

Privacy Policy Of EW Bullock

Last Updated on 8/25/2021. This privacy policy is effective immediately.

At EW Bullock (the “Company” or “We” or “Data Controller”), we respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit this website (our “Website”) and our practices for collecting, using, maintaining, protecting and disclosing that information.

The Company is responsible for the processing of personal data it receives. The Company complies with the Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received, The Company is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

We encourage individuals from the EU member countries and Switzerland who have questions or complaints about how we process their personal data under either Privacy Shield Framework to contact us directly on our Contact Page. We will work to resolve your issue as quickly as possible, but in any event no later than 45 days of receipt. If you have an unresolved concern that we have not addressed satisfactorily, please contact us.

Types Of Data Collected

Among the types of Personal Data that this website may collect, by itself or through third parties, there are: Cookie, Usage data, First name, Last Name, Phone Number and Email address.

All users are immediately notified of our use of cookies and are given the option to leave the site and stop using it.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using this Application.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify

Users and remember their preferences, for the sole purpose of providing the service required by the User.

Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode And Place Of Processing The Data

Methods Of Processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

Retention Time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

The Use Of The Collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Analytics and Contacting the User.

We may use data to provide our Services to you, to communicate with you about your use of our Services, to respond to your inquiries, to fulfill your orders, and for other customer service purposes.

- To tailor the content and information that we may send or display to you, to offer location customization and personalized help and instructions, and to otherwise personalize your experiences while using our Services.
- To contact you, including for marketing and promotional purposes. For example, we may use your information, such as your email address, if you have opted in to this kind of contact, to send you news and newsletters, special offers, and promotions, or to otherwise contact you about products or information we think may interest you. We also may use the information that we learn about you to assist us in advertising our Services on third-party services.
- To better understand how individuals access and use our Services, including to learn about their engagement levels and navigation paths, as well as user retention and funnel drop-offs, and for other research and analytical purposes.

The laws in some jurisdictions require companies to tell you about the legal ground(s) they rely on to use or disclose your personal data. To the extent those laws apply, our legal grounds for processing data for which we are a controller are as follows:

- To Honor Our Contractual Commitments. Some of our processing of personal data is to meet our contractual obligations to Customers, or to take steps at Customers' request in anticipation of entering into a contract with them.
- Legitimate Interests. In most cases, we handle personal data on the ground that it furthers our legitimate interests in commercial activities, such as the following in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals:
 - Customer service;
 - Analyzing and improving our business;
 - Protecting our business, personnel and property;
 - Marketing; and/or
 - Managing legal issues.
- We may also process personal data for the same legitimate interests of our Customers and business partners.

Consent. Where required by law, and in some other cases, we handle personal data on the basis of consent. For example, we will obtain consent to our use of cookies in certain jurisdictions.

Legal Compliance. We need to use and disclose personal data in certain ways to comply with our legal obligations.

Our Use Of Cookies And Other Tracking Mechanisms

We or our services providers may also collect data about your use of the Services through the use of Internet server logs, cookies, JavaScript, tracking pixels, and/or other technologies. A web server log is a file where website activity is stored. A cookie is a small text file that is placed on your computer when you visit a website, that enables us to: (a) recognize your computer; (b) store your preferences and settings; (c) understand the web pages of the Services you have visited; (d), enhance your user experience by delivering content and advertisements specific to your inferred interests; (e) perform searches and analytics; and (f) assist with security administrative functions. Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email, and that are designed to provide usage information like ad impressions or clicks, measure popularity of the Services and associated advertising, and to access user cookies. We also may include Web beacons in email messages, newsletters and other electronic communications to determine whether the message has been opened and for other analytics, personalization and advertising. As we adopt additional technologies, we may also gather additional information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., Internet Explorer; Google Chrome; Mozilla Firefox; or Apple Safari). Please note that by blocking any or all cookies, you may not have access to certain features or offerings of the Services.

We may use third parties such as network advertisers to serve advertisements on our Services or on third-party services that enable us and third parties to target advertisements to you. These third parties may use cookies, JavaScript, web beacons (including clear gifs), and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third parties’ practices are governed by their privacy policies, and not this on.

If you are in the United States, you may opt out of many third-party ad networks by going to the Digital Advertising Alliance (“DAA”) Consumer Choice page for information about opting out of interest-based advertising and your choices regarding use of your information by DAA companies. You may also go to the Network Advertising Initiative (“NAI”) Consumer Opt-Out page for information about opting out of interest-based advertising and your choices regarding use of your information by NAI members. If you are in the European Economic Area (“EEA”), you may opt out of many third-party ad networks by going to the European Interactive Digital Advertising Alliance (“EDAA”) Your Online Choices page for information about opting out of interest-based advertising and your choices regarding use of your information by EDAA members.

Opting out from one or more companies listed on the DAA, NAI, or EDAA pages will opt you out of those companies' delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising through our Services or on other services. You may continue to receive ads, for example, based on a particular website that you are viewing (i.e., contextually based ads). Also, if your browsers are configured to reject cookies when you opt out, your opt out may not be effective.

We may use third-party web analytics services on our Services to collect and analyze the information discussed above, and to engage in auditing, research or reporting. The information (including your IP address) collected by various analytics technologies described above will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services, including by noting the third-party website from which you arrive, analyzing usage trends, assisting with fraud prevention, and providing certain features to you.

Security

We have taken steps to help protect the personal data we collect from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our best efforts, no data security measures can guarantee 100% security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

Detailed Information On The Processing Of Personal Data

Personal Data is collected for the following purposes and using the following services:

- Analytics
- Contacting The User

Additional Information About Data Collection And Processing

Legal Action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services. The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

Additional Information About User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

System Logs And Maintenance

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

Your Choices And Rights

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

We offer the options described below for exercising rights and choices under applicable laws. Many of these are subject to important limits or exceptions under applicable law.

- The law of your jurisdiction (for example, within the EEA) may give you additional rights to request access to and rectification or erasure of certain personal data we hold. In some cases, you may be entitled to receive a copy of the personal data you provided to us in portable form or to request that we transmit it to a third party. The law may also give you the right to request restrictions on the processing of your personal data, to object to processing of your personal data, or to withdraw consent for the processing of your personal data (which will not affect the legality of any processing that happened before your request takes effect). You may contact us as described below to make these requests.
- You may contact us with any concern or complaint regarding our privacy practices, and you also may lodge a complaint with the relevant governmental authority.
- You may opt out of such communications by following the opt-out instructions contained in the email. Opting out is immediate, but in some cases it may take up to 10 business days for us to process opt-out requests. If you opt out of receiving emails about recommendations or other information we think may interest you,

we may still send you emails about your account or any Services you have requested or received from us.

- You may opt out of receiving push notifications by turning them off in your device settings.

Children

Our Services are not targeted to individuals under 16, and we do not knowingly collect personal data from individuals under the age of 16. Where required by applicable law, if we discover that a child under 16 has provided us with personal data, we will delete such personal data from our systems. In the United States, if we become aware that we have collected personal information (as defined by the Children's Online Privacy Protection Act) from children under the age of 13, we will take reasonable steps to delete it as soon as practicable.

Access To My Personal Data

Upon request The Company will provide you with information about whether we hold, or process on behalf of a third party, any of your personal data. You may access, correct, or request deletion of your personal data by logging into your account, contacting us on our Contact page, or by updating your profile information. We will respond to your request within a reasonable timeframe. In certain circumstances we may be required by law to retain your personal data, or may need to retain your personal data in order to continue providing a service. We may retain your information for as long as your account is active, or as needed to provide you services, comply with our legal obligations, resolve disputes, and enforce our agreements.

The Company acknowledges that you have the right to access your personal data. If requested by a Customer to review, correct, amend, or delete personal data, we will respond within a reasonable timeframe. We will retain personal data on behalf of our Customers for as long as needed to provide services to our Customers, or as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Cookie Policy

This site uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised

tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the [About Cookies website](#) which offers guidance for all modern browsers

Contact Us

If you have questions about the privacy aspects of our Services or would like to make a complaint, please contact us at our Contact page.

Changes To This Policy

This Policy is current as of the last updated date set forth at the top of the policy. We will continue to evaluate this Policy as we update and expand the Services and our offerings, and we may make changes to the Policy accordingly. We encourage you to periodically review this page for the latest information on our privacy practices. If we make any material changes, we will notify you as required by law.