal activities;
- customize, measure and improve our services, content and advertising;
- tell you about our services, targeted marketing, service updates, and promotional offers based on your
- communication preferences; and

### Our Disclosure of Your Information

We may disclose personal information to respond to legal requirements or enforce our policies. Such information will be disclosed in accordance with applicable laws and regulations.

We may also share your personal information with:

- Service providers under contract who help with our business operations such as credit card processing. We currently use Authorize.net to process credit card transactions.
- Other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service).
- Law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity. In such events, we will disclose information relevant to the investigation, such as name, city, state, zip code, telephone number, email address, User ID history, IP address.
- Other business entities, should we plan to merge with or be acquired by that business entity. (Should such a combination occur, we will require that the new combined entity follow this privacy policy with respect to your personal information. If your personal information will be used contrary to this policy, you will receive prior notice.)

Without limiting the above, in an effort to respect your privacy, we will not otherwise disclose your personal information to law enforcement, other government officials, or other third parties without a subpoena, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity.

### **Cookies**

We use "cookies" (small files placed on your hard drive) on certain of our pages to help analyze our web page flow; customize our services, content and advertising; measure promotional effectiveness, and promote trust and safety.

A few important things you should know about cookies are that:

- We offer certain features that are available only through the use of cookies.
- We use cookies to help identify you and maintain your signed-in status.
- Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session.
- You are always free to decline our cookies if your browser permits, although doing so may interfere with your use of some of our sites or services.

### **No Spam or Spoofing**

We do not tolerate spam. To report Cleverley & Associates-related spam or spoof emails to Cleverley & Associates, please contact us at 888.779.5663 use our Contact Us form located on all websites. You may not use our communication tools to send spam.

### **Account Protection**

If you have created a username and password with Cleverley & Associates, your password is the key to your account. Use unique numbers, letters and special characters, and do not disclose your Cleverley & Associates password to anyone. If you do share your password or your personal information with others, remember that you are responsible for all actions taken in the name of your account. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately notify Cleverley & Associates and change your password.

### **Accessing, Reviewing and Changing Your Personal Information**

You can see, review and change most of your personal information by signing on to a Cleverley & Associates website. You must promptly update your personal information if it changes or is inaccurate. Upon your request, we will de-activate your account. We do retain personal information from closed accounts to comply with law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, and take other actions otherwise permitted by law.

### **Security**

Your information is stored on our servers located in the United States. We treat data as an asset that must be protected and use lots of tools (encryption, passwords, physical security, etc.) to protect your personal information against unauthorized access and disclosure. However, as you probably know, third parties may unlawfully intercept or access transmissions or private communications, and other users may abuse or misuse your personal information that they collect from the site. Therefore, although we work very hard to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

### **General**

We may amend this Privacy Policy at any time by posting the amended terms on this site. If you have any questions regarding our Privacy Policy you may contact us at 888.779.5663, write to us at: Cleverley & Associates