# Aspire For More Privacy Policy

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Aspire For More LLC and its parents, subsidiaries, affiliates, properties, and property owners (collectively, "Aspire," "us," or "we") provide ticketing and event management services that enable organizations and individuals to attend live events to connect with each other and learn from entrepreneurs, athletes, and celebrities to aspire to be more. Our Aspire For More App technology (our "App") helps users to participate in meetings, events, conferences, and trade shows (together, "Events"). We understand and appreciate concerns regarding how information about our users, including customers, clients, organizers, event planners, trainers, end users, participants, and attendees, to the extent applicable (together, "you" or "yours"), is used and shared, and we appreciate your trust that we will use and share information about you carefully and sensibly. This Privacy Policy governs your participation in and use of our services; any content or information therein, including the Aspire For More Mobile Apps, our Web Apps, and any other website pages on which services are provided by us (collectively, the "Services").

This Privacy Policy applies to your use of the Services. This Privacy Policy applies to information we collect through your use of the Services and any other means by which we may collect information about you. This Privacy Policy describes the types of information we may collect from you or that you may provide when you use our Services in general and our practices for collecting, using, maintaining, protecting, and disclosing that information.

By accessing or using our Services or contacting us, you acknowledge that you have read, understood, and agree to the practices as described in this Privacy Policy. This Privacy Policy may change from time to time (see <u>Changes to our Privacy Policy</u> below). Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check our Privacy Policy periodically for updates.

# 1. When do we collect your information?

Aspire collects information relating to you and your use of the Services in order to provide Services and features that are easy to use and responsive to your needs. Aspire collects personal information in the following ways:

- From you when you register an account, purchase services, and communicate with us. We collect information from you when you register an account with us, purchase products or services, request information, send us email, send us postal mail, send us text messages, send us chat messages, or speak with us on the telephone. When you register an account with us or purchase products and services, you will be prompted to give your consent to our processing of your personal data. By indicating your consent, you expressly authorize Aspire to collect and process your personal data consistent with the purposes described in this Privacy Policy.
- From the Apps. We may collect information from your mobile device when our App is installed on your mobile device, or you provide your information to us via the App. When you install our App on your mobile device and sign up, you will be prompted to give your consent to our processing of your personal data. By indicating your consent, you expressly authorize Aspire to collect and process your personal data consistent with the purposes described in this Privacy Policy.

- <u>From third parties.</u> We may receive and collect information from your social media accounts if you choose to give us permission to access your social media accounts.
- <u>Automatically as you navigate the Apps.</u> Information collected automatically may include usage details, email addresses, IP addresses, and information collected through cookies and other tracking technologies.

#### 2. What information do we collect?

- 2.1 <u>Information you provide to us</u>. When you provide information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of the collection. For example, if you send us an email requesting information, we will use your personal information to respond to your request. We may collect the following information:
  - First and last name
  - Phone number
  - Email address
  - Mailing address
  - Biographical information
  - External social network credentials
  - Title
  - Company
  - Photograph, Video, Audio, or other media
  - Bank or payment information
- 2.2 <u>Information we and our third-party service providers collect</u>. When you use our Services, we and our third-party service providers automatically collect information about how you access and use the Services and information about the device you use to access the Services. We typically collect this information through a variety of tools, including cookies, web beacons, pixels, social media widgets, other tools to enable data recording and indexing, and similar technology (collectively, "tracking technologies"). We and our third-party partners may automatically collect such information as:
  - IP address
  - Device type
  - Browser type
  - Operating system or platform
  - Name of Internet service provider
  - · Referring website
  - · Exiting website
  - Pages visited to our websites or Apps
  - Frequency, time, data, and duration of your visit to our websites or Apps
  - Your location
  - Whether you access our website or Apps from multiple devices
  - Other interactions you may have on our websites or Apps
  - Unique Device Identifier (UDID) or International Mobile Equipment Identity (IMEI)
  - Mobile device MAC or IP address
  - Information about your mobile carrier
  - Social network information

- Communications relating to customer support, and information drawn from such communications, for statistical and reference
- Feedback relating to customer sentiment

## 3. How do we use your personal information?

- 3.1 <u>Providing services to you</u>. We process personal information in order to provide Services to you and additional Services you may request, as well as to respond to communications from you. The precise purposes for which your personal information is processed will be determined by the request and by applicable laws, regulatory guidance, and professional standards.
- 3.2 Conducting data analytics and supporting our Services. We use information we collect from you and information that we collect automatically to manage and improve our Services and our business. We take steps to ensure that your rights and the legitimacy of Aspire's activities are safeguarded. For example, Aspire may use your de-identified information and combine it with the de-identified information of others to generate statistics as a source of data for our products. For example, we use information to:
  - <u>To monitor, analyze, and improve our Services</u>. For example, we analyze visitor and customer behavior and conduct research and analysis about the way you and others use our Services.
  - <u>To manage risk and protect the Services</u>. We use data to better protect our Services, our Apps, and you by helping to detect and prevent fraud and abuse of the Services.
  - <u>To market our own Services to you</u>. Information we collect about you and how you use our Services provides valuable information about how we can improve and offer additional products and services that we think might interest you.
  - Conduct internal monitoring and training.
  - Develop new services.
  - Conduct processing necessary to fulfill other contractual obligations for you.
  - <u>To comply with our legal and regulatory obligations</u>. We will use your information as necessary to enforce the terms of our Services and to comply with all applicable laws and regulations.
- 3.3 Sometimes we may de-identify information by removing any identifier that can be associated with your personal information. De-identified information helps us develop reports and analyses about how our customers use our Services and for other research, such as research regarding behavioral inferences. We may share de-identified information and reports and analyses based on de-identified information publicly and with other companies. To further protect your privacy, de-identified information does not include contact information or any other information that would identify any specific individual or household.

# 4. Do we disclose any information to outside parties?

We do not sell, trade, or transfer your personal information to third parties with respect to information that Aspire collects directly from you, except in the circumstances described below.

- 4.1 <u>Within Aspire</u>. We may share your personal information with other Aspire entities, brands, divisions, parents, subsidiaries, and affiliates to serve you, including for the activities listed above.
- 4.2 <u>Other Customers</u>. To the extent you provide personal information to us via our Services and Apps, such information may be visible to and may be disclosed to other third-party users of our Apps, such as other event attendees, only with your express consent. Aspire, in some cases, provides its community

members with a list of all members. As such, Aspire's customers using our Apps are able to view certain personal information of other members. Our "Community Rules" located within our Apps govern the use of personal information of members and prohibit bulk unsolicited advertising and promotional messages.

- 4.3 Third-Party Service Providers. We disclose personal information to advertisers, merchants, consumer and market research companies, service providers who help us provide services, or to other third-party service providers who provide certain specialized services to us, to provide services on our behalf, or who co-operate with us on projects. These business partners operate as separate controllers and are responsible for their own compliance with data protection laws. These third parties are restricted from using or disclosing the information except as necessary to perform services or to comply with legal requirements. We may disclose aggregated, de-identified information, analyses, and reports derived from such information to third parties, including utilities, service providers, advertisers, merchants, consumer and market research companies, and other organizations. If we have obtained your personal information from one of our clients, they may have the same access to your information as we do.
- 4.4 <u>Legal Requirements and Business Transfers</u>. We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other government official requests, (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iii) in connection with an investigation of a complaint, security threat, or suspected or actual illegal activity; (iv) in connection with an internal audit; or (v) in the event that Aspire is subject to mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third-party.

## 5. What choices do you have about your personal information?

We offer certain choices about how we communicate with you and what personal information we obtain about you and share with others. How can you update your information and communication preferences?

- 5.1 <u>Profile</u>. If you have created a profile or account on our websites or Apps, you can update your contact information after you log into your account.
- 5.2 <u>E-mail</u>. You may unsubscribe from emails from us by clicking the "Unsubscribe" text link at the bottom of any promotional email from us. You may also contact us by e-mail or postal address, as noted below. Please include your current contact information, the information you are interested in accessing, and your requested changes.
- 5.3 <u>Cookies</u>. We provide a variety of services on our websites and Apps using cookies. We place cookies on your device in order to provide you with personalized access to essential services, enhance functionality, and show you offers and services tailored to your interests.

A cookie is a small piece of data that a website can send to your browser, which may then be stored on your hard drive as a "tag" that identifies your computer. Cookies help to navigate from page to page on a website, provide secure connections, gather statistics about the usage and effectiveness of our site, and remember preferences from a previous visit when you return.

We use third-party services for analytics and interest-based advertising purposes. These service providers and ad partners may use cookies alone or in conjunction with unique identifiers, beacons, and other tracking technologies to collect information about you when you use our website, open our emails, or interact with our ads.

Most web browsers automatically accept cookies, but you can change your browser's settings to disable all or certain cookies if you wish. Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our Apps. Disabling or clearing cookies may also affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

Most mobile operating systems provide an option in the device settings to limit ad tracking associated with the device identifier they may share with us. Please reference your mobile operating system's help center to learn more.

To learn more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <a href="https://en.wikipedia.org/wiki/HTTP\_cookie">https://en.wikipedia.org/wiki/HTTP\_cookie</a>, <a href="https://en.wikipedia.org/wiki/HTTP\_cookie">www.allaboutcookies.org</a>, or <a href="https://en.wikipedia.org/wiki/HTTP\_cookie">www.allaboutcookies.org</a>. We are not affiliated with and are not responsible for these third-party websites.

The following websites provide choices to opt out of tracking through certain third-party advertising and analytics cookies:

- For visitors in the United States: <a href="https://preferences-mgr.truste.com">https://preferences-mgr.truste.com</a>
- For visitors in Canada: <a href="https://youradchoices.ca">https://youradchoices.ca</a>
- For visitors in the European Union and the United Kingdom: <a href="https://www.youronlinechoices.eu">https://www.youronlinechoices.eu</a>
- Visit the opt-out pages for the <u>Digital Advertising Alliance</u> and <u>Network Advertising Initiative</u>
- Click here to opt out of targeted ads on Facebook
- Click <u>here</u> to opt out of Google Analytics for displaying advertising or to customize Google Display Network ads
- 5.4 <u>Do Not Track</u>. Because there currently is no industry or legal standard for recognizing or honoring Do Not Track ("DNT") signals, we do not respond to them at this time.

# 6. Do we transfer your personal information across geographies?

If you are in a country outside the United States, we may transfer personal information across geographical borders to Aspire entities, authorized service providers, or business partners in other countries working on our behalf in accordance with applicable law. We, our affiliates, business partners, and other third parties may be based locally or in other countries outside of your own.

## 7. How long do we retain your personal information?

We will keep your personal information for the period necessary to fulfill the purposes described in this Privacy Policy or as required under applicable law.

## 8. Third-party links

Occasionally, at our discretion, we may include or offer third-party products or services on our websites or Apps. These third-party sites have separate and independent privacy policies. We therefore have no

responsibility or liability for the content and activities of these linked sites. We urge you to read the privacy policies of other websites before submitting any information to those websites.

# 9. How do we protect your information?

- 9.1 Aspire has implemented reasonable physical, technical, and administrative security standards to protect personal information from loss, misuse, alteration, or destruction. We strive to protect your personal information against unauthorized access, use, or disclosure using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.
- 9.2 Our affiliates, business partners, and other third parties are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose. Our clients may also impose additional data rights and protection obligations depending on the laws, regulations, and rules that govern their data processing practices.

#### 10. Individuals Within the European Union

Our Services are not intended for individuals located in the European Union (EU). No one located in the European Union (EU) may provide any information to or on our websites or Apps. We do not knowingly collect personal information from individuals in the European Union (EU). If you are an individual located in the European Union (EU), do not use or provide any information on the websites or Apps or on or through any of its features, use any of the interactive or public comment features of the websites or Apps or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or username you may use. If we learn we have collected or received personal information from an individual located in the European Union (EU), we will delete that information. If you believe we might have any information from or about an individual located in the European Union (EU), please contact us at privacy@aspireformore.com.

## 11. Your California privacy rights

11.1 California Civil Code Section § 1798.83 permits users of our Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to privacy@aspireformore.com or write us at:

Aspire For More LLC Attention: Privacy Rights 90 Fort Wade Road Ponte Vedra, FL 32081

In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements, and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

- 11.2 If you are a California resident, pursuant to the CCPA, you have the right to request:
  - the categories of personal information Aspire has collected about you;
  - the categories of sources from which your personal information is collected;

- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom Aspire shares your personal information;
- the specific pieces of personal information Aspire has collected about you;
- the categories of personal information that Aspire has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt-out of having your personal information disclosed or sold to third parties.

To submit a request or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at <a href="mailto:privacy@aspireformore.com">privacy@aspireformore.com</a>. To verify your identity when you submit a request, we will match the identifying information you provide to us to the personal information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account.

- 11.3 Aspire will not be required to comply with your request to delete your personal information if it is necessary for Aspire to maintain your personal information in order to:
  - complete the transaction for which the personal information was collected, provide a good or service requested by you or reasonably anticipated within the context of Aspire's ongoing business relationship with you, or otherwise perform a contract between you and Aspire;
  - detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
  - debug to identify and repair errors that impair existing intended functionality;
  - exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
  - comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
  - engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws when Aspire's deletion of the information is likely to render impossible or seriously impair the achievement of such research if you have provided informed consent;
  - to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with Aspire;
  - comply with a legal obligation; or
  - otherwise use your personal information internally in a lawful manner that is compatible with the context in which you provided the information.
- 11.4 Aspire will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:
  - denying goods or services to you;
  - charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
  - providing a different level or quality of goods or services to you; or
  - suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.
- 11.5 This Policy is available to consumers with disabilities. To access this Policy in an alternative downloadable format, please click <a href="here">here</a>.

#### 12. Do we collect information from children?

Our Services are not intended for children under eighteen (18) years of age. No one under the age of 18 may provide any information to or on the websites or Apps. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on our websites or Apps or on or through any of its features, use any of the interactive or public comment features of the websites or Apps, or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or username you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at <a href="mailto:privacy@aspireformore.com">privacy@aspireformore.com</a>.

## 13. Contacting us

For any questions or to request further information regarding this Privacy Policy, please contact us at <a href="mailto:privacy@aspireformore.com">privacy@aspireformore.com</a>.

# 14. Changes to this Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the primary e-mail address specified in your account and/or possibly through a notice on the website or Apps' home pages. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable e-mail address for you and for periodically visiting our websites or Apps and this Privacy Policy to check for any changes.