



## Privacy Policy

This privacy policy sets out how we, Haven Tower Group, LLC, a California limited liability company (“we”, “us”, “our”, “Company” or “HTG”) treat the privacy of customers, users of our online services, website, applications and other services (“Services”), and others with whom we interact. We respect the privacy rights of individuals. This policy details how we collect, store and use personal information.

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

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Use offline or through any other means, including on any other website operated by Company or any third party; or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practice regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree and acknowledge that you are bound to this privacy policy. From time to time it may be necessary for us to revise and update our privacy policy. We reserve the right to change our privacy policy at any time without prior notice by updating this page. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. We suggest you familiarize yourself regularly with our policies and your rights before placing an order with us to ensure you are aware of our most up to date privacy policy.

### 1. Children’s Information

Our Website is not intended for anyone under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal

information from anyone under 13. If you are under 13, do not use or provide any information on this Website, register on the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from anyone under 13 years of age without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [info@haventower.com](mailto:info@haventower.com).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see the California Residents section below for more information.

## 2. Collection and Storage of Personal Information and Data

We, and the third-party providers we engage, will collect personal information about individuals when they visit our site or get in touch. Our usual approach is to collect personal information directly from the individual concerned. This information could include your name, email, telephone or address contact details, birth date, social media information, shopping preferences and profile, credit card and payment related information, and other information that identifies you personally ("personal information"). We may also collect information about your device and browser, demographic information such as your location, your IP address, and pages you visit on our site and products you view.

For example, we collect personal information in circumstances including:

- (i) when a person signs up to become a user of the Services;
- (ii) when goods or services are ordered or paid for;
- (iii) when you telephone us or visit our website and make an inquiry to which a later response is requested and to do so requires your contact details;
- (iv) when you ask to be included on marketing distribution lists or interact with our social media services;
- (v) when you, as an individual, either on your own behalf or on behalf of the business you work for, enter into an agreement with us for the supply of goods or services by you/ your business;
- (vi) when you navigate through the site. Information collected automatically includes usage details, IP addresses, and information collected through cookies;
- (vii) from third parties; and
- (viii) when receiving applications for employment, when evaluating job applicants and personnel which may include collection of details such as employment history and educational qualifications.

We may use 'cookies' to collect data relating to your general internet usage. A cookie is a small text file that is placed on your computer's hard drive. This data may include IP-addresses, browser versions, number of visits and similar such data relating to your navigation of the internet and our site. We also may use these cookies and other technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Email us at [info@haventower.com](mailto:info@haventower.com) for information on how you can opt out of behavioral tracking on this website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking. The information we collect automatically may include personal information and we may maintain it or associate it with personal information

we collect in other ways or receive from third parties. Cookies help us to improve our site and to deliver a better and more tailored service, for instance by storing information about your preferences and allowing us to recognise you when you return to our site.

You may refuse to accept cookies by activating settings on your internet browser. However, please note that if you select such settings you may be unable to access certain parts of our website.

Pages of our Website and our e-mails may also contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We hold personal information in our own secure databases, and, to some extent, for marketing and other purposes in the databases of third party data centers.

For information about managing your privacy and security settings, as well as opting-out of certain data collection, see Your Choices and Rights Relating to your Information.

### 3. Use and Disclosure of Personal Information

We have a legitimate interest in the collection of personal information. We will not sell or distribute your information to third parties unless we have your express consent to do so or are required to by law. We may use personal information for the purpose of marketing but only where such use complies with the applicable privacy laws.

We use the personal information collected from you for the purpose it was provided or collected, including in the following ways:

- (a) For the purposes of collection described in (2) above;
- (b) To respond to inquiries received from you;
- (c) To process, confirm, fulfill and update you about your orders and to carry out our obligations arising from any contracts entered into between you and us;
- (d) To verify your identity and to assist you if you have forgotten any user name or password;
- (e) To communicate with you and provide you with information (whether by email, post or other means) about our products or our Services, where you have requested or consented to receiving this from us or where this provision is otherwise permitted at law;
- (f) To notify you about changes to our goods and services;
- (g) To allow you to participate in interactive features of our service, when you choose to do so;
- (h) To facilitate your participation in surveys we (or a third party on our behalf) runs where you volunteer that personal information;
- (i) To interact with you through social media platforms (such as Facebook, Twitter, Instagram, Pinterest), if you elect to use such platforms, subject to the platform's privacy policy;
- (j) To receive and address complaints or feedback from you;
- (k) To protect our legal interests and fulfil our regulatory obligations (if and to the extent necessary);

- (l) For business analysis, reporting, and market research;
- (m) To present our Website, and its contents, our goods, and services to you;
- (n) In any other way we may describe when you provide the information; and
- (o) In other circumstances, with your prior consent.

We may use personal information for the purposes of marketing to users but only where such use complies with applicable legislation.

When you subscribe to our database and provide us with your personal information, you consent to our use of your personal information, such as your name, email address and phone number for marketing purposes. This includes, but is not limited to, sending you correspondence such as newsletters, competitions and promotions via email, SMS, social media and postal mail.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile. For more information, see [Your Choices and Rights Relating to your Information](#).

### 3.1 Information We Collect Through Third Parties

We may obtain information about you from other trusted third-party sources to update or supplement the information that you provide or that we collect automatically. This includes, for example, information from public databases or data aggregators that may include your demographic information, media consumption, or lifestyle preferences. We may also receive information about you from our partners and service providers, (including, for example, business partners, analytics vendors, advertising networks and search information providers).

We may use this information to help us maintain the accuracy of the information we collect, personalize your experience with us, target our communications so that we can inform you of products and services or other offers that may be of interest to you, to measure ad quality and responses, and for internal business analysis or other business purposes.

### 3.2 Third-Party Use of Cookies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not endorse or control these third parties' tracking technologies or how they may be used. Third parties might use your information differently than our policy permits. If you have any questions about an advertisement or other targeted content, you should contact the

responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Your Choices and Rights Relating to your Information. The Network Advertising Initiative (NAI) has also developed an informative site to help you safeguard your online privacy and provide a way for you to opt-out of interest-based messaging. To learn more, visit the NAI at [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices).

### 3.3 Data Processing; Disclosure to Third parties

We partner with third parties to manage our payments, advertising, marketing and email marketing. Some of your personal information is processed by these third parties on our behalf. This means that some of your data is hosted outside of the United States and the European Economic Area. When opting into receiving communication from us or by placing an order with us via any of our platforms, we take this to mean that you have read our privacy policy and all terms, and that you consent to the use and storage of your information as mentioned in this policy.

We may also provide personal information to third parties outside our group companies for limited purposes, such as to help us in providing goods and services to customers.

Those persons and business may include:

(a) Organizations who carry out credit, fraud and other security checks; and

(b) Third party software providers who store details of customer accounts for us or who provide other IT services.

We may also disclose your personal information to third parties outside our group of companies:

(a) Where we have your express permission to do so;

(b) Where it can reasonably be inferred from the circumstances that you consent to the disclosure to the third parties;

(c) If all of our assets are acquired by a third party, in which case personal information which we hold about our customers may be one of the transferred assets (subject to the same constraints on use and disclosure as under this policy); and

(d) If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions or to protect the rights, property, or safety of our business, its personnel or customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We limit the information we provide to third parties to the information they need to help us provide or facilitate the provision of goods and services to you. We deal with third parties that are required to meet the privacy standards required by law in handling your personal information, and use your personal information only for the purposes that we gave it to them.

### 3.4 Disclosure and Transfer of Information Overseas

We may transfer personal information outside the United States for the purposes of application hosting, enterprise resource planning, eCommerce transaction services, marketing, customer care and SMS communications. Where we do so, we have agreements with those businesses that require them to protect personal information to the same extent we are required to.

## 4. GDPR Compliance

All customers and others with whom we interact have the option to opt-out of receiving marketing communications from us. If you do not wish to continue to receive electronic marketing communications from us and/or selected third parties you should opt-out by clicking on the "unsubscribe" link in any email communications that we might send you.

## 5. Security of Personal Information

We take all reasonable steps to protect your personal information, including internal and external security, restricting access to personal information to those who have a need to know, maintain technological products to prevent unauthorised computer access and regularly reviewing our technology to maintain security.

We treat website and credit card security seriously and endeavour to provide a secure, safe platform through which to conduct transactions.

## 6. Questions and Concerns; Access and Correction to Your Personal Information

You have a right to access the personal information we hold about you. Please provide sufficient detail about the information in question to help us locate it. We will then use commercially reasonable efforts to promptly determine if there is a problem and take the necessary corrective action within a reasonable time.

To obtain a copy of the personal information we hold about you, or to otherwise make a complaint about a matter relating to privacy, please write to us at:

The Privacy Officer  
Customer Care  
Haven Tower Group, LLC  
3019 Wilshire Boulevard, #103  
Santa Monica, CA 90403  
Email: [info@haventower.com](mailto:info@haventower.com)

California residents may have additional personal information rights and choices. Please see the California Residents section for more information.

## 7. Your Choices and Rights Relating to Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to [info@haventower.com](mailto:info@haventower.com).
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our own or third parties' products or services, you can opt-out by unsubscribing or by sending us an email stating your request to [info@haventower.com](mailto:info@haventower.com). If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt

out does not apply to information provided to us as a result of a product purchase, product service experience or other transactions. You can also opt out of receiving any opt-in communications from us at any time by clicking the 'unsubscribe' link at the bottom of every email we send you from our mailing list (this does not include emails relating to your order or any customer queries you send us via our customer service channels) or SMS 'STOP' to opt-out of our mobile marketing list. You can opt out of any marketing displayed to you via social media platforms such as Facebook or search engines like Google by amending your settings to exclude marketing activity via its channels.

- Targeted Advertising. If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by sending us an email with your request to [info@haventower.com](mailto:info@haventower.com).
- We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.
- We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

## 8. California Residents

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. These rights include requesting details on how your information is shared with third parties for direct marketing purposes.

If you are a California resident and would like to exercise any of your rights, please send a verifiable request through email with the subject "Your California Privacy Rights" to [info@haventower.com](mailto:info@haventower.com) or write us at: 3019 Wilshire Blvd. #103, Santa Monica, CA 90403. We will verify your request by checking the information it holds against the information on your computer or mobile device.

We may require that you provide appropriate identification to fulfill your request. Any such identifying information will be used only for this purpose.

## 9. European Economic Area Residents - GDPR

The GDPR is European Union ("EU") legislation which protects the rights of "data subjects" with respect to their "personal data," as such terms are defined in the GDPR. The GDPR governs the handling and transfer of personal data originating throughout the European Economic Area ("EEA"). For clarity, the term "EEA" includes the United Kingdom even after its withdrawal from the European Union.

Under the GDPR, you may be entitled to additional rights, including:

- The right to withdraw consent to processing where consent is the basis of processing.
- The right to access your personal information and certain other supplementary information.
- The right to object to unlawful data processing.
- The right to erasure of personal information about you.

- The right to demand that we restrict processing of your personal information if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, or believe your personal information is inaccurate.
- The right to data portability of personal information that you provided us in a structured, commonly used, and machine-readable format.
- The right to object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- The right to lodge a complaint with data protection authorities.

You may have a right to access, delete, or rectify your personal information in accordance with the above. To exercise any of the above rights please send an email to [info@haventower.com](mailto:info@haventower.com) or write us at: 3019 Wilshire Blvd. #103, Santa Monica, CA 90403. Exceptions may apply, including based on whether your request is permitted or required by law.

## 10. Data Security

We take all reasonable technical, physical, and organizational security measures required to protect your personal data from loss, unauthorized disclosure or other forms of misuse. Data is stored in a safe environment that is not open to public access.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website. If we share information with a third party, as detailed in this privacy policy, we shall use all reasonable efforts to ensure that they keep the information secure and only use the information consistent with the terms of this Privacy Policy.

## 11. Changes to Our Privacy Policy

We may modify, alter or otherwise update this privacy policy at any time. We will post revisions on our website. We encourage you to review this policy from time to time.

## 12. Contact Information

If you have any questions about this privacy policy, believe your personal information is incorrect, or need to access this privacy policy in an alternative format due to a disability, please contact us at:

Haven Tower Group, LLC  
3019 Wilshire Blvd. #103  
Santa Monica, CA 90403  
Email: [info@haventower.com](mailto:info@haventower.com)

Last Modified: November 1, 2023