

## **Privacy Policy**

This privacy policy applies to information collected by Third Gate Partners (“Company”, “we” or “us”), via our [www.thirdgate.com](http://www.thirdgate.com) website (collectively, the “Site”). This document will outline our privacy practices, including how we collect and utilize information obtained, as they pertain to visitors to and users of our Site. It also describes the choices available to you regarding our use of your information and how you can opt-out of having your information collected. By using or accessing the Site, you consent to the terms of this privacy policy. **IF YOU DO NOT AGREE TO THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE THE SITE.**

### **Information Collection**

We may collect Personally Identifiable Information, such as your name, address, phone number, geolocation or e-mail address, as well as name, address, phone number, e-mail address and other information (collectively, “PII”) from the Site only when you choose to provide it to us. For example, you may choose to send us PII about yourself in an email. We use this information to contact you to respond to your inquiry and as otherwise permitted by this privacy policy.

Our Site may collect certain non-Personally Identifiable Information (“Non-PII”), such as your IP type, IP host address, ISP address, cookie IDs and segment IDs associated with cookie IDs, pages viewed and/or search terms entered, browser type, operating system, duration and frequency of visits, anonymous usage statistics including frequency of messaging and interaction with other users, clickstream data, downloads, anonymized demographic information such as age and gender, and other log file data. On mobile devices, we may also collect device type, make and model, operating system, carrier, user ID, similar device IDs, and information about the apps you use. Please note that we may use third party service providers, such as Google Analytics to help operate and provide services in connection with our Site and these third party service providers will collect Non-PII from our Site as well.

### **Information Usage**

We use the Non-PII we collect through our Site for a variety of purposes, including to analyze interactions with and performance of our Site and to customize and improve the consumer experience. We may also use Non-PII data from third parties (such as data vendors) pursuant to their own privacy policies, and provide access to or share Non-PII with any number of third parties, including but not limited to business partners, affiliates and advertising clients. Similarly, we may enhance the Non-PII collected via our Site with Non-PII collected from our business partners.

We may use your PII, as provided by you through the Site, to contact and correspond with you and/or to respond to your inquiries. We do not sell your PII to third parties or mass marketers. We may disclose your information, including your PII, to third parties who are providing services on our behalf, as well as when we reasonably believe we are obligated to do so by law, and in order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud and situations involving potential threats to the safety of any person or property. In the event another company acquires all or most of our assets, all data compiled or owned by us may be among the items transferred in that transaction. In such event, all the data

will continue to be governed by this privacy policy. Finally, please note that if you specifically consent to additional uses of your PII, we may use your PII in manner consistent with that consent.

### **Cookies and Similar Technologies**

“Cookies” are pieces of information that may be placed on your computer by a web site for the purpose of facilitating and enhancing your communication and interaction with that web site. Many web sites use cookies for these purposes. We use Cookies, clear gifs, web beacons or similar devices to help us improve the Service.

You may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Note that this may cause some features of the Site to work incorrectly. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile tracking activities via their device settings. For further information, please see “Opt-Out” below.

### **Clickstream**

As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as "clickstream data," can be collected and stored by a website's server. Clickstream data can tell us the type of computer and browsing software you use and the address of the website from which you linked to the Site. We may collect and use clickstream data to anonymously determine how much time visitors spend on each page of our Site, how visitors navigate throughout the Site and how we may tailor our web pages to better meet the needs of visitors. This information will be used to improve our Site and our services. Any collection or use of clickstream data will be anonymous, and will not intentionally contain any PII.

### **Security**

We have undertaken and will undertake commercially reasonable efforts to prevent unauthorized Internet access to user data retained in our servers, however, due to the inherent open nature of the Internet, Company cannot ensure or warrant the security of any information provided online. We retain your PII, if provided by you through the Site, for as long as your inquiry is active (as determined by us) and for a reasonable time thereafter, or if applicable, for as long as you remain on our marketing list. Even if we delete some or all of your PII, we may continue to retain and use aggregate, anonymous data previously collected and/or anonymize and aggregate your personal information. Please note that Company will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

### **Information Relating to Children**

Our Site is designed for those 18 years of age and older. We do not knowingly collect information from anyone under the age of 13. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

### **Policy Modifications/ Opt-out:**

We reserve the right, at our discretion, to modify, add, or remove portions from this policy at any time. However, if at any time in the future we plan to use any data in a way that materially differs from this policy, we will post such changes here. We encourage you to periodically

review the Site for the latest information on our privacy practices.

As noted above, you may opt-out of or restrict the placement of cookies on your device or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on many mobile devices. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings.

### **Site Terms of Use**

Use of this Site is governed by, and subject to, the legal notices contained at the Terms of Use available at [www.thirdgate.com](http://www.thirdgate.com). Your use, or access, of the Site constitutes your agreement to be bound by these provisions. **IF YOU DO NOT AGREE TO THESE TERMS OF USE YOU MAY NOT ACCESS OR OTHERWISE USE THE SITE.**

### **Comments and Questions**

We use reasonable processes to ensure compliance with this privacy policy and periodically verify that the policy is accurate. To opt-out of any future promotional messages from us, if applicable, you should send an unsubscribe request to us at [claudia@thirdgate.com](mailto:claudia@thirdgate.com). We will process your request within a reasonable time after receipt. However, we are not responsible for removing your PII from the lists of any third party who has previously been provided with your information in accordance with this Privacy Policy or your consent. We encourage you to raise any concerns using the contact information provided below, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of information. You may also request access to your PII (if you have provided PII to us through the Site) and information about our collection, use and disclosure of that information by using the contact information provided below. Subject to certain exceptions prescribed by law, you will be given reasonable access to your personal information, entitlement to challenge the accuracy and completeness of the information, and the ability to have it amended as is appropriate. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information.

Via Email:

[claudia@thirdgate.com](mailto:claudia@thirdgate.com)

### **United States of America**

Our Site is maintained in the United States of America. By using the Site, you authorize the export of your information to the USA and its storage and use as specified in this policy. You understand that data stored in the USA may be subject to lawful requests by the courts or law enforcement authorities in the USA.

**Effective Date:** This privacy policy is effective and was last updated on November 21, 2016.