

Sterling E-Marketing, Inc. Privacy Policy

Effective as of 06-18-2019.

Introduction

Thank you for your interest in Sterling E-Marketing, Inc. ("Sterling"). We respect the privacy of our users when they use our websites, mobile and other online applications and products and services (collectively, the "Sterling Sites"). By using the Sterling Sites, you consent to the use of your information and information about you in accordance with this Privacy Policy (this "Policy").

This Policy applies to information collected through the Sterling Sites and does not describe the collection, use and disclosure practices of any of our corporate affiliates or third parties. For information on the collection, use and disclosure practices of any company with whom you are doing business, whether or not affiliated with Sterling, please review their respective privacy policies.

Services offered by Sterling are directed only to individuals who are citizens of the United States of America (excluding unincorporated territories, Puerto Rico and Guam), eighteen (18) years of age or older, and who have the capacity to enter into a valid contract. If you are under eighteen (18), you should not provide any personal information to us.

Information We Collect

Information may be gathered from the Sterling Sites by us, our service providers, advertisers, sponsors and partners.

Information You Provide. We may collect information that you choose to provide on the Sterling Sites in a variety of ways, such as when you:

1. register for one of our products or services (this information may include without limitation your name, address, telephone number, and email address);
2. make information available to us via social networking logins, such as Facebook or Twitter;
3. participate in chats, web forums or other interactive sessions;
4. subscribe to newsletters or provide feedback; and
5. participate in surveys, sweepstakes or other promotions.

Automated Information. Information regarding your use of the Sterling Sites may be collected and/or aggregated through the use of automated means. Information that is collected automatically may include information such as:

1. the IP address, the type of browser and operating system used by the device you used to access the Sterling Sites;
2. the date and time you access the Sterling Sites and pages you visit, and if you linked from or to another website, the address of that website;
3. email(s) you open and links you click on within those email(s); and
4. your ISP or mobile carrier, and the type of handheld, mobile or other device that you used.

Data Technologies. Various technologies are used to automatically collect information, such as cookies, local shared objects, and web beacons (generally referred to as "Data Technologies"). "Cookies" are small identifiers sent from a web server that are stored on your device for the purpose of identifying your browser or storing information or settings in your browser. "Local shared objects," sometimes known as Flash cookies, may be used to store your preferences or display content based upon what you have viewed on various websites to personalize your visit. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies. Anonymous advertising identifiers are increasingly being used on mobile devices and otherwise in a manner similar to cookies. When we refer to Data Technologies, we are including all current and similar future technologies.

One or more Data Technologies may be used on the Sterling Sites and other non-Sterling websites and mobile applications (that may not be the Sterling Sites) by us, by another party on our behalf, or by third parties in accordance with their privacy policies. Data Technologies may be used by us and others, on

our behalf and on their own behalf, to transmit information to you or about you and connect information about you from different sources, websites, devices, and mobile applications.

We may use a telephone number for customer service related reasons. If you call us we may collect non-personally identifiable information about the call (e.g. date, time, duration), as well as personally identifiable information (e.g. your name, the number from which your call originated).

Videos We may target and track the videos and other content you access on the Sterling Sites. You consent to our tracking of your video viewing through the Sterling Sites or third party social media as permitted by applicable law.

Location Information. When you download or use the Sterling Sites, we may collect physical location information that is sufficiently precise to allow us to locate a specific person or device ("Location Information"). We collect Location Information only with your permission (e.g., such as when you consent to provide it to us by accessing or downloading the Sterling Sites). We may use Location Information and provide it to third parties to provide you with content and services that are relevant to a particular location, such as advertising, search results, dealers in the area, and directions.

Publicly Posted Information. Information that you make available to us and others via social media networks, forums, blogs, list serves, chat rooms or similar functionality is public information that we or others may share or use in accordance with applicable law.

Combined Information and Information from Other Sources. We may combine information that you provide to us, directly or indirectly, through our affiliates and other sources, and also with other information that is automatically collected. The combined information may include information about your use of the Sterling Sites, your use of other websites, devices and mobile applications and information from our affiliates and other sources.

How We May Use the Information We Collect

We may use information we collect for the following purposes:

1. for everyday business purposes, such as establishing and managing your user account, providing products and services you request, and providing customer support;
2. to offer our other products or services and/or the products or services of others to you;
3. to communicate about, and administer your participation in, special events, programs, surveys, contests, sweepstakes and other offers or promotions;
4. to enable you to interact with Sterling and others through various means, such as through our message boards, blogs and social media;
5. to evaluate and improve our business, including developing new products and services and analyzing the effectiveness of products, services, applications and websites;
6. to diagnose and address technical and service problems;
7. to perform data analyses, including market and consumer research, trend analysis, demographic analysis and financial analysis;
8. to deliver content (including advertising) correlating to your interests and browsing and usage history, both within the Sterling Sites and on other websites and applications;
9. to comply with applicable legal requirements and our policies; and
10. to contact you via telephone, text or chat. We will obtain your consent to contact you when and in the manner required by law.

Applications, Widgets and Social Media

We may include applications or widgets from social media providers that allow interaction or content sharing by their users. These widgets, such as a Facebook "Share" or "Like" button, are visible to you on the web page you visit. Integration between the Sterling Sites and social media networks such as Facebook, Twitter and others may allow social media networks in which you participate to collect information about you, even when you do not explicitly activate the network's application or widget. Please visit the applicable social media network's privacy policy to better understand their data collection

practices and choices they make available to you. The privacy policy of the social media network controls the collection, use and disclosure of all personal information transmitted to that network.

Advertising Networks

Advertising that is customized based on predictions generated over time from your visits across different websites, devices and mobile applications is sometimes called "online behavioral" or "interest-based" advertising. We may partner with advertising networks, which are companies that deliver targeted advertisements to consumers and generate statistics and metrics related to the delivery of interest-based advertisements. They may utilize information collected through a variety of Data Technologies to provide customization, auditing, research and reporting for us, our affiliates and other advertisers. This data collection takes place both on the Sterling Sites and on third-parties' websites and mobile applications. This process allows Sterling and third parties to deliver targeted advertising, enhance marketing programs and help track the effectiveness of such efforts. Advertising networks also may use this information for determining or predicting the characteristics and preferences of their respective advertising audiences and measuring the effectiveness of their advertising in accordance with their privacy policies.

We do not provide personal information that is directly associated with a specific person (such as name and address) to an advertising network when you interact with or view a customized advertisement, but we may provide automated information, such as your IP address. When you view or interact with an advertisement, the advertiser may make an assumption that you are interested in the subject matter of the advertisement or other assumptions.

If you have chosen to enable Google to associate your web and app browsing history with your Google account, and to use information from your Google account to personalize ads you see across the web, Google may use data it has otherwise collected about you together with Sterling's analytics data about your visit to our website to build and define audience lists for cross-device remarketing. In order to support this feature, Google Analytics may collect your Google-authenticated identifiers and join them to Sterling's data about your visit to our website.

Some companies disclose when they are using interest-based advertising programs on the Sterling Sites to deliver third-party ads or collecting information about your visit for these purposes and give you the ability to opt-out of this use of your information. You may see an icon  in or around third-party advertisements on the Sterling Sites that use interest-based advertising programs and on pages where data is collected and used for online interest-based advertising. Clicking on this icon will provide additional information about the companies and data practices that were used to deliver the ad. You can opt out of delivery of targeted advertising to you by multiple companies by visiting www.aboutads.info/choices, www.networkadvertising.org/managing/opt_out.asp and www.ghosteryenterprise.com. Please note that even if you opt out, you will continue to receive advertisements, but they will not be tailored to your specific interests.

Information We Share

We do not sell or otherwise share information about you that we collect or receive, except as described below:

1. Affiliates. We may share information about you, including personal information, with our corporate affiliates, who will use it in accordance with their privacy policies.
2. Our Service Providers. We may engage third parties to provide the services offered through or in connection with the Sterling Sites on our behalf. We require such providers to maintain information about you as confidential and to use the information only to perform the services specified by us in a manner consistent with this Policy.
3. Corporate and Asset Transactions. If we sell all or substantially all of our business or sell or transfer all or a material part of our assets, or are otherwise involved in a merger or transfer of all or a substantial part of our business, we may transfer information we have collected and stored,

including personal information, to the party or parties involved in the transaction as part of that transaction.

4. Other. We may access or disclose information, including personal information, to:
 - a. protect or defend our interests and the legal rights or property of Sterling and our affiliates;
 - b. protect the rights, interests, safety and security of users of the Sterling Sites or members of the public;
 - c. protect against fraud or for risk management purposes; or
 - d. comply with prudent legal practice as we may determine, and applicable law or legal process.

Your Choices

You are entitled to make certain choices about how we communicate with you.

1. You may choose not to provide personal information, even though that might impact your ability to register or receive a particular product or service.
2. If you do not want to receive marketing email from us, you can follow the unsubscribe link provided in those emails.
3. If you do not want to receive interest-based advertisements, you can opt out as discussed in the "Advertising Networks" section above.
4. You have a number of choices regarding certain Data Technologies. Most web browsers automatically accept cookies, but you can usually modify your browser's setting to decline cookies if you prefer. You may also render some web beacons unusable by rejecting their associated cookies and disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or opting out at www.ghosteryenterprise.com or the website of the technology provider. If you choose to decline cookies or similar technologies, however, please note that certain features may not function properly or at all as a result. You may be able to adjust the use of advertising identifiers on mobile devices through the settings on your device. Finally, if you do not want to use a uniquely generated telephone number, you may choose to not call us.
5. If you do not want us to use Location Information, you can decline our initial invitation to provide that information, or opt out by changing the location services settings on your mobile device. However, please note that certain features may not function properly or at all as a result if you opt out.

Your California Privacy Rights

California Civil Code Section 1798.83 entitles California users to request information concerning whether a business has disclosed certain information about you to any third parties for the third parties' direct marketing purposes. California users who wish to request further information in compliance with this law or have questions or concerns about our privacy practices and policies may contact us as specified in the "How to Contact Us" section below.

Online Tracking Policy for California Residents: As of the effective date of this Policy, there is no commonly accepted response for Do Not Track signals initiated by browsers, therefore we do not respond to them.

Access and Correction

Access to information that we collect and maintain about you may be available to you. For example, if you created a password-protected account within the Sterling Sites, you can access that account to update certain information you previously provided. Additionally, if you believe that information we maintain about you is inaccurate, subject to applicable law, you may request that we correct or amend the information by contacting us as indicated in the "How to Contact Us" section below.

Links

The Sterling Sites may contain links to websites not operated by us, as well as third party widgets and applications discussed above. Once you leave the Sterling Sites, we suggest that you review the applicable privacy policy of the third-party website, widget or application. We are not responsible for the

content or use of any websites, widgets or applications other than on the Sterling Sites or for the privacy practices of those websites, widgets or applications.

Data Security

We use commercially reasonable administrative, technical, personnel, and physical security measures designed to safeguard information about you in our possession against loss, theft and unauthorized use, disclosure or modification. Despite all the security measures taken, the internet is not a 100% secure environment. Sterling does not warrant the security of any information you transmit to our website. Sterling does not and cannot guarantee perfect security of networks, servers and databases we operate or that are operated on our behalf, or that the physical, technical, or managerial safeguards maintained by us or our third party service partners will never fail or be breached.

Disputes

If you choose to visit the Sterling Sites, your visit and any dispute regarding privacy is subject to this Policy and our Website Terms of Use, including limitations on damages, resolution of disputes, and application of the law of the state of South Dakota.

Updates to this Policy

We may update this Policy to provide clarification or notice of changes to our practices. If we make changes, we will revise the date at the top of this Policy. In cases where we deem it appropriate, we may provide notice of changes that we deem material before we implement those changes.

How to Contact Us

If you have any questions or comments about this Policy, or if you would like us to update information we have about you or your preferences, please contact us by email at info@sterlingmarketing.com.