

SARGE FITT Privacy Policy
Version 1.0
Last Revised: 23 Feb 2019

SARGE FITT LLC (“**Company**”) is committed to protecting your privacy. We have prepared this policy (the “**Privacy Policy**”) to describe to you our practices regarding the Personal Data (as defined below) we collect from users of our websites, located at <https://www.sargefitt.com/> and <https://www.sargefittfam.com>, (collectively, the “**Site**”) and online services (“**Services**”).

1. Questions; Contacting Company; Reporting Violations. If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or phone number:

SARGE FITT LLC
Attn: Juan Biddix Jr.
1007 Anderson Place SE,
Washington DC 20032
240-543-3432

2. User Consent. By submitting Personal Data through our Site or Services, you agree to the terms of this Privacy Policy and you expressly consent to the collection, use and disclosure of your Personal Data in accordance with this Privacy Policy.

3. A Note About Children. We do not intentionally gather Personal Data from visitors who are under the age of 13. If a child under 13 submits Personal Data to Company and we learn that the Personal Data is the information of a child under 13, we will attempt to delete the information as soon as possible. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us using the details in Section 1 above. We will delete such information from our files as soon as reasonably possible.

4. A Note to Users Outside of the United States. If you are a non U.S. user of the Site, by visiting the Site and providing us with data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

5. Purposes of Processing.

What is Personal Data?

We collect information about you in a range of forms, including Personal Data. As used in this Policy, “Personal Data” includes any information which, either alone or in combination with other information we hold about you, identifies you as an individual, including, for example, your name, postal address, email address and telephone number.

Why do we need your Personal Data?

We will only process your Personal Data in accordance with applicable data protection and privacy laws. We need certain Personal Data in order to provide you with access to the Site or Services. If you created a profile/registered with us, you will have been asked to check a tick box indicating your agreement to provide this data in order to access our Services, purchase our products, view our content. This consent provides us with the legal basis we require under applicable law to process your Personal Data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your Personal Data in line with this policy, please do not use our Site or Services.

Sensitive Personal Data

Subject to the following paragraph, we ask that you not send us, and you not disclose, any sensitive Personal Data, including social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, criminal background, and/or trade union membership, on or through the Site or Services, or otherwise to us.

If you send or disclose any sensitive Personal Data to us when you submit user generated content to our Site or Services, you consent to our processing and use of such sensitive Personal Data in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive Personal Data, you must not submit such user generated content to our Site or Services.

6. Types of Data We Collect. We collect Personal Data and Anonymous Data, as described below. When we use the term “Anonymous Data,” we are referring to data and information that does not permit you to be identified or identifiable, either alone or when combined with any other information available to a third party. We may create Anonymous Data from the Personal Data that we receive about you and other individuals whose Personal Data we collect. Anonymous Data might include analytics information and information collected by us using cookies (“**Cookies**”). We make Personal Data into Anonymous Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyze usage patterns in order to make improvements to our Site or Services.

(a) Information You Provide to Us.

- We may collect Personal Data from you, such as your first and last name, gender, email and mailing addresses, age, and password when you create an account to log in to our network (“**Account**”).
- Our Site lets you store preferences like how your content is displayed, your location, safe search settings, and favorite widgets. We may associate these choices with your ID or browser, and you can edit these preferences at any time.
- When connecting to our Services via a service provider that uniquely identifies your mobile device, we may receive this identification and use it to offer extended services and/or functionality.
- When you order services on our Site, we will collect all information necessary to complete the transaction, including your name, credit card information and billing information.
- We retain information on your behalf, such as files and messages that you store using your Account.

- If you provide us feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.
- When you participate in one of our surveys, we may collect additional profile information.
- We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via email regarding support for the Services.
- We may also collect other forms of Personal Data, such as at other points in our Site that state that Personal Data is being collected.

(b) Information Collected via Technology.

- Information Collected by Our Servers. To make our Site and Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.
- Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Site, track users’ movements around the Site, gather demographic information about our user base as a whole, and better tailor our Services to our users’ needs. For example, some of the information may be collected so that when you visit the Site or the Services again, it will recognize you, and the information could then be used to serve advertisements and other information appropriate to your interests. Except as noted in this Privacy Policy, we do not link this automatically-collected data to Personal Data.
- How We Respond to Do Not Track Signals. **We do not currently respond to “do not track” signals or other mechanisms that might enable consumers to opt out of tracking on our Site.**

7. Cookies and Other Technologies

We may collect information using Cookies. Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of Cookies: (1) first party Cookies, served directly by us to your computer or mobile device, which are used only by us to recognize your computer or mobile device when it revisits our Site or Services; and (2) third party Cookies, which are served by service providers on our Site or Services, and can be used by such service providers to recognize your computer or mobile device when it visits other websites.

Our Site and Services use the following types of Cookies for the purposes set out below:

Type of Cookies	Purpose
Essential Cookies	These Cookies are essential to provide you with services available through our Site and to enable you to use some of its features. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services. We do not use essential Cookies to collect information about you for marketing purposes or to track your Internet activity on other websites.
Functionality Cookies	These Cookies allow our Site to remember choices you make when you use our Site. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site and Services, We do not use functionality Cookies to target you with advertisements on other websites. You can block these Cookies using your browser settings, but this may mean that we cannot offer you certain services and may prevent us from remembering that you have chosen not to receive a certain service.
Analytics and Performance Cookies	These Cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to our Site and/or Services, the websites that referred them to Site and/or Services, the pages they visited on our Site/Services, what time of day they visited our Site and/or Services, whether they have visited our Site and/or Services before, and other similar information.
Flash Cookies	When we post videos, third parties may use local shared objects, known as "Flash Cookies," to store your preferences for volume control or to personalize certain video features. Flash Cookies are different from browser Cookies because of the amount and type of data collected and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies. To learn how to manage privacy and storage settings for Flash Cookies, click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html .

8. Use of Your Personal Data

(a) General Use. In general, Personal Data you submit to us is used either to respond to requests that you make or to aid us in serving you better. We use your Personal Data in various ways, including as follows:

- facilitate the creation of and secure your Account on our network;
- identify you as a user in our system;
- provide improved administration of our Site and Services;
- provide the Services you request;
- improve the quality of experience when you interact with our Site and Services;
- send you a welcome email to verify ownership of the email address provided when your Account was created;
- send you administrative email notifications, such as security or support and maintenance advisories;
- respond to your inquiries; and
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes of Company.

(b) User Testimonials and Feedback. We often receive testimonials and comments from users who have had positive experiences with our Services. We occasionally publish such content. When we publish this content, we may identify our users by their first and last name and may also indicate their home city. We obtain the user's consent prior to posting his or her name along with the testimonial. In addition, we may post user feedback on the Site from time to time. We will share your feedback with your first name and last initial only. If we choose to post your first and last name along with your feedback, we will obtain your consent prior to posting your name with your feedback. If you make any comments on a blog or forum associated with our Site, you should be aware that any Personal Data you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these blogs and forums.

(c) Creation of Anonymous Data. We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data for various purpose, including to analyze request and usage patterns so that we may enhance the content of our Services and improve Site navigation. We reserve the right to use Anonymous Data and aggregated and other de-identified information for any purpose and disclose Anonymous Data to third parties in our sole discretion.

9. Disclosure of Your Personal Data. We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

(a) Users. We will share your Personal Data with other users solely for the purpose of providing the Services.

(b) Third Party Service Providers. We may share your Personal Data with third party service providers to provide you with the Services that we offer you through our Site; to conduct quality

assurance testing; to facilitate creation of accounts; to provide technical support; and/or to provide other services to the Company.

(c) Affiliates. We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under a common control ("**Affiliates**"), in which case we will require our Affiliates to honor this Privacy Policy.

(d) Corporate Restructuring. We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

(e) Other Disclosures. Regardless of any choices you make regarding your Personal Data (as described below), Company may disclose Personal Data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on Company; (c) to protect or defend the rights or property of Company or users of the Site or Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use agreement.

10. Third Party Websites. Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

11. Your Choices Regarding Your Information. You have several choices regarding use of information on our Services:

(a) Email Communications. We will periodically send you free newsletters and emails that directly promote the use of our Site or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the email you receive or by contacting us directly (please see contact information above). Despite your indicated email preferences, we may send you service related communications, including notices of any updates to our Terms of Use agreement or Privacy Policy.

(b) Cookies. If you decide at any time that you no longer wish to accept Cookies from our Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser's technical information. If you do not accept Cookies, however, you may not be able to use all portions of the Services or all functionality of the Services. If you have any questions

about how to disable or modify Cookies, please let us know at the contact information provided in Section 1 above.

(c) Changing or Deleting Your Personal Data. You may change any of your Personal Data in your Account by editing your profile within your Account or by sending an email to us at the email address set forth in Section 1 above. You may request deletion of your Personal Data by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain your information for fraud or similar purposes.

12. Security of Credit Card and Bank Account Information. For online payments and/or Automated Clearing House (ACH) payouts, we use the payment services of Stripe (<https://stripe.com/>). We do not process, record or maintain your credit card or bank account information. For more information on how payments are handled, or to understand the data security and privacy afforded such information, please refer to <https://stripe.com/us/privacy>.

13. Retention. We will only retain your Personal Data until you close your Account/cancel your subscription unless a longer retention period is required or permitted by law (for example, for regulatory purposes).

14. Complaints. We are committed to resolve any complaints about our collection or use of your Personal Data. If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your Personal Data, please contact us at info@sargefitt.com. We will reply to your complaint as soon as we can, and in any event, within 45 days. We hope to resolve any complaint brought to our attention; however, if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority.