

## **Information We Collect About You**

The ASP offers access to services on its website that require registration and authentication using your email address. The ASP does not intend to sell, rent, or otherwise give your email address to a third party without your consent.

When you pay for something via the ASP website, we will ask for your name, email address, mailing address, credit card number, and credit card expiration date. This lets us process and fulfill your request and notify you with confirmation or update messages. We will not share or sell credit card information with any third parties without your express permission other than in connection with the processing of the credit card transaction.

The ASP also collects personal information when you interact with us or apply for a position with us. The personal information we collect about you will vary by context and may include:

- Your name and contact details;
- Your professional background;
- Company name;
- Your stated and inferred interests;
- Credit card details; and
- Your activity on the website, both in terms of transactions (such as order history) and in terms of otherwise interacting with the website (eg, behavioral patterns).

## **Using your personal information**

Personal information submitted through our website will be used for the purposes specified in this policy, or on the relevant pages of the website. We may use your personal information for the following:

1. Enabling your use of the services on our website;
2. Sending you goods purchased through our website;
3. Supplying services purchased through our website;
4. Sending you non-marketing commercial communications;
5. Sending you email notifications that you have specifically requested;

6. Sending you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology; and
7. Dealing with inquiries and complaints made by or about you relating to our website.

For United States residents, we undertake marketing only in compliance with the CAN-SPAM Act, the Telephone Consumer Protection Act, and other applicable law. For European Union (EU) residents, we undertake marketing only with your express affirmative consent and in compliance with applicable data privacy laws. EU residents will not be added to the marketing lists unless they have already provided express affirmative consent consistent with applicable data protection laws.

We may also use personal information in administering, facilitating and managing your relationship with us, to develop new products and services, and in connection with our internal operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

## **Disclosing personal information**

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors as reasonably necessary for the purposes set out in this policy. We may disclose your personal information:

1. To the extent that we are required to do so by law;
2. In connection with any ongoing or prospective legal proceedings;
3. To establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
4. We may transfer or share a copy of personal information about you in the event that the ASP or one of its assets, affiliates, or subsidiaries goes through a corporate transition, such as a merger, being acquired by another company, being reorganized or liquidated, or by selling a portion of its assets; and
5. To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this policy, we will not provide your personal information to third parties.

## **Retaining personal information**

We store personal information for different periods of time consistent with the purposes for which they were originally collected, as subsequently further authorized, or when required or allowed under applicable law. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Notwithstanding the other provisions of this Section E, we will retain documents (including electronic documents) containing personal data:

- a. to the extent that we are required to do so by law;
- b. if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- c. to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **Use of cookies on the ASP website**

The ASP website may send a “cookie” to your computer. A cookie is a small piece of data sent to your browser and stored on your computer’s hard drive. A cookie cannot read data from your hard drive or read cookie files created by other websites. The ASP uses cookies to identify which areas of the ASP website you have visited or customized so that those pages can be made readily available to you on your next visit.

Most browsers allow you to refuse to accept cookies. Blocking all cookies may have a negative impact upon the usability of some websites. If you block cookies, you may not be able to use all the features on our website.

Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. We do not modify your online experience based upon whether such a signal is broadcast.

## **Security of your personal information**

1. We will take reasonable technical and organizational precautions designed to prevent the loss, misuse, or alteration of your personal information;
2. Under our policies, all personal information should be stored on secure (password- and firewall-protected) servers;
3. All electronic financial transactions entered through our website will be protected by encryption technology;
4. While we implement security measures to help safeguard your data, no physical or electronic security system is impenetrable. We cannot guarantee the security of our servers or databases, the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet; and
5. You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## **Children's Privacy**

This ASP website is not intended for children. We do not knowingly collect personal information directly from children under the age of 13, and in the event that we learn that a child under the age of 13 has provided information, we will delete that information as soon as possible.

## **Amendments**

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy. We may notify you of changes to this policy by email or through the private messaging system on our website.

## **Data Quality, Storage, and Access**

While we make every effort to ensure that all information we hold about you is accurate, complete and up to date, you can help us by promptly notifying us if there are any changes to your personal information. Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **Your rights**

Individuals resident in Argentina, Australia, California, Canada, Europe, Hong Kong, Israel, Japan, Mexico, New Zealand, Singapore, South Korea, Switzerland, Uruguay, and certain other jurisdictions have certain data subject rights. If you are not a resident in one of these jurisdictions, we will normally afford you the same control over your information on a voluntary basis unless we deem it unreasonably burdensome for us to do so.

These rights vary by jurisdiction, but they may include the right to: (i) request access to and rectification or erasure of their personal data; (ii) obtain restriction of processing or to object to processing of their personal data; and (iii) the right to data portability. Individuals may also have the right to lodge a complaint about the processing of personal data with a data protection authority.

If you make a request related to information about you, you may be required to supply a valid means of identification as a security precaution; for this purpose, we will usually accept

- a. a photocopy of your passport certified by a notary; or
- b. a copy of a state-issued identification card certified by a notary.

We will process your request within the time provided by applicable law. We may withhold personal information that you request to the extent permitted by law.

You may instruct us at any time not to process your personal information for marketing purposes.

## **Dispute Resolution**

If you believe that we may be processing data about you and wish to have access to that information, we can provide you with that data or at least an explanation of why we cannot do so in the particular context, such as if responding to the request would be unreasonably expensive.

Please also let us know if you have any questions, concerns, disputes, or issues. We are open to dialogue to resolve issues. If your concerns cannot be resolved, we can enter into appropriate third-party neutral dispute resolution. If you need to reach us about a privacy or data protection issue, please contact us using the contact information below.

## **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 customer information we share with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. We do not share your personal information with third parties or corporate affiliates for their direct marketing purposes.

## **Third-party websites**

Our website may include hyperlinks to, and details of, third-party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **Contact information**

For any questions or concerns on ASP compliance, email [arkpaths@gmail.com](mailto:arkpaths@gmail.com)