

## Privacy Policy

This Privacy Policy describes how Pournader and Company Inc. d/b/a P&C Global (together with affiliates, “P&C Global”) collects, uses, or discloses personal information that we receive through our website (<https://pandcglobal.com/>) and any mobile applications or other related online or offline services that we may offer (collectively, the “Services”). This policy also describes your choices about the collection and use of your information. Note that if you have a business relationship with us, the terms of that relationship will control.

Please read the Privacy Policy carefully before you start to use our Services. By using the Services, you agree to be bound and abide by our posted Terms of Use (“Terms”) and this Privacy Policy. If you do not agree to both the Terms and our Privacy Policy, or if you violate them in any way, your right to access or use the Services is terminated. *Please see Sections 5-6 of our Terms regarding your legal rights in any dispute involving our Services.*

### 1. How We Collect Information

We may collect information about you by various means, including:

- Directly from you, both online and offline;
- Through our Services; and
- From other third-party sources and social media platforms that you may use to engage with us, as well as from our affiliates, partners or third parties, including but not limited to public databases, for the purposes provided below, and/or to supplement information we already possess.

### 2. Types of Information We Collect

In order to better provide you with our Services, we may collect the following categories of information:

- *Contact information*, such as your name, mailing address, e-mail address, phone number, and business interests, which may include signing up to some of our communications;
- *Communications* between you and us, such as via e-mail, web form, mail, phone, or other channels;
- *Offline activity* you engage in with us (e.g., phone, conferences); and
- *Online User Activity* described in the next section.

If you provide us with information regarding another individual, you represent that you have that person’s consent to give us his or her information and to permit us to use the information in accordance with this policy.

### 3. Online User Activity, Cookies, and Information Collected by Other Automated Means

Cookies are a commonly used web technology that allow websites to store and retrieve certain information on a user's system, and track users' online activities. We, our service providers, and our advertising partners may use such technology to collect information about your use of the Services by such automated means, including but not limited to cookies, pixels and other similar technologies.

These technologies may help us automatically identify you when you return to our Services. Cookies help us review website traffic patterns, improve the Services, and determine what Services are popular. We can also use such information to deliver customized content and advertising to users of the Services whose behavior indicates that they are interested in a particular subject area.

When you use the Services, the information that we may collect by automated means includes, for example:

- *Usage Details* about your interaction with our Services (such as the date, time, and length of visits, and specific pages or content accessed during the visits, search terms, frequency of the visits, and referring website addresses);
- *Device Information* including the IP address and other details of a device that you use to connect with our Services (such as device type and unique device identifier, operating system, browser type, and mobile network information); and
- *Location information* where you choose to provide the Services access to your device's location information.

We may also ask advertisers or other partners to serve ads to you, which may use cookies or similar technologies placed by us or the third party. If a user does not want information collected through the use of cookies, most browsers allow the visitor to reject cookies, but if you choose to decline cookies, you may not be able to fully experience the interactive features that our Services provide. We may share non-personal information obtained via cookies with our advertising partners. Because there is not yet a consensus on how companies should respond to web browser-based do-not-track ("DNT") mechanisms, we do not respond to web browser-based DNT signals at this time.

You may see us advertising on various websites, web pages, social media, and other platforms. We may not always be made aware of the platforms or websites on which our advertising may appear, and if you believe that our advertising is being displayed through channels that promote inappropriate or offensive content, please contact us as directed below.

#### **4. How We Use Information We Collect**

We may use the information that we obtain about you for purposes allowed by applicable laws, including:

- Provide our Services to you and respond to your inquiries and other communications;
- Tailor the content that we display to you in our Services and communications, including advertising, and offer products and information that we believe may be of interest to you;
- Operate, evaluate, and improve our Services, including to diagnose or fix technology problems;

- Monitor the performance of our Services including metrics such as total number of visitors, traffic, and demographic patterns, as well as analyze and enhance our communications and strategies (including by identifying when emails sent to you have been received and read);
- Provide you with administrative notices, such as to inform you about changes to this Privacy Policy and our Terms; and
- Comply with and enforce as needed applicable legal requirements, industry standards, our policies, and our contractual rights.

We may also use or share information in an anonymized or aggregate manner for many purposes such as research, analysis, modeling, marketing and advertising, as well as improvement of our Services.

## **5. How We Share Your Information**

We will not disclose your personal information to third parties without your consent, except in the following circumstances:

- We may share your information as permitted by law, including, for example, with our corporate affiliates, and service providers that we believe need the information to perform a technology, business, or other professional function for us (examples include IT services, maintenance and hosting of our Services, payment processors, shipping and returns partners, marketing partners, and other service providers). We only provide such vendors with information so that they can perform their required functions on our behalf.
- We may also disclose information about you: (i) if we are required to do so by law or legal process; (ii) when we believe disclosure is necessary to prevent harm or financial loss; (iii) in connection with an investigation of suspected or actual fraudulent or illegal activity; or (iv) under exigent circumstances to protect the personal safety of our staff, users, or the public.
- We reserve the right to transfer the information that we maintain in the event that we sell or transfer all or a portion of our business or assets. If we engage in such a sale or transfer, we will make reasonable efforts to direct the recipient to use your personal information in a manner that is consistent with this Privacy Policy.

Where appropriate, we will limit sharing of your information in accordance with the choices that you have provided us and applicable law.

## **6. Your Privacy Choices**

We offer you certain choices about what information we collect from you, how we use and disclose the information, and how we communicate with you.

- *Marketing Emails:* From time to time, we may contact you via email or through other channels for the purpose of providing announcements, promotional information and/or other general communication. In order to improve our Services, we may be notified when you open an email from us or click on a link therein. You may choose not to receive marketing emails from us by clicking on the unsubscribe link in the marketing emails you receive from us. Even if you opt out of receiving such communications, we may continue sending you non-marketing email

communications, such as administrative or transaction alerts, or information about changes to our terms of service.

- *Cookies:* Web browsers may offer users the ability to disable receiving certain types of cookies; however, if cookies are disabled, some features or functionality of our Services may not function correctly.

## **7. Links to Other Websites and Third-Party Content**

Our Services may contain links to other websites or apps. This can include social media integrations. Please be aware that we are not responsible for the content or privacy practices of such other websites or apps, and we encourage you to be aware when you leave our Services and to read the privacy statements of any other website or app that collects personal information.

## **8. How We Protect Information**

We endeavor to maintain reasonable administrative, technical, and physical safeguards designed to protect the personal information that we maintain against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, we cannot ensure the security of any information that you transmit to us, or guarantee that this information will not be accessed, disclosed, altered, or destroyed. We will make any legally required disclosures in the event of any compromise of personal information. To the extent the law allows us to provide such notification via e-mail or conspicuous posting on the Services, you agree to accept notice in that form.

## **9. Children**

We do not knowingly collect personal data from children under the age of 13 on our Services. If you have reason to believe that a child under the age of 13 has provided personal information to us through our Services, please contact us. We endeavor to delete personal information from our systems in the event that we learn that we collected it from a child under the age of 13.

## **10. International Data Transfers and Use**

Our Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country, or territory other than those of the United States. Any information that you provide through use of the Services may be stored and processed, transferred between, and accessed from, the United States and other countries which may not guarantee the same level of protection of personal information as the one in which you reside. However, we will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is stored or accessed.

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your personal information, potentially including sensitive data, by us from your region to countries which do not have data protection laws that provide the same level of protection that exists in countries in the European Economic Area, including the United States. By providing your personal information, you consent to any transfer and processing in accordance with this Privacy Policy.

## 11. State-Specific Notices

For California residents, the California Consumer Protection Act (the “CCPA”) provides various rights to individuals and households with respect to the collection and use of personal information that we have collected about you. Among other rights under the CCPA, you may have the right to request that we: (i) disclose to you any personal information that we have about you; (ii) delete personal information that we have about you (subject to certain exceptions); or (iii) not “sell” your information to a third party (excluding qualified service providers), as that term is interpreted under the CCPA. It is unlawful for us to discriminate against you because you exercised any of your rights under the CCPA. If you are a California resident, you can submit such requests to us via the contact information provided below and we will complete the request within the timeframe permitted by law.

For Nevada residents, please note that we do not sell personal information as defined by Nevada law (Ch. 603A, Sec. 1.6). You can submit a request to us regarding the sale of such information via the contact information provided below.

## 12. European Residents

Our Services provided in the United States are not intended to subject us to the laws or jurisdiction of any state, country or territory other than those of the United States, as provided in our Terms.

With respect to Services that are subject to the laws of the European Union or European Economic Area (together with the United Kingdom and Switzerland for purposes herein, the “EU”), we provide as follows:

- For the purposes of the General Data Protection Regulation (GDPR) and similar privacy laws in the EU, (i) we are a data processor when delivering Services to a user on behalf of another party who is operating as the data controller (such as when we operate as a processor under a data processing agreement), but (ii) we are a data controller if we provide Services directly to a user without any controller-processor relationship. These roles have different responsibilities under applicable data protection laws.
- When operating as a data processor, we process personal data under the terms of a contract between us and the data controller. This is to ensure that any personal data is processed lawfully and securely. This defines the purpose, duration and nature of processing, the type of data, categories of recipient and the plan for returning and/or destroying personal data at the end of the contract. When we are a data processor, we cannot operate outside of that contractual relationship with respect to the personal data within its scope and must follow the instruction of the data controller.
- When operating as a data controller, our legitimate interests in processing your personal data are mainly to provide the Services as described in the sections above. We may store personal data throughout the period of your relationship with us and retain it for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying legal, accounting, or reporting obligations or to resolve disputes.
- Under EU privacy laws like the GDPR, you may have the right to make certain requests concerning your personal data, such as knowing what personal data we hold about you and obtaining a copy of it, the right to correct your personal data, the right to have us delete or

restrict our use of your personal data or withdraw any consent you previously provided. Note that these rights may be subject to certain scope and limits under applicable law. If you have any concerns with how data is being used under EU law as described in this section, or would like to submit any such requests, you can contact us as directed below. If you believe that we have violated any rights, we encourage you to contact us first so that we can try to resolve the issue. However, you may have the right to lodge a complaint with an applicable [data protection authority](#).

### **13. Updates to Our Privacy Policy**

We may revise or update this Privacy Policy at any time. We will post the updated version on our Services and may notify you of any significant changes to our Privacy Policy. We will indicate on our Privacy Policy when it was most recently updated. Your continued use of our Services after such updates will constitute your: (i) acknowledgment of such updates; and (ii) agreement to abide and be bound by the updated Privacy Policy.

### **14. Contacting Us**

If you have any questions, concerns, or comments about this Privacy Policy, our privacy practices, or if you would like us to update information or preferences that you provided to us, please contact us via e-mail at [info@pournader.us](mailto:info@pournader.us) or by phone at +1 214-624-9575.

This Privacy Policy was last updated on November 30, 2020.