

Privacy Policy

LAST UPDATED: 1/10/2020

7Wire Ventures and its affiliates (“7Wire”, “we”, “our”, and “us”) respect your concerns about privacy and personal data protection and value our relationship with you. This Privacy Policy (this “Policy”) applies solely to personal information collected through www.7wireventures.com (the “Site”), whether accessed via computer, mobile device or other device (collectively, “Device”).

This Policy describes the types of personal information we collect and how that personal information may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your personal information, access and control the use of the personal information, or get answers to questions you may have about our privacy practices at our Site. Please read this Policy carefully, because by accessing and using our Site you are acknowledging that you understand and agree to the terms of this Policy.

This Privacy Policy does not apply to any websites operated by third parties. We are not responsible for, and this Privacy Policy does not apply to the privacy practices of other companies or other websites. We encourage you to seek out and read the privacy policy of each website that you visit.

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When do we collect your information?

7Wire collects information relating to you and your use of the Site in order to provide and improve the Site so that it is responsive to your needs. 7Wire collects personal information in the following ways:

- **From you.** We collect information from you when you subscribe to our newsletter, request information, send us email, send us postal mail, speak with us on the telephone, or otherwise interact with us.
- **Automatically as you navigate the Site.** Information collected automatically may include usage details, email address, IP addresses, and information collected through cookies and other tracking technologies.

What information do we collect?

Information You Provide Us. 7Wire collects the information that you directly provide us when you use the Site, including but not limited to, your first and last name, e-mail address, and any other personal information you may provide when you contact us via the Site.

Information Sent to Us by Your Web Browser.

When you use our Site, we and our third-party service providers automatically collect information about how you access and use the Site and information about the device you use to access the Site. We typically collect this information through a variety of tools, including cookies, web beacons, pixels, and other tools to enable data recording and indexing, and similar technology (collectively, “tracking technologies”). We and our third-party partners may automatically collect such information as:

- IP address
- Device type
- Browser type
- Operating system or platform
- Name of Internet service provider
- Referring website
- Exiting website
- Pages visited on the Site
- Frequency, time, data, and duration of your visit on our Site
- Your location
- Whether you access our website from multiple devices
- Other interaction you may have on our Site
- Device Unique Device Identifier (e.g., Unique Device Identifier (UDID) or International Mobile Equipment Identity (IMEI))
- Mobile device MAC or IP address
- Information about your mobile carrier

- Communications relating to customer support, and information drawn from such communications, for statistical and reference

How do we use your personal information?

7Wire Ventures uses your personal information for various purposes, including:

- To provide support and contact you regarding any inquiries you submit
- To send you our newsletter when you subscribe
- To gather analysis or valuable information so that we can improve our Site
- To monitor the usage of our Site
- To detect, prevent and address technical issues
- To provide you with news and general information about us

Do we disclose any information to outside parties?

We do not sell, trade, or transfer your personal information to third parties, except in the circumstances described below.

Affiliates, Subsidiaries, and Independent Distributors

We may share your personal information with other 7Wire affiliates and subsidiaries.

Third-Party Service Providers

We may disclose your personal information to our vendors and other third-party service providers that help us provide our services and support features on our Site.

Legal Requirements and Business Transfers

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other government official requests, (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iii) in connection with an investigation of a complaint, security threat, or suspected or actual illegal activity; (iv) in connection with an internal audit; or (v) in the event that 7Wire is subject to mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party.

What choices do you have about your personal information?

We offer certain choices about how we communicate with you and what personal information we obtain about you and share with others.

E-mail

You may unsubscribe from emails from us by clicking the Unsubscribe at the bottom of any promotional email from us or following instructions provided in any email. You may also contact us by e-mail or postal address as noted below. Please include your current contact information, the information you are interested in accessing, and your requested changes.

Cookies

We provide a variety of services on our Site using cookies. We place cookies on your device in order to provide you with personalized access to essential services, and enhance functionality.

A cookie is a small piece of data that a website can send to your browser, which may then be stored on your hard drive as a “tag” that identifies your computer. Cookies help to navigate from page to page on a website, provide secure connections, gather statistics about the usage and effectiveness of our site, and remembers preferences from a previous visit, when you return.

We use third-party services for analytics and interest-based advertising purposes. These service providers and ad partners may use cookies alone or in conjunction with unique identifiers, beacons, and other tracking technologies to collect information about you when you use our website, open our emails, or interact with our ads. We do not combine the information collected through the use of these services with information that directly identifies you.

Most web browsers automatically accept cookies, but you can change your browser’s settings to disable all or certain cookies if you wish. Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our Site. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

Do Not Track

Because there currently is not an industry or legal standard for recognizing or honoring Do Not Track (“DNT”) signals, we do not respond to them at this time.

Location of our Site

Our Site is hosted and operated in the United States. However, we and our service providers may store information about individuals in the United States, or we may transfer it to, and store it within, other countries.

Visitors from jurisdictions outside the United States visit us at their own choice and risk.

If you are not a resident of the United States, you acknowledge and agree that we may collect and use your personal information outside your home jurisdiction, and that we may store your personal information in the United States or elsewhere. Please note that the level of legal protection provided in the United States from which you may access our Site may not be as stringent as that under privacy standards or the privacy laws of other countries, possibly including your home jurisdiction.

How long do we retain your personal information?

We will keep your personal information for the period necessary to fulfil the purposes described in this Privacy Policy, unless a longer retention period is permitted or required by law.

Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our Site. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. We urge you to read the privacy policies of other websites before submitting any information to those websites.

How do we protect your information?

7Wire has implemented reasonable physical, technical, and administrative security standards to protect personal information from loss, misuse, alteration, or destruction. We strive to protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access.

Individuals Within the European Union

Controllers of Personal Data

7Wire Ventures
444 N. Michigan Ave.
Suite 3500
Chicago, IL 60611
United States

is the data controller of the personal data processed through the Site.

Legal Bases for Processing Personal Data

If you are an individual located in the European Union (EU), we collect and process personal data about you where we have a legal basis for doing so under applicable EU laws. This means we collect and process your data only when:

- it is necessary for a legitimate interest (which is not overridden by your individual privacy interests), such as preventing fraud, improving our Site, and increasing the security of the website and network infrastructure;
- you have consented to this collection and processing for a specific purpose;
- it is necessary to fulfil our contractual obligations; or
- it is necessary to comply with a legal obligation.

Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. Some examples of where we rely on your consent to process your personal data include sending you marketing emails. If you wish to withdraw your consent, please contact us at web@7wireventures.com.

Some examples of our legitimate interests for processing personal data include:

- network security;
- customer support;
- fraud prevention; or
- improving our Site.

Where we rely on our legitimate interests to process your personal data, you may have the right to object. More information on exercising this right can be found in the Individual Rights section below.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us at web@7wireventures.com.

Individual Rights

If you are located in the EU, you have certain rights under EU data protection law with respect to your personal data, including the right to request access to, correct, and delete your personal data. You may also have the right to receive a copy of your personal data in a commonly used and machine-readable format, and to transmit such data to another controller. You also may object to processing of your personal data or ask that we restrict the processing of your personal data in certain instances.

To request deletion of, access to, or to make changes to your personal data, or to otherwise any of the rights in this section, please contact us at web@7wireventures.com. Please note that not all requests can be honored.

Transfers, Storage, and Processing

Our Site is operated from and hosted on servers located in the United States. If you access and use our website from a location outside of the United States, any personal data you provide to us or that is otherwise collected may be transferred to and processed in the United States or any other jurisdiction in our sole discretion. Users of our Site should be aware that the laws that apply to the use and protection of personal data in the United States or other countries or jurisdictions to which we transfer, or in which we process, personal data may differ from those of your country of residence. Users who access or use our Site from jurisdictions outside of the United States do so at their own choice and risk and are solely responsible for compliance with local law. While we take steps to safeguard your personal data, the United States has NOT been deemed by the European Commission to ensure an adequate level of protection for personal data. Accordingly, the level of protection provided in the United States or other non-EU countries and jurisdictions from which you may access our Site may not be as stringent as that under EU data protection

standards or the data protection laws of some other countries, possibly including your home jurisdiction.

If we are processing your personal data on behalf of another party, your personal data is transferred across borders to the United States or to other countries or jurisdictions in which we or our third-party associates may process personal data through the use of Standard Contract Clauses.

Unresolved Complaints

If you are a resident of the EU and your inquiry with us has not been satisfactorily addressed, or if you believe we are processing your personal data not in accordance with the law or this Privacy Policy, you may file a complaint with the supervisory authority in your country of residence.

Your California privacy rights

California Civil Code Section § 1798.83 permits users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to web@7wireventures.com or write us at:

7Wire Ventures
444 N. Michigan Ave.
Suite 3500
Chicago, IL 60611
United States

In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

Pursuant to applicable California law, including the California Consumer Privacy Act (CCPA), 7Wire makes the following disclosures regarding the personal information 7Wire has collected within the last 12 months:

<u>Category of Personal Information</u>	<u>Category of Source from Which Data is Collected</u>	<u>Purpose of Collection</u>	<u>Category of Third Parties to Whom Data is Disclosed</u>
Contact information such as first and last name, and email address,	Directly from user	To provide support and communicate with our users	Service Providers
Automatically collected usage information such as browser type, device type, IP address	Cookies and other tracking technologies	To conduct data analytics and support the Site; to monitor, analyze, and improve our Site's	Service Providers

		performance functionality	and	
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7Wire has not sold consumers' personal information in the twelve (12) months preceding the Effective Date of this Privacy Policy.

If you are a California resident, pursuant to the CCPA, you have the right to request:

- the categories of personal information 7Wire has collected about you;
- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom 7Wire shares your personal information;
- the specific pieces of personal information 7Wire has collected about you;
- the categories of personal information that 7Wire has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at web@7wireventures.com, 877-790-0770, or complete the web form located at <https://www.7wireventures.com/contact-us/>. To verify your identity when you submit a request, we will match the identifying information you provide to us to the personal information we have about you.

7Wire will not be required to comply with your request to delete your personal information if it is necessary for 7Wire to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of 7Wire's ongoing business relationship with you, or otherwise perform a contract between you and 7Wire;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when 7Wire's deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with 7Wire;
- comply with a legal obligation; or

- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

7Wire will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

This Policy is available to consumers with disabilities in an alternative downloadable format.

Do we collect information from children?

Our Site is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Site. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on the Site or on or through any of its features, including your name or email address. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at web@7wireventures.com.

Contacting us

For any questions, or to request further information regarding this Policy, please contact us at:

web@7wireventures.com

7Wire Ventures
444 N. Michigan Ave.
Suite 3500
Chicago, IL 60611

Changes to our privacy policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the primary e-mail address you have provided to us. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Site and this Privacy Policy to check for any changes.