

# AWO Marketing© is a brand of Avanti Enterprises©

Avanti Enterprises© is a family owned, private unincorporated business, within the geographic borders of The United States of America [unincorporated], any further references of this name will be understood to be the same unincorporated business. This is a private business. We are not licensed to provide services to Federal Employees or their Dependents. Accept service at your own risk. We stand under The Public Law of The United States of America [unincorporated]. All Rights Reserved.

## GDPR Policy

Last Updated on October 10<sup>th</sup>, 2022

### **UNDERSTAND THIS COMPLETELY:**

By consuming any information from Avanti Enterprises© through our websites, brands or associated information channels such as but not limited to email, messengers or social media - You agree to all policies below, and you agree that these policies may update at any time without notice. Therefore, you agree you are solely responsible to keep yourself updated on any and all current policies.

### **I. Collection and Use of Personal information.**

Avanti Enterprises© may collect personal information from You. Personal information is information relating to an identifiable person who can, by virtue of such information, be directly or indirectly identified. You may be asked to provide Your personal information anytime You are in contact with Avanti Enterprises© or a Avanti Enterprises© affiliated company. Avanti Enterprises© and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if You chose not to do so, in many cases we will not be able to provide You with our products or services or respond to any queries You may have.

## **II. What personal information we collect**

When You create a Avanti Enterprises© User Account, work with Avanti Enterprises©, purchase a product, download a software update, or contact us, we collect a variety of information, including Your name, mailing address, phone number, e-mail address, contact preferences, and computer/browser/location information. When payment, or payment information, is required, we will direct You to submit credit card information through a third-party for us or through one of our affiliates or an affiliate promotion we are running for someone else.

## **III. How we use Your personal information.**

The personal information we collect allows us to keep You posted on Avanti Enterprises© 'latest product announcements, software updates, and upcoming events. If You don't want to be on our mailing list, You can opt out anytime by navigating to the unsubscribe link in the last e-mail You received from Avanti Enterprises©. You will have the option to unsubscribe from an individual list, or from all Avanti Enterprises© lists. We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes. We may use Your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of Avanti Enterprises© account holders or clients. From time to time, we may use Your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to Your interaction with Avanti Enterprises©, You may not opt out of receiving these communications. We may also use personal information for internal purposes such as auditing, data

analysis, and research to improve Avanti Enterprises©'s products, services, and customer communications.

#### **IV. Collection and Use of Non-Personal Information.**

We also collect data in a form that does not identify any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it: We may collect information such as business, language, zip code, area code, unique device identifier, referrer URL, and the time zone where a Avanti Enterprises© product is used so that we can better understand customer behavior and improve our products, services, and advertising. We may collect information regarding customer activities on any of our websites. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is non personal information. We may collect and store details of how You use our services. This information may be used to improve the relevancy of results provided by our services.

#### **V. Cookies and Other Technologies.**

Avanti Enterprises© 'websites, e-mail messages, and advertisements may use "cookies" and other technologies such as tracking, re-marketing tags, and pixels based on context, e.g., a search query, a channel You are reading, or inferred interests. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non personal information. We design and target advertising based on how You interact with Avanti Enterprises©. If You do not wish to receive ads targeted to Your interests from

Avanti Enterprises©, you can choose to limit ad tracking, which will opt Your Avanti Enterprises© ID out of receiving such ads regardless of what device You are using. You may still see ads based on context like a search query or a channel You are reading. Avanti Enterprises© and our partners also use cookies and other technologies to remember how You use our website and services. Our goal in these cases is to make Your experience with Avanti Enterprises© more convenient and personal, and provide You better customer service. To limit ad tracking, you may use Your browser's settings to disable cookies and other tracking tools. Please note that certain features of the Avanti Enterprises© website will not be available once cookies are disabled. This may even include access to services you have paid for.

We gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data. We use this information to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole. Avanti Enterprises© may use this information in our marketing and advertising services.

In some cases we use a “click-through URL” linked to content on the Avanti Enterprises© website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our marketing communications. We also use it to account for Affiliate activity and pay Affiliate commissions and bonuses or track promotions we are running.

## **VI. Disclosure to Third Parties.**

At times Avanti Enterprises© may make certain personal information available to strategic partners that work with Avanti Enterprises© to provide products and services, or that help Avanti Enterprises© market to customers. Personal information will only be shared by Avanti Enterprises© to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

**Affiliates.** Avanti Enterprises© will provide Your email address to affiliates or users who refer You to us, or through whom You create a Avanti Enterprises© account. We may also rent our email list, in order to promote products/services by those who have paid for us to send the offer(s). We will not share your information, however.

**Service Providers.** Avanti Enterprises© shares personal information with companies who provide services such as information processing, fulfilling customer orders, delivering products to You, managing and enhancing customer data, providing customer service, and assessing Your interest in our products and services. Avanti Enterprises© also shares Your information with financial institutions who provide payment (both to and from You) services. Finally, Avanti Enterprises© provides Your personal information with API integrators You have chosen, and other third party software services to assist You or affiliate partners. These companies are obligated to protect Your information and may be located wherever Avanti Enterprises© operates.

**Lawful.** It may be necessary – by law, that requests from lawful government authorities within or outside Your country – for Avanti Enterprises© to disclose Your personal information. We may also disclose information about You if we determine that for purposes of law enforcement, disclosure is necessary or appropriate. We may also disclose information about You if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Our

company stands under the Public Law of The United States of America [unincorporated].

**Corporate Change.** Additionally, in the event of a reorganization, merger, or sale of Avanti Enterprises© we may transfer any and all personal information we collect to the relevant third party.

## **VII. Protection of Personal Information.**

Avanti Enterprises© takes the security of Your personal information very seriously. When Your personal data is stored by Avanti Enterprises©, we use computer systems with limited access housed in facilities using physical security measures. When You use some Avanti Enterprises© products and services that by their nature are public facing, such as when You post on a Avanti Enterprises© forum, the personal information and content You share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information You choose to share or submit in these instances. For example, if You list Your name and e-mail address in a forum posting, that information is public. Please take care when using these features.

## **VIII. Retention of Personal Information.**

Avanti Enterprises© will retain Your personal information for as long as You have a Avanti Enterprises© account. After Your Avanti Enterprises© account is terminated, we will retain Your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law or to keep proper records for the functions of analyzing our business' performance.

## **IX. Access to Personal Information.**

You can help ensure that Your contact information and preferences are accurate, complete, and up to date by contacting

us. For personal information we hold, we will provide You with access (including a copy) upon Your request. We may decline to process requests that are frivolous, vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Access, correction, or deletion requests can be made by contacting us.

## **X. Children & Education.**

We understand the importance of taking extra precautions to protect the privacy and safety of children using Avanti Enterprises© products and services. Children under the age of 18, are not permitted to create their own Avanti Enterprises© IDs or start a client relationship; instead, a parent must obtain the account or start the client relationship and provide their information to Avanti Enterprises©. If we learn that we have collected the personal information of a child under 18 we will delete the information as soon as possible.

## **XI. Third Party Sites and Services.**

Avanti Enterprises© websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties is governed by their privacy practices. We encourage You to learn about the privacy practices of those third parties.

## **XII. Your Rights Under the GDPR.**

If You are a citizen or a resident of a country in the European Union, the GDPR grants You the following rights:

- a. **Access to Your Personal Data.** You have the right to receive a copy of Your personal data that is subject to processing by Avanti Enterprises©. Ordinary requests will be granted without

charge to You within one calendar month of when You make the request. In cases of excessive, unreasonable, or repeated requests Avanti Enterprises© may charge You a reasonable fee and may require additional time to grant Your request. Also, Avanti Enterprises© may use reasonable means to confirm Your identity before granting any request for data so as to prevent granting fraudulent requests. To request a copy of Your personal data, please contact us.

**b. To have Your Data Corrected.** If Your personal data is erroneous or outdated, You have the right to have it corrected. To do so, please contact Avanti Enterprises©.

**c. To be Forgotten.** You have the right to be forgotten by Avanti Enterprises©. You may exercise this right by contacting us. We will comply with Your request, at no charge to You, within one calendar month by deleting Your account, along with all of Your personally-identifiable data that is subject to any Avanti Enterprises© processing. Naturally, after we grant Your request You will not have access to any Avanti Enterprises© products or services unless and until You open a new Avanti Enterprises© account. Avanti Enterprises© may use reasonable means to confirm Your identity before granting any request for data so as to prevent the granting of fraudulent requests.

**d. To Restrict Processing of Your Data.** You can request that Your data not be processed via Avanti Enterprises© partners. You can make that request by contacting us and, if you wish, you can even specify which third parties to restrict from processing Your data. We will respond to Your request, at no charge to You, within thirty (30) days from when You make Your request. Please be advised that some of our partners, e.g., Stripe, are essential to Avanti Enterprises© services, so that if You block processing by them, Avanti Enterprises©' services may be unavailable to You.



**e. Portability.** You have the right to receive a copy of Your personal data that is subject to processing by Avanti Enterprises© in a portable format, or to have it transferred directly from Avanti Enterprises© to another party. Ordinary requests will be granted without charge to You within one calendar month of when You make the request. Avanti Enterprises© may use reasonable means to confirm Your identity before granting any request to transfer data to You or another party so as to prevent granting fraudulent requests. To request a copy of Your personal data in a portable format, or to request a direct transfer of Your data, please contact us.

### **XIII. Your Responsibility Under GDPR.**

If You are a Avanti Enterprises© User or client, then that probably means You are a business owner, using the Avanti Enterprises© software to sell goods and services to Your customers. With respect to the customer data that You provide to Avanti Enterprises©, Avanti Enterprises© is a data processor and will comply with its obligations under the GDPR; but with respect to Your customers, You are probably a data controller, and if any of Your customers is a citizen or a resident of a country in the European Union, then You must ensure that You comply with Your obligations as a data controller under the GDPR; namely, You must ensure that You afford Your Customers the rights identified in section (a) above. Avanti Enterprises© sells its products/services; it does not provide legal advice or legal services, nor does it sell a “done-for-you” GDPR compliance package. Please consult legal counsel of Your own choosing for advice on what You need to do to comply with GDPR.

### **XIV. Our Companywide Commitment to Your Privacy.**

To make sure Your personal information is secure, we communicate our privacy and security guidelines to Avanti

Enterprises© employees and strictly enforce privacy safeguards within the company.

## **XV. Privacy Questions.**

If You have any questions or concerns about Avanti Enterprises©'s Privacy Policy or data processing or if You would like to make a complaint about a possible breach of local privacy laws, please contact us. When a privacy question or an access or download request is received we have a team dedicated to addressing the specific concern or query which You are seeking to raise. In responding to Your request, we may need to request more information from You. If You are unsatisfied with the response You receive, You may refer Your complaint to the relevant regulator in Your jurisdiction. If You ask us, we will endeavor to provide You with information about relevant complaint avenues which may be applicable to Your circumstances. If You live in the European Economic Area, United Kingdom, or Switzerland, and You wish to contact us regarding questions or to exercise Your statutory rights, please contact us.

## **XVI. Updates to the Policy.**

Avanti Enterprises© may update its Privacy Policy and this GDPR Policy from time to time, as posted on our website, without notice.