

ANSIRA PARTNERS, INC.
PRIVACY POLICY AND COOKIE NOTICE

Updated: March 14, 2023

This Privacy Policy (“**Policy**”) and Cookie Notice (“**Notice**”) govern how Ansira Partners, Inc. and its subsidiaries (“**Ansira**,” “**we**,” “**our**,” or “**us**”) use Personal Data (defined below) that is collected, received, and stored about you in connection with your use of our website <https://ansira.com/>, and all related sub-domains, webpages, social media pages, Programs (as defined below), and the services and products controlled by Ansira and any other online or offline interaction with Ansira (collectively, the “**Service**”). By choosing to participate in one or more marketing programs administered by Ansira (“**Programs**”), you will have access to the Service that is operated by Ansira. The Service facilitates business-to-business transactions between you and Ansira as part of the Program.

Certain content/functionality of the Services may require that you provide Ansira with “**Personal Data**,” which includes any information relating to an identified or identifiable person. We have adopted this Policy to explain what information may be collected, how we may use this information, and under what circumstances we may disclose the information to third-parties.

Ansira takes your privacy seriously and handles all personal data as confidential. But you may choose whether or not to provide or disclose Personal Data in connection with your use of our Services. If you choose not to provide the Personal Data we request, you may still visit and use parts of our Services but may be unable to access or use certain features, options, programs, and services. Our Services may contain links to third-party websites and services that are not owned or controlled by Ansira. We are not responsible for the privacy practices or the content of third-party websites, services, and advertisements, and you visit them at your own risk.

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1. **Introduction.** Ansira is a marketing agency that arms brands and their partners with solutions to design relevant, persuasive experiences for all moments that matter. We are committed to respecting privacy and recognize the need for appropriate protection and management of any Personal Data that is shared with us as part of using our Services.

2. **Changes to this Policy.** Ansira reserves the right, at our discretion, to change the terms of this Policy and Notice at any time. You can see when this Policy and Notice was last updated by reviewing the “Updated” legend on the top of this page. We may provide you with notice of material changes to the Policy and Notice as appropriate under the circumstances, but you should check our Services frequently to see the current Policy that is in effect and any changes that may have been made to it. UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS POLICY AND NOTICE WILL APPLY IMMEDIATELY UPON POSTING TO THE SERVICES, APPLICATION, AND/OR PLATFORM.

3. **Personal Data Collected.**

3.1. Types of Personal Data. Ansira and our service providers collect the following Personal Data in order to provide the Services to you, enable your participation in our Programs, or because we are legally required to do so. Without this Personal Data we request, we may not be able to provide you with the Services, and you will need to find alternative method to complete your request to participate in the Program. The Personal Data we and/or our service providers may collect includes, but is not limited to:

- Your name;
- Email address;
- Address;
- Credit card information;
- Company name and address;
- Job title;
- Phone number(s); and/or
- Communications you send to us.

3.2. When Personal Data is Collected. You may be required to provide us with certain information that may constitute Personal Data in the following ways:

- **Program Participation:** As part of the Program, we may share Personal Data with the entity for which we serve as the Program administrator (i.e., the Program’s namesake). We may, however, disclose some information if we believe in good faith that it is necessary to prevent a crime or an injury to, or interference with, Ansira’s rights or property, or the rights or property of a third-party. We may also disclose information if we believe in good faith that the law requires it, to take precautions against legal liability and/or to comply with a judicial proceeding, court order or legal process.
- **Payment Information:** To facilitate a transaction on the Services, it may be necessary for you to provide credit card information. This information is not collected by Ansira, but instead collected by and processed through a third-party Authorize.net. To see what information may be collected, how

that information is used, and how this information is disclosed, please go to <http://www.authorize.net/company/privacy/>.

- 3.3. Information Collected Automatically. Certain information on our Services is collected automatically by means of various software tools. We have a legitimate interest in using such information to assist in log-in, systems administration purposes, information security and abuse prevention, to track user trends, and to analyze the effectiveness of our Services and Programs. Alone or in combination with other information, such automatically collected information may constitute Personal Data. Some of our service providers may use cookies or other methods to gather information regarding your use of our Services. Such third-parties may use these cookies or other tracking methods for their own purposes by relating information about your use of our Services with any Personal Data about you that they may have. The use of such information by a third-party depends on the Policy of that third-party.
- 3.4. Log Files On Our Services. The information inside the log files includes internet protocol (“IP”) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages, and any other information your browser may send to us.
- 3.5. Cookies. Ansira uses cookies to make interactions with our Services easy and meaningful. When you visit our Services, our servers may send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your web browser. Unless you choose to identify yourself to us, either by responding to a promotional offer, opening an account, or filling out a web form, for example, you remain anonymous to us. We may use cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your web browser’s ability to accept cookies, you will not be able to navigate our Services.

The following sets out how we may use different categories of cookies and your options for managing cookies’ settings:

Strictly Necessary	These cookies are essential for our Services to perform their basic functions. These include those required to allow registered users to authenticate and perform account related functions.
Functionality	These cookies are used to store preferences set by users such as account name, language, and location.
Security	These cookies help identify and prevent potential security risks.

Analytics and Performance	These cookies collect information on how users interact with our Services, including what pages are visited most, as well as other analytical data. We use these details to improve how our Services function and to understand how users interact with them.
Advertising	These cookies are used to display relevant advertising to users who use our services or visit websites we provide, as well as to understand and report on the efficacy of ads served on our websites. They track details such as the number of unique visitors, the number of times particular ads have been displayed, and the number of clicks the ads have received. They are also used to build user profiles, including showing you ads based on products you've viewed or acts you have taken on our (and other) Services. These are set by Ansira and trusted third-party networks and are generally persistent in nature.
Third-party / Embedded Content	Third-party websites hosted on Ansira's Services make use of different third-party applications and services to enhance the experience of websites visitors. These include social media platforms such as Facebook® and Twitter® (through the use of sharing buttons). As a result, cookies may be set by these third-parties, and used by them to track your online activity. We have no direct control over the information that is collected by these cookies.

3.6. Other Tracking Technologies. When you visit our Services, we may collect your IP address for purposes of monitoring the regions from which you navigate our Services.

- Ansira may use web beacons alone or in conjunction with cookies to compile information about your usage of our Services and interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular site tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to our Services. We may use web beacons to operate and improve our Services and email communications.
- For more details on your choices regarding use of your web browsing activity for interest-based advertising you may visit the following third-party websites:
 - networkadvertising.org
 - optout.aboutads.info
 - youradchoices.com
 - youronlinechoices.eu

3.7. Mobile Device. On a mobile device, you may also be able to adjust your settings to limit ad tracking.

3.8. Cookie Banners. You may see a “cookie banner” on our Services. We do not set, or allow our ad partners to set, cookies that are used to show you targeted ads before you click to accept. When you consent in this manner, we and our advertising partners may set advertising cookies on the site you are visiting and on other of our Services, dashboards, and services. We'll display the banner to you periodically, just in

case you would like to change your preferences.

4. The Purposes for Which We Use Personal Data.

4.1. We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Carry out your requests as a participant in the Program.
- Share information with the entity for which we serve as the Program administrator (i.e., the Program’s namesake).
- Provide information (such as brochure requests), support, and to process general inquiries you may make through our Services.

4.2. We may disclose information if we believe in good faith that it is necessary to prevent a crime or an injury to, or interference with, Ansira’s rights or property, or the rights or property of a third-party. We may also disclose information if we believe in good faith that the law requires it, to take precautions against legal liability and/or to comply with a judicial proceeding, court order or legal process.

4.3. We process your Personal Data for the following purposes:

Purposes for Processing Personal Data
Marketing, Provision of product and company information and updates
Delivery of service bulletins and product information and related information to customer contacts
Legal and regulatory compliance, litigation, investigations, and risk management (including systems for storage of legal work products, documents, and information);
Other legal and customary business-related information, such as making back-up copies of files for business continuity, as needed for computer system maintenance and other everyday human resource purposes;
Personal Data collected through its internal websites, including without limitation in connection with subscriptions for newsletters, downloads of materials and registration for products and services, including online and offline Personal Data pertaining to prospective, current, and former customer contacts;
Data processed by Ansira’s threat management platform and its related technologies and procedures that will provide advanced prevention, detection, response, and intelligence capabilities to protect Ansira and the employee data it processes;
Systems enabling collaboration, including document sharing;
Systems for storage and distribution of internal emails and archiving historical data;

Purposes for Processing Personal Data
Business operations purposes, including maintaining records related to mergers, acquisitions, reorganizations, sales, distributions, dispositions, financial management and reporting;
Statistical analysis of website traffic, including the use of Cookies.

5. How We Disclose Personal Data.

- 5.1. Ansira does not sell, lease, rent, or otherwise disclose or disseminate the Personal Data collected from our Services to third-parties unless otherwise stated below or with your express, prior consent.
- 5.2. In the event of a merger or similar exchange of control, Ansira may transfer or assign this Policy and any Personal Data to a third-party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control.
- 5.3. Ansira may disclose Personal Data about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (a) comply with any applicable law, regulation, legal process or governmental request; (b) enforce our terms of use, including investigations of potential violations thereof; (c) detect, prevent, or otherwise address fraud or security issues; or, (iv) protect against harm to the rights, property or safety of Ansira, our users, or the public.

6. Retention of Personal Data. Ansira reserves the right to retain any Personal Data as long as the Personal Data is needed to fulfill the purposes that are described in Section 4 (The Purposes for Which We Use Personal Data) and comply with applicable law.

7. Your Personal Data Rights.

- 7.1. If you have an account on our Services, we provide access to — and the ability to edit or delete — certain categories of Personal Data through the account. If you would like to access, amend, erase, export (i.e., data portability), or object to or restrict the processing of Personal Data collected via our Services, you may submit a request to legal@ansira.com or write to us at:

Ansira Partners, Inc.
 2300 Locust Street
 St. Louis, MO 63103
 Attn: Legal Department Data Request

We will promptly review all such requests in accordance with applicable laws.

- 7.2. Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Data about you. We encourage you to first reach out to us at legal@ansira.com so we have an opportunity to address your concerns directly before you do so.

8. Personal Data Transferred from the European Union, the United Kingdom, or Switzerland To The United States. Due to the global reach of Ansira’s services, Ansira sometimes collects, analyzes, reviews, and otherwise processes Personal Data that originates from the European Union, the United Kingdom, or Switzerland on behalf of its customers, website visitors, and other Program participants, as necessary. In turn,

Ansira may transfer this data to its subsidiaries, affiliates, vendors, business partners, government agencies, and other third-parties to provide products and services, assist in providing products or services, or subject to a customer request. Ansira provides adequate protection for such Personal Data by means authorized by applicable laws, including but not limited to, by entering into the standard contractual clauses or model clauses approved from time to time by decision of the European Commission that meet the requirements for appropriate safeguards for international transfers of Personal Data under Article 46(2) of the General Data Protection Regulation from our clients upon request, and corresponding privacy laws of the United Kingdom and Switzerland.

9. **Data Security.** The security of Personal Data is important to us. We follow generally accepted industry standards to protect the Personal Data submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is completely secure. While we strive to use commercially acceptable means to protect Personal Data, we cannot guarantee its absolute security.
10. **Children’s Privacy.** Our Services are not intended for children under the age of eighteen (18). Accordingly, we do not intend to knowingly collect Personal Data from anyone under eighteen (18) years of age. If you are under eighteen (18) years old, please do not send any Personal Data about yourself to us through the Services or offline. If we determine that Personal Data belongs to an individual under the age of thirteen, we will immediately take action to delete the Personal Data.
11. **Your Choice.** Ansira does not track Services users over time and across third-party websites to provide targeted advertising. Accordingly, we do not currently respond or take any action with respect to web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Data about an individual consumer’s online activities over time and across third-party web sites or online services. For email communications, you may choose not to receive future promotional or advertising emails from us by selecting an unsubscribe link at the bottom of each email that you receive from us. You cannot opt out of receiving transactional emails related to the performance of our Services. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any “Contact” request as well as administrative, maintenance, and operational emails (for example, in connection with a password reset request).

NOTICE FOR CALIFORNIA RESIDENTS

This Section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 (“CCPA”) and its implementing regulations, as amended by the California Privacy Rights Act (“CPRA”), where “Personal Information” has the definition set forth in the CCPA. This Section describes (1) the categories of Personal Information collected and disclosed by us, (2) your privacy rights under the CCPA, and (3) how to exercise your rights.

Ansira makes the following disclosures regarding the Personal Information Ansira has collected within the 12-month period preceding the Effective Date of this Privacy Policy:

Category of Personal Information	Collected	Category of Source from which Personal Information is Collected	Purpose of Collection	Third Parties to whom Personal Information is Disclosed for a Business Purpose	Third Parties to whom Personal Information is Sold or Shared	Retention
Identifiers: Contact information such as name, email address, phone number, mailing address	Yes	Directly from you	See section above titled "How We Use Your Personal Information and Other Data"	Service Providers	We do not sell this category of personal information. However, we share your IP address with advertisers and social networks for purposes of cross-context behavioral advertising	
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Yes	Directly from you	See section above titled "How We Use Your Personal Information and Other Data"	Service Providers	We do not sell or share this category of Personal Information	
Protected classification characteristics under California or federal law	No	N/A	N/A	N/A	N/A	
Commercial information	Yes	Directly from you	See section above titled "How We Use	Service Providers	We do not sell or share this category of	

			Your Personal Information and Other Data”		Personal Information	
Biometric information	No	N/A	N/A	N/A	N/A	
Internet or other similar network activity	Yes	Cookies and other tracking technologies	See section above titled “How We Use Your Personal Information and Other Data”	Our Service Providers	We do not sell this category of personal information. However, we share your IP address with advertisers and social networks for purposes of cross-context behavioral advertising	
Geolocation data	Yes	Cookies and other tracking technologies	See section above titled “How We Use Your Personal Information and Other Data”	Our Service Providers	We do not sell or share this category of Personal Information	
Sensory data	No	N/A	N/A	N/A	N/A	
Professional or employment-related information	Yes	Directly from you	See section above titled “How We Use Your Personal Information and Other Data”	Service Providers	We do not sell or share this category of Personal Information	

Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	No	N/A	N/A	N/A	N/A	
Inferences drawn from other Personal Information	Yes	Directly from you	See section above titled "How We Use Your Personal Information and Other Data"	Service Providers	We do not sell or share this category of Personal Information.	
Sensitive Personal Information: Account login along with password required credentials	Yes	Directly from you	See section above titled "How We Use Your Personal Information and Other Data"	Service Providers	We do not sell or share this category of Personal Information	

If you are a resident of California, you may have the following rights:

Privacy Right	Description
Notice	You may have the right have the right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Access	You may have the right to request the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have

	collected about you, and the business purposes for which such Personal Information is collected and shared. You may also have the right to request the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Erase	You may have the right to have your Personal Information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your Personal Information internally, in a lawful manner that is compatible with the context in which you provided it.
Correction	You may have the right to request that we correct any incorrect personal information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers that hold your data on our behalf to correct) your personal information from our records, unless an exception applies. We may deny your correction request if (a) we believe the personal information we maintain about you is accurate; (b) correcting the information would be impossible or involve disproportionate; or (c) if the request conflicts with our legal obligations.
Automated Decision Making	You may have the right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out.
To Opt-Out of Sales or Sharing of Personal Information	To the extent we sell or share personal information, you may have the right to opt out of the selling or sharing of personal information; you can do so here.
Limit Use of Sensitive Personal Information	We do not use or disclose Sensitive Personal Information other than to provide our Services. However, if we used or disclosed Sensitive Personal Information for other purposes, you would have the right to opt out.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your minor child.

You may only make a request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Exercising your Privacy Rights

To exercise any of the privacy rights afforded to you under applicable data protection law, please submit a request to us by one of the following methods:

- Submitting the form or
- E-mailing us at privacy@ansira.com

Verification

We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor's identity. If you are an authorized agent making a request on behalf of a California consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes

This Privacy Notice is available to consumers with disabilities. To access this Privacy Notice in an alternative downloadable format, please [click here](#).

California Shine the Light Law:

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any. To make such a

request, please contact us using the information in the Contact Us section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

12. **Contacting Us** . Any comments, concerns, complaints, or questions regarding our Policy may be sent to Ansira at privacy@ansira.com, or write to us:

Ansira Partners, Inc.

2300 Locust Street

St. Louis, MO 63103

Attn: Legal Department - Privacy Request