

# Privacy Policy

## Go Vertical ICM, LLC

### (June 2024)

Go Vertical ICM LLC (“**Company**”, “**Us**” or “**We**”) respect your privacy and are committed to protecting it through our compliance with this policy.

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#### **Introduction**

This policy describes the types of information we may collect from you or that you may provide when you communicate with us, enter into contractual relationships with us for our products, professional services and related commercial transactions, or visit our “**Website**” and use our products, services, contractors, vendors or applications, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, telephonic and other electronic messages between you and us including using this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- When you use our products or services or applications.
- From our business partners and other third parties.

It does not apply to information collected by:

- Any third party that maintains its own separate privacy policy.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website or our products and services. By accessing or using this

Website, you agree to this privacy policy. This policy may change from time to time (June 17,2024). Your continued use of this Website or our products and services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

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### **Children Under the Age of 16**

Our Website and products and services are not intended for children under 16 years of age. No one under age 16 may provide any personal information to us directly via email, telephone, social media posting or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at (provide email address here.)

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### **Information We Collect About You and How We Collect It**

We collect several types of information from and about customers, potential customers and users of our Website, including information:

- By which you may be personally identified, such as name, postal address(es), e-mail address, telephone number, job title, or any other identifier by which you may be contacted online or offline (“**personal information**”);
- That is about you but individually does not identify you, such as your employer, interest in our products and services; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you voluntarily provide it to us and communicate with us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners, contractors, professional advisors including accountants, attorney, intellectual property specialists and others.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

### *Information You Provide to Us*

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of requesting further services. We may also ask you for information when you enter a promotion sponsored by us, and when you report a problem with our Website.

- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to offerings of our services and our proposals, or surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out directly with us or through our Website and of the fulfillment of your orders.
- Your search queries on the Website.

### *Information We Collect Through Automatic Data Collection Technologies*

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, time zone setting, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, hardware, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically may include personal information or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Recognize you when you return to our Website.

- Speed up your searches.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

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### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services.

They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us or that we offer to you.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for product and service delivery, fulfillment, billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To operate and improve our business, and to administer, protect and improve our products, services and systems.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent, which consent you may withdraw by contacting us.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please contact us to opt-out.

## **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, professionals including accountants, auditors, attorneys and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users, customers and prospective customers is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to request additional information, we will use your email address to provide that information to you, and will transmit it to third parties as necessary to fulfill your request.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use or Conditions and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Go Vertical ICM, LLC, our customers, or others. This includes exchanging information with

other companies and organizations for the purposes of fraud protection and credit risk reduction.

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### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your email address/contact information used by the Company to promote our own or third parties' products or services, you can opt-out by checking the relevant box located on the form on which we collect your data or at any other time by sending us an email stating your request to [info@govertical.co](mailto:info@govertical.co) . If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

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

You may send us an email at (provide email address here to request access to, correct or delete any personal information that you have provided to us. We may not be able to delete all of your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.



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## Your GDPR Rights

If you are a citizen of the European Union, you may have additional rights under the GDPR or other privacy laws regarding use of your personal information. Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Accordingly, if the GDPR applies to you, you have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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## **Data Security**

We store and process data in the United States and on servers that may be located elsewhere around the world. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for

circumvention of any privacy settings or security measures contained on the Website.

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### **Retention**

We retain information while you have an active account or as needed to provide you with services and information you requested. We will delete personal data within a reasonable time after the data is no longer necessary for the business purpose for which it was collected. We will also retain and use personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

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### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. 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 email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

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### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Go Vertical ICM, LLC ([info@govertical.co](mailto:info@govertical.co))

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**Use of Our website, products and services after we make changes is deemed to be your acceptance of those changes, so please check the policy periodically for updates.**

**"No mobile information will be shared with third parties/ affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not<sup>11</sup> be shared with any third parties"**

