

## **PRIVACY POLICY**

This Website is operated by Steep Hill Labs, Inc. (“we/our/us”). “Website” means the website located at <http://steephilllab.com>, <http://steephill.com> or any subsequent URL which may replace this website, and all associated websites, URLs and micro sites. “You/your” means you as a user of the Website. “User” means all users of this Website. We offer this Website, including all information, tools and services available from this Website, to you conditioned upon your acceptance of all the terms, conditions, policies and notices stated here.

**WE TAKE PRECAUTIONS WITH USER INFORMATION AND PERSONAL DATA.**

We value our Users and respect your privacy. We collect information about you through the Website in an effort to improve your online experience and to communicate with you about our services and promotions. Neither your name nor anything personal about you is sold or shared with any non-affiliated company or agency. However, as described in greater detail below, we may share your information under certain circumstances with businesses with whom we work to help the Website function. This Privacy Policy describes the personal information we collect about you, why we collect it, how we use it, and when we share it with third parties. This Privacy Policy also describes the choices you can make about how we collect and use certain of that information.

By accessing this Website, you acknowledge this Website Privacy Policy and agree to be bound by the terms hereof and the Terms of Use set forth on the Website. If there is anything you do not understand please email any inquiry to [mitch@steephill.com](mailto:mitch@steephill.com). If at any time you do not agree to this Privacy Policy, please do not use this Website.

We reserve the right to change or update this Privacy Policy by posting such changes or updates to the Website. Amendments to this Privacy Policy will be posted at this URL and will be effective when posted. It is your responsibility to review any such changes or updates and check the Website from time to time to be sure you understand all terms and conditions, agreements and policies of the Website and are in compliance with them. You can tell if the policy has changed by checking the last modified date that appears at the end of this Privacy Policy. Your continued use of the Website following the posting of any amendment, modification or change shall constitute your acceptance thereof.

### **1. Types of Personal Information Collected**

We will ask you for certain kinds of personal information (“Personal Information”) to provide the services you request. This information includes:

Register to Receive Information - You have the opportunity to provide your contact details which can include your name, email address, phone number and mailing address. The Personal Information provided by you is not used for any purpose other than as outlined in this Privacy Policy.

Email List - When you create an account with us, you will be added to our mail list. Your Personal Information will never be shared with or sold to third parties. Subscriptions to the email

list can be cancelled at any time. To be removed from our email list, please follow the instructions on the email.

## **2. Use of Your Personal Information**

We use the Personal Information we collect for various purposes, including: a) to communicate with you about matters, including services and opportunities that might be of interest to you; and b) to improve our overall Website experience

## **3. Sharing Personal Information With Third Parties**

3.1 We do not share, sell or trade your Personal Information gathered online with any third parties, except with your consent or as described herein. We do not contribute to or participate in cooperative databases, which give other companies access to such Personal Information.

3.2 We may disclose your Personal Information when legally required to do so, to cooperate with law enforcement investigations or other legal proceedings, to protect against misuse or unauthorized use of the Website, to limit our legal liability and protect our rights or to protect the rights, property or safety of Users of this Website or the public.

3.3 We may also disclose your Personal Information to outside individuals and/or companies that help us bring you the products and services we offer and to create, operate, and maintain our Website. For example, we may work with third parties to: (a) manage a database of customer information; (b) assist us in distributing e-mails; (c) assist us with direct marketing and data collection; (d) provide data storage and analysis; (e) provide fraud prevention; (f) provide customer service; and (g) provide other services designed to assist us in developing and running our Website and maximizing our business potential. We require that these outside companies agree to keep all information shared with them confidential and to use the information only to perform their obligations to us.

3.4 In addition, if we go through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information will likely be among the assets transferred.

3.5 Our Website will allow users to post comments and other content to our Website. Any Personal Information that you post to our Website will become public information and will be accessible by other users of the Website. In addition, your user name will be viewable by other users, and we therefore encourage you to use a user name that is not your actual name. We have no responsibility to maintain the privacy or security of any such Personal Information that you may choose to post to our Website.

## **4. Non-Personally Identifiable Information**

4.1 Through your use of this Website, we may also collect certain non-personally identifiable information from you (“NPII”). NPII is not associated with you as an individual. It is measured anonymously and only in the aggregate.

4.2 The Website may use cookies. A cookie is a small piece of information sent by a website that is saved on your hard drive by your computer’s browser. Cookies help us remember you when you return to the Website. Cookies also hold information to personalize and enhance your experience and to gather website statistical data, such as which pages are visited, the Internet provider’s domain name and the addresses of the sites you visited immediately before coming to and immediately after leaving the Website. The information in the cookies lets us trace your “clickstream” activity (i.e., the paths taken by users of the Website as they move from page to page) to enable us to better serve our users by revealing which portions of the Website are the most popular. Cookies contain absolutely no Personal Information. You may disable cookies on your browser. Please review your browser’s instructions for doing so.

4.2 We may also use “pixel tags” (sometimes called “web beacons” or “clear gifs”), which are tiny graphic images, on the Website. Pixel tags help us analyze Users’ online behavior and measure the effectiveness of the Website and our advertising and marketing. We may also use other analytical tools to evaluate site performance through the use of aggregated data, which contain no Personal Information. We work with service providers that help us track, collect, and analyze this information.

4.3 Cookies, pixel tags and/or other analytical tools that we may use on the Website may collect information about your visit, including the pages you view, the features you use, the links you click, and other actions you take in connection with the Website. This information may include your computer’s Internet protocol (IP) address, your browser type, your operating system, date and time information, and other technical information about your computer. We may also track certain information about the identity of the website you visited immediately before coming to the Website. We do not otherwise track any information about your use of other websites.

4.5 We may also work with businesses that use tracking technologies to deliver advertisements on our behalf across the Internet. These companies may collect information about your visits to the Website and your interaction with our advertising and other communications, but no Personal Information is shared with them.

4.6 We may combine the NPII collected through cookies, pixel tags and other analytical tools with other information we may have collected from you. This information may be used to improve our Website, to personalize your online experience, to help us deliver information to you, to determine the effectiveness of advertising, and for other internal business purposes.

## 5. Your Security

5.1 We strive to keep your Personal Information private and safe. We take commercially reasonable physical, electronic and administrative steps to maintain the security of

Personal Information collected, including limiting the number of people who have physical access to database servers, as well as employing electronic security systems and password protections that guard against unauthorized access.

5.2 Unfortunately, despite our best efforts, the transmission of data over the Internet cannot be guaranteed to be 100% secure. While we will use every reasonable means to ensure the security of information you transmit through the Website, we cannot guarantee that such information will not be intercepted by third parties. We will, however, prosecute any unauthorized or fraudulent transactions to the fullest extent permitted by law.

## **6. Links to Other Websites**

6.1 While visiting the Website, you may link to websites operated by third parties or you may have come to the Website using a link found in another website. This does not mean that we endorse these websites or the goods or services they provide. We do not make any representations or warranties about any website that may be linked to the Website. Such other websites are independent from us, and we have no control over, or responsibility for, their information, products or activities.

6.2 In addition, our privacy practices may differ from those of these other websites. If you provide Personal Information at one of those websites, you are subject to the privacy policy of the operator of that website, not our Privacy Policy. Please make sure you understand the other website's privacy policy before providing Personal Information.

## **7. Opt-Out**

You will receive emails from us only if you have asked to receive them. If you do not want to receive e-mails from us you may click on the "unsubscribe" link at the bottom of any email communication sent by us. Please allow us 10 business days from when the request was received to complete the removal, as some of our promotions may already have been in process before you submitted your request.

## **8. Children and Privacy**

The Website is not meant for children, and we will not knowingly collect any Personal Information from children under the age of 13 without verified parental consent. We will remove from our files any Personal Information of anyone we discover to be under 13 years old. Our online contests or sweepstakes are restricted to entrants who are at least 18 years old. We are concerned about the safety of children when they use the Internet, and we understand that children may not understand all the provisions of our Privacy Policy or make informed decisions about the choices that are made available to adult users of the Website.

## **11. Your California Privacy Rights**

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice describing what categories of Personal Information we share with third

parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please email the request to mitch@steephill.com. Please allow 30 days for a response. We do not currently share any Personal Information with any third parties or corporate affiliates for direct marketing purposes.

## **12. Disclosure for Legal Purposes**

You hereby authorize us to disclose any of your Personal Information pursuant to judicial and administrative proceedings and to law enforcement or government agencies if we believe the disclosure is necessary or appropriate. You also authorize us to disclose Personal Information if we believe the disclosure is necessary or appropriate in the event of an investigation of improper or illegal conduct in connection with the Website, such as fraud, misrepresentation, intellectual property infringement, or other activity that may put us at risk for liability.

## **13. Non-Confidential Information**

We do not want you to send to us any confidential or proprietary information through email or otherwise. Any information, materials, suggestions, ideas or comments sent to us will be considered non-confidential, and by submitting the same to us, you are giving us the absolute right to use, modify, reproduce, transmit, display and distribute the information for any purpose whatsoever, with no payment or other compensation to you. However, we will not use your name unless we are required by law to identify the source of the materials, information, suggestions, ideas or comments, or unless we first obtain your permission.

## **14. Assignment**

We may freely assign this Privacy Policy or any of our rights and/or obligations hereunder.

## **14. Contact**

If you have any questions about your privacy or security at the Website, please send an email to mitch@steephill.com and include your name and email address in the message. If you do not receive a response from us to any emails you send to us within 7 business days, please send us another email as your original email may not have been received.

DATE LAST MODIFIED: April 17, 2015