### THEPULVR.COM PRIVACY POLICY

Courtright Engineering Company, LLC ("Courtright" "we" "us" or "our") values your privacy.

This "Privacy Policy" outlines how your personally identifiable information (your "Visitor Information") may be collected, used, and shared in connection with your access to and/or visitation or use of our site thepulvr.com (the "Site"), as well as what information we may collect through any third party application or third party sites, social network or social media sites (such as Facebook, Instagram, Twitter, Google, etc., collectively "Applications"). This Privacy Policy also describes your choices and rights regarding the use, access and correction or deletion of your Visitor Information. By visiting our Site, you consent to the use of your Visitor Information in accordance with this Privacy Policy. You may also be asked to provide clear and unequivocal affirmative consent to the collection, processing, and sharing of your Visitor Information via opt-in procedures. This Site is owned and operated by Courtright Engineering Company, LLC.

# General Information We Collect and How We Use It

We collect Visitor Information when you use our Site. Sometimes you may submit it to us yourself, other times it may be collected automatically.

#### **Information Collected**

When you use our Site, your Visitor Information may be collected, used, and shared. As detailed below, the type of Visitor Information collected may vary based on how it was gathered, but may include, among other things, your name, email address, and other information that you voluntarily submit (e.g., when you request to receive our e-newsletter subscription), information automatically collected about your usage of our Site which does not include personally identifiable information (e.g., the content that you choose to view, how you interact, and information about you that third parties may share with us if such third parties have previously received your consent to do so).

Courtright does not collect or process any data regarding the following: Race or ethnic origin; political opinions; religious or philosophical beliefs; trade union memberships; genetic or biometric data; health or mortality; sexual orientation.

## **Voluntary Submission**

Courtright may collect Visitor Information that is voluntarily provided by you or with your permission. For example, we may ask you for information, such as your name and e-mail address, when you register to receive our e-newsletter or complete our Contact Us form.

#### **Third Party Websites**

The Site may contain links to websites not owned or controlled by Courtright. Courtright does not have any control over these third-party websites. We encourage you to be aware of these other third-party websites and their privacy policies, as we cannot control and are not responsible for privacy policies or practices of third party websites.

#### Web Beacons

Courtright may contain electronic images known as web beacons (invisible images often referred to as pixel tags or clear GIFs) on our Site in order to recognize users, assess traffic patterns, identify preferred content and measure Site engagement. We may also include web beacons in our e-mail messages, including e-newsletters, in order to count how many e-mail messages have been opened.

Courtright and its partners (including Google) also may use web beacons to collect various data provided by your browser while you are on our Site and elsewhere (i.e., outside of our Site) where we may be acting as a 3rd party. This data is collected in the aggregate, but may include or be associated with other non-personally identifiable information or personally identifiable information that you have voluntarily submitted.

### Log Files

Our Site's web and ad servers log information about your IP address, browser type and the current URL you are requesting. This information is always provided by your browser and automatically logged. These log files are stored in a secure location and used in our internal analysis of traffic patterns.

#### **Cookies and Similar Tools**

A cookie is a small data file that is written to your device by a web browser. A cookie file can contain and/or automatically collect information, such as a user identification code or IP address that a website will use to track the pages and number of times you have visited. The data read from these cookies may be linked to personally identifying (PII) and non-personally identifying (non-PII) information.

We and our partners may use cookies and similar technologies on the Site to personalize and optimize your browsing experience and the Site by: providing you tailored content (see below for more information), enabling social media features, safeguarding against spam and malware, analyzing trends, traffic, and user behavior, administering the website, gathering demographic information about our user base as a whole, tracking web and advertising analytics throughout the Site and its affiliates, remembering your preferences and voluntarily-submitted information, performing location-related functionalities and analytics, participating in market research (e.g., ratings), and educating ourselves about how we can continue to improve the Site and its various elements.

Cookies fall into the subcategories below:

ESSENTIAL COOKIES. Certain cookies are used for specific purposes that are essential to your secure use and navigation of the Site. Without them, Courtright may not be able to provide core Site functions and features to you, and the Site would not operate as well as you or Courtright would like. These cookies collect and use information such as your server preferences, single-session data and corresponding identifier, web beacons and log files (detailed below), and other credential-related information. Essential cookies also help inform Courtright whether you require, or have already been served, an affirmative consent request in connection with our data policies. Essential cookies also include analytics cookies, which provide us data that allows Courtright to better understand its users and improve the Site based on what we have learned from that data.

PREFERENCE COOKIES. Other cookies are used to collect and process information about your preferences and similar choices in connection with the Site in order to optimize your browsing experience. Preference cookies include social media cookies, which collect information about your social media usage and other data you may have provided in connection with such usage (if you access the Site through a social media website or mobile application, you may have social media cookies). If you wish to modify or change your social media cookies, please visit and review the settings related to your applicable social media account(s).

ADVERTISING COOKIES. To help support the Site and further tailor your experience, Courtright and its advertising/messaging partners (and/or their third party providers – i.e. Google) may also use cookies on the Site to personalize the content you may be shown. Such content use cookies are used to provide you targeted advertisements that may be more consistent with your interests than non-targeted advertisements. Certain Courtright advertising partners may also use cookies to monitor or track the performance of their advertising content. Courtright does not provide user information to advertising partners except in connection with the Site or as required by law.

NOTE: You have the ability to accept or decline cookies by changing certain settings of your web browser. Most web browsers automatically accept cookies, but generally allow users to modify their browser settings to display a warning before accepting a cookie, to accept cookies only from certain websites, and/or to refuse all cookies. We encourage you to consider keeping your cookies enabled, as if you choose to disable cookies from our Site, you may not be able to use or benefit from certain features of the Site, particularly the features that are designed to personalize your experience.

If you would like to manage your cookie preferences or learn more information about this practice and your right to decline (or opt-out of) cookies placed by some or all of these companies, please contact us as outlined below. **Analytics** 

Analytic tools such as Google Analytics<sup>TM</sup> ("Analytic Services") are being used with this Site which transmits website traffic data to servers in the United States. These Analytic Services do not collect personal information, identify individual users or associate your IP address with any other data. We do not share any personally identifiable information with our Analytic Services in connection with their performing of any services on our Site. We use reports provided by Analytic Services to help us understand website traffic and webpage usage. You may opt out by installing the Google Analytics optout browser add-on found here.

### Use of Your Information

Your Visitor Information may be used for the purposes outlined below. We will not use your Visitor Information without a valid legal basis to do so.

#### **To Provide Communications**

From time to time we may provide e-mails highlighting new features, promotions or content on the Site to those users who have expressly provided us with their permission to send such communications.

## **Sharing of Information**

You may be requested to voluntarily provide certain Visitor Information during your use of our Site. If you choose to do so, that Visitor Information may be shared with Courtright as well as business partners and vendors providing hosting and other web based services for Courtright.

We use third parties to provide e-mail messaging and hosting services on the Site. When you sign up for services, we will share your Visitor Information only as necessary for the third party to provide that service. These third parties are prohibited from using your Visitor Information for any other purpose. If you do not want your information to be shared, you can choose not to allow the transfer of your information by not using that particular service.

#### As Necessary to Provide Services to You

We may occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of e-newsletter mailings, processing certain transactions, or performing statistical analysis of our services. We will only provide those companies the information they need to deliver the service. In some instances, these companies may collect information directly from you. In these cases, you will be notified of the involvement of the external service provider. In all cases, these companies are subject to agreements that require them to maintain the confidentiality of your information and they are prohibited from using that information for any other purpose.

### In the Event of Sale or Bankruptcy

The ownership of Courtright may change at some point in the future. Should that occur, we want Courtright to be able to maintain a relationship with you. In the event of a sale, merger, bankruptcy or other change in control of Courtright, your information may be shared with the person or business that owns or controls this Site. You will be notified as described below in "Changes to Privacy Policy."

### As Required By Law

Courtright may disclose your personal information if required to do so by law such as to comply with a subpoena or in the good faith belief that such action is necessary to conform to the edicts of the law, protect your safety or the safety of others, investigate fraud or comply with a judicial proceeding, court order or legal process served on Courtright or to protect and defend the rights or property of Courtright.

Courtright will not process your Visitor Information without a lawful basis to do so. In general, Courtright will process your Visitor Information on the legal bases of consent, contract (if you have entered into an agreement with us and such processing is a necessary part thereof), or legal obligation (as noted above).

#### How We Protect Your Information

Your information is stored on servers of our business partners (Scales) located in the United States. Scales uses industry standard physical, electronic, and organizational safeguards to protect your Visitor Information against loss or theft as well as unauthorized access and disclosure to protect your privacy. Scales employs many different security techniques to protect such data from unauthorized access.

### **Additional Privacy Considerations**

See below for additional privacy considerations.

## **Third Party Policies**

This Privacy Policy covers only our Site. Courtright may contain links to unaffiliated third parties. These links are provided as a service to you and do not constitute our endorsement or support of the third party or the information or content contained within the third party. Unaffiliated third parties who provide information and links through this Site are encouraged to participate in industry privacy initiatives and to take a responsible attitude towards privacy. However, since we do not have direct control over the policies or practices of participating third parties, we are not responsible for and do not endorse the privacy practices or content of those sites. We recommend and encourage that you always review the privacy policies of any third parties before you provide any personal information or complete any transaction with such parties. Please contact each third party provider directly if you have any questions about their privacy policies or the information they require for you to complete any transaction.

## **General Data Protection Regulation**

Courtright does not actively target or market to any EU member state and does not, to its knowledge, process or control any EU citizen Visitor Information: Despite this fact, this Privacy Policy and its enumerated provisions are intended to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "General Data Protection Regulation" or "GDPR") and provide appropriate protection and care with respect to the treatment of all of our users' information in accordance with GDPR.

# **Children's Online Privacy Information**

#### CHILDREN ONLINE PRIVACY PROTECTION ACT ("COPPA") NOTIFICATION

This Site was not designed for anyone under the age of 13. We are not responsible for any access or use of the Site by children or minors under the age of 13. Courtright does not sell products on this Site designated for purchase by children under the age of 13 nor is it designed for their use or entertainment.

If we change our collection practices in the future, we will obtain prior, verifiable parental consent before collecting any Visitor Information from children. If at any time we establish or begin providing services on our Site that in anyway meets the criteria of Children's Online Privacy Protection Act ("COPPA") we will ensure that full compliance is met in every aspect of COPPA.

### **Residents of California**

The California Consumer Privacy Act ("CCPA") provides California residents with specific rights as to the privacy and management of their Visitor Information. These laws include the right to know what Visitor Information a business has on its systems, how that information is used, and a right to request it be deleted. This privacy policy describes such visitor's rights related to the use of their Visitor Information. If you would like to exercise your rights under CCPA, you may contact us via the CONTACT US page, on the tab REQUEST MORE INFORMATION to submit your request. If you choose to exercise your rights under CCPA, you may not be discriminated against by us for choosing to do so.

### **Changes to Privacy Policy**

If we make any material changes we will notify you by email (sent to the e-mail address specified if you voluntarily provided us with one) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices and to review our most current Privacy Policy.

### **Contacting Data Controller**

If you have any questions regarding this Privacy Policy, please feel free to contact us via our **CONTACT US** page, on the tab REQUEST MORE INFORMATION.

Courtright will use commercially reasonable efforts to promptly respond and resolve any problem or question.

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