

# Aprium Privacy Policy

This Privacy Policy governs the manner in which Aprium Group LLC collects, uses, maintains and discloses information collected from users (each individually a "User" or collectively "Users") of the aprium.com website, connected digital devices and related products and services (collectively the "Site"). This privacy policy applies to the Site and all products and services offered by Aprium Group LLC.

## **Personal Identification Information**

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users, visit, register, place an order, fill out a form, or perform any other action in connection with activities, services, features or resources we make available through our Site. Users may be asked for, as appropriate, first and last name, email address, mailing address, phone number, and credit card information. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

## **Non-Personal Identification Information**

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about the way Users connect to our Site, such as the operating system and the Internet service providers utilized and other similar information.

## **Web Browser Cookies**

Our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes and

sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, please note that some parts of the Site may not function properly.

## **How We Use Collected Information**

Aprium collects and uses Users personal information for the following purposes:

- a. *To Personalize User Experience.* We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site so we can improve our products and services.
- b. *To Improve our Site and Offerings.* We continually strive to improve our website offerings based on the information and feedback we receive from you.
- c. *To Improve Customer Service.* Your information helps us to more effectively respond to your customer service requests and support needs.
- d. *To Process Transactions.* We may use the information Users provide about themselves when placing an order only to provide service to that order. We do not share this information with outside parties except to the extent necessary to provide the service.
- e. *To Send Periodic Emails.* The email address Users provide for order processing, will generally only be used to send them information and updates pertaining to their order. It may also be used to respond to their inquiries, and/or other requests or questions. User will receive emails that may include company news, updates, related product or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, they may do so by contacting us via our Site or by using the Unsubscribe link found in our emails.

## **How We Protect Your Information**

The email address Users provide for order processing, will generally only be used to send them information and updates pertaining to their order. It may

also be used to respond to their inquiries, and/or other requests or questions. User will receive emails that may include company news, updates, related product or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, they may do so by contacting us via our Site or by using the Unsubscribe link found in our emails.

## **Sharing Your Personal Information**

We do not for any reason sell Users personal identification information to others. We may disclose both personal information, as well as share generic aggregated demographic information not linked to any personal identification information regarding visitors and Users, with our business partners, trusted affiliates, third party service providers, and advertisers for the purposes outlined above.

Types of third parties we may disclose your personal information to:

- a. *Third Party Service Providers.* We may employ third parties to perform services on our behalf. These services have access to personal information only to the extent that it is needed to perform the requested services and only if the third party has an appropriate commitment to protect personal information.
- b. *Analytics.* We employ third party analytics vendors which may set and access their own cookies, pixel tags, and other similar technologies on our Site, they may also collect or have access to information about you which they may collect over time and across different websites, to provide us with aggregate information.
- c. *Payment Processor.* We employ the service of a payment processor, which collects and processes payment information only to the extent that is necessary to complete your purchase.

Users wishing to opt out of any sharing described in this document, should email us at [support@aprium.com](mailto:support@aprium.com).

## **Privacy Shield**

Aprium Group complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (collectively, the “Frameworks”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. Aprium has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, those principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

We commit to subject to the Principles all personal data received from the EU and/or Switzerland in reliance on the Privacy Shield.

Aprium is subject to the investigatory and enforcement powers of the Federal Trade Commission, which is the agency that ensures compliance with the Privacy Shield.

## **Onward Transfers**

In this Privacy Policy we describe the different types of third parties that we may disclose Users personal information to, and the purpose for which we choose to disclose such information. If we disclose Users personal information to a third party acting as a data controller or as an agent, we will comply with the requirements, and protect the personal information as provided in, the Accountability for Onward Transfer Principles (“Transfer Principles”), which is part of the EU-U.S. Privacy Shield Framework. Aprium will ensure that the data controller or agent will provide the same level of protection as required by the Transfer Principles. We remain responsible for the processing of personal information received under the Frameworks and subsequently transferred to a third party acting as an agent if the agent processes such personal information in a manner inconsistent with the Principles.

We may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. In such cases, we will minimize any disclosure of personal information to that which is legally required.

### **Rectification, Choice, and Access**

Users are free to change their personal information or cancel their account with us at any time. Users may use controls found within our application, or by contacting us using the information specified in this document to accomplish said task.

Users may opt out of any disclosing of personal information described within this document, by contacting us at: [support@aprium.com](mailto:support@aprium.com). If we have need to disclose your personal information for means other than that which is described in this document, or we disclose data to another processor or controller not previously identified. We will inform and allow reasonable time for Users to object to said disclosing of personal information.

We acknowledge the right of EU and Swiss individuals to access their data pursuant to the Privacy Shield. Users may request access to personal information stored within our systems as needed. Users can request said access by contacting us at: [support@aprium.com](mailto:support@aprium.com).

### **Recourse and Enforcement**

In compliance with the EU-US and Swiss-US Privacy Shield Principles, Aprium commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact Aprium at: [support@Aprium.com](mailto:support@Aprium.com). Aprium will respond to any complaint within 45 calendar days of submission. Aprium has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not

satisfactorily addressed, please visit:

<http://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information, or to file a complaint.

If neither Aprium nor the BBB EU PRIVACY SHIELD resolves your complaint, you may pursue binding arbitration. More information on this process can be found at:

<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>.

### **Changes to this Privacy Policy**

Aprium has the discretion to update this Privacy Policy at any time to make sure it complies with emerging legal requirements and best practices. When we do, we will revise the date of the last revision at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of any modifications.

### **Your Acceptance of These Terms**

By using this Site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

### **Contacting Us**

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at:

[support@aprium.com](mailto:support@aprium.com)

This document was last updated on December 1st, 2018