

# 1. SCOPE AND APPLICATION

Variant Systems Group, LLC, (“we” or “our” or “us”), understands the importance of our customers’ privacy. This Privacy Policy describes the treatment of information we collect from and about you when you visit our website, use our services, or software that contain a link to this Privacy Policy or otherwise refer to or provide the URL to this Privacy Policy (collectively, the “Services”). Our Privacy Policy also describes other sources we use to obtain information about you; tells you how we use, share and protect your information; and what choices you have about how your information is used.

For purposes of this Privacy Policy, “personal information” means information that identifies a specific person, such as full name or email address. When other information, such as email newsletter choices, product purchases, or consumer product preferences, is associated with personal information, this other information will also be treated as personal information under this Privacy Policy.

# 2. COLLECTION OF INFORMATION

Information You Provide Directly to Variant Systems Group.

If you are interested in obtaining information, products or services from Variant Systems Group, or participating in certain activities through the Services, you may need to provide us or our service providers with information about yourself. For example:

- If you register for a Service to become a member, receive a newsletter, or get information about Variant Systems Group promotions or events, you may be asked for your name, email address, mailing address, phone number and other information.
- If you order a product from us or one of our business partners, you may be asked for your name, postal address, email address, telephone number and your credit card number.
- If you participate in an activity such as a survey or webinar, you may be asked for your name, email address, and also to provide other types of information such as business scopes and business interests, which may be associated with you and personally identifiable information that has been obtained from or about you.

## **Information We May Collect Automatically**

In addition to information you choose to provide to Variant Systems Group and our service providers also use standard technologies to automatically collect certain additional information. For example:

- **IP Address and Other Identifiers.** When you access and interact with our Services, Variant Systems Group and our service providers may collect information about your visits in order to permit you to connect to and obtain the Services and to understand the frequency with which specific visitors visit various parts of our Services. For example, we may collect your Internet Protocol (“IP”) address, which identifies the computer or service provider that you use to access the Services, or information about your browser type, authentication identifiers, and other software and hardware information. If you access the Services through a mobile or other device we may collect your mobile device identifier, geolocation data (including your precise location), or other transactional information for that device. We may combine this information with other information that we have collected to make our Services and our communications to you more targeted to your interests.
- **Social Media Information and Content.** If you access or log into a Service through a social media service or connect a Service to a social media service, the information the system software requires to function may also include your user ID and/or user name associated with that social media service, is stored locally on the system hardware, but is not transferred to Variant Systems Group or stored on any of its servers or archives. When you access the Services through social media services or when you connect a Service to social media services, you are authorizing Variant Systems Group to collect, store, and use such information and content in accordance with this Privacy Policy.
- **Cookies.** Our Services may also use cookies. Cookies are small text files that are stored on a user’s computer and allow websites to remember information about users. We and our service providers may use cookies for a variety of purposes in order to enhance the quality of our sites. We may use transient (also called “session ID”) cookies to provide continuity from page to page. A session ID cookie expires when you close your browser. We also may use persistent cookies. Persistent cookies allow our online store and certain other parts of our site to recognize your browser when you return after your first visit to that part of our site. Cookies

allow us to personalize your return visits to our site and to save you time during certain activities, such as checking out from our online store. You have the choice to set your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.) It is up to you whether to allow us to send you cookies. However, if you do not accept cookies from us, your ability to use some aspects of our Services may be limited, such as our shopping cart feature or online support.

### **Information Contained in User Content**

Some parts of our Services may allow users to post or transmit messages, comments, screen names, computer files and other materials, typically during webinars or online trainings where the screen content may be captured. If you choose to make personal information public through these Services, Variant Systems Group will consider that information public and will not limit its use or disclosure in the manner described in this Privacy Policy.

### **Information from Other Sources**

Variant Systems Group and our service providers may supplement the information we collect from and about you with information from other sources, such as publicly available information from social media services, commercially available sources and information from VSG Affiliates or business partners.

### **Do Not Track Signals**

California Law requires us to disclose how we respond to "Do Not Track" signals. At this time, we do not respond to browser 'Do Not Track' signals, as we await the work of interested stakeholders and others to develop standards for how such signals should be interpreted.

## **3. USE AND DISCLOSURE**

Variant Systems Group and our service providers may use information that we collect from and about you for a variety of business purposes, including:

- to maintain and manage your account, deliver content and services that you request, and enhance your experience on our Services;

- to process and track your product or service orders and provide the Services and content you request;
- to communicate with you about the content and Services or other products, content or services in which you may be interested, or to respond to your inquiries or comments;
- to offer you branded or co-branded services, products, or features, such as travel services and products;
- to deliver relevant advertising;
- to perform business analyses or for other purposes to improve the quality of our business, the Services, and the products and services we offer; or
- in accordance with your consent.

When information we collect is aggregated, anonymized or otherwise does not identify you, we may use that information for any purpose or share it with third parties, to the extent permitted by applicable law.

## 4. INFORMATION SECURITY

We take a number of commercially reasonable administrative, technical, personnel and physical steps to safeguard information in our possession from loss, theft and unauthorized use, disclosure or modification. However, no method of transmitting or storing electronic data is ever completely secure, and therefore we cannot warrant or guarantee that such information will never be accessed, used or released in a manner that is inconsistent with this Privacy Policy.

We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

## 5. USER ACCESS AND CONTROL

You may opt out of having your personal information used or disclosed for certain purposes.

- You can opt out of receiving promotional communications from Variant Systems Group by contacting us at:  
[contact@variantsystemsgroup.com](mailto:contact@variantsystemsgroup.com)

- If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out of receiving these emails by clicking “Unsubscribe” or “Update my Preferences” at the bottom of any marketing email you receive.
- If you continue to receive our communications in error after expressing an opt-out preference, please let us know so that we can investigate the situation.

We will try to comply with your request(s) as soon as reasonably practicable. We may also retain backup information related to your account on our servers for some time after cancellation for fraud detection or to comply with applicable law or our internal security policies. It is not always possible to completely remove or delete all of your information due to technical constraints, contractual, financial or legal requirements.

## 6. OTHER IMPORTANT INFORMATION

### Third Party Sites

If you click on or interact with a hyperlink or advertisement that you find on the Services, you may leave our Services or send information to a different website or application. Our Privacy Policy does not apply to your interactions with third-party websites or mobile apps, even if you find a link to them on or access them through our Services, and so you should read the privacy policy of the third-party provider to see how your personal information will be treated on its site. We have no control over such third-parties, their Internet sites, or their products or services.

### **Payment Services**

In some cases, we may use an unaffiliated payment service to enable you to purchase a product or make payments on a third party payment service provider website (“Payment Service”). If you wish to purchase a product or make a payment using a Payment Service, you will be directed to a page operated by that Payment Service. Any information that you provide to a Payment Service will be subject to the applicable Payment Service's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, any Payment Service's use of information collected through any Payment Service.

## **Visiting Our Services from Outside the United States**

Please be aware that your personally identifiable information may be accessed from, transferred to, processed, and stored in any country where we have facilities or engage service providers. By using the Services or providing us with any personal information through the Services, you consent to the transfer, processing and storage of your personal and non-personal information in countries outside your country of residence, including the United States, where the data protection and other laws might be different from those in your country. This includes the use of cookies and other tracking technologies as described above. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in the United States may be entitled to access your personal information. As a result, please read this Privacy Policy with care.

## **Changes in this Privacy Policy**

We may amend this Privacy Policy at any time by posting the most recent version of the Policy on the Services, along with an indication of the date on which the Policy was amended most recently. If we make any material changes in the way we collect, use, and/or share personally identifiable information that we collect about you through the Services, we will provide appropriate notification to you.

## **7. CONTACT US**

If you want to access and correct your personal information, or have questions or wish to send us comments about this Privacy Policy, please write us at:

Variant Systems Group

Attn: Marketing Services - Privacy

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