

# Privacy Policy

This is the Privacy Policy for AMB Consulting Inc. (dba Simplified Global) and its affiliates and subsidiaries that link to this policy (together, referred to herein as "SG", "we", "us", or "our"). This Privacy Policy informs you of SG's data and information privacy policies and practices. This Privacy Policy explains the Personal Information we collect and receive about you, how we use and share your Personal Information, and your choices regarding our collection, use, and disclosure, both on this website and from certain offline sources, as described further below.

If you have any questions or concerns regarding our Privacy Policy or practices, please contact us as provided at the end of this Privacy Policy.

## Scope of Privacy Policy

This Privacy Policy applies to Personal Information collected about you by or on behalf of SG when you access or use any website or mobile application, owned, operated, or controlled by us that posts a link to this Privacy Policy (our "Sites"), as well as any products, programs, features, blogs, social networks, services, or transactions provided through our Sites or otherwise online (including by email) (together with our Sites, our "Online Services"), through offline channels (such as by telephone or by mail) or at any physical location where SG products or services are available (collectively, our "Offline Services") (our Online Services and Offline Services, collectively, our "Services"). This Privacy Policy does not apply to SG employees, contractors, job applicants or business contacts.

"Personal Information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include publicly available information that is made available from federal, state, or local government records.

## Changes to Our Privacy Policy

Because our business will continue to evolve, from time to time our policies will be reviewed and may be revised. We reserve the right to change this Privacy Policy at any time and to notify you by posting an updated version of this Privacy Policy, along with the date on which it was most recently updated, on our Sites. You will be able to tell when this Privacy Policy was last updated by the Last Update date included at the bottom of this Privacy Policy. We recommend that you review this Privacy Policy from time to time during visits to the Sites and note any changes before your continued use of the Sites. Your continued use of the Sites after we post any updates to this Privacy Policy constitutes your acceptance of the revisions to our Privacy Policy. It is your responsibility to periodically check for updates to this Privacy Policy. Please contact us as provided at the end of this Privacy Policy if you would like information regarding any changes.

## Information Collected About You

SG and our third-party business partners and service providers (which are third-party companies that work on our behalf) collect information about you from a variety of sources, including information you provide directly to us, and information we automatically collect from you when you access and use our Services, as further described below.

## Information You Provide Us

When you use the Services, such as when you sign-up to become a member of one of our programs, or otherwise utilize any of our Services, we collect the requested information that you provide in furtherance of our provision of the Services. The Personal Information you provide to us while using the Services may include, without limitation, the following categories:

- a. Identifiers (such as a real name, alias, date of birth, U.S. mail address, mobile and home telephone and fax numbers, unique personal identifier, online identifier, email address, account name).
- b. Characteristics of protected classifications under California or federal law (such as your age, sex, credit, payment card and financial account information, and medical information).
- c. Commercial information (such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies); and
- d. Professional or employment-related information.

You may choose whether to provide such information; however, the information may be required to utilize certain features of our Services.

We also collect information, including Personal Information, such as your name and email address, when you send us an email or otherwise communicate with us through our Services.

## Information Collected Automatically

We and our third-party business partners and service providers collect information automatically from you when you visit our Sites or otherwise use our Online Services, including in connection with our emails, online advertisements, and social media pages, as described in this section. As discussed further below, we and our business partners and service providers may use a variety of technologies to assist in collecting this information. Such information may include, without limitation, the following categories:

- a. Identifiers (such as a unique personal identifier, online identifier, or IP address).
- b. Commercial information (such as products or services purchased, obtained, or considered, purchasing or consuming histories or tendencies, including, but not limited to, those related to your use of certain Online Services).
- c. Internet or other electronic network activity information, such as:
  - i. Usage information. We collect information about how you interact with our Online Services. This includes information such as the dates and times that you visit our Sites, the pages you view, links clicked, referring / exit URLs, your browser type, non-sensitive text entered, mouse movements, and the number of clicks on our Sites. In some cases, we collect this information through cookies, web beacons, and similar technologies. To learn more about these technologies, please see the Cookies and Other Technologies section below.
  - ii. Device Information. We collect information about the devices (e.g., computer, tablet, and mobile phone) you use to access our Online Services, including your device model, IP address, operating system, the temporary or persistent unique device identifiers, and mobile network operator information; and
- d. Geolocation data. If you utilize any of the location-based services offered through our Online Services, we and our third-party business partners and service providers may collect, use, and share location data, including the real-time geographic location of your device. We and our providers use such information to provide and improve location-based products and services.

## Information We Receive from Third Parties

We may receive information about you from third parties including payment processors and marketing service providers. The categories of Personal Information that we receive from such third parties include the following categories:

- a. Identifiers (such as a real name, alias, date of birth, U.S. mail address, mobile and home telephone and fax numbers, unique personal identifier, online identifier, IP address, email address, account name).
- b. Characteristics of protected classifications under California or federal law (such as your age, sex).
- c. Commercial information (such as products or services purchased, obtained, or considered, purchasing or consuming histories or tendencies, including, but not limited to, those related to your use of certain Online Services).
- d. Internet or other electronic network activity information, such as:
  - i. Usage information. We collect information about how you interact with our Online Services. This includes information such as the dates and times that you visit our Sites, the pages you view, links clicked, referring / exit URLs, your browser type, non-sensitive text entered, mouse movements, and the number of clicks on our Sites. In some cases, we collect this information through cookies, web beacons, and similar technologies. To learn more about these technologies, please see the Cookies and Other Technologies section below.
  - ii. Device Information. We collect information about the devices (e.g., computer, tablet, and mobile phone) you use to access our Online Services, including your device model, IP address, operating system, the temporary or persistent unique device identifiers, and mobile network operator information.
- e. Geolocation data. If you utilize any of the location-based services offered through our Online Services, we and our third-party business partners and service providers may collect, use, and share location data, including the real-time geographic location of your device.
- f. Professional or employment-related information.

## Social Media

When you link your social media account or engage with SG's social media pages, you understand that you may be allowing us to have ongoing access to certain information, including Personal Information, stored on those social media sites (e.g., your public profile, friend list, people you follow or who follow you, your email address, birthday, work history, education history, interests, current city, website, personal description, and likes, and your friends' birthdays, education histories, personal descriptions, and likes). We may receive certain information about you, including Personal Information, which is stored on social media sites if other users of those sites give us access to their profiles and you are one of their friends or connections depending upon your settings on those third-party social networking sites. We may also receive other information (e.g., content viewed and information about the advertisements within the content you have been shown or may have clicked on, etc.) from your interaction with our social media pages. The information we have access to from the third-party social media websites varies by website and is controlled by your privacy settings on that website.

## Cookies and Other Technologies

We and our third-party business partners and service providers use cookies and other technologies such as log files, web beacons, and analytic tools and services on our Sites and other Online Services, including in our email communications and online advertisements, to collect information automatically from you. Such information includes your IP address, device type, any unique device identification numbers, type of

browser, operating system, your browsing activities, location information, and other usage information. We collect this information for a number of reasons, including optimization of our Sites, improving our Services, to enhance your user experience, remembering user preferences and settings, marketing and advertising purposes, security purposes, and analyzing Site traffic and trends.

Please see below for more information regarding the technologies that we may use.

*Cookies.* A cookie is a small piece of data stored by your web browser on your computer or mobile device. We use cookies to collect information from you regarding your usage of our Online Services to remember user preferences and settings, personalize your experience with our Online Services, and for security purposes.

*Log File Information.* Log file information is automatically reported by your browser or mobile device each time you access our Online Services. The information collected from log files may include your web request, Internet Protocol (IP) address, browser type, referring / exit pages and URLs, number of clicks, landing pages, and pages viewed.

*Web Beacons.* We may also use web beacons (also known as a "pixel tag" or "clear gif") which are small blocks of code installed on or utilized with our Online Services, emails, and online advertisements which can retrieve certain information about your device and browser, and other usage information.

*Social Media Features.* Our Online Services contain social media features such as the Facebook and Twitter buttons. These features may collect information such as your IP address and the pages you are visiting on our Sites and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Sites. Your interactions with these features are governed by the privacy statement of the company providing the applicable feature.

*Online Analytics.* We may use third-party analytics tools to help us measure traffic and usage trends for our Online Services. These tools collect information sent by your browser or mobile device, including the pages you visit and other usage information.

## **How Your Information Is Used**

We use your information, including Personal Information, for a variety of business purposes, including:

- a. Performing a contract with you or to take steps at your request before entering into a contract with you.
- b. Complying with legal or regulatory obligations or in response to law enforcement requests.
- c. Providing our Services.
- d. Processing your transactions.
- e. Creating and managing your membership accounts.
- f. Communicating with you.
- g. Responding to your inquiries and communications.
- h. Customer service and technical support, which may include responding to your requests, resolving issues, and/or troubleshooting problems.
- i. Improving and customizing our Services, communications, and advertisements.
- j. For internal operations such as enhancing our offerings and Sites and to conduct research and analysis.
- k. For marketing purposes.
- l. To assist in loss prevention and anti-fraud measures.
- m. To enforce our Terms of Service, and any other applicable terms and conditions and agreements.
- n. To comply with applicable laws, regulations, and legal processes; and

- o. To maintain and protect the safety, security, and integrity of our business, Services, brands, users, customers, and third-party business partners and service providers.

In some cases, we rely on your consent for processing your Personal Information, but only in those cases where we specifically ask for your consent.

## **How We Share Your Information**

We may disclose your Personal Information to third parties for business or commercial purposes, such as if we conclude that we are required to do so by law or have a good faith belief that access, preservation, or disclosure of such information is reasonably necessary to protect the rights, property or safety of SG, our customers, or the public. We may also contract with other companies and individuals to perform certain functions and services, including processing, storing, tracking, and organizing information on our behalf. These service providers may have access to Personal Information to perform their functions but are generally prohibited by contract from using Personal Information for any purpose other than providing services to us. SG shares and discloses your information, including Personal Information, under the following circumstances:

- a. With third parties that provide a variety of services on our behalf, including the development, hosting, maintenance, and support of our Services; processing your transactions and payments; data management, storage, and analysis; communications; and marketing.
- b. With our third-party business partners for analytical and marketing purposes.
- c. To comply with law, a court order, or other legal process, or in connection with a legal investigation.
- d. As may be necessary to protect the rights and interests of SG, its third-party business partners, and service providers, and our and their respective employees, customers, visitors, users, or any other person or entity.
- e. To enforce our Terms of Service, and any other applicable terms and conditions and other agreements.
- f. In connection with a potential, and/or upon the closing of a, corporate transaction, including a merger, acquisition, sale, consolidation, change in control, financing, dissolution, or similar transaction or other fundamental corporate change involving all or a portion of SG's or any of its affiliates' or subsidiaries' business operations or assets.
- g. In the event of an insolvency, bankruptcy, or receivership, your Personal Information may be sold and transferred as a business asset.
- h. In aggregated or other non-personally identifiable form.
- i. In accordance with your consent.

We do not knowingly disclose Personal Information of minors under 16 years of age to third parties.

We do not sell your Personal Information to third parties.

## **Aggregate or Deidentified Information**

We may track visits to the pages, links on our websites, and create and use other forms of aggregate or deidentified information. We may choose to share this aggregate or de-identified information with third parties.

## **Automated Decisions**

We will not use personal information to formulate a decision based solely on automated processing which produces legal effects or similarly significantly impacts the person.

## Advertising and Third-Party Data Collection

We may enter into relationships with third-party advertising companies to drive traffic to and serve ads on our Sites. These third-party companies may also collect information using their own cookies and other technology to measure the effectiveness of their ads and to personalize advertising content. We do not have access to or control over cookies or other features used by these advertisers, and their information practices are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about Internet advertising companies (also called "ad networks" or "network advertisers"), including information about how to opt out of their information collection.

## Your Choices

SG provides you with the opportunity to update and/or delete certain Personal Information and to opt out of having information collected for certain purposes. For example, you may:

- a. Update your account information.
- b. Close your account.
- c. Choose whether to receive promotions and offers from us.
- d. Change your preferences for certain communications; and
- e. Request access to your Personal Information.

You may exercise your choices by contacting us via the Contact Us information provided below or following the instructions provided in the electronic communications sent to you.

Because we plan our communications in advance, it may take several weeks for your request to become effective. If you continue to receive our communications after expressing an opt-out preference, please let us know so that we can investigate the situation. We will, however, continue to send transaction-based emails if you engage in a transaction, request customer support, or make similar requests.

In some cases, if you choose not to provide us with the requested information, you may not be able to utilize certain features of our Services.

*Location Information.* You may opt out from allowing us and our third-party business partners and service providers to have access to your location data by adjusting the permissions in your web browser and mobile device. However, some features of our Services may not function properly if use or availability of location data is impaired or disabled.

*Social Media.* You may be able to opt out from allowing us to have access to information about you stored on social media websites by adjusting your privacy settings on that social media website.

*Cookies and Other Technologies.* You may opt out of the automatic collection of some information by referring to your web browser's or mobile device's options or settings menu. However, doing so may disable many of the portions, features, or functionality of our Services.

*Google Analytics.* Google provides users choice on how their data is collected by Google Analytics by developing an [Opt-out Browser Add-on](#).

## **Do Not Track Notice**

Currently, there is no worldwide uniform or consistent industry standard or definition for responding to, processing, or communicating Do Not Track signals. Thus, like many other websites and online services, our Online Services are currently unable to respond to Do Not Track Signals. Find out more about "[Do Not Track](#)".

## **Security of Information**

SG takes steps to help protect your Personal Information from unauthorized access, use, and disclosure. However, information submitted via the Internet, including through a web page, email, or mobile communications, is subject to interception or incorrect routing, and the Internet is not a fully secure communications channel. Therefore, we cannot and do not guarantee or warrant that your information will never be accessed, used, or disclosed in a manner that is inconsistent with this Privacy Policy.

## **Links**

Our Online Services and electronic communications may contain links to third-party websites and social media platforms such as Facebook or Twitter, and our Services may be advertised and/or offered on third-party websites ("Linked Sites"). SG is not responsible for the privacy practices, policies, security, or content of any Linked Sites, even if you link to them from our Online Services or communications. This Privacy Policy does not apply to any Linked Sites. We have no control over the collection or use of your information on any Linked Site. We encourage you to read and understand the privacy practices of any Linked Sites that you visit.

## **User Generated Content**

SG's Online Services, including our social media pages, may allow you to post messages and submit content (e.g., comments, blogs, photos, postings, etc.), which may include your Personal Information. You are responsible for all actions resulting from any information, including Personal Information, which you post on our Online Services or social media pages. Please remember that any information you post becomes public information, is not subject to this Privacy Policy, and SG is not responsible for the results of such postings.

## **Children Under Thirteen Years of Age**

We do not knowingly solicit or collect any Personal Information from children under thirteen years of age. If you are under thirteen years of age, do not send any information about yourself to us. If you, or a parent or guardian becomes aware their child has provided us with Personal Information, contact us as provided below in the Contact Us section.

## **Collection In and Transfer to The United States**

Our Services are operated in the United States. If you are located outside United States, please be aware that any information you provide to us will be collected in or transferred to, and stored and processed in, the United States. The data protections and other laws of the United States may not be as comprehensive

as those in your country. We will rely on legally provided mechanisms to lawfully transfer Personal Information across borders.

## California Privacy Rights

### Privacy Rights

Under the CCPA, California residents may have certain privacy rights, including the rights to: (i) request additional information and obtain a copy of Personal Information, i.e., a "Request to Know," sometimes called the "Right to Access;" (ii) request deletion of Personal Information, i.e., a "Request to Delete Information," sometimes called the "Right to Be Forgotten;" and (iii) opt out of the sale of Personal Information if SG were to sell Personal Information, i.e., a "Request to Opt Out." SG does not sell your information as defined in the CCPA, so you are already opted-out of such sales. SG will not discriminate against you for exercising any of these rights, for example, by charging a different price or denying goods or services. However, SG may charge a different price or rate or provide a different level or quality of goods or services when that difference is reasonably related to the value provided to us by the data.

### How to Exercise Data Subject Rights

If you wish to exercise your California privacy rights, please use the methods in the Contact Us section. We will review your requests and respond accordingly. The rights described herein are not absolute and we reserve all our rights available to us at law in this regard. Additionally, if we retain your Personal Information only in de-identified form, we will not attempt to re-identify your data in response to a California Privacy Rights request.

If you make a request related to Personal Information about you, we will need to verify your identity. To do so, we will request that you match specific pieces of information you have provided us previously, as well as, in some instances, provide a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If it is necessary to collect additional information from you, SG will use the information only for verification purposes and will delete it as soon as practical after complying the request. For requests related to particularly sensitive information, we may require additional proof of identification.

If you make a California Privacy Rights request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf.

We will process your request within the time provided by applicable law.

### California "Shine the Light"

In addition to the rights already described, under California Law, California residents have the right to request certain details about how their information is shared with third parties and, in some cases, affiliates, for those third parties' and affiliates' own direct marketing purposes. Under the law, a business must either provide this information or permit California customers to opt in to, or opt out of, this type of sharing.

We may from time to time elect to share certain information about you collected by us while providing the Services with third parties or affiliates for those third parties' or affiliates' own direct marketing purposes. If you are a California resident, you may request the above information or opt out of such future sharing of your personal information (as defined by the California Shine the Light Act) by contacting us using the information in the Contact Us section below. We will respond to these requests within thirty days. Requests that come by other means may result in a delayed response.



## **Additional Privacy Rights for Individuals in the European Union (EU Users Only)**

Under the General Data Protection Regulation (GDPR) you have rights regarding your personal data.

- a. *Withdraw Consent.* You may withdraw your consent to our processing of your Personal Data, in whole or in part (i.e., for marketing purposes). Certain Services may be ineffective upon opt out.
- b. *Access.* You may access the Personal Information we hold about you at any time via your account or by contacting us using the information in the Contact Us section.
- c. *Modification.* You may modify the Personal Information we hold about you at any time via your account or by contacting us using the information in the Contact Us section.
- d. *Erase and Forget.* In certain situations, for example, when the Personal Information we hold about you is no longer relevant or accurate, you can request that we erase your Personal Information.
- e. *Portability.* You may request a copy of your Personal Information and may always move it to other entities as you desire.

If you had provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the EU Data Protection Authorities, [click here](#) if you believe that we have not complied with the requirements of the GDPR with regard to your Personal Information.

## **Individuals with Disabilities**

If you have a disability and would like to access this privacy policy in a different format, you may contact us using the information in the Contact Us section below.

## **Contact Us**

If you have a question or comments about our Privacy Policy, you may contact us as listed below.

AMB Consulting Inc.  
P.O. Box 76  
Hinckley, Ohio 44233  
Attention: Privacy Policy Inquiries

This Privacy Policy was last updated January 27, 2022.