

Velvetel Privacy Policy

Velvetech is committed to the privacy of our users

This privacy policy applies only to the websites and applications controlled by Velvetech, LLC and/or its subsidiary and affiliated entities ("Velvetech," "we," "our" or "us") where this privacy policy is posted (collectively, the "Sites"), including velvetech.com (collectively "Velvetech Sites"). This privacy policy does not pertain to information that is collected offline. BY USING OUR SITES, YOU CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND TO OUR PROCESSING OF PERSONAL INFORMATION FOR THE PURPOSES STATED BELOW. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, PLEASE DO NOT USE OUR SITES.

A. Information Collected

Your privacy is important to us, and we provide this notice explaining our online information practices and the choices you can make about the collection and use of the personal information you submit on our Sites. We collect two types of information from visitors to our Sites: (1) Personally Identifiable Information and (2) Non-Personally Identifiable Information, such as your IP address or cookies.

(1) Personally Identifiable Information

"Personally Identifiable Information" is information that identifies you personally, such as your name, address, telephone number, email address, or company name. Velvetech collects and stores the personally identifiable information that you have provided to us. Here are some examples of manners in which we may collect personally identifiable information on our Sites:

- We may collect your name, address, e-mail address, cell phone number and MSISDN (mobile station integrated services digital network number) to provide you with our services and to set up your account.

- We may collect your name and email address if you sign up to receive a newsletter.
- We may collect your name, address, credit card and billing information if you purchase products or services from us.
- We may collect your company name, annual revenues, number of employees, or industry when you register your business to receive our products or services.
- We may collect information from your contact lists in order to identify recipients of your messages; however, you will retain ownership of such information.
- We may collect your download history, texts, messages, customer generated content and/or information about your interests in and use of various products, programs, and services to better tailor our services to you.

The above list provides an example of the personally identifiable information that may be collected on our Sites. We will not collect any personally identifiable information about you unless you provide it to us voluntarily. If you do not want Velvetch to have access to your personally identifiable information, please do not provide it to us.

(2) Non-Personally Identifiable Information

"Non-Personally Identifiable Information" can be technical information, or it can be demographic information, such as your age, gender, or interests. Non-personally identifiable information does NOT identify you personally. Here are some examples of the non-personally identifiable information that is collected via our Sites and a description of how this information is used:

Cookies

To enhance your experience with the Sites, we use "cookies" on our Sites. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your browser to enable our systems to recognize your browser and to provide features. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at our Sites. However, once you become a customer and furnish the Sites with personally identifiable information, this information may be linked to the data stored in the cookie. We use cookies to understand site usage and to improve the content and offerings on our Sites. For example, we may use cookies

to personalize your experience at our Sites (e.g., to recognize you when you return to the Sites). Please note that there are two types of cookies: 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. If you have chosen to identify yourself to Velvetech, we use session cookies containing encrypted information to allow us to uniquely identify you. Each time you log into the Sites, a session cookie containing an encrypted, unique identifier that is tied to your account is placed on your browser. These session cookies allow us to uniquely identify you when you are logged into the Sites and to process your online transactions and requests. Session cookies are required to use our services. Velvetech also uses persistent cookies that only we can read and use to identify browsers that have previously visited our Sites. When you purchase our services or provide us with personal information, a unique identifier is assigned to you. This unique identifier is associated with a persistent cookie that we place on your web browser. We are especially careful about the security and confidentiality of the information stored in persistent cookies. For example, we do not store account numbers or passwords in persistent cookies. If you disable your web browser's ability to accept cookies, you will be able to navigate the Sites, but you will not be able to successfully use some of our services. With most Internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. Please consult the "Help" section of your browser for more information. However, certain areas of the Sites can be accessed only in conjunction with cookies or similar devices, and you should be aware that disabling cookies or similar devices might prevent you from accessing some of our content.

Web Beacons

Velvetech uses web beacons alone or in conjunction with cookies to compile information about visitor usage of the Sites and interaction with emails from us. Additionally, our third-party advertising partners employ software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our Sites by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to

track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on webpages and are about the size of the period at the end of this sentence. We may tie the information gathered by clear gifs to our customers' personally identifiable information.

Internet Protocol (IP) Address

Your IP address is a number that lets computers attached to the Internet know where to send you data—such as the webpages you view. We use this information to deliver our webpages to you upon request, to tailor our Sites to the interests of our users and to measure traffic within our Sites. Your IP address may also be used for identification and security purposes.

Information Collected Automatically

Velvetech may also (i) automatically collect non-personally identifiable information about your use of the Sites, such as the domain from which you access the Internet (for example, Comcast.net, if you are connecting from a Comcast account), the date and time you access the Sites, and the Internet address of the website from which you linked directly to our Sites; and (ii) use data capture and analysis tools, and other similar tools, to extract, compile and analyze any non-personally identifiable data or information resulting from your use of the Sites and the services offered thereon (collectively "Blind Data"). To the extent that any Blind Data is collected by Velvetech, such Blind Data shall be solely owned by Velvetech and may be used by Velvetech for any lawful business purpose, including, without limitation, analyzing and enhancing the Sites and services offered hereby, disclosing such Blind Data to third parties for a variety of purposes, including online behavioral advertising. For example, third party vendors, including Google, show our ads on sites on the Internet.

Demographic Information

"Demographic Information" may be your gender, age, zip code and interests, which you voluntarily provide to us on the Sites. We use this information to provide you with personalized services and to analyze trends to ensure the information provided by the Sites meets your needs. For example, we offer personalized products and services if you tell us your interests. Please note

that we also consider aggregated information, which is not personally identifiable, to be non-personally identifiable information. The above list provides an example of the non-personally identifiable information that is collected via the Sites.

B. Use of Information Collected Via Our Sites

(1) Personally Identifiable Information

We use your personally identifiable information that is collected on these Sites primarily for the following purposes:

- to deliver services, information, newsletters or software you request or purchase;
- to contact you about programs, products, features or services in which we believe you may be interested (such as future promotional materials), or for other purposes disclosed from time to time;
- to fulfill your requests for products and services;
- to fulfill the terms of a promotion;
- to ensure our Sites are relevant to your needs;
- to improve the content and navigation of our Sites, or for other internal purposes;
- to notify you about a material change to this privacy policy, our Terms of Use or other policies or terms that affect you and your use of our Sites and services, if necessary;
- to contact friends if you elect to use our referral service to inform friends about the Sites. In such situations, we will use the friend's name and email address. Velvetech will automatically send the friend a one-time email inviting him or her to visit the Sites, but will not store this information;
- to allow you access to limited-entry areas of the Sites;
- to contact you in response to sign up forms and information request forms such as the "Contact Us" form.

(2) Non-Personally Identifiable Information

Non-personally identifiable information is used as described above and in other ways as permitted by applicable laws, including combining non-personally identifiable information with personally identifiable information (except with respect to non-personally identifiable information collected from children under the age of 13, which is explained at Section D below).

C. Sharing and Disclosure of Information

(1) Personally Identifiable Information

We may share or disclose your personally identifiable information in the following instances:

- To provide a service to you. We may share the personally identifiable information you provide with your cell phone service provider or their partner and subcontractor companies. Additionally, if you email us a question, we may use your email address to process your request and respond to your question. Also, if you are entering a sweepstakes or contest, we may use your personally identifiable information in order to fulfill the terms of that promotion. This means that we may share the information for prize fulfillment purposes or with mail carriers. We also may share your information with the co-sponsor of that promotion.
- Testimonials. We post customer testimonials on our website, which may contain personally identifiable information. We do obtain the customer's consent via email prior to posting a name along with a testimonial. If you wish to request to have your testimonial removed, you may contact us.
- Affiliates, Strategic Partners, and Third Parties. While Velvetech collects certain personally identifiable information to enhance user experience and ensure efficient service delivery, we prioritize the privacy and trust of our users. We want to assure our clients that we do not provide or sell this information to affiliates, strategic partners, agents, third-party marketers, or any other unaffiliated parties for the purpose of contacting users with offers, advertisements, or for their own research and business purposes. Our commitment is to safeguard user data and utilize it solely for

the enhancement of our services and user experience. Any data sharing that occurs is strictly for operational purposes and is bound by stringent confidentiality agreements that prohibit the misuse of the information.

- To unaffiliated third-party service providers, agents or independent contractors who help us maintain our Sites and provide other administrative services to us (including, but not limited to, order processing and fulfillment, providing customer service, maintaining and analyzing data, sending customer communications on our behalf, and entry collection, winner selection and prize fulfillment for contests, sweepstakes and other promotions). For example, we use an email service provider to send out emails on our behalf. We also use Live Chat to assist you if you have questions while using our site or regarding our service. When you sign up for our services, we will share your personally identifiable information as necessary for the third party to provide that service. We seek to ensure that these unaffiliated third parties will not use the personally identifiable information for any other purpose than to provide the administrative services for which they are responsible. Because such unaffiliated third-party service providers that help us administer our Sites will have access to users' personally identifiable information, if you do not wish for our unaffiliated third-party service providers to have access to your information, please do not register or submit any personally identifiable information to us.
- To complete your purchase. If you choose to make a purchase on the Sites, we may collect from you your credit card number, billing address and other information related to such purchase, and we may use such collected information in order to fulfill your purchase. We may also provide such information, or other personally identifiable information provided by you, to unaffiliated third parties as necessary to complete your purchase (for example, to process your credit card).
- We may disclose information about our users, including personally identifiable information; (i) when requested by governmental or quasi-governmental authorities conducting an investigation; (ii) if required to do so by subpoena, court order or legal process; (iii) to verify or enforce compliance with the policies governing our Sites and

applicable laws; or (iv) to protect against misuse or unauthorized use of our Sites. We also may disclose user information whenever we believe disclosure is necessary to limit our legal liability; to protect or defend our rights or property; or protect the safety, rights, or property of our users.

- We may sell, transfer, or otherwise disclose user information, including personally identifiable information, to a successor entity in connection with a corporate merger, consolidation, the sale of substantially all assets, or other corporate change respecting Velvetech, the Sites and/or the services offered hereby.
- To track and analyze non-identifying and aggregate usage and volume statistical information from our visitors and customers and provide such information to third parties.
- To protect against potential fraud, we may verify with third parties the information collected from these Sites. In the course of such verification, we may receive personally identifiable information about you from such services. In particular, if you use a credit card or debit card to purchase services with us, we may use card authorization and fraud screening services to verify that your card information and address matches the information that you supplied to us, and that the card has not been reported as lost or stolen.

Please know that you will retain ownership of any information that you may include in your account and contact lists and Velvetech will not use contact lists for its own promotional campaigns or sell contact lists to third-parties, subject at all times to Velvetech's need to access and use such information in order to provide the services pursuant to its Terms of Use and this privacy policy. Except as stated in this privacy policy, or as otherwise stated at the time personally identifiable information is gathered, Velvetech will not provide personally identifiable information to third parties who are not under the direction and control of Velvetech.

(2) Non-Personally Identifiable Information

We use non-personally identifiable information collected on the Sites in the manner disclosed above, in Section A(2). We may share this non-personal information with third parties.

D. Collection and Use of Information from Children under the Age Of 13

The Sites are not directed at individuals less than thirteen (13) years of age, and Velvetech does not intend to collect any personally identifiable information from such individuals, unless otherwise stated at the time such information is collected.

E. International Transfer of Information

If you choose to provide us with personally identifiable information, we may transfer that information to our affiliates and subsidiaries or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. Please note, however, that data originating from the European Economic Area (EEA) will not be transferred outside of the EEA. If you are visiting the Sites from outside the United States and EEA, please be aware that your personal data will be processed by Velvetech in the United States or EEA, where data protection and privacy regulations may differ from similar regulations in other countries. By using the Sites, you consent to:

- the use of your personally identifiable information for the uses identified above in accordance with this privacy policy;
- any such transfer of information outside of your country if you are located outside of the United States, with the exception of data from the EEA as stated above.

F. Opt-Out

We communicate with users who subscribe to our services on a regular basis via email as well as via phone and text message. For example, we may use your email address to confirm your request, to send you notice of payments, to send you information about changes to our products and services, and to send notices and other disclosures as required by law. We may call you or send text messages to provide you with reminders in accordance with our service to you. You can opt-out of some but not all of these communications, however, they will be primarily

informational in nature rather than promotional. However, we provide you the opportunity to exercise an opt-out choice if you do not want to receive other types of communication from us, such as emails or updates from us regarding new services and products or if you do not want us to share your personally identifiable information with third parties. The opt-out choice may be exercised by ticking or un-ticking the appropriate box if such checkbox is available at the points where personally identifiable information is collected or by contacting us. For text message communications, you can opt-out by replying "STOP" to the message that you receive. You also may opt-out of receiving certain emails by clicking on the "unsubscribe" link within the text of the email. We will process your unsubscribe as soon as possible, but please be aware that in some circumstances you may receive a few more messages until the unsubscribe is processed.

G. Access to Personal Information

If your personally identifiable information changes, or if you no longer desire our service, you may correct, update, delete or deactivate it by making the change on our member information page or by emailing our Customer Support at support@velvetech.com. We will respond to your request for access within 30 days. We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

H. Blogs, Forums, and Other Public Posting Areas

Our Sites offer publicly accessible blogs or community forums. Please note that any information you include in a message you post to any chat room, forum or other public posting area is available to anyone with Internet access. If you do not want people to know your e-mail address, for example, do not include it in any message you post publicly. **PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN FORUMS AND OTHER PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN FORUMS AND OTHER PUBLIC POSTING AREAS.** To request removal of your personal information from our blog or community forum, contact us at support@velvetech.com. In some

cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

I. Third-Party Websites

This statement applies solely to information collected on the Sites. The Sites may contain links to third party websites, whose information practices may be different from Velvetech's. Visitors should consult such third-party sites' privacy notices, as Velvetech does not have any control over information that is submitted to, or collected by, these third parties. Velvetech does not make any representations or warranties as to the security of any information (including, without limitation, credit card and other personal information) you might be requested to give to any third party. These links are provided solely as a convenience to you and not as an endorsement by Velvetech of the contents on such third-party websites. Velvetech cannot ensure that you will be satisfied with any products or services that you purchase from a third-party site that links to or from the Sites, since these sites are owned and operated by independent retailers. Velvetech is not responsible for the content of linked third-party sites and does not make any representations regarding the content or accuracy of materials on such third-party sites. Velvetech has not taken any steps to confirm the accuracy or reliability of any of the information contained on such third-party sites. If you decide to access linked third-party sites, you do so at your own risk. Velvetech strongly encourages you to make whatever investigation you feel necessary or appropriate before proceeding with any online or off-line transaction with any of these third parties.

J. Third-Party Advertisers

We value your online privacy and strive to give you control over the cookies that may be placed on your computer when visiting our Sites. In addition to our own cookies, we may collaborate with advertisers, third-party ad networks, and other advertising entities to display ads on the Sites.

Be informed that these advertising partners may use cookies, web beacons, and other tracking technologies to gather data about your visits to our Sites and other websites. This is done to provide you with relevant ads, analyze the effectiveness of their campaigns, and understand your online behavior. For instance, third-party vendors, like Google, might use cookies to show ads based on your previous interactions on our website.

To empower you with choice, we have implemented measures that allow you to decide which cookies you want to permit during your visit. Moreover, you can always opt out of specific advertising cookies on the respective Site.

K. Data Security Policy

The importance of security for all personally identifiable information associated with visitors to the Sites—as well as Velvetech customer information, such as cell phone numbers, texts, messages, credit card information, and addresses, and other account data—is of utmost concern to Velvetech, and we have implemented, and periodically review, certain physical, electronic, and managerial procedures to help prevent unauthorized access and maintain data security. Your payment and personal information is always safe. Our Secure Sockets Layer (SSL) software is the industry standard and among the best software available today for secure commerce transactions. It encrypts all of your personal information, including credit card number, name, and address. Unfortunately, due to the open nature of Internet communications, no data transmission over the Internet can be guaranteed to be secure, and thus we cannot guarantee that communications between you and Velvetech will be free from unauthorized access by third parties. Visitors of the Sites and Velvetech customers use the Sites at their own risk.

L. Your Acceptance of These Terms

By accessing the Sites, you signify your assent to the Velvetech Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Sites. You should visit this page periodically, as we may, from time to time, update this Privacy Policy and such changes shall be effective

immediately upon posting on the Sites and without further notice to you. Your continued access to the Sites following the posting of changes to this Privacy Policy shall be deemed an acceptance of such changes by you. Velvetech will, however, use personally identifiable information only in accordance with the version of the Privacy Policy under which the information was collected.

M. Your California Privacy Rights

Right to Know About Personal Information Collected, Disclosed, or Sold: California residents can request details about their personal information use over the past 12 months.

Right to Request Deletion of Personal Information: California residents can ask Velvetech to erase their personal information, with certain exceptions.

Right to Non-Discrimination for Exercising Privacy Rights: Exercising privacy rights under the CCPA will not lead to discriminatory treatment by Velvetech.

Right to Opt-Out of the Sale of Personal Information: Note that Velvetech does not sell personally identifiable information.

Exercising Your CCPA Rights: To exercise any of the rights described above, please contact us at support@velvetech.com.

N. Changes in This Privacy Policy

We may update this privacy statement to reflect changes to our information practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

O. Questions/Concerns?

If you have any questions, comments, or concerns regarding our Privacy Policy, please contact us at support@velvetech.com. You may also contact us via postal mail at:

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