



GOST® PRIVACY POLICY

Our Privacy Policy has been updated and has an effective date of November 26, 2019.

This Privacy Policy describes our practices regarding the collection, use and disclosure of information collected by Giant Oak, Inc. (“**Giant Oak**”) through our web sites, applications, and other online services that post or include a link to this Privacy Policy (collectively, the “**Sites**”). This Privacy Policy only covers information collected on the Sites and does not cover any information collected offline or at any other web site or elsewhere by Giant Oak (unless specifically stated).

Please review this Privacy Policy carefully. In addition, please review the [Terms of Use](#), which govern your use of the Sites.

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THE INFORMATION WE COLLECT

Information You Provide Us

We may ask you to provide personally identifiable information, which is information that identifies you as a specific identified individual, such as your name or e-mail address (collectively, “**Personal Information**”), and other information about you, demographic information (for example, your gender, age or similar information). Certain features may also collect information about your preferences and interests. If we combine demographic, preference-related or similar information with the Personal Information we collect, we will treat that combined information as Personal Information under this Privacy Policy.

The Sites are not intended for use by anyone younger than the age of 13 and we do not knowingly collect Personal Information from children younger than age 13. If we learn that we have inadvertently collected Personal Information from a user who is younger than age 13, we will delete the information from our active databases.

Information We Collect Automatically

We and third party advertising companies and service providers may use a variety of technologies that automatically or passively collect certain information whenever you visit any Site or otherwise interact with us or our content (“**Usage Information**”). Usage Information may include the hardware model, browser, and operating system you are using, the URL or advertisement that referred you to the Site you are visiting, all of the areas within the Sites that you visit, your time zone, location information, and mobile network (if applicable), among other information. In addition, we automatically collect your IP address or other unique identifier (“**Device Identifier**”) for any computer, mobile phone or other device you use to access our Sites. In some cases, we may directly collect location information through your device. You may be able to turn off the collection of location information through the settings on your device. Usage Information is generally non-identifying, but if Giant Oak associates it with you as a specific and identifiable person, Giant Oak treats it as Personal Information.

The methods that may be used to collect Usage Information include the following:



Cookies and Local Storage

Cookies and local storage are data files placed within a browser on a device when it is used to visit a Site. Certain web browsers and browser add-ons, such as Adobe Flash, may provide additional local data storage mechanisms. For example, a Flash cookie is a data file placed on a device via the Adobe Flash plugin. Cookies and local storage can be used for a variety of purposes, including to store a unique identifier for your device that recognizes your device as you visit the Sites or other web sites or online services and to remember your preferences. Most browsers provide you with the ability to disable or decline cookies and local storage. You will need to check your browser's settings for further information. For more information about Flash and the privacy choices Adobe offers, visit http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html. If you choose to disable cookies or to adjust your Flash privacy settings on your device, some features of a Site may not function properly.

Web Beacons

Small graphic images or other web programming code called web beacons (also known as "1x1 GIFs" or "clear GIFs"), may be included in our web pages and e-mail messages. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to a Site, to monitor how users navigate a Site, to count how many e-mails that were sent were actually opened or to count how many particular links were actually viewed.

Information Third Parties Provide About You and Social Media Interactions

Giant Oak may receive information about you from third parties, including business partners and data providers. You may also have the opportunity to interact with a third party application or feature available through a Site, such as features that allow you to log-in through, access, or otherwise connect your account on a third party service (e.g., Facebook or Twitter). If you choose to utilize such a third party service, we will receive information about you from that third party service (which may include Personal Information) and they may receive information about your use of the Sites. Through these features, third parties may collect your IP address or other Device Identifier, which page you are visiting on a Site, and may set cookies to enable the third party feature to function



properly. If you choose to post information to a third party platform, that information may be public.

We may combine the information we receive from those other sources with information we collect through the Sites. In those cases, we will apply this Privacy Policy to the combined information. The information collected and stored by the third party is subject solely to the third party's privacy practices.

OUR USE OF INFORMATION COLLECTED THROUGH THE SITES

Giant Oak may use information collected through the Sites, including Usage Information and Personal Information, to: (1) allow you to participate in features we offer or to provide related customer service; (2) recognize you across the Sites and across devices; (3) tailor content recommendations and offers we display to you, both on the Sites and elsewhere online; (4) process your transactions; (5) provide you with information, products, or services that you have requested or that we think may interest you; (6) investigate and prevent fraudulent transactions and other illegal activities or activities that violate our policies; (7) process your registration, including verifying your information is active and valid; (8) improve the Sites or our services and for internal business purposes; (9) contact you with regard to your use of the Sites or any Giant Oak service and, in our discretion, changes to the Sites' policies; and (10) for purposes disclosed at the time you provide your Personal Information or otherwise with your consent. We may also use and share non-personal information in our discretion and we may use non-personal information, including information that has been de-identified (typically by using a mathematical process known as a "hash"), to make inferences about you and offers and content you may be interested in.

DISCLOSURE OF INFORMATION TO THIRD PARTIES

Giant Oak may share non-personally identifiable information, such as information that has been de-identified, aggregated user statistics, or a Giant Oak identification or transaction number, with third parties in our discretion.

We may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information or otherwise with your consent, and as described below or elsewhere in this Privacy Policy.



We do not share your Personal Information with third parties for those third parties' own direct marketing purposes. California Residents, please see below for additional information on ["Your California Privacy Rights."](#)

When You Request That We Share Your Information

We may share information when you request that we do so. For example, you may be presented with an opportunity to receive information and/or marketing offers from one or more third parties. If you agree at that time to have your Personal Information shared, your Personal Information will be disclosed to that third party (or parties) and will be subject to their privacy practices. Or, you may choose to interact with a third party application or feature, through which information about you is shared. Please note that we are not responsible for the privacy practices of third parties. If you later decide that you no longer want to receive communications from a third party, you will need to contact that third party directly.

Third Parties Providing Services on Our Behalf

We may share information about you, including Personal Information, with third party vendors to enable them to perform services on our behalf. We may share various information relating to our users and fraudulent or potentially fraudulent activities with our fraud prevention and similar vendors, and they will use this information to help us and their other clients prevent fraudulent and illegal transactions.

Administrative and Legal Reasons

We may also transfer and disclose user information, including Personal Information, to third parties: (i) in the event we are required to respond to subpoenas or other legal process or if in our opinion such disclosure is required by law; (ii) at the request of governmental authorities conducting an investigation; or (iii) to protect and/or defend the [Terms of Use](#) or other policies applicable to a Site or our services or to protect the personal safety, rights, property or security of Giant Oak, our customers, or a third party. We may also use Device Identifiers, including IP addresses, to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies in our discretion.



Business Transfers

Giant Oak may share Personal Information with its subsidiaries and affiliates, primarily for business and operational purposes. Giant Oak reserves the right to disclose and transfer all information related to Sites, including Personal Information: (i) to a subsequent owner, co-owner or operator of a Site or applicable database; or (ii) in connection with a corporate merger, consolidation, restructuring, bankruptcy, the sale of certain of Giant Oak' ownership interests, assets, or both, or other company change, including, without limitation, during the course of any due diligence process.

THIRD-PARTY ANALYTICS COMPANIES

We use analytics providers to provide us with information regarding the use of the Sites. These third parties may set and access their own tracking technologies on your device (including [cookies](#) and web [beacons](#), and they may otherwise collect or have access to information about you, including Usage Information. Some of these parties may collect Personal Information over time when you visit the Sites or other online websites and services. We may share non-personal information, including information that has been de-identified, Usage Information, and location information, with third party analytics providers and other third parties.

We may use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Sites and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/ and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

HOW WE RESPOND TO "DO NOT TRACK" SIGNALS

Note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. Like many websites and online services, the Sites do not alter their practices when they receive a "Do Not Track" from a visitor's browser. To find out more about "Do Not Track," please visit www.allaboutdnt.com.



CHANGING YOUR INFORMATION

You are responsible for the accuracy of the information you submit to us, such as your contact information. You may also contact us at privacy@giantoak.com if you have questions about or wish to modify certain information that we have collected from or about you. Note that when you modify your Personal Information or change your preferences on a Site, information that you remove may persist internally for Giant Oak’s administrative purposes or within backup media. If you have made any public postings on a Site, these communications cannot generally be removed.

YOUR CHOICES

You may opt out of receiving marketing e-mails by following the opt-out instructions provided to you in those e-mails. Please note that we reserve the right to send you certain communications relating to your account or use of the Sites or Giant Oak services, such as administrative and services announcements. These transactional account messages may be unaffected if you choose to opt out from marketing e-mails.

If you sign up to receive SMS or MMS messages from Giant Oak, you may unsubscribe from any SMS or MMS messages received by replying “STOP”.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits residents of California to request certain details about how their Personal Information has been shared during the prior calendar year with third parties for those third parties’ own direct marketing purposes. This information includes the categories of Personal Information and types of services provided to the individual, as well as a list containing the names and addresses of all third parties to which the visitor information was disclosed. As stated above, Giant Oak does not share Personal Information with third parties for those third parties’ own direct marketing purposes.

If you are a California resident and you have questions about the disclosure of Personal Information about you, please write us at:



Attention Privacy Office
1515 N. Courthouse Road
Suite 1120
Arlington, VA 22201
privacy@giantoak.com

You must put the statement “Your California Privacy Rights” in the subject field of your email or in the address line of your envelope. You must include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

THIRD PARTY CONTENT, SITES & DEVICES

The Sites may contain content that is served by someone else or links to third party content or web sites that Giant Oak does not control. This includes links from sponsors and partners that may use our logo(s) as part of a co-branding relationship. You may also be able to access the Sites through third party devices and platforms, such as a set-top box, internet-connected TV, or similar device. The third party operators and content providers may send their own cookies to your device, they may independently collect data or solicit Personal Information, and may have their own published privacy policies. Giant Oak is not responsible for the privacy practices employed by any third party.

SECURITY

Giant Oak takes commercially reasonable steps to protect and secure Personal Information. However, no data transmission over the Internet, by wireless transmission or any electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information we collect, and you use the Sites and our services and provide us with your information at your own risk.



CONSENT TO TRANSFER

Giant Oak is based in the United States and the information we collect is governed by United States law. By accessing or using the Sites or providing us with any information, you consent to the transfer, processing and storage of your information in and to the United States and other countries, jurisdictions in which the privacy laws may not be as comprehensive as those in the country where you reside and/or are a citizen.

CHANGES TO THE PRIVACY POLICY

Giant Oak reserves the right to change this Privacy Policy at any time without prior notice and will notify you of material changes by posting the changed or modified Privacy Policy on the Sites. We may also provide notice to you in other ways in our discretion, such as through contact information you have provided. Any changes will be effective immediately upon the posting of the revised Privacy Policy unless otherwise specified and your continued use of any of the Sites after the effective date of the revised Privacy Policy will constitute your consent to those changes. However, Giant Oak will not make material changes to how it treats previously collected Personal Information about you without providing notice and giving you the chance to consent (opt-in or opt-out). Note, however, that you may need to consent to our new policies in order to continue to use the Sites and our services.