

Last Updated: October \_\_, 2015

### **Consumer Safety Advocates™ Privacy Policy**

Thank you for visiting the Consumer Safety Advocates™ website located at [www.consumersafetyadvocates.com](http://www.consumersafetyadvocates.com) (the "Site"). The Site is an Internet property of Consumer Safety Advocates ("Consumer Safety Advocates™," "we," "our" or "us"). This Consumer Safety Advocates™ Privacy Policy ("Privacy Policy") covers our treatment of personal information and other information that we collect when end-user visitor to the Site ("User," "you" or "your"): (a) accesses or uses the Site; (b) accesses and/or views any of the: (i) links to third-party product safety, health and/or medical-related resources and/or other information ("Third Party Links"); and/or (ii) text, video and other information pertaining to product safety, health, prescription drug and/or legal-related products and/or services (the "Informational Content," and together with the Third Party Links, the "Content"); and/or (c) utilizes the various contact forms and/or contact information made available on the Site as a means to contact directly, or request to be contacted by, Consumer Safety Advocates'™ third-party legal-related product and/or service providers ("Third Party Legal Services Providers") (collectively, the "Contact Services," and together with the Site and Content, the "Site Offerings").

Capitalized terms not defined herein shall have the meanings set forth in the Consumer Safety Advocates™ Website Terms and Conditions ("Terms and Conditions"). **IF YOU DO NOT AGREE TO TERMS OF THIS PRIVACY POLICY IN THEIR ENTIRETY, YOU MAY NOT ACCESS OR OTHERWISE USE THE SITE OFFERINGS.**

**Please be advised that the User Data submitted by you, and any and all other information provided by you to Consumer Safety Advocates™, is not protected by the attorney-client privilege, and submitting this User Data does not create an attorney-client relationship. Further, Consumer Safety Advocates™ is not a covered entity for purposes of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), nor is the information provided by you to Consumer Safety Advocates™ considered protected health information under HIPAA. Therefore, HIPAA privacy and security rules do not apply to Consumer Safety Advocates™.**

#### **Your California Privacy Rights**

**If you are a resident of the State of California and would like to learn how your "personal information" (as defined in the Shine the Light Law, Cal. Civ. Code § 1798.83) is shared with third parties, what categories of personal information that we have shared with third parties in the preceding year, as well as the names and addresses of those third parties, please e-mail us at: [info@consumersafetyadvocates.com](mailto:info@consumersafetyadvocates.com).**

**Further, if you are a resident of the State of California and would like to opt-out from the disclosure of your personal information to any third party for marketing purposes, please e-mail us at: [info@consumersafetyadvocates.com](mailto:info@consumersafetyadvocates.com). Please be advised that where California State residents opt-out from permitting their personal information to be shared, such individuals may still receive selected offers directly from us, in accordance with applicable law.**

#### **Personal Information Collected**

For the purposes of this Privacy Policy, "personal information" shall mean individually identifiable information from or about an individual. We collect personal information when you access certain of the Site Offerings and complete the required information request form and/or otherwise provide such information to us. Where a User attempts to utilize the Contact Services, that User may be required to submit, and Consumer Safety Advocates™ may collect, some or all of the following information: (a) the User's e-mail address; (b) the User's full name; (c) the User's telephone number; and (d) any other information collected via the Contact Services form (collectively, "Contact Data").

Upon entering Contact Data and clicking on the applicable submission button on the Site: (i) Consumer Safety Advocates™ may pass your Contact Data along to one (1) or more of its Third Party Legal Services Providers; and (ii) you may be contacted by Consumer Safety Advocates™ and/or one (1) or more of its Third Party Legal Services Providers regarding your request. Where Consumer Safety Advocates™ contacts you in connection with your submission of Contact Data, a Consumer Safety Advocates™ representative may request additional information over the telephone including some or all of the following: (A) User date of birth; (B) User mailing address; (C) User's emergency contact name and telephone number; (D) questions pertaining to certain of User's health conditions, if any, including: (I) prescription drugs taken in connection with same; (II) physicians that provide(d) treatment in connection with same; and (III) complications experienced in connection with same; and (E) any other information requested by the applicable Consumer Safety Advocates™ representative (collectively, "Follow-Up Data," and together with the Contact Data, the "User Data"). For purposes of this Privacy Policy, items (C) and (D) in the preceding sentence shall be considered "Sensitive Information."

**Please be advised that Consumer Safety Advocates™ does not itself provide any underlying legal, medical or health services, and the ultimate terms and conditions of any such services will be determined by the applicable Third Party Legal Services Provider.**

### **Use of Personal Information**

By submitting your personal information by and through the Site Offerings, you agree that we may share, sell, rent, lease or otherwise provide that personal information (other than Sensitive Information) to any third party for any purpose permitted by law, and we may work with other businesses to bring selected retail opportunities to our Users. These businesses and third parties may include, but are not limited to: (a) providers of direct marketing services and applications, including lookup and reference, data enhancement, suppression and validation; (b) e-mail marketers; (c) telemarketers (where permitted by applicable law); and (d) direct marketers. We will also use your personal information to send you promotional messages regarding various Consumer Safety Advocates™ products and/or services, as well as third party products and/or services that we think may be of interest to you.

Without limiting the foregoing, we may share your User Data (including Sensitive Information) with those Third Party Legal Service Providers that you request to be contacted by. These Third Party Legal Service Providers may use your User Data to offer you legal-related products and/or services, and for any other lawful purposes, subject to any restrictions contained herein. The information that you supply directly to any Third Party Legal Service Providers shall be governed by the applicable Third Party Legal Service Provider's privacy policy.

Where you submit personal information, we use the personal information that you make available to personalize your experience with the Site and to facilitate the delivery of the applicable Site Offerings to you, including to respond to any inquiries made by you.

You also agree that we may contact you at any time with updates and/or any other information that we may deem appropriate for you to receive in connection with your continued use of the Site Offerings, and to keep you informed of our other products and services.

We may also employ other companies and individuals to perform certain functions on our behalf. Examples include sending direct and electronic mail, removing duplicate information from User lists, analyzing data and providing marketing analysis. The agents performing these limited functions on our behalf shall have access to our Users' personal information as needed to perform these functions for us, but we do not permit them to use User personal information for other purposes.

We will also use your personal information for customer service, to provide you with information that you may request, to customize your experience with the Site Offerings and/or to contact you when necessary in connection with your use of the Site Offerings. We may also use your personal information for internal business purposes, such as analyzing and managing our service offerings including, without limitation,

the Site Offerings. We may also combine the information we have gathered about you with information from other sources.

By submitting your personal information by and through the Site Offerings, you agree that such act constitutes an inquiry and/or application for purposes of the Amended Telemarketing Sales Rule (16 CFR §310 et seq.), as amended from time to time (the "Rule") and applicable state do-not-call regulations. As such, notwithstanding that your telephone number may be listed on the Federal Trade Commission's Do-Not-Call List, and/or on applicable state do-not-call lists, we retain the right to contact you via telemarketing in accordance with the Rule and applicable state do-not-call regulations.

Where you provide "prior express written consent" within the meaning of the Telephone Consumer Protection Act (47 USC § 227), and its implementing regulations adopted by the Federal Communications Commission (47 CFR § 64.1200), as amended from time-to-time ("TCPA"), you consent to receive telephone calls, including artificial voice calls, pre-recorded messages and/or calls (including SMS text messages) delivered via automated technology, to the telephone number(s) that you provided. Please note that you are not required to provide this consent in order to obtain access to the Site Offerings, and your consent simply allows Consumer Safety Advocates™ to contact you via these means. **Please be advised that by agreeing to this Privacy Policy, you are obligated to immediately inform us if and when the telephone number that you have previously provided to us changes.**

We reserve the right to release current or past personal information (including Sensitive Information): (i) in the event that we believe that the Site Offerings are being or have been used in violation of the Terms and Conditions or to commit unlawful acts; (ii) if the information is subpoenaed; *provided, however,* that, where permitted by applicable law, we shall provide you with e-mail notice, and opportunity to challenge the subpoena, prior to disclosure of any personal information pursuant to a subpoena; or (iii) if we are sold, merge with a third party, are acquired or are the subject of bankruptcy proceedings; *provided, however,* that if Consumer Safety Advocates™ is involved in a bankruptcy proceeding, merger, acquisition or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on the Site of any change in ownership or uses of your personal information, as well as any choices that you may have regarding your personal information.

You hereby consent to the disclosure of any record or communication to any third-party when we, in our sole discretion, determine the disclosure to be appropriate including, without limitation, sharing your e-mail address with third-parties for suppression purposes in compliance with applicable law including the CAN-SPAM Act of 2003, as amended from time to time. Users should also be aware that courts of equity, such as U.S. Bankruptcy Courts, might have the authority under certain circumstances to permit personal information to be shared or transferred to third parties without permission.

## **Non-Personal Information Collection and Use**

### IP Addresses/Browser Type

We may collect certain non-personally identifiable information about you and your desktop computer and/or mobile device when you visit many of the pages of the Site. This non-personally identifiable information includes, without limitation, the type of browser that you use (e.g., Safari, Chrome, Internet Explorer), your IP address, the type of operating system that you use (e.g., Windows or iOS) and the domain name of your Internet service provider (e.g., Verizon, AT&T). We use the non-personally identifiable information that we collect to improve the design and content of the Site Offerings and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze usage of the Site Offerings.

### Cookies

When a User visits the Site, we send one (1) or more cookies and/or gif files (collectively, "Cookies") to assign an anonymous, unique identifier to the applicable User's computer. A Cookie is a piece of data stored on your hard drive containing non-personally identifiable information about you. Cookies have many benefits to enhance your experience at the Site. To find out more about Cookies, please visit

www.cookiecentral.com. We use Cookies to improve the quality of the Site Offerings, including for storing User preferences and tracking Site-User trends (such as pages opened and length of stay at the Site).

Most Internet browsers are initially set up to accept Cookies, but you can reset your browser to refuse all Cookies or to indicate when a Cookie is being sent. To disable and reject certain Cookies, follow the instructions associated with your Internet browser. Even in the case where a User rejects a Cookie, he or she may still use the Site Offerings; *provided, however*, that certain functions of the Site Offerings may be impaired or rendered inoperable if the use of Cookies is disabled. We reserve the right to retain Cookie data indefinitely.

#### ***Behavioral Tracking***

Neither Consumer Safety Advocates™, nor any third party, uses Cookies, pixels or other tracking technology on the Site for purposes of tracking Users' activities after they leave the Site.

#### ***Aggregate Data***

Consumer Safety Advocates™ reserves the right to transfer and/or sell aggregate or group data about Users of the Site Offerings for lawful purposes. Aggregate or group data is data that describes the demographics, usage and other characteristics of Site Offerings Users as a group, without disclosing personally identifiable information.

#### **Third-Party Websites**

This Site may contain links to third-party owned and/or operated websites including, without limitation, the Third Party Legal Service Providers. Consumer Safety Advocates™ is not responsible for the privacy practices or the content of such websites. In some cases, you may be able to make a purchase through one of these third-party websites. In these instances, you may be required to provide certain information, such as a credit card number, to register or complete a transaction at such website. These third-party websites have separate privacy and data collection practices and Consumer Safety Advocates™ has no responsibility or liability relating to them.

#### **Security**

We endeavor to safeguard and protect our Users' personal information. When Users make personal information available to us, their personal information is protected both online and offline (to the extent that we maintain any personal information offline). Where our registration/application process prompts Users to enter Sensitive Information, and when we store and transmit such Sensitive Information, that information is encrypted with advanced TLS (Transport Layer Security).

Access to your personal information is strictly limited, and we take reasonable measures to ensure that your personal information is not accessible to the public. All of our Users' personal information is restricted in our offices, as well as the offices of our third party service providers. Only employees or third party agents who need User personal information to perform a specific job are granted access to User personal information. Our employees are dedicated to ensuring the security and privacy of all User personal information. Employees not adhering to our firm policies are subject to disciplinary action. The servers that we store User personal information on are kept in a secure physical environment. We also have security measures in place to protect the loss, misuse and alteration of personal information under our control.

Please be advised, however, that while we take every reasonable precaution available to protect your data, no storage facility, technology, software, security protocols or data transmission over the Internet or via wireless networks can be guaranteed to be 100% secure. Computer hackers that circumvent our security measures may gain access to certain portions of your personal information, and technological bugs, errors and glitches may cause inadvertent disclosures of your personal information; *provided, however*, that any attempt to breach the security of the network, our servers, databases or other hardware or software may constitute a crime punishable by law. For the reasons mentioned above, we

cannot warrant that your personal information will be absolutely secure. Any transmission of data at or through the Site, other Site Offerings or otherwise via the Internet or wireless network, is done at your own risk.

In compliance with applicable federal and state laws, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your personal information. You will be notified via e-mail in the event of such a breach. Please be advised that notice may be delayed in order to address the needs of law enforcement, determine the scope of network damage, and to engage in remedial measures.

## **Minors**

Visitors under eighteen (18) years of age are not permitted to use and/or submit their personal information at the Site. Consumer Safety Advocates™ does not knowingly solicit or collect information from visitors under eighteen (18) years of age. Consumer Safety Advocates™ encourages parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children.

## **Opt-Out/Unsubscribe**

To opt-out of receiving e-mail communications from us, you can follow the instructions at the end of the applicable e-mail message or e-mail us at: [info@consumersafetyadvocates.com](mailto:info@consumersafetyadvocates.com).

Notwithstanding the foregoing, we may continue to contact you for the purpose of communicating information relating to your request for Site Offerings, as well as to respond to any inquiry or request made by you. To opt-out of receiving Site Offerings-related and/or inquiry response-related messages from Consumer Safety Advocates™, you must cease requesting and/or utilizing the Site Offerings and/or cease submitting inquiries to Consumer Safety Advocates™, as applicable.

## **Deleting, Modifying and Updating Your Information**

At your request, we will: (a) inform you of what personal information we have on file for you; (b) amend the personal information that we have on file for you; and/or (c) remove personal information that you have provided to us, or that we have collected. You may do so by e-mailing us at: [info@consumersafetyadvocates.com](mailto:info@consumersafetyadvocates.com). We ask individual Users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and, to the extent permitted by applicable law, we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others or would be extremely impractical (for instance, requests concerning information residing on backup tapes).

Please be advised that deleting your personal information may terminate your access to certain of the Site Offerings. If you wish to continue using the full complement of Site Offerings, you may not be able to delete all of the personal information that we have on file for you.

Please be further advised that, after you delete your personal information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

## **Changes to this Privacy Policy**

Consumer Safety Advocates™ reserves the right to change or update this Privacy Policy at any time by posting a notice on the Site that we are changing our Privacy Policy. If the manner in which we use personal information changes, Consumer Safety Advocates™ will notify Users by: (a) sending the modified policy to our Users via email; and/or (b) by any other reasonable means acceptable under applicable state and federal law. You will have a choice as to whether or not we use your information in this different manner and we will only use your information in this different manner where you opt-in to such use.

## **Contact Us**

If you have any questions about this Privacy Policy, you can utilize the options made available on the "Contact" page of the Site.