Wired2fish Privacy Policy

Updated: January 1, 2023

Thank you for visiting Wired2fish.com (“Wired2fish” or “we” or “our”). This Privacy Policy describes the personal data handling policies of Wired2fish as a data controller, including the following:

1. What personal data we collect, including from Wired2fish online applications, services and our website at www.wired2fish.com, (the “Website”, and collectively with the foregoing, the “Services”);
2. How we use the data;
3. With whom we may share the personal data;
4. Legal basis for processing the data;
5. Storage and security of your data;
6. Your Privacy Rights, Choices and Disclosures, including those for Europe and California;
7. Users outside the United States;
8. Links to other sites;
9. Privacy Policy updates; and
10. Contact Information.

1. Personal Data We Collect or Process

(a) The Services capture some information about you automatically utilizing background local storage and session storage technologies (“Cookies”). Cookies are small files or other pieces of data which are downloaded or stored on your computer or other device, that can be tied to information about your use of the Services (including certain third party services and features offered as part of our Website). Examples of information of this type are your IP address, the browser you are using, the operating system you are using, the pages on the Website that you visit and details of your transaction activity, such as the amount, date and time for each transaction. When we use Cookies, we may use “session” Cookies that last until you close your browser or “persistent” Cookies that last until you or your browser delete them. You may change your browser setting to decline the use of Cookies.

We use Google Analytics, a web analytics service of Google Inc. which uses Cookies to identify the frequency of use of certain areas of our Website and to identify preferences. For more information regarding how Google collects, uses, and shares your information please visit http://www.google.com/policies/privacy/partners/. The information regarding your use of this Website that is generated by the cookie (including your truncated IP address) is transferred to a Google server in the United States and stored there. Google will use this information to analyze your use of the Services, compile reports on activity for us, and perform further services associated with website use and Internet use. Google may also transmit this information to third parties where
required by law or to the extent that third parties process these data on behalf of Google. You can deactivate Google Analytics using a browser add-on if you do not wish the analysis to take place. You can download the add-on here: https://tools.google.com/dlpage/gaoptout?hl=en.

Pixel Tags or Clear GIFs, also known as Web Beacons or Web Bugs, are transparent graphical images placed on a website. We use these items on our Website to 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 operate social media pages on third party networks and have social media icons on our Website. When you visit or link to our social media pages, data is processed both by us and the applicable social media provider. Social media providers are unaffiliated with us, and we are not responsible for the content or privacy practices of social media providers. Social media providers have their own terms of use and privacy policies, and we encourage you to review those policies whenever you visit their websites or interact with their platforms.

We use third parties, including Google Ad Manager and Freestar, to help us tailor Website content to users or to serve ads or messages on our behalf. Such third parties may employ Cookies and web beacons to measure advertising or messaging effectiveness (such as which web pages are visited, which messages are responded to, or what products are purchased and in what amount). Some of our advertisements are those of Wired2fish’s corporate customers and not based on our Website users’ online browsing behavior unless you opt-in to customized advertising when you sign up on our Website, in which case the advertisements may be based on your online browsing behavior.

We use Freestar to service our programmatic ads. For more information regarding how Freestar collects, uses, and shares your information please view their privacy policy here: https://help.freestar.com/help/privacy-policy-d48f0f6.

When you click on a link that is provided in a product review or available in an advertisement, data is processed both by us and the linked site. Linked sites are unaffiliated with us, and we are not responsible for the content or privacy practices of the operators of such linked sites.

(b) We also collect information that you provide to us or to our service providers voluntarily. Wired2fish (or its service providers) collects the information that you submit when you sign up to receive newsletters, announcements and invitations, register for contests and giveaways, enter into contracts for advertising insertion orders, and contact us by email. We ask for information such as your name, email address, physical address and, in some instances, such as if you execute an insertion order, your payment information. You may also indicate your preferences for receiving marketing communications from us and/or third parties whose products and services may be of interest to you.

We utilize third party service providers to process your payments. To the extent you are redirected to those providers’ user interfaces, information may be provided directly to such providers via our Website, and accordingly we may receive information about you from those providers in connection with your transactions on our Website.
If you inquire about a career at Wired2fish, you have the option of sending to us a resume containing personal data about you and which we will use solely for employment evaluation purposes. Providing this information is completely voluntary.

(c) We do not knowingly collect information from users of our website under the age of 18 and/or their internet usage, and such persons are not authorized to use the Services. If we obtain actual knowledge that a user is under 18, we will take steps to remove that user’s personal information from our databases. By using the Services, you represent that you are at least 18 years old. You also represent, by accessing or using the Services, that you are of legal age to enter into legal agreements, or if you are not, that you have obtained your parent’s or legal guardian’s consent to accept the terms in this Privacy Policy.

2. How We Use the Data

We use the personal data we collect to fulfill orders, communicate with you about your orders and transactions, respond to your inquiries, provide or enhance the services you request, perform our contractual obligations, provide updates and other important information related to your activity on and with the Services, inform you of new services or changes in Services, inform you of products and services of third parties that may interest you, administer the Services, fill employment positions, fulfill legal obligations we have to governmental authorities or other third parties, and for other legitimate business purposes. You will have the opportunity to opt out of any electronic marketing communications you may receive from us.

3. With Whom We Share Personal Data

Wired2fish is headquartered in the United States, and as such may need to share information with third parties who may be outside your country of residence that perform services on our behalf, including without limitation our online shop provider, Website hosting provider, and professional advisors.

We have relationships with third parties, including those of our advertisers. If you opt in to receive communications from third parties when you sign up on our Website, we may provide them some personal information such as your name and email so that they may contact you about products or promotions you may be interested in.

When you click on a link that is provided in a product review or available in an advertisement, your data may be shared with the linked site, and Wired2fish may receive a commission in connection with your navigation to and activity on such linked sites.

We may disclose information (within or outside your country of residence) if we have a good faith belief that disclosure is necessary by law or the legal process, to protect and defend our or others’ interests or property, or to enforce agreements you enter into with us.

We may share your data with a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, liquidation or other disposition of all or any portion of our business, assets or stock with such third party.

We may share aggregated and de-identified information with third parties (within or outside your country of residence) for analytical, research or other similar purposes.

Wired2fish may obtain your written consent from time to time in electronic form by using online agreements or other acknowledgements on the Services, including for any other contemplated uses of
your personal data not addressed in this Privacy Policy. Please read all online agreements carefully before accepting them.

4. **Grounds for Using Your Personal Data**

We rely on the following legal grounds to process your personal information:

**Consent.** Some uses of your personal data as described in this Privacy Policy are subject to your consent, such as marketing email communications.

**Performance of a contract.** We may need to collect and use your personal information to enter into a contract with you and to perform Services that you request.

**Legitimate Interests.** We may use your personal information for our legitimate interests to provide our Services and to improve our Services and the content contained thereon. We may use technical information as described in this Privacy Policy and use personal information for our marketing purposes consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law.

**Compliance with Legal Obligations.** We may use your personal information as necessary to comply with our legal obligations.

5. **Storage and Protection of Your Personal Data**

We retain the personal data we collect for so long as reasonably necessary to fulfill the purposes for which the data was collected and to perform our contractual and legal obligations. Notwithstanding the generality of the foregoing, we store email addresses until the user requests to be unsubscribed or removes themselves through any self-service tools offered to the user.

We do not store payment card information; rather we utilize a third party online store platform and payment processors and store only an electronic receipt that sets forth confirming payment details, such as purchase date, the expiration date of the payment card and the payment ID, but not complete payment card information.

We take reasonable administrative, physical and technical precautions to protect your personal data and communications between us. This includes, when required or as we deem appropriate and feasible under the circumstances, encryption and written commitments from third parties that may have access to your data that they will protect the data with appropriate safeguards.

No Internet or e-mail transmission is ever fully secure or error free, however. We therefore cannot guarantee absolute security of your data, and we are not responsible for processes and networks that we do not control. Users assume the risk of security breaches and the consequences resulting from them. Please be careful in deciding what information you send to us via email or over the Internet.
6. Your Rights, Choices and Disclosures

(a) General. This section is subject to specific disclosures on privacy rights set forth below. We are committed to facilitate the exercise of your rights granted by the laws of your jurisdiction, which may include the right to request the correction, modification or deletion of your personal information and the right to opt out of the sale or sharing of your personal information. We will do our best to honor your requests subject to any legal and contractual obligations. If you would like to make a request, cancel your account or request we delete or no longer use your account information to provide you Services, contact us at info@wired2fish.com.

You may opt out of receiving electronic marketing communications from us by clicking on the “unsubscribe” link on the communication or contacting us at info@wired2fish.com. Some non-marketing communications may not be subject to a general opt-out, such as communications about your orders, disclosures to comply with legal requirements and other support-related information.

Subject to local law, you may have additional rights under the laws of your jurisdiction regarding your personal data, such as the right to complain to your local data protection authority and the right to appeal our decision regarding a data access request.

You may be able to disable Cookies through your browser settings, but if you delete or disable Cookies, you may experience interruptions or limited functionality in certain areas of the Services.

(b) Your European Privacy Rights and Choices. While we do not specifically market the Services to those who reside outside the United States, we will provide accommodations for the exercise of your rights provided under data protection laws of the European Union, the United Kingdom or another jurisdiction that has adopted laws substantially similar to the General Data Protection Regulation (“GDPR”). By visiting our Website and utilizing our Services, you are consenting to the transfer of your information from your jurisdiction to the United States. Your privacy rights under GDPR include the following:

• Transparency and the right to information. Through this policy we explain how we use and share your information. However, if you have questions or need additional information you can contact us any time.

• Right of access, correction, restriction of processing, erasure. You may contact us to request information about the personal data we have collected from you and to request the correction, modification or deletion of such personal information, which requests we will do our best to honor subject to any legal and contractual obligations. To make a request or to ask us a question about our data practices, please contact us via email at info@wired2fish.com.

• Right to withdraw your consent at any time. When we process your personal data based on your consent, you have the right to withdraw it at any time.

• Right to object at any time. You have the right to object at any time to receiving marketing or promotional materials from us by either following the opt-out instructions in commercial e-mails or by contacting us, as well as the right to object to any processing of your personal data based on your specific situation. In the latter case, we will assess your request and provide a reply in a timely manner, according to our legal and contractual obligations. Some non-marketing communications are not subject to a general opt-out, such as communications about transactions and disclosures to comply with legal requirements.

• Right to data portability. You have the right to data portability of your own personal data by contacting us.
• **Right not to be subject to an automated decision, including profiling.** We do not make automated decisions using your personal data that may negatively impact you.

• **Right to lodge a complaint with a supervisory authority.** If you consider that the processing of your personal data infringes your privacy rights according to the European Privacy regulation, you have the right to lodge a complaint with a supervisory authority, in the member state of your habitual residence, place of work, or place of the alleged infringement.

(c) **California Disclosures**

**California “Shine the Light” Information-Sharing Disclosure:** California residents may request a list of all third parties with respect to which we have disclosed any information about you for direct marketing purposes and the categories of information disclosed. If you are a California resident and want such a list, please send us a written request by email to info@wired2fish.com with “California Shine The Light Rights” in the subject line.

**California Do Not Track Disclosure:** We utilize an automated tool designed to recognize Do Not Track settings and Global Privacy Controls in end-user browsers.

**California Consumer Privacy Act Disclosures.** Under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act effective January 1, 2023, California residents have the right to request:

- The categories of personal information (including sensitive personal information if applicable) we have collected about you;
- The categories of sources from which the personal information is collected;
- The business or commercial purpose of collecting, selling or sharing personal information;
- The categories of third parties with whom we share or sell personal information;
- The categories of personal information about you that we have disclosed; and
- The specific pieces of personal information we have collected about you.

Additionally, you have the right:

- to know the length of time we retain your personal information;
- to request deletion of your personal information;
- to request the correction of any inaccurate data;
- to opt out of the sale or sharing of your information (if applicable);
- to limit the use of sensitive personal information (if applicable); and
- to not be discriminated against for exercising any of your CCPA rights.

Please see the chart below regarding the categories of data we may have collected or received in the 12 months preceding the effective date of this Privacy Policy from Consumers in connection with providing our Website and to whom we may have disclosed the information for business purposes.
<table>
<thead>
<tr>
<th>Personal Information Category</th>
<th>Source of Personal Information</th>
<th>Purpose for Collecting the Personal Information</th>
<th>To whom we disclose the Personal Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifiers such as a name, address, unique personal identifier, email, phone number</td>
<td>Information you provide to us; Information we collect automatically; Information collected from third party providers. See Sections 1(a) and 1(b) above</td>
<td>See Section 2 above</td>
<td>See Section 3 above</td>
</tr>
<tr>
<td>Information described in 1798.80(e) (and not otherwise addressed in this table), including bank account number, credit card number, debit card number, or any other financial information, medical information, or health information</td>
<td>Information you provide to us; Information collected from third party providers. See Section 1(b) above</td>
<td>See Section 2 above</td>
<td>See Section 3 above</td>
</tr>
<tr>
<td>Protected Classifications under California and federal law, including gender, age and citizenship</td>
<td>Information you provide to us (such as in connection with a job application).</td>
<td>See Section 2 above</td>
<td>See Section 3 above</td>
</tr>
<tr>
<td>Commercial information such as records of products or services purchased, obtained, or considered, purchase histories and tendencies</td>
<td>Information we collect from you; information we collect automatically; Information collected from third party providers. See Sections 1(a) and 1(b) above</td>
<td>See Section 2 above</td>
<td>See Section 3 above</td>
</tr>
<tr>
<td>Biometric information</td>
<td>We do not collect this information</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Internet or other electronic network activity information, including browsing history and search history and interactions with an advertisement.</td>
<td>Information you provide to us; Information we collect automatically; Information collected from third party providers. See Sections 1(a) and 1(b) above</td>
<td>See Section 2 above</td>
<td>See Section 3 above</td>
</tr>
<tr>
<td>Information Type</td>
<td>Source/Type</td>
<td>Reference</td>
<td></td>
</tr>
<tr>
<td>--------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------</td>
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<td></td>
</tr>
<tr>
<td>Geolocation data that is sufficient to identify a precise location.</td>
<td>We do not collect this information.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sensory data, such as audio, electronic, visual, or other similar information.</td>
<td>We do not collect this Information.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Professional or employment-related information</td>
<td>Information you provide to us (such as in connection with a job application). See Section 2 above</td>
<td>See Section 3 above</td>
<td></td>
</tr>
<tr>
<td>Education Information</td>
<td>Information you provide to us (such as in connection with a job application). See Section 2 above</td>
<td>See Section 3 above</td>
<td></td>
</tr>
<tr>
<td>Inferences about preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</td>
<td>Information you provide to us; Information we collect automatically; Information collected from third party providers. See Sections 1(a) and 2 above</td>
<td>See Section 3 above</td>
<td></td>
</tr>
</tbody>
</table>

Any sensitive data we collect is used only for a business purpose and not for the purposes of inferring characteristics of a consumer.

In the last 12 months preceding the effective date of this Privacy Policy, we have shared (as defined under CCPA) consumers’ personal information in the context of cross-contextual behavioral advertising. To opt out of the sharing of your personal information for cross-contextual behavioral advertising, there is a “Do Not Sell or Share My Personal Information” link on our homepage.

For users who opt in to receiving third party marketing communications when they sign up on our Website, we provide some of your personal information such as your name and email address to third parties for their direct marketing purposes. If you have previously opted in and would like to opt out, you may contact us at any time to opt out.

Personal data may be provided to our service providers, contractors, and, pursuant to Sections 1798.140(ad)(2)(A) and 1798.140(ah)(2)(A) of the CCPA, to third parties.

You may opt out of the use of such Cookies using your browser settings. You may also opt out of the use of Google Analytics Cookies by downloading the browser add-on here: https://tools.google.com/dlpage/gaoptout?hl=en.

Our contact information is listed at the bottom of this policy. You may also submit a request on our Website form located at the “Contact Us” tab at https://www.wired2fish.com/contact-us. If you submit a
data subject request, we may ask for your jurisdiction of residence, name, email address and phone number, and we will endeavor to authenticate your account by using the IP address associated with your submission email. We may also require that you submit your request via the Services’ standard authentication procedures, if applicable (i.e., log on with username and password to submit a request), and/or provide information about any historical transactions with the Services to ensure you are the person you say you are. If this information or these processes are insufficient to verify your identity and assess your privacy request, we may need to ask for additional information. You may also designate an authorized agent to make a CCPA privacy request.

7. Users Outside the United States

The Services are controlled and operated from the United States. If you are an individual from the European Union, Canada or any other jurisdiction with laws or regulations governing personal data collection, use, and disclosure that differ from United States laws, please be advised that we may store the information we collect in the United States which is not deemed an “adequate jurisdiction” by the European regulatory authorities. Personal data may also be transferred from the country of your residence to other countries, including the United States. By visiting or using our Services, you are consenting to the transfer of your information from your jurisdiction to the United States.

8. Links to Other Sites

Our Services may contain links to other websites for your convenience or information. These websites may be operated by companies unaffiliated with Wired2fish, and we are not responsible for the content, products, services or privacy practices of those websites. Linked websites may have their own terms of use and privacy policies, and we encourage you to review those policies whenever you visit the websites.

9. Privacy Policy Changes

We may update this Privacy Policy from time to time and without prior notice to you to reflect changes in our information practices, and any such amendments shall apply to information already collected and to be collected. Your continued use of the Services after any changes to our Privacy Policy indicates your agreement with the terms of the revised Privacy Policy. Please review this Privacy Policy periodically and especially before you provide personal data to us. If we make material changes to this Privacy Policy, we will notify you here, by email or by means of a notice on our home page. The date of the last update of the Privacy Policy is indicated at the top of this Privacy Policy.

10. Questions and Contact Information

Please contact us if you have any questions about our Privacy Policy. You may contact us by emailing us at info@wired2fish.com or sending correspondence to Wired2fish, Inc., 29 County Road 63, Grand Rapids, MN 55744.