

## **PRIVACY POLICY**

Last Updated: [12/7/18]

Thank you for visiting our website. This Privacy Policy applies to information collected by AML RightSource (“we”, “us”, or “AML RightSource”) through <https://amlrightsource.com/> (the “Site”). The purpose of this Privacy Policy is to inform you about the types of information we gather about you when you visit the Site, information we may receive from third parties or affiliates, how we may use that information, whether we disclose that information to anyone and the choices you have regarding our use, and your ability to correct, the information. By using the Site, you expressly consent to the use and disclosure of information as described in this Privacy Policy.

This Privacy Policy also governs the use of Personal Information we obtain from you from any third party site or application where we post content or invite your feedback or participation, including, but not limited to, Twitter and LinkedIn (“Social Media Sites”). This policy does not apply to other websites which are linked to the Site. Please also be aware that our promotional partners, advertisers, and sponsors accessible through the Site and websites owned or controlled by independent third parties. We are not responsible for any actions or policies of such third parties. You should check the applicable privacy policies of those third parties when providing personally identifiable information to them.

### **WHAT INFORMATION DO WE COLLECT?**

We collect the following types of information from you when you interact with our Site:

#### **Personal Information**

When you use our Site, you may choose to provide certain information directly to us to request more information or services, including the following Personal Information (“Personal Information”):

- name;
- email addresses;
- telephone and fax numbers;
- postal addresses; and
- IP addresses.

#### **Usage Information**

We may also use cookies and other technologies to automatically gather information about how you use the Site, including:

- new or returning visitor;
- time of visit;

- duration of visit;
- pages viewed;
- where you found this Site (search, direct, social media, etc.);
- country you're visiting from;
- technology you're using (browser, screen resolution, etc.); and
- gender and age range.

We only use, share, and store Personal Information consistent with this Privacy Policy.

## **HOW DO WE COLLECT YOUR INFORMATION?**

We collect Personal Information when you:

- visit our Site;
- create an account;
- request information;
- purchase products or services; and
- participate in surveys, promotional offers, contests or sweepstakes, or reservation confirmations.

We also collect information in several ways by your use of the Site. When you log onto the Site, our servers log your IP address, the URL of your request and other information that is provided in the HTTP header. When you conduct searches on the Site, we may log the search terms that you use. Also, our third-party service providers may ask you voluntarily to provide Personal Information on their websites and may share such Personal Information with us, as governed by their respective privacy policies. Our use of information received from a service provider will be dictated by the service provider's privacy policies and not this Privacy Policy. AML RightSource collects this information in order to provide information about our products and services that will meet the expectations of our users.

### Cookies

A "cookie" is a small data file stored on your web browser or on your mobile device that allows us to recognize your computer or mobile device when you visit the Site by associating identification numbers with other user information you have provided us. Some cookies will remain on the hard drive of your computer or mobile device for the duration of your browser or user session, while others will remain until deleted by you. You may also be able to configure your computer or mobile device to limit the collection of these "cookies," but that limitation may also limit our ability to provide all the services or functionality of the Site. Some third party service providers may use "flash cookies," which are saved on your computer, but cannot be rejected, disabled, turned off, opted out of, or deleted in the same way as regular cookies. To learn how to manage your flash cookie settings, visit the Flash player settings page on Adobe's website.

### Google Analytics

This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. (“Google”), to better assist AML RightSource in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for AML RightSource’s use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that by doing so, you may not be able to use the full functionality of the Site. The use of cookies by Google Analytics is covered by Google’s privacy policy.

You can learn more about Google’s practices at <http://www.google.com/policies/privacy/partners> and view its currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.

## **WHAT DO WE DO WITH YOUR INFORMATION?**

We use your Personal Information to:

- personalize user experience;
- improve our Site;
- improve customer service;
- share your information with third parties pursuant to this Privacy Policy;
- administer a content, promotion, survey or other Site features; and
- send information you agree to receive about topics we think will be of interest to you.

Additionally, we may use cookie-based information or other information collected directly from your mobile device to:

- provide you with access to your user preferences, and sign-in on approved devices;
- help diagnose problems with the Site, administer and improve the Site, and measure the use of the Site;
- identify your internet provider, page views and other information regarding utilization of the Site;
- gather other web analytics information related to your and other users’ use and navigation of the Site;
- aggregate cookie data across all users to track overall visitor traffic patterns and provide this aggregated information to vendors, potential advisors, business partners, new agencies, or other parties to identify interests or plan for technical infrastructure requirements;
- otherwise provide improvements and enhancements to the Site.

To the extent we are able to do so, we may link your Personal Information to information we collect that by itself typically cannot be used to identify or contact you, such as demographic information (e.g. age, profession or gender), browser types, domain names, and other anonymous statistical data involving the use of our Site. We may also link information collected online with information we collect offline or that is collected online by third parties.

## **HOW WE SHARE YOUR INFORMATION**

Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Site.

AML RightSource also may disclose your Personal Information:

- in situations where sharing or disclosing your information is required in order to offer you products or services you desire;
- to our subsidiaries and affiliates with assurances they will treat your Personal Information consistent with this Privacy Policy;
- to a third party or parties, with your consent and where disclosure is required or permitted by law;
- if, in the reasonable judgment of AML RightSource, it is necessary to enforce compliance with our internal policies or to protect our Site, customers, or others; and
- to any other entity that acquires all or a portion of our organization by merger, reorganization, operation of law, or a sale of some or all of AML RightSource's assets.

AML RightSource may also be required to use or disclose your information in connection with a legal action or other proceeding, including without limitation, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request.

## **EMAIL OPT OUT**

From time to time, you may receive e-mails from AML RightSource with news or other information on events, products, services, discounts, special promotions, upcoming events or other offers from or on behalf of AML RightSource. If at any time you wish to stop receiving emails or mailings from AML RightSource please send us an email to [privacy@amlrightsource.com](mailto:privacy@amlrightsource.com) with the phrase "Privacy Opt-out: AML RightSource Mailings" in the subject line, or write to us at the address provided below, and we will remove you from AML RightSource's mailing list. Alternatively, for e-mail communications, you may opt out of receiving such communications by following the unsubscribe instructions set forth at the bottom of most promotional e-mail messages from AML RightSource.

## **THIRD-PARTY SERVICES AND SITES**

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

Once you leave our Site or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our Site's terms.

### Social Media Sites

We work with third parties, including social network sites like Twitter and LinkedIn, and with application developers who specialize in social commerce so we can connect to your social networks. All of these companies operate Social Media Sites. We provide access to our Site by third parties and business partners so we can generate interest in our products among members of your social networks and to allow you to share product interests with friends in your network.

The use of any features made available to you on our Site by a third party may result in information being collected or shared about you by us or by the third party. Information collected or shared through any such third party features is considered public information by us because the Social Media Sites made it publicly available. If you do not want us to be able to access information about you from Social Media Sites, you must instruct Social Media Sites not to share the information. AML RightSource is not responsible for how these third parties may use information collected from or about you so be sure to review the privacy policies and privacy settings on your social networking sites to make sure you understand the information they are sharing. If you do not want a Social Media Site to share information about you, you must contact that site and determine whether it gives you the opportunity to opt out of sharing such information. However, we do identify any areas on our Site where third parties share information about you.

We use features on Social Media Sites that allow you to express positive opinions about our products or services. Those Social Media Sites may collect or register your views about our products and make those views available to AML RightSource and on public portions of the Social Media Sites. If you do not wish any of this to happen, you should not express your views about our products on Social Media Sites, you should not buy our products through Social Media Sites, and you should review your privacy settings on such Social Media Sites. We are not obligated to display your name or other identifying information, account name, profile photo or other information or content on our Site even if you express an opinion about one of our products or have consented to our use of such information or content. We reserve the right to remove the information of any person for any reason. We may also remove from our Sites, in our sole discretion, any product offering or any photo or product description relating thereto. If you would like us to delete the data we have collected about you that we have received through any social media provider or Social Media Site, please contact us. However, if your information is deleted you may not have access to certain promotions, product information or opportunities as a result.

## Links

The Site may list or link to third party products or services. AML RightSource does not have any control over the quality, safety or legality of the items advertised, the truth or accuracy of the listings, the ability of suppliers to sell items or the ability of buyers to buy items. For these reasons, AML RightSource and its affiliates cannot ensure that a buyer or supplier will actually complete a transaction. AML RightSource will not be a party to any transactions between you and such third parties and any correspondence concerning such transactions should be conducted between you and the third party.

## **SECURITY**

To protect your Personal Information, we utilize reasonable technical, physical, and administrative safeguards.

## **CHILDREN'S INFORMATION**

The Site is not directed to children under the age of 13. Children under the age of 13 are prohibited from submitting any personally identifiable information to AML RightSource through the Site. If you believe a child has provided us with information, contact us at [privacy@amlrightsource.com](mailto:privacy@amlrightsource.com).

## **SPECIAL NOTIFICATION FOR CALIFORNIA RESIDENTS**

If you are a California resident, you have the right to request information from us regarding the manner in which AML RightSource shares certain categories of Personal Information with third parties for their direct marketing purposes in addition to the rights set forth above. Under California law, you have the right to send us a request at the designated address listed below to receive the following information:

- The categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year;
- the names and addresses of the third parties that received the information; and
- if the nature of the third party's business cannot be determined from their name, examples of the products or services marketed.

This information may be provided in a standardized format that is not specific to you. The designated email address for these requests is: [privacy@amlrightsource.com](mailto:privacy@amlrightsource.com).

Also, please note that we have not yet developed a response to browser "Do Not Track" signals, and do not change any of our data collection practices when we receive such signals. We will continue to evaluate potential responses to "Do Not Track" signals in light of industry developments or legal changes.

## **INTERNATIONAL USERS**

At this time, our Site is based in and solely intended for residents of the United States and Canada. If you are not a resident of the United States or Canada, please do not provide any Personal Information to us through the Site. If you have any questions or requests, you may contact us at [privacy@amlrightsource.com](mailto:privacy@amlrightsource.com).

## **CHANGES TO THIS PRIVACY POLICY**

We will occasionally update this Privacy Policy as necessary to protect our users and to comply with a changing environment. We recommend that you check the Privacy Policy when you visit our Site to be sure that you are aware of and understand our current policy.

## **QUESTIONS AND CONTACT INFORMATION**

If you have any questions or would like to request the right access, correct, amend or delete any Personal Information we have about you, register a complaint, or simply want more information contact us at [privacy@amlrightsource.com](mailto:privacy@amlrightsource.com) or by mail at:

AML RightSource  
200 Public Square  
Suite 3100  
Cleveland, Ohio 44114