

Privacy Policy

1. Introduction

Saphran, Inc. (“**Saphran**,” “**we**,” “**us**,” and “**our**”) respects your privacy and is committed to protecting it through our compliance with this policy. We have adopted this policy to explain our privacy practices with respect to information that we may collect about you when you access our website, www.saphran.com (the “**Site**”).

Please read this policy carefully to understand our practices regarding the information we collect from you or about you and how we will treat it. By accessing or using the Site, you agree to this Privacy Policy. This policy may change from time to time. Your continued use of the Site after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This policy applies to information we collect:

- On or through this Site.
- In email, text, and other electronic messages between you and us or the Site.
- Through mobile and desktop applications you download, which provide dedicated non-browser-based interaction between you and our Site.

It does not apply to information collected by:

- Us offline or through any other means or any third party (including affiliates or subsidiaries); or
- Any third party (including our affiliates or subsidiaries), including through any application or content that may link to or be accessible from or on the Site.

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 Site. By accessing or using our Site, you agree to this privacy policy.

2. Children Under the Age of 13

Our Site is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or through the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Site, or through any of its features, register on the Site, or provide any information about yourself to us, including your name, address, telephone number, email address, or the personal information of anyone else including a parent or

legal guardian. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at info@saphran.com.

3. **Information We Collect About You and How We Collect It**

Personal information, or personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity or Contact Data** includes name, email address, telephone number, or similar identifier.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting, location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Site.
- **Transaction Data** includes details about products or services that you have purchased from us, if applicable.
- **Profile Data** includes your interests, property and neighborhood preferences, feedback and survey responses.
- **Usage Data or Navigation Data** includes information about how you use the Site.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose, which we do not treat as personal information. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a feature on the Site. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy policy.

We collect this information through:

- **Direct interactions.** You may give us information about you by filling in forms or by communicating with us via e-mail or otherwise. This includes information you provide when you provide your name, mailing address, email address, phone number, business address, business email, etc.
- **Automated technologies or interactions.** As you interact with our Site, we may automatically collect technical data about your equipment, browsing actions and patterns as specified above. We may collect this information by using cookies,

server logs, web beacons, and other similar technologies (see *Cookies and Automatic Data Collection Technologies*).

- **From our service providers.** This includes businesses that collect your personal information on our behalf, if applicable, in order to help us respond to consumer inquiries, conduct market research, and comply with legally mandated disclosure requirements.
- **Other third parties or publicly available sources.** We may receive information about you if you visit other websites employing our cookies or from third parties including, for example, business partners, payment processors, sub-contractors, social network platforms, analytics providers, search information providers, credit reference agencies, data brokers, or aggregators.

Cookies and Automatic Data Collection Technologies

Our Site uses automatic data collection technologies to distinguish you from other Site users. This helps us deliver a better and more personalized service when you browse our Site. We collect information to improve our Site by enabling us to:

- Estimate our audience size and usage patterns.
- Store your preferences so we may customize our Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Site.

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).

We use Google Analytics to perform analytics services for us, which may include tracking your interactions with our Site and to store information, such as what time you visited the Site, whether you have visited it before and what site referred you to it. Website measurement statistics may be used to personalize your website experience, as well as to evaluate – anonymously and in aggregate – statistics on website activity. We use this information to measure the effectiveness of our web presence and to compile statistical reports.

Certain internet browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for preference-based advertising purposes (“DNT Notice”). Some browsers are, by default, set to provide a DNT Notice, whether that reflects your preference. Please note that with respect to our Site, we do not take any action based on browser based DNT Notices. If you do not wish to

participate in behavioral tracking activities, you should follow the opt-out process described in *What Are Your Choices About How We Use and Disclose Your Information*.

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. For information about managing browser settings to refuse cookies, see *What Are Your Choices About Your Information*.

Third Party Content, Apps, and Links

Some content or applications on the Site may be served by third parties, content providers and application providers. Information collected by these applications is subject to the privacy policy and terms of the social media company that provides the application.

4. How We Use Your Information

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

- To present the Site to you.
- To fulfill any other purpose for which you provide such information.
- To respond to your inquiries, concerns, and receive your feedback regarding our Site, including through physical mailings and responses to online surveys, if applicable.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, if applicable.
- To notify you about changes to our Site, or any products or services we offer or provide through physical mailings and responses to online surveys, if applicable.
- To allow you to participate in interactive features on our Site.
- In any other way, we may describe when you provide the information.
- For any other purpose with your consent.

We may also use the information you provide to us to contact you about our own and third-party goods and services that may be of interest to you. For more information, see [What Are Your Choices About How We Use and Disclose Your Information](#).

5. Disclosure of Your Information

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

We may disclose personal information that we collect, or that is provided by you as described in this privacy policy:

- We will disclose personal information to the third-party service providers that we engage to assist us in making the Site available. These service providers consist of our datacenter provider(s), storage provider(s), customer support system provider(s), email service provider(s), and software development contractors. These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- 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 assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Site are among the assets transferred.
- 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 other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Saphran, Inc. our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6. **What Are Your 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 their information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies or to be alerted when cookies are being sent. To learn how you can manage your Flash cookie settings (if applicable), 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 may not function properly.

- **Promotional Offers from Saphran.** If you do not wish to have your email address or contact information used by us to promote our own or third parties' products or services, you can opt-out by calling us 248.522.7000 or by emailing us at info@saphran.com. 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 us as a result of a product purchase, warranty registration, product service experience, or other transactions.
- **Third Party Websites.** Our Site may, from time to time, contain links to and from the websites of our partner networks, co-sponsors of promotions and affiliates, or plug-ins enabling third-party features.
- **California Residents.** If you are a California resident, you may have additional personal rights and choices with regard to your personal information. Please see [*Your California Privacy Rights*](#) for more information.

7. **Your California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. At this time, we do not engage in this type of disclosure.

8. **Nevada Privacy Rights**

Nevada law gives Nevada citizens the right to opt out-of the sale of their personal information under Nevada Revised Statutes Chapter 603A. However, please know we do not sell data triggering that statute's opt-out requirements.

9. **Accessing and Correcting Your Information**

Please email us at info@saphran.com in order to request access to, correct or delete any personal information that you have provided to us. 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.

10. **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. We urge you to be careful about giving out information in public areas of the Site. The information you share in public areas may be viewed by any other users of the Site.

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 Site. 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 Site.

11. Contact Information

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

Saphran, Inc.

info@saphran.com

248.522.7000