

# **Veribella Privacy Policy**

Effective November 1, 2019

## **OUR COMMITMENT TO PRIVACY**

Our (Veribella Inc. or simply “Veribella”) Privacy Policy has been developed as an extension of our commitment to combine quality products and services with integrity in dealing with users. The Policy is designed to assist you in the understanding of how we collect, use and protect the personal information provided to us.

## **THE INFORMATION WE COLLECT**

When you visit our site (“Site”), we collect two types of information: personal information you actively choose to disclose (“Active Information”) and information not visible to you that arises out of your browsing of our Site (“Passive Information”). Please note that Passive Information is collected on an aggregate and anonymous basis.

### **1. Personally Identifiable Information**

Personally Identifiable Information (“PII”) is information that identifies and is reasonably linked to you.

#### **A. Registration**

When you register to become an authorized reseller of our products or services, we will collect PII (which may include, but not limited to, names, address, email address, and telephone numbers). This PII is securely stored and may be accessed on our website. You are assigned an identification number and select your own password – both are needed to enter the Site and to access your Contact Information. Please safeguard your password in a secure location as we are not responsible for breaches into the system when access is willingly provided.

#### **B. Ordering**

When you place an order for products or services, we collect PII (e.g., name, contact and billing information, credit card, and other transactional information). We use this information to deliver your order, process payment, and to communicate the status of your order.

#### **C. Credit and Debit Card Storage**

Credit and debit card information collected at registration or for product orders is used only to process payment for the transaction and, generally, is not retained on our Site. However, you may voluntarily elect to securely store multiple credit cards to be used for product orders.

#### **D. Surveys and Promotions**

Occasionally, you may voluntarily provide PII to complete surveys and questionnaires or to participate in user polls. We use this information to improve our products and

services and to ensure that we're providing accurate disclosures. We may also use your PII to provide you newsletters and other marketing information that coincide with your preferences. You may customize your marketing preferences, or let us know if you do not wish to receive any promotional materials, by adjusting your Subscriptions & Email options on the Site.

### **Active Information You Choose to Provide**

In order to gain use of the Site (become a "user"), we require you to disclose the following information: Name, Address and Phone Number

We use secure socket layer (SSL) encryption to protect the transmission of the information you submit to us when you use our secure online forms. The information you provide to us is stored securely.

### **2. Passive Information**

**We store and collect various types of passive information on an aggregate and anonymous basis. This information may include such technical information as it pertains to your Internet protocol address, your device operating system and browser type, cookies, and an address of a referring website or any other path you take to reach our website all described in greater detail below.**

#### **Aggregate Information**

This refers to information that does not, by itself, identify you as a specific individual. Such information would include the Uniform Resource Locator ("URL") of the website that referred you to our Site, your Internet Protocol ("IP") address (a number automatically assigned to your computer whenever you surf the web), your operating system and browser type, and any search terms that you enter on our Site. Our web server aggregates this information in order to monitor the level of activity on our Site, evaluate its effectiveness, and improve the content of our Site in order to make your visit an easy and enjoyable experience.

We may collect, compile, store, publish, promote, report, or otherwise disclose or use any Aggregate Information, provided that such information does not personally identify you. We do not correlate any PII with the Aggregate Information that we collect on our Site. If we do correlate any Aggregate Information to you, it will be protected like any other PII under this Privacy Statement.

#### **What is a Cookie?**

Cookies are a feature of web browser software that allows web servers to recognize the computer used to access a site. They are small pieces of data stored by a user's browser to simplify subsequent interactions with the site. This makes it easier for a user to move from site to site and to complete transactions over the Internet. Cookies should make your online experience easier and more personalized.

Our Site utilizes cookies to collect information about how our Site is used. Passive Information gathered may include the date and time of visits, the site pages viewed, time spent at our Site, the sites visited just before and just after visiting our Site. If you do not wish to transmit “cookie” information about yourself, you may turn off the cookie function in your web browser.

Our Site’s servers also automatically identify your computer by its Internet Protocol address, which is a unique string of numbers that are assigned to your computer by your Internet Service Provider. The IP address may be used to address problems with our server or to gather broad demographic information about our users. We passively collect your IP Address.

### **HOW WE USE THE INFORMATION COLLECTED**

Broadly speaking, persons we employ directly, or as contractors or agents at our direction, use Active Information for purposes of administering our core business functions, such as the fulfillment of orders or services, the furnishing of customer care and support, and supplying the availability of other products or services we think might be of interest to our users.

We use Passive Information to gather information about our users and to enhance our Site to make it easier, faster and friendlier for users. Additionally, cookies help us better understand the usage pattern of the people that visit our Site, which helps us improve our services. Passive Information may result in your viewing of particular advertising based on your user habits.

We reserve the right to use Active and Passive Information in order to prevent, detect and investigate fraud, security breaches, or any other potentially prohibited or illegal activity.

We may use any Active Information or Passive Information provided to contact you about various changes to our Site, new services, features or products we offer. If at any time you do not wish to receive such information, you may “opt-out” of doing so by adjusting your email settings in the back office of the website.

### **Your Information Relating to Hyperlinks**

You might be able to access other websites through our Site via hyperlinks. When you do so, you are subjecting yourself to their privacy policies and data collection. Please read the privacy policies of those sites to ensure you agree with the terms before using such sites.

### **Receiving and Sharing of Information from and with Third Parties**

We reserve the right to receive information about you from other third-party sources, that help us update, expand and analyze our records and identify new customers.

Furthermore, we may share Personal Information necessary to the prevention of fraud, illegal activities, and security breaches. Because of this, it’s possible some of your

personal information may be shared with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud may be passed on to these agencies. Likewise, law enforcement and governmental agencies may access and use certain information pursuant to any law, regulation, or subpoena. This applies to information as it relates to both open and closed accounts.

Additionally, third parties who perform services for us as it relates to security, payment, etc. (such as Internet Service Providers, credit card processors, and merchant banks) may also have access to your information in the performance of such necessary services.

Finally, we may disclose anonymous information about user habits to third party advertisers on our Site. Should we buy or sell assets of our company, another company may need to review our company's assets, which might include your information, to make business decisions as to whether to acquire such assets.

## **HOW WE SECURE ACTIVE AND PASSIVE INFORMATION**

We secure your personal information submitted by you by using reasonable efforts to prevent unauthorized access or disclosure, or accidental loss of Active and Passive Information. Individual postings on this Site and other communications to our office via email or standard mail may not be secure unless we advise you that security measures are in place prior to your submission of information. Therefore, if you choose to communicate with us through these means, you are assuming the risk of doing so and we respectfully request that you do not send or post sensitive information through these means.

### **Accessing and Correcting Your Information**

We take reasonable measures to ensure that any PII we collect on our Site is accurate, current, complete, and reliable for its intended use. If you wish to update or otherwise correct PII provided to us, you may edit your information online.

### **Protecting Your Information**

We acknowledge your trust and are committed to take reasonable steps to protect PII provided from loss, misuse, and unauthorized access. We employ physical, electronic, and managerial processes to safeguard and secure your information.

It is your responsibility to safeguard the password you use to access our Site and to promptly advise us if you ever suspect that your password has been compromised. We strongly encourage you to change your password regularly to prevent unauthorized access. Because your identification number and password are specific to you, you acknowledge sole responsibility for any and all use of our Site conducted with your identification number and password.

### **Links to Other Websites**

Links to third-party websites may be provided solely for your information and convenience or to provide additional shopping for various other goods and services through our Merchant and Services Partners. If you use these links, you will leave our Site. This Privacy Statement does not cover the information practices of those websites nor do we control their content or privacy policies. We suggest that you carefully review the privacy policies of each site you visit.

### **Children's Privacy Protection**

We take special care to protect the privacy needs of children and encourage parents to be an active participant in their child's online activities. Our Site does not target and is not intended for children under the age of 18, and we will not knowingly collect PII from them. If we discover personal data from a child through our Site, we will eliminate that data. You may learn more about protecting children's privacy online by visiting: <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children%27s-privacy>.

### **CHANGES TO THIS POLICY**

Any updates or changes to the terms of this Privacy Policy will be posted on our Site and the date of the newest version posted below. Please check back frequently, especially before you submit any PII at our Site, to see if this Privacy Statement has changed. By using our Site, you acknowledge acceptance of this Privacy Statement in effect at the time of use.

**YOUR USE OF OUR SITE MEANS THAT YOU ACCEPT THE PRACTICES SET FORTH IN THIS POLICY. YOUR CONTINUED USE INDICATES YOUR AGREEMENT TO THE CHANGES.**

For any additional questions on this Policy, please direct inquiries to [privacy@veribella.com](mailto:privacy@veribella.com).