

Last Modified: Jun 15, 2024

This privacy notice explains what personal information Power Digital Marketing and its subsidiaries and affiliates (“**We**”, “**Our**”, “**Us**” or “**PDM**”) may collect through <https://powerdigitalmarketing.com/> (“**Site**”) and related information, services, and features, including the DataQ platform located at app.dataq.ai and the Nova platform located at <https://app.novapower.io/> (collectively, the “**Services**”), how We may use it, and the rights that you have concerning that data (“**Privacy Notice**”).

We provide access to our **Services** to you conditioned upon your acceptance of all terms, conditions, policies and notices stated in this Privacy Notice and our Terms of Use found here: <https://powerdigitalmarketing.com/terms-of-use/> (“**Terms of Use**”). By providing your Personal Information or using the Services you consent to the practices set forth in this Privacy Notice, the Terms of Use and to Our collection, processing, transfer or use of your Personal Information. If you do not consent to any collection, processing, transfer or use of such information, please do not use or access any part of the Services or submit Personal Information.

GENERAL

When you provide personal information about yourself through the Services , We only process your personal information when We have a lawful basis to do so. We collect certain information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or household (“**Personal Information**”). Personal Information does not include de-identified or aggregated consumer information. We collect Personal Information from individuals visiting our Services , including as you browse our Services . By accessing the Services, you acknowledge this Privacy Notice and agree to be bound by the terms hereof.

Our legal bases for processing your Personal Information include: (1) your consent; (2) fulfilment of a contractual obligation; (3) compliance with our legal obligations; and (4) where We have a legitimate interest to process your Personal Information consistent with applicable law. Our legitimate interests include:

- Investigating, preventing, and protecting against fraud, security risks, threats to you and others, and violations of this Privacy Notice;
- Protecting and defending our rights and properties, including intellectual property;
- Complying with laws and regulations that apply to Us, as well as responding to requests from law enforcement or government authorities or as otherwise required by law;
- Improving your experiences with our Services ;
- Understanding and improving our Services, user experience, and customer relationships;
- Marketing and promoting our Services; and
- Enabling our business operations.

Where We rely on your consent to process your Personal Information, you have the right to change, withdraw or withhold your consent. Notwithstanding the forgoing, the processing of IP addresses is



a necessary part of providing access to the Services, so We cannot provide access to the Services without this information.

INFORMATION WE MAY COLLECT

We collect Personal Information that you choose to share with Us as well as information provided to us by third parties or directly by your browser or device when you visit our Services.

Information Collected from Third Parties

We may collect information from third parties, including social networks and hiring platforms.

The use and transfer of information received from Google APIs by Site will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements.

AI Models and Data Sharing:

- **Which third-party AI models your app utilizes:** We utilize third-party AI models, including but not limited to OpenAI's GPT-4. These models assist in enhancing our service delivery, personalization, and user experience.
- **What data is shared with these models:** The data shared with these AI models includes user inputs (e.g., queries, comments, interactions), usage information (e.g., frequency of use, interaction patterns), and anonymous demographic data (e.g., age, location).
- **The purpose of sharing this data with AI models:** The data is shared to improve our service offerings, personalize user experiences, and for analytical purposes.
- **How the models use this data and what impact it might have on users:** These AI models process the data to generate more accurate responses and recommendations, detect fraudulent activities, and enhance overall user satisfaction. The impact includes improved service relevance and security.
- **Do users have any options to control or opt-out of data sharing with AI models:** Users can control or opt-out of data sharing with these AI models by adjusting their account settings or contacting us directly to request exclusion.
- **How you ensure responsible and ethical use of data by these models:** We ensure the responsible and ethical use of data by conducting regular audits, adhering to industry standards, and implementing robust security measures.

Information Collected from You

Contact Us

When you contact Us via the Services, We ask for your name, email address, telephone number, company name, website URL, and job title. We will also collect the content of your message, which will include any additional information you choose to share with Us. We collect this information when you initiate contact with Us for the purpose of responding to your communication.



Mailing List	<p>When you join Our mailing list or request a playbook, We may collect your first and last name, company name, and email address. We collect this information when you initiate contact with Us for the purpose of responding to your communication.</p>
Submitting a Proposal	<p>When you submit a proposal, you provide Your company's name, the state that your company is located in and other business information such as your Company's monthly marketing budget, your company's business classification and the information that you choose to provide when responding to how you heard about Us. We collect this information for the purpose of establishing your account and to recommend services or products that may be of interest to you.</p>
Creating an Account	<p>When you create an account, We collect Your first and last name, email address, company, password, job title, and phone number. We collect this information for the purpose of establishing Your account and enabling Your purchases.</p>
Interact with Our Platforms	<p>If you have created an account, We also collect information about your purchases, account funding, customer service inquiries, integrations, data access requests, clients, scoreboards, and audiences, and product reviews. We collect this information for the purpose of administering your account, recommending products, and improving your user experience.</p>
Request a Nova appraisal	<p>When you request a Nova appraisal, We may collect your name, work email address, phone number, company name, website URL, job title, and information related to how you heard about Us and what We can do to help you.</p>
When you submit an application for employment	<p>When you submit an application for employment with PDM, we will collect your name and contact information, and any information you provide to us or to the vendors we use to support our hiring process, including information about your employment and education history.</p>
Other Information	<p>When you purchase something from any of our Services as part of the buying process. We collect the Personal Information you give Us such as your name, address and email address. We use this information to process and provide you with the items you purchased. We collect this information for the purpose of fulfilling your order, including updating you on your order status. Additionally, if you choose to receive future communications from Us regarding Our products and offers, We will use the Personal Information you provide through the order process for such purposes.</p>

Information Collected from your Browser and other Web-based Technologies

Browser or Device Information	<p>We also collect information sent to Us automatically by your web browser or device when you view and navigate the Services. This information typically includes your IP address, usage details, operating system information,</p>
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location data, your device's unique device identifier, the date and time of your visit, and the pages you visit. We collect this data to help Us:

- Provide the Services and improve your user experience;
- Analyze Services trends and aggregate usage;
- Promote and improve the Services; or
- Fulfill your requests and contact you.

Cookies and Web Beacons

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

We may set persistent and session cookies on your computer or device to customize the user experience. "*Cookies*" are small files placed on your computer or device

We collect this information for the purpose of conducting analyses on our web traffic and improving a user's experience while visiting our Services . When you first visit our Services, you will be asked to consent to our use of cookies, and you can withhold, withdraw, or change your consent at any time. You also have the ability to decline cookies by modifying the settings in your browser or on your device. If you decline or disable cookies, please note that certain functionalities of our Services may no longer work.

We place two types of cookies on our Services:

- *Session Cookies*: Session cookies typically only last for as long as your session, which is usually the duration of your current visit to our Services or for as long as you keep the browser open that was used to visit our Services. We use our session cookies to store information about your visit (referring website, landing page, etc.). We also use session cookies to track and record the number of visits to our Services.
- *Persistent Cookies*: Persistent cookies are cookies that remain on your browser or device and are read when you return to our Services. We may use persistent cookies to remember your preferences, personalize your experience, and help secure your visit to our Services. We use persistent cookies to remember the contents of your shopping cart (which is stored for two weeks), and, if applicable, determine if you have access credentials to the Services.

Third Party Cookies and Web Beacons

Some content or applications on our Services are served by third parties, including service providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies already in your browser or device to collect information about you when you visit our Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different

websites and other services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. These third-party web technologies may also allow Us to share our content with you when you visit the websites of our third-party partners.

Most web browsers and devices let you choose whether to accept cookies. Most also let you delete cookies already set. The choices available, and the mechanism used, will vary from browser to browser or device to device. Such settings are typically found in the “options”, “tools” or “preferences” menu. You may also consult the browser’s “help” menu. There are online tools available for clearing all cookies left behind by the websites you have visited, such as www.allaboutcookies.org. With the exception of GPC signals recognized pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act, please note at this time, we do not recognize automated browser signals regarding tracking mechanisms, which may include “do not track” instructions.

Social Media

Our Services may include social media “widgets,” small icons that allow you to access our content posted on social media sites (Facebook, Instagram, TikTok, YouTube, and LinkedIn).

If you are logged into your account on these social media platforms, your access to our social media pages and our Services will be linked to your account.

When you interact with Us or the Services through a social media platform (such as by clicking on a social media icon linked from our Services), We may collect the Personal Information that you make available to Us on that page, including your account ID or username and other information included in your posts. If you choose to log in to your account with or through a social networking service, We and that service may share certain information about you and your activities.

If you contact Us via social media, you authorize Us to share information with your social media account provider, and you understand that the use of the information We share will be governed by the social media site’s privacy notice. Your interactions with Our business pages on these social media platforms is governed by the privacy practices of these platforms.

Third Parties

The Services may contain links to other websites, applications or platforms. Please read the privacy policies of these third-party websites, applications or platforms that collect personally identifiable information in order to understand their privacy policies and data collection practices. This Privacy Notice applies solely to Personal Information collected and processed by PDM or on its behalf.

We engage third-party vendors to help provide the Services to you.

HOW WE USE PERSONAL INFORMATION

We only use your Personal Information in accordance with this Privacy Notice and as permitted by law and/or our agreements with you. We may use your Personal Information to:

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- Fulfill or meet the reason for which the information is provided, for example, to provide the information and services you request;
- Keep a record of your contact information and correspondence;
- Contact you with newsletters, marketing or promotional materials and other information that may be of interest to you.
- Personalize our communications with you;
- Improve our marketing efforts;
- Collect and process applications for employment;
- Administer the Services;
- Analyze Services usage to improve the design, functionality, and content of the Services ;
- Comply with applicable law or legal or government request;
- Maintain security, protect our rights or property or the rights and property of others, and prevent fraud;
- Fulfill any other purpose for which you provide it;
- Carry out Our obligations and enforce Our rights arising from any contracts entered into between you and Us;
- Notify you about changes to Our Services or any products or services We offer or provide through them;
- Satisfy any other purpose We may describe when you provide the information; and
- Fulfill any other purpose with your consent.

WHEN WE SHARE PERSONAL INFORMATION

In certain circumstances We may disclose your Personal Information to provide services requested by you or as required by law or for a business purpose, including:

- Fulfilling the purpose for which you provide it;
- Sharing your Personal Information with our affiliates and subsidiaries or service providers We have retained to perform services on Our behalf, including: advertising networks, social networks (including links to our Facebook, LinkedIn, YouTube, Instagram, and TikTok pages), data management platforms, data collaboration platforms, data analytics providers, technology providers, payment processors, customer relationship management platforms, customer service providers, video sharing platforms (including Vimeo and YouTube; for more information about YouTube's collection of information, see Google's privacy policy at: <http://www.google.com/policies/privacy>), and tag management systems;
- Disclosing your Personal Information with your consent;
- Complying with applicable laws or responding to a request from government authorities;
- Preventing or investigating a possible crime, such as fraud or identity theft, or protecting our own rights or property or the rights, property or safety of others;
- Enforcing or applying Our agreements with you;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred; and
- For any other purpose disclosed by Us when you provide the information.

YOUR CHOICES AND RIGHTS

General You may update or delete information from your profile at any time, or request that We do so; however, because we archive past transactions, You cannot delete this information. You may also request that we delete Your account entirely by contacting us. Terminating Your registration will not necessarily remove previous public comments or other user content on public display on the Services. If you wish to cancel Your account on the Services or delete Your information previously provided to Us, You may send Your request here: privacy@powerdigital.com

If You do not receive a response from us to any emails you send to us within ten (10) business days, please send Us another email, as Your original email may not have been received.

Email You may choose not to subscribe to email communications other than service-related communications such as payment confirmation. If You do choose to receive email communications such as email newsletters and promotional emails, You may later opt out by following the instructions provided at the bottom of each email, clicking the “unsubscribe” button at the bottom of emails We sent You.

Advertising and Marketing and Website Analytics You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the Services for the Network Advertising Initiative, the Digital Advertising Alliance, and the European Interactive Advertising Digital Alliance European (EDAA). Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device. For more information about how to change these settings go to:

- Apple: <https://support.apple.com/kb/HT4228>
- Android: <https://www.google.com/policies/technologies/ads/>
- Windows: <https://choice.microsoft.com/en-US/opt-out>

Google Analytics collects Personal Information through the Services, including through the use of cookies. For information about how Google Analytics collects and processes data, please visit:

<https://policies.google.com/technologies/partner-sites>. To opt out of having your information used by Google Analytics, please visit: <https://tools.google.com/dlpage/gaoptout/>. For more information, please visit Google’s privacy policy at: <https://policies.google.com/privacy?hl=en&fg=1>.

To opt out of Google Analytics Advertising Features, visit Google’s Ad Settings page. Website users can also access the Google Analytics Opt Out Browser Add-on <https://support.google.com/analytics/answer/181881?hl=en>. Please note that opting-out of advertising networks services does not mean that you will not receive advertising while using our Services or on other services, nor

will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will, however, exclude You from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, you may also delete Your opt-out preferences. If You use multiple browsers or devices You may need to execute this opt out on each browser or device.

Additionally, third parties, including Google (through, for example, our use of Google Analytics Advertising Features, including Dynamic Remarketing), may place and read cookies on your browser, or use web beacons to collect information in connection with ad serving on or through the Services, including for the purposes of showing Our ads on sites across the internet. Our partners will collect Personal Information for personalization of ads and may use first-party cookies or other first-party identifiers and third-party cookies and other third-party identifiers for personalized and non-personalized advertising and measurement. Ad serving may be based on users' visits to Our Services or other websites on the Internet, and your activity may be tracked over time and across websites. For information about how Google collects, shares, and uses data, please visit: <https://policies.google.com/technologies/partner-sites>. You can opt out of Google's use of cookies or device identifiers by visiting the Google Ads Settings web page at: <http://www.google.com/ads/preferences/>. For more information, please visit Google's privacy policy at: <https://policies.google.com/privacy?hl=en&fg=1>. You can opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page or control the use of device identifiers by using your device's settings.

We use the Meta Pixel to analyze user activity on Our Services for remarketing and behavioral targeting. The Meta Pixel is triggered when you perform certain activities on the Services, and aids us in displaying Facebook ads to Facebook users who have visited Our Services, or Facebook users who share certain characteristics with visitors to Our Services. Meta and other third parties may use cookies, web beacons, and other storage technologies to collect information from the Services and from other internet websites, and use that information for the purposes of targeting ads and providing measurement services. Meta may track your activity over time and across websites. For more information about the data Meta collects, please visit Meta's privacy policy at: <https://www.facebook.com/privacy/policy/>. For specific information about Meta Pixel, please visit: <https://www.facebook.com/business/help/742478679120153?id=1205376682832142>. For more information about ad targeting and exercising your choice to opt out of the collection and use of information for ad targeting, please visit: <https://www.facebook.com/help/568137493302217>, or <http://optout.aboutads.info/?c=2&lang=EN>.

Microsoft collects or receives Personal Information from Our users or Us to provide Microsoft Advertising (including through individual end user tracking and data sharing with third parties for advertising and marketing purposes). We partner with Microsoft Clarity and Microsoft Advertising to capture how You use and interact with Our Services through behavioral metrics, heatmaps, and session replay to improve and market Our products/services. Services usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, We use this information for Services optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your Personal Information, visit the [Microsoft Privacy Statement](https://privacy.microsoft.com/en-US/privacystatement), available at: <https://privacy.microsoft.com/en-US/privacystatement>.

When you visit or log in to our website, cookies and similar technologies may be employed by our online data partners or vendors to link these activities with additional personal information they or others possess about you, potentially including your email or home address. Subsequently, we (or service providers acting on our behalf) may utilize this information to send communications and marketing to the associated email or home addresses. If you wish to opt out of receiving such advertising, please visit <https://app.retention.com/optout>.

When you use or log in to our app, information received from Google APIs may be used by our online data partners or vendors to link these activities with additional personal information they or others possess about you, potentially including your email or home address. Subsequently, we (or service providers acting on our behalf) may utilize this information to send communications and marketing to the associated email or home addresses. The use and transfer of information received from Google APIs by (App) will adhere to the Google API Services User Data Policy, including the Limited Use requirements. If you wish to opt out of receiving such advertising, please visit [Google API Services User Data Policy](#).

When you visit or log in to our website, cookies and similar technologies may be employed by our online data partners or vendors to link these activities with additional personal information they or others possess about you, potentially including your email or home address. Subsequently, we (or service providers acting on our behalf) may utilize this information to send communications and marketing to the associated email or home addresses. If you wish to opt out of receiving such advertising, please following the “unsubscribe” information at the bottom of the email or by replying “Stop” to any text message you receive.

The DAA’s AppChoices App provides options regarding the collection of cross-app data for your device.

Additional resources or tools may exist that streamline the process of submitting opt-out requests—for example, TRUSTe’s Ad Preference Manager. We do not review or warrant the representations made by these tools and cannot guarantee their effectiveness.

International Users

For international users, please note that it may be necessary to transfer your information internationally and, in particular, your information may be transferred to and processed in the United States. It is important to know that data protection laws in some jurisdictions may not be as strong as those in your country. By using the Services, you agree to have your information used and transferred to the United States as set forth in this Privacy Notice. PDM relies on the safeguards set forth in Article 46 of the GDPR or derogations for specific situations set forth in Article 49 of the GDPR in order to transfer Personal Information across international borders.

Individuals in the EEA or the UK may request a copy of applicable Article 46 agreements by contacting us at: privacy@powerdigital.com.

EEA and UK Data Subject Rights

If you are an EEA or UK data subject, we provide you with choices about the collection, use and disclosure of your Personal Information. You may exercise these rights by contacting us in writing by electronic mail, postal mail, or commercial courier at the address or email address provided at the end of this Privacy Notice under the heading “Contact Information.” Unless explicitly stated otherwise, we will respond to your request as soon as possible, but at the latest within one month.

Your rights include:

- Accessing your Personal Information to know what information we have collected about you and how it has been shared;
- Requesting the deletion of all or some of your Personal Information;
- Changing or correcting inaccurate or outdated information;
- Objecting to, limiting or restricting processing of all or some of your Personal Information; and
- Requesting a copy of your Personal Information, including in a portable format.

When the processing of your Personal Information is based on your consent, you have the right to withdraw your consent at any time, but this will not affect any processing We have already performed. If you withdraw your consent, refuse to provide certain information, or provide inaccurate information, you may not be able to access or utilize all of the features or content available on or through the Services, and We may not be able to fulfill your requests for products or information.

Please contact us using any of the methods identified in the *Contact Information* section if you would like to exercise your individual rights. We may

need to obtain or confirm certain Personal Information in order to accommodate your request. We will not accommodate a request to change information if We believe the change would violate any law or legal requirement or cause the information to be incorrect.

You also have the right to lodge a complaint with your supervisory authority if you believe we have violated your privacy rights or applicable laws and regulations.

Explicit Consent for AI Data Sharing

- **Are users explicitly informed about the use of AI models and the potential data sharing involved:** Users are explicitly informed about the use of AI models and the potential data sharing during the account creation process and through our privacy policy updates.
- **Does the app obtain explicit consent from users before sharing their data with any third-party AI models:** Before sharing data with third-party AI models, we obtain explicit consent from users through a clear opt-in process. Users are provided with detailed information and must agree to the data sharing terms.
- **How is this consent obtained (e.g., clear opt-in checkbox, detailed explanation):** Consent is obtained through a clear opt-in checkbox presented during the registration process or through an in-app notification for existing users. Detailed explanations of the data sharing practices and purposes are provided at the point of consent.

California residents may have additional personal information rights and choices. Please see our *Privacy Statement for California* for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: privacy@powerdigital.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.

PRIVACY STATEMENT FOR CALIFORNIA

Last Updated: December [], 2023

California Residents

The following disclosures are made pursuant to the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 ("CCPA"). These disclosures supplement any privacy notices we previously or contemporaneously provided to you, including any California-specific privacy notice provided to you if you are an employee of PDM.

Right to Know

California residents have the right to be informed of the categories and specific pieces of personal information collected about them, including sensitive personal information, collected, used, and



disclosed, the categories of sources from which that information is collected, whether that information is sold or shared, the categories of third parties to whom that information has been disclosed, the business or commercial purposes for collecting and using each category of personal information, and the intended retention period for each category of personal information.

The below chart reflects the categories of personal information we have collected from California residents during the past twelve months, the categories of sources from which the information was collected, the business or commercial purpose for which the information was collected, the categories of third parties to whom we disclosed that information, and our anticipated retention period for each category of information.

Personal Information Category set forth in Cal. Civ. Code § 1798.140	Source(s) of Personal Information Collection	Business or Commercial Purpose(s) for Collection/Use	Third Parties, Service Providers, and Contractors Receiving Personal Information Category	Retention Period
Personal identifiers , including real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers.	Directly from you; indirectly from you as you navigate or use our Services; data analytics providers; social networks; advertising networks; internet or mobile service providers. <u>For job applicants:</u> directly from you; background check providers; recruiters; hiring platforms.	Provide you with our Services; communicate with you; protect and secure our environment; verify, maintain, improve, upgrade, or enhance a product or service; identify and repair errors; advertise or market to you; perform analytics. <u>For job applicants:</u> Assess your application; satisfy legal obligations.	Affiliates; advertising networks; social networks; data management platforms; data collaboration platforms; data analytics providers; technology providers; payment processors; customer relationship management platforms; customer service providers; video sharing platforms; tag management systems.	The length of your business relationship with us plus any legally required additional retention period for this category of personal information following conclusion of your business relationship with us or as long as our business need require.
California Customer Records Personal Information (Cal. Civ. Code § 1798.80(e)),	Directly from you. <u>For job applicants:</u> directly from you; background check	Provide you with our Services; communicate with you; protect and secure our	Affiliates; advertising networks, social networks; data management platforms;	The length of your business relationship with us plus any legally required

<p>including name, signature, physical characteristics or description, address, telephone number, education, employment, employment history, etc.</p>	<p>providers; recruiters; hiring platforms.</p>	<p>environment; verify, maintain, improve, upgrade, or enhance a product or service; identify and repair errors; advertise or market to you; perform analytics.</p> <p><u>For job applicants:</u> Process your application; satisfy legal obligations.</p>	<p>data collaboration platforms; data analytics providers; technology providers; payment processors; customer relationship management platforms; customer service providers; video sharing platforms; tag management systems.</p>	<p>additional retention period for this category of personal information following conclusion of your business relationship with us or as long as our business needs require.</p>
<p>Characteristics of protected classifications under California or federal law.</p>	<p>Directly from you; indirectly from you as you navigate or use our Services; data analytics providers; social networks; advertising networks; internet or mobile service providers.</p> <p><u>For job applicants:</u> directly from you; background check providers; recruiters; hiring platforms.</p>	<p>Provide you with our Services; communicate with you; protect and secure our environment; verify, maintain, improve, upgrade, or enhance a product or service; identify and repair errors; advertise or market to you; meet our legal obligations.</p> <p><u>For job applicants:</u> Process your application; satisfy legal obligations.</p>	<p>Affiliates; advertising networks, social networks; data management platforms; data collaboration platforms; data analytics providers; technology providers; customer relationship management platforms; customer service providers; video sharing platforms; tag management systems.</p>	<p>The length of your business relationship with us plus any legally required additional retention period for this category of personal information following conclusion of your business relationship with us or as long as our business needs require.</p>
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Directly from you; indirectly from you as you navigate or use our Services; data analytics providers; social networks; advertising networks; internet</p>	<p>Provide you with our Services; communicate with you; protect and secure our environment; verify, maintain, improve, upgrade, or enhance a product or service; identify and repair errors; advertise or</p>	<p>Affiliates; advertising networks, social networks; data management platforms; data collaboration platforms; data analytics providers; technology providers; payment processors; customer relationship</p>	<p>The length of your business relationship with us plus any legally required additional retention period for this category of personal information following conclusion of your business relationship</p>

	or mobile service providers.	market to you; meet our legal obligations; maintain transaction records.	management platforms; customer service providers; video sharing platforms; tag management systems.	with us or as long as our business needs require.
Biometric information.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information about individual interactions with an Internet website, application, or advertisement.	Indirectly from you as you navigate or use our Services; data analytics providers; social networks; advertising networks; internet or mobile service providers.	Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; verify, maintain, improve, upgrade, or enhance a service or device that is owned or controlled by us; identify and repair errors; advertise or marketing to you; perform analytics.	Affiliates; advertising networks, social networks; data management platforms; data collaboration platforms; data analytics providers; technology providers; customer relationship management platforms; customer service providers; video sharing platforms; tag management systems.	Barring any legally required additional retention period, up to one year.
Geolocation data	Indirectly from you; devices you use to access our Services; data analytics providers; social networks; advertising networks; internet or mobile service providers.	Provide you with our Services; protect and secure our environment; verify, maintain, improve, upgrade, or enhance a product or service; identify and repair errors; advertise or market to you.	Affiliates; advertising networks, social networks; data management platforms; data collaboration platforms; data analytics providers; technology providers; customer relationship management platforms; customer service providers; video sharing platforms; tag management systems.	Barring any legally required additional retention period, up to one year.
Sensory data including audio, electronic, visual,	We do not collect.	Not applicable.	Not applicable.	Not applicable.

thermal, olfactory, or similar information.				
Professional or employment-related information.	<p>Directly from you; data analytics providers; social networks; advertising networks.</p> <p><u>For job applicants:</u> directly from you; background check providers; recruiters; hiring platforms.</p>	<p>Provide you with our Services; communicate with you; protect and secure our environment; verify, maintain, improve, upgrade, or enhance a product or service; identify and repair errors; advertise or market to you.</p> <p><u>For job applicants:</u> Process your application.</p>	<p>Affiliates; advertising networks, social networks; data management platforms; data collaboration platforms; data analytics providers; technology providers; customer relationship management platforms; customer service providers; video sharing platforms; tag management systems.</p>	<p>The length of your business relationship with us plus any legally required additional retention period for this category of personal information following conclusion of your business relationship with us or as long as our business needs require.</p>
Non-public education information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 C.F.R. Part 99)	<p><u>For job applicants:</u> Directly from you; background check providers; recruiters; hiring platforms.</p>	<p><u>For job applicants:</u> Process your application.</p>	<p><u>For job applicants:</u> Affiliates; data management platforms; technology providers; customer relationship management platforms.</p>	<p><u>For job applicants:</u> Barring any legally required additional retention period, up to ten years for non-hired applicants.</p>
Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<p>Indirectly from you; devices you use to access our Services; data analytics providers; social networks; advertising networks; internet or mobile service providers.</p>	<p>Advertise or market to you; perform analytics; maintain, improve, upgrade, or enhance a product or service.</p>	<p>Affiliates; advertising networks, social networks; data management platforms; data collaboration platforms; data analytics providers; technology providers; customer relationship management platforms;</p>	<p>The length of your business relationship with us plus any legally required additional retention period for this category of personal information following conclusion of your business relationship with us or as long as our business needs require.</p>

			customer service providers; video sharing platforms; tag management systems.	
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Sensitive Personal Information Category as set forth in Cal. Civ. Code § 1798.140	Sources from which Information was Collected	Purposes for Collection; Use	Third Parties, Service Providers, and Contractors Receiving Personal Information	Retention Period
Social security number, driver's license number, state identification card, or passport number.	<u>For job applicants:</u> Directly from you; background check providers; recruiters; hiring platforms.	<u>For job applicants:</u> Process your application; fulfill our legal obligations.	<u>For job applicants:</u> Affiliates; technology providers.	<u>For job applicants:</u> Barring any legally required additional retention period, up to ten years for non-hired applicants.
Account access credentials (user names, account numbers, or card numbers combined with required access code, security code or password to access an account).	Directly from you; indirectly from you as you navigate or use our Services; internet or mobile service providers.	Provide you with our Services; communicate with you; protect and secure our environment; verify, maintain, improve, upgrade, or enhance a product or service; identify and repair errors.	Affiliates; technology providers.	The length of your business relationship with us plus any legally required additional retention period for this category of personal information following conclusion of your business relationship with us or as long as our business needs require.
Precise geolocation (location within a geographical area of a circle with a radius of 1850 feet or less).	We do not collect.	Not applicable.	Not applicable.	Not applicable.

Racial or ethnic origin	<u>For job applicants:</u> Directly from you; hiring platforms.	<u>For job applicants:</u> Process your application; fulfill our legal obligations.	<u>For job applicants:</u> Affiliates; technology providers.	<u>For job applicants:</u> Barring any legally required additional retention period, up to ten years for non-hired applicants.
Religious or philosophical beliefs	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Union membership	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Genetic Data	We do not collect.	We do not collect.	Not applicable.	Not applicable.
Mail, email, or text messages where the content is not directed to us.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Unique identifying biometric information	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Personal information collected and analyzed concerning health.	We do not collect.	We do not collect.	Not applicable.	Not applicable.
Personal information collected and analyzed concerning sex life, or sexual orientation.	We do not collect.	We do not collect.	Not applicable.	Not applicable.
Personal information that reveals immigration status	<u>For job applicants:</u> Directly from you; hiring platforms.	<u>For job applicants:</u> Process your application; fulfill our legal obligations.	<u>For job applicants:</u> Affiliates; technology providers.	<u>For job applicants:</u> Barring any legally required additional retention period, up to ten years for non-hired applicants.
Personal information that reveals citizenship status	<u>For job applicants:</u> Directly from you; hiring platforms.	<u>For job applicants:</u> Process your application; fulfill our legal obligations.	<u>For job applicants:</u> Affiliates; technology providers.	<u>For job applicants:</u> Barring any legally required additional retention period, up to ten years for

				non-hired applicants.
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Right to Limit Use and Disclosure of Sensitive Personal Information

We do not collect or process sensitive personal information for the purpose of inferring characteristics about consumers. We also do not disclose sensitive personal information for purposes other than those specified in section 7027(m) of the CCPA regulations promulgated by the California Privacy Protection Agency. Therefore, we do not offer consumers the option to limit the use of their sensitive personal information.

Right to Opt Out of Sharing for Cross-Context Behavioral Advertising

In the past twelve months we have used data about your activities on our online properties to serve you ads on online properties owned or controlled by third parties. In the past twelve months, we have provided the following categories of information to affiliates, advertising networks, customer relationship management platforms, data analytics providers, social networks, tag management systems, video sharing platforms, data management platforms, and data collaboration platforms for this purpose:

- Personal identifiers, such as unique personal identifier, online identifier, internet protocol address, device information and identifiers, and unique advertising identifiers and cookies; Internet and other electronic network activity information; geolocation information; inference data; characteristics of protected classifications under California or federal law; professional or employment-related information; and commercial information.

If you would like to opt out of this sharing, you may exercise your right using our “Do Not Sell or Share My Personal Information” link, or by modifying your cookie settings, or, you may do so in a frictionless manner by activating Global Privacy Control (“GPC”) opt out preference signal to opt out of disclosures of your personal information through the browser you are using. To learn more about the GPC, click [here](#).

Right to Opt Out of Sale

While we do not sell personal information in exchange for monetary consideration, we do share personal information for other benefits that could be deemed a “sale,” as defined by the CCPA. The CCPA broadly defines “sale” in a way that may include activities such as the delivery of targeted advertising on websites or allowing third parties to receive certain information, such as cookies, IP address, and/or browsing behavior. In the past twelve months, we have provided the following categories of information to affiliates, advertising networks, customer relationship management platforms, data analytics providers, social networks, tag management systems, video sharing platforms, data management platforms, and data collaboration platforms in ways that could be considered a “sale” under California law:

- Personal identifiers, such as unique personal identifier, online identifier, internet protocol address, device information and identifiers, and unique advertising identifiers and cookies;



Internet and other electronic network activity information; geolocation information; inference data; characteristics of protected classifications under California or federal law; professional or employment-related information; and commercial information.

We disclosed these categories of information to these third parties in order to market and advertise our products and services; perform analytics; and to maintain, improve, upgrade, or enhance our products or services.

We have no actual knowledge of selling the personal information or the sensitive personal information or minors under 16 years of age.

California residents have the right to opt out of the “sale” of their personal or sensitive personal information.

If you would like to opt out of such disclosures, you may exercise your right using our “Do Not Sell or Share My Personal Information” link, or by modifying your cookie settings, or, you may do so in a frictionless manner by activating Global Privacy Control (“GPC”) opt out preference signal to opt out of disclosures of your personal information through the browser you are using. To learn more about the GPC, click [here](#).

Right to Delete Personal Information

You have the right to request the deletion of your personal information, subject to certain exceptions.

Right to Correct Inaccurate Personal Information

You have the right to request the correction of any inaccurate personal information that we maintain about you.

Right to Access

You have the right to request the categories and specific pieces of personal information we have collected about you.

Right of Non-Retaliation and Non-Discrimination

You have the right to exercise the privacy rights conferred to you under the CCPA without receiving retaliatory or discriminatory treatment. PDM does not retaliate or discriminate against you for exercising the privacy rights conferred to you under the CCPA.

Exercising Your Rights

To exercise your rights, you may contact us via phone at 619-501-1211 or via email at: privacy@powerdigital.com. Requesters will need to provide us with personal information in order to verify their identity and residency, including name, email address, and state of residence. We will compare the information you provide with our internal records. The personal information that we use to verify identity and residency will not be used for any other purpose.

You may authorize an agent to submit a request on your behalf if you provide the authorized agent with written permission signed by you. PDM may require you to verify your identity directly with us



and confirm that you provided the authorized agent with permission to submit a request on your behalf.

OTHER IMPORTANT INFORMATION

Privacy Notice Changes	We reserve the right to change or update this Privacy Notice by posting such changes or updates to the Services. Amendments to this Privacy Notice will be posted at this URL and will be effective when posted. You can tell if the Notice has changed by checking the last modified date that appears at the end of this Privacy Notice. If We make material changes to how we treat Our users' Personal Information, We will notify you in accordance with applicable law. You are responsible for ensuring We have an up-to-date active and deliverable email address for you, and for periodically visiting our Services and this Privacy Notice to check for any changes. Your continued use of the Services following the posting of any amendment, modification or change shall constitute your acceptance thereof.
Cross-Border Data Transfers	Where we transfer your Personal Information from the European Economic Area (including the UK or Switzerland) ("EEA") to a location outside the EEA, we will only transfer your data if an appropriate level of protection for your Personal Information is guaranteed
Data Retention	We retain your information for as long as needed: (i) to conduct business with you; (ii) as needed for the purposes outlined in this Privacy Notice; and (iii) as necessary to comply with Our legal obligations, resolve disputes, and enforce any agreements.
Children	We do not knowingly collect Personal Information from children, as defined under applicable law. Our Services are not intended for children, and no children may provide information on the Services. If we learn we have collected or received Personal Information from a child, we will delete that information. If you believe we might have any information from or about a child, please contact us at the email address identified in the <i>Contact Information</i> section.
Third-Party Websites	Our Services may contain links to other websites of interest. However, once you have used these links to leave our Services, you should note that We do not have any control over that other website. Therefore, We cannot be responsible for the protection and privacy of any information that you provide while visiting such sites and such sites are not governed by this Privacy Notice. You should exercise caution and look at the privacy statement applicable to the website in question.
Security	We have implemented organizational and technical safeguards for protecting the Personal Information that you share with Us, including Secure Socket Layer (SSL) security software encryption for all personal customer information. Notwithstanding the forgoing, no website is one hundred percent (100%) secure and transmitting information over the internet inherently possess risk therefore We cannot guarantee absolute security.



Please note that e-mail is not encrypted and is not considered to be a secure means of transmitting credit card information, so please do not send us your credit card number by email. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

**Contact
Information**

If there are any questions regarding this Privacy Notice you may contact Us using the information below.

- *Address:* 2251 San Diego Ave. Suite a250, San Diego, CA 92110
- *Email:* privacy@powerdigital.com