Privacy Policy

Effective Date / Last Updated: 07/10/2024

To print this Privacy Policy, please click here.

This Privacy Policy applies to the sites and apps where it is posted, including everydayconsumers.com (together with any mobile version, or other related functionality, the "**Site**"). It explains how we collect, share, use, and protect personal information and data collected through this Site. "We", "us," and "our" generally refers to Crossroads.ai, LLC and its affiliate companies that operate the Site. "You" and "your" refers to any person who accesses or uses this Site. By using the Site, you authorize our ability to collect, use, disclose, share, and sell your personal information as set forth below in this Privacy Policy, and also agree to be bound and abide by our <u>Terms of Use</u> and this Privacy Policy (collectively, the "Terms") in effect at the time of use. California residents can review <u>Section 7</u>, below, for our Notice at Collection. Do not access or use this Site if you do not agree with these Terms.

We may change this Privacy Policy from time to time. When we do, we will post the revised Privacy Policy on this page with a new "effective date" date. If we make any material changes, we will notify you by means of a notice on the home page of the Site. Any changes to this online Privacy Policy will become effective when posted unless indicated otherwise.

By using the Site, you represent and warrant that you are of legal age to form a binding contract and meet all of the eligibility requirements in these Terms. The Site is intended only for individuals who are at least 18 years old. We do not have actual knowledge that we sell or share personal information from children under 16.

1. CATEGORIES OF INFORMATION WE COLLECT

We may collect the categories of information from you described below when you use our Site and where we believe it is reasonably required for our business purposes.

1.1. Customer and Online Data. We collect and use third-party analytics tools to help us collect and store other information about you and your visit to, or use of, our Site. Such information may include:

1.1.1. Personal information you voluntarily provide. This includes contact information (such as name and email address) you may be prompted to provide while using our Site.

1.1.2. Communications. We also receive information you may provide through the Site (e.g., feedback, inquiries, etc.) and communications between you and us, such as chats, emails, or messages.

1.1.3. Information collected automatically through web technologies. When you use our Site, we may automatically collect certain elements of your internet information, such as IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp,

and/or clickstream data. This information is collected through web technologies, including cookies, tracking pixels, web beacons, Javascript, and other similar technologies (collectively "**Web Technologies**"). If you arrive at the Site by "clicking" on or from an email, ad, or other website, we may collect certain information about you through the use of cookies, web beacons, and other tracking technology, such as the terms you were searching that led you to the Site, or your clicks while on the Site. We may also use cookies and web beacons in any email communications we send, which help us track whether and when an individual opens and/or clicks on the emails and how they engage with the links contained within.

1.1.4. Service providers and contractors. We may receive personal information about you from our service providers and contractors, such as internet service providers.

1.1.5. Third-parties. We may receive personal information about you from third-parties, such as affiliates and marketing and advertising partners.

1.1.6. Mobile Activity. When you use a mobile device to connect to our Site, we may collect a unique device identifier or other device information.

1.1.7. Usage Details and Session Information. We may collect information about your interactions with our Site (such as the date, time, and length of visits, and specific pages or content accessed during the visits, frequency of visits, and referring website addresses). We may also log the details of your visits to our Site and information generated in the course of using our Site, such as mouse movements, clicks, page visits, text entered, how long you spent on a page, and other details of your actions on our Site.

1.1.8. Device Information. We may collect the IP address and other details of a device that you use to connect with our Site (such as device type and unique device identifier, operating system, browser type, and mobile network information).

1.1.9. General Location Information. We may collect general location information about you based on IP address or ZIP code.

1.2. <u>Third Party Collection</u>. Our third-party partners may also use Web Technologies to capture information about your use and interaction with the Site. For instance, third-party service providers, including those that enable us to provide the Site, search feeds, and featured links, and social media platforms utilize their own Web Technologies on the Site. We may display certain advertising offers on the Site or allow third party service providers, advertisers, ad networks, or other third parties to advertise on the Site. Additionally, we may use third party software to serve ads on the Site, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use Web Technologies to help manage and optimize your online experience with us. These third-party service providers may use information collected to record advertising, and for statistical analysis. They may also combine information collected with other information collected across the internet or from other websites. Please see below regarding your choices with respect to cookies and to opt-out of sale / sharing / targeted advertising with respect to your personal information.

2. HOW WE USE YOUR INFORMATION

2.1. **Essential Purposes**. We may use information we collect as we believe to be necessary or appropriate for certain essential purposes. These purposes are listed below (collectively, the "**Essential Purposes**") and include:

2.1.1. As permitted or required by law, including to comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations, and our policies;

2.1.2. To detect, prevent, or investigate fraud, and suspicious or illegal activities;

2.1.3. To enforce our Terms of Use and other legal terms;

2.1.4. To evaluate, negotiate, or conduct a merger, sale, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of all or any portion of our business, assets, or equity, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding (collectively, "**Business Transactions**"), in which your personal information is or may be among the assets sold or transferred;

2.1.5. To manage any other business relationship between you and us and carrying out our obligations and enforcing our rights arising from any contracts entered into between you and us;

2.1.6. To verify your identity if you make privacy-related requests;

2.1.7. To create aggregated or de-identified data, which we may use for any purpose, unless prohibited by law;

2.1.8. To protect our rights, privacy, safety, property, operations, or security and/or that of our affiliates, business partners, you, or others; and

2.1.9. To allow us to pursue available remedies or limit the damages that we may suffer.

2.2. <u>Customer and Online Data.</u> In addition, Customer and Online Data may be used for the following business purposes (collectively, "**Business Purposes**"):

2.2.1. To provide you with products or services or to otherwise fulfill your requests;

2.2.2. To provide personalized advertising, content and information through our Site, thirdparty websites, email, and/or other communications, which could include information or offers of various products or services that you may be interested in;

2.2.3. To notify you about changes to our Site;

2.2.4. To provide customer service support;

2.2.5. To operate and improve the functionality of our websites, as well as our business and operations, including internal administration, auditing, and troubleshooting for our Sites;

2.2.6. To conduct testing, research, analysis, and product development, including to develop and improve our Site;

2.2.7. To monitor metrics such as total number of visitors, traffic, advertisement placement, and demographic patterns;

2.2.8. To provide, improve, test, and monitor the effectiveness of the Site, and diagnose and fix technology issues; and

2.2.9. To understand our customer base, advertise our Site to you and other prospective customers, display relevant content and ads, monitor the performance of our Site, improve the user experience, and enhance the security of our Site.

3. HOW WE DISCLOSE YOUR INFORMATION

3.1. We may disclose personal information, for the Essential Purposes and Business Purposes noted above, to the following categories of entities:

3.1.1. Legal affiliates within the Crossroads.ai family of companies, including affiliated entities controlling us, under our control, or under common control with us;

3.1.2. Service providers and contractors who provide technology, business, professional, research, security, legal expertise or other such services to us (such as website hosting, information technology and related infrastructure, customer services, fraud prevention, internet, and email delivery);

3.1.3. Third parties engaged in publishing, advertising, marketing or promotional activities, including, without limitation, ad networks, search engines, social media platforms, content publishers, and advertising feed providers;

3.1.4. Data analytics providers who report on and help us analyze and monitor traffic to, from, and within our websites;

3.1.5. External parties (including government agencies) to comply with legal requirements, including, but not limited to, regulatory, court, and law enforcement demands (e.g., subpoenas, court orders, etc.) (collectively, "Legal Requirements"); to prevent and address fraud, security or technical issues, and to respond to an emergency or otherwise to protect our rights, property or security as well as that of our customers and other third parties (collectively "Security Purposes").

3.1.6. External parties in the event of any evaluation, negotiation and/or completion of any Business Transaction.

4. HOW WE STORE YOUR INFORMATION

By using our Site, you consent to the transfer and use of your personal information anywhere where our Site or our service providers maintain facilities, consistent with this Privacy Policy. We keep personal information at least as long as necessary for business purposes, our retention policy, and legal requirements. Although we implement commercially reasonable administrative, physical and technical security measures designed to protect your personal information from unauthorized access or use, we cannot guarantee that the information will not be accessed, disclosed, altered, or destroyed.

Please note that information you send to us electronically may not be fully secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us.

5. YOUR CHOICES ABOUT YOUR INFORMATION

5.1. **Privacy Rights.** Residents of certain US states may have all or some of the following rights with respect to their personal information within the scope of applicable state laws. Where such laws apply to you, we will endeavor to fulfill your requests as and to the extent required, and within the time provided, under the relevant state law. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

California residents should review $\underline{\text{Section 7}}$ for information specific to their rights under California law.

5.1.1. Right to Access. You may have the Right to Access the personal information we have collected about you (if any) and information regarding the sources of that personal information, the purposes for which we collect it, and the categories of third parties and service providers with whom we share it. Oregon residents may have the right to know the third parties to which we disclosed personal information.

5.1.2. Right to Correct. You may have the Right to Correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

5.1.3. Right to Delete. You may have the Right to Delete personal information that we have collected from you.

5.1.4. Exercising Your Rights. If you live in a state that provides for such protections, you may submit a request by clicking <u>here</u>. To protect your personal information, you may be required to verify your identity before we can act on your request. Thus, we may ask you to provide personal identifiers we can match against information we may have collected from you previously, and to confirm your request using the contact information provided in the request. If we need additional information, we will let you know.

5.1.5. Right to Appeal. There may be certain circumstances that prevent us from processing your privacy right request. In such instances we will explain our reasons for declining your request, and if you live in a state that provides for such protections, you may submit an appeal by emailing us at privacy@crossroads.ai and noting in that email that you are specifically appealing a prior denial of your request.

Right to Non-Discrimination. You have the right to be free from discrimination if you 5.1.6. exercise privacy rights under state law.

Right to Opt-Out. We may engage in "targeted advertising" and "sell" or "share" (as 5.2. applicable and such terms are defined under applicable state law) information we have collected to third parties to provide more relevant ads or content to you. For example, Customer and Online Data may be shared with or collected by third parties, such as ad networks, data analytics providers and social media platforms, about your visit to, or use of, our Site, and will be used by those parties for their own purposes. Some of these third parties may be able to associate such information with you based on other information they have collected independently (not from us). You can opt-out of "sales" or "sharing" of your personal information with certain third parties by clicking the "Do Not Sell or Share My Personal Information" link on the Site and submitting the appropriate requests. This link can be found at the bottom of the Site.

Cookies. We use cookies, such as Google Analytics, to analyze traffic over time and 5.3. across our and third-party websites and participate in interest-based advertising, also known as online behavioral advertising. We also use cookies to enhance your browsing experience. You can take the following steps to limit data shared with third parties via tracking cookies. Certain selections are specific to the device, website, and browser you are using, and may be deleted whenever you clear your browser's cache.

Rejecting Cookies. Most web browsers allow a user to reject cookies, but doing so may 5.3.1. diminish your experience with our Site.

5.3.2. Opting-Out of Tracking Cookies. We provide website visitors with the option of turning off tracking cookies by clicking on the "Cookie & Ad Preferences" link found at the bottom of the Site. Please note that if you clear cookies from the cache in your browser, or access our Site via a new device, your preferences regarding cookies & ads may be erased, and you may need to reset them. For more information on how to opt out of Google Analytics, please visit https://tools.google.com/dlpage/gaoptout and

http://www.google.com/safetycenter/tools/#manage-your-ads-preferences.

Global Privacy Control. We respond to the current version of the Global Privacy 5.3.3. Control signal.

5.3.4. Do Not Track. We do not respond to Do Not Track signals.

Emails. If in the future we send promotional emails, you can opt-out from receiving 5.4. promotional emails from us by clicking the "unsubscribe" or similar link within any email.

Please note if you have shared multiple email addresses with us, you will need to make an optout request for each email address.

5.5. <u>Mobile devices</u>. As with cookies, mobile devices may allow a user to block certain information requests (e.g., location information), but doing so may diminish your experience with our Site. Mobile device or mobile operating system providers typically provide instructions on how to adjust such privacy features.

6. LINKING TO THIRD-PARTY WEBSITES AND SERVICES

Our Site contains links to other applications, websites, services or social media platforms that are owned or operated by other companies (collectively, "**Third-Party Websites**"). Third-Party Websites are not subject to our Privacy Policy. We are not responsible for the practices employed by any Third-Party Websites linked to or from our Site, including the information or content contained within them. Your browsing and interaction on any Third-Party Websites, including those that have a link on our Site, are subject to that third party's own rules and policies, not ours. By accessing Third-Party Websites you agree that we are not responsible and do not have control over any third parties that you authorize to access your personal information, which includes linking your activity to any social media platforms or data aggregators.

7. ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

7.1. Notice at Collection

If you are a California resident, you have certain rights under the California Consumer Privacy Act (as amended, "**CCPA**") and to the extent that we collect personal information subject to the CCPA, that information and our practices are described below.

A few things to note when reading this chart:

- The categories we use to describe personal information ("**PI**") are those enumerated in the CCPA. Certain personal information may fall into multiple categories. Categories not discussed here are either not collected or not within the scope of the CCPA.
- We are required by law to list entities to whom we (1) "sell" personal information; or (2) "share" personal information for cross-context behavioral advertising. Under the CCPA, a business "sells" personal information when it discloses it to a third party for monetary or other benefit. A company may be considered a third party either because the purpose for its sharing of personal information is not for an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for other purposes. A disclosure is not considered a sale if it is authorized by you or otherwise does not meet this definition.

Category

Information Types

Collection Details

Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers.	Collected: Yes Source: You, your devices (e.g. mobile, computer, etc.), and Web Technologies. Purposes of collection and use: Includes Essential Purposes and Business Purposes. Categories of Parties to Whom PI is "Sold" or "Shared": We may sell or share your PI with our publishing, advertising and marketing partners. Categories of Parties to Whom PI is Disclosed: We may disclose your PI with our legal affiliates, service providers and contractors, website partners, data analytics providers, and external parties including government agencies.
Personal Information Categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))	e Name, electronic signature, address, or telephone number.	Collected: Yes Source: You, your devices (e.g. mobile, computer, etc.), and Web Technologies. Purposes of collection and use: Includes Essential Purposes and Business Purposes. Categories of Parties to Whom PI is "Sold" or "Shared": We may sell or share your PI with our publishing, advertising and marketing partners. Categories of Parties to Whom PI is Disclosed: We may disclose your PI with our legal affiliates, service providers and contractors, website partners, data analytics providers, and external parties including government agencies.
Protected Classification Characteristics under California or Federal Law	Gender, marital status, national origin, age (40 years or older), veteran or military status.	Collected: No
Commercial Information	Records of personal property, products or services obtained or considered, answers to optional survey questions on our websites, or other purchasing or consuming histories or tendencies.	Collected: No

Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Collected: No
Internet or Other Electronic Network Activity	Browsing history, device ID, search history, and information regarding your interaction with an internet website application, or advertisement.	Collected: Yes Source: You, your devices, and through Web Technologies. Purposes of collection and use: Includes Essential Purposes and Business Purposes. Categories of Parties to Whom PI is "Sold" or "Shared": We may sell or share your PI with our publishing, advertising and marketing partners. Categories of Parties to Whom PI is Disclosed: We may disclose your PI with our legal affiliates, service providers and contractors, website partners, data analytics providers, and external parties including government agencies.
Geolocation Data	Non-precise physical location of you or your device, including zip code and IP address.	Collected: Yes Source: You, your devices (e.g. mobile, computer, etc.), and through Web Technologies. Purposes of collection and use: Include Essential Purposes and Business Purposes. Categories of Parties to Whom PI is "Sold" or "Shared": We may sell or share your PI with our publishing, advertising and marketing partners. Categories of Parties to Whom PI is Disclosed: We may disclose your PI with our legal affiliates, service providers and contractors, website partners, data analytics providers, and external parties including government agencies.
Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	Collected: No

Professional or employment-related information	<i>Current or past job history or performance evaluations.</i>	Collected: No
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists ,student schedules, student identification codes, student financial information, or student disciplinary records.	Collected: No
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Collected: Yes Source: You, your devices, and through Web Technologies. Purposes of collection and use: Includes Essential Purposes and Business Purposes. Categories of Parties to Whom PI is "Sold" or "Shared": We may sell or share your PI with our publishing, advertising and marketing partners. Categories of Parties to Whom PI is Disclosed: We may disclose your PI with our legal affiliates, service providers and contractors, website partners, data analytics providers, and external parties including government agencies.

7.2. Retention. The length of time we retain personal information will depend on a number of criteria, including (i) the length of time we are required to retain personal information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain personal information in order to accomplish the business or commercial purpose(s) for which such personal information is collected, used or disclosed (as indicated in this Privacy Policy), and (iii) whether you choose to exercise your right (subject to certain exceptions) to request deletion of your personal information.

7.3. Notice of Financial Incentive. We do not provide a financial incentive, a price, or service difference to customers in exchange for the retention or sale of their personal information. We may send promotions or offers to customers or other individuals who elect to receive marketing communications, unless a customer has opted-out of such communications. We do not offer financial incentives to deter customers from making such requests.

7.4. CCPA Rights: If you are a California resident, you may have the following rights with respect to your personal information within scope of the CCPA:

7.4.1. Privacy Rights: the Right to Access, the Right to Correct, the Right to Limit, the Right to Delete, the Right to Opt-Out, and Right to Non-Discrimination. For more information on these rights, please refer to Section 5 of this Privacy Policy.

7.4.2. Exercising Your Rights. You may submit a request for access to your personal information, to correct your personal information, to opt-out of the sale or sharing of your personal information, or to limit the use or disclosure of, or to delete your personal information, by clicking <u>here</u>. To protect your personal information and process your request, we may ask you to provide personal identifiers we can match against information we may have collected from you previously, and to confirm your request using the contact information provided in the request. If we need additional information, we will let you know.

7.4.3. Authorized Agents. You may authorize another individual or a business, called an authorized agent, to make requests on your behalf through these means.

7.5. Shine the Light – Your California Privacy Rights. California residents have the right to request information from us regarding whether we have disclosed certain categories of information to other companies for their direct marketing purposes. If you are a California resident and would like to make such a request, you may do by submitting a Right to Access request for your personal information as outlined above. Additionally, if you would like us to not disclose your personal information to other companies for their direct marketing purposes you may opt-out of such disclosures by clicking the "Do Not Sell or Share My Personal Information" link located at the bottom of on our websites.

8. HOW TO CONTACT US

8.1. Please direct questions or concerns about this Privacy Policy or our Site to us at privacy@crossroads.ai.