

## **WEBSITE PRIVACY NOTICE**

### **MARKETING HOUSE WEBSITE PRIVACY NOTICE**

EFFECTIVE DATE: SEPTEMBER 8, 2023

Marketing House (“Agency”) respects your concerns about privacy. This Website Privacy Notice describes the types of information we collect about individuals on <http://www.marketinghouse.nyc> (the “Site”), how we use the information, with whom we share it, and the choices available regarding our use of the information. The Website Privacy Notice also describes the measures we take to safeguard personal information, how long we retain it, and how individuals can contact us about our privacy practices and exercise their rights.

When used in these Website Privacy Notice, “we” and “our” means Marketing House, and “you” and “your” refers to any individual, company, or legal entity that accesses or otherwise uses this Site.

#### **INFORMATION WE OBTAIN**

##### ***Information You Provide***

We gather and retain personal information (such as name and other contact information) that you decide to share with us on the Site or when reaching out to us. "Personal Information" refers to data that either pinpoint you as an individual or is associated with an identifiable person. The varieties of personal data we amass encompass:

- Contact information, such as your name and surname, e-mail address, telephone number; and
- Other personal information you may submit to us, such as when you contact us.

##### ***Information We Receive About You from Other Sources***

We obtain your Personal Information from alternative sources, such as publicly accessible databases and suppliers of demographic data.

##### ***Automated Collection of Information***

While utilizing the Site, we collect specific data through automated methods, including browser cookies, beacons, device identifiers, server logs, and other technologies.

The information we obtain in this way may contain your information:

- Device IP address,
- Domain name,
- Identifiers associated with your device,
- Device and operating system type and characteristics,
- Web browser characteristics,
- Language preferences,
- Clickstream data,
- Your interactions with the Site (such as the web pages you visit, links you click, and features you use),
- The pages that led or referred you to the Site,
- Dates and times of access to the Site, and
- Other information about your use of the Site.

You can see more information about how we obtain certain information by automated means in our Cookie Notice, which is incorporated into this Privacy Notice by this reference.

### ***Third-Party Web Analytics Services***

We use third-party online analytics services such as Google Analytics. The service providers that manage these analytics services use cookies and similar technologies to collect and analyze information about the use of the Site, report on activities and trends, and diagnose technical problems. To learn more about Google's practices, please visit <https://policies.google.com/technologies/partner-sites>, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

### ***Interest-Based Advertising through Advertising Networks***

You may see our ads on other websites or mobile applications because we participate in advertising networks such as Google Adwords. Ad networks allow us to target our messages to users based on demographic data, inferential interests of users, location, and browsing context. These networks track users' online activities over time by collecting information through automated means, including through the use of browser cookies, web beacons, device identifiers, server logs, and other similar technologies on the Site and on third-party websites and applications. The networks use this information to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple websites and applications, and to build a profile of users' online browsing and app usage activities. The information our ad networks collect through users' use of the Site includes data about users' visits to the Site and this is matched to information about users' visits to other websites and applications that participate in the relevant ad networks, such as the pages or ads viewed and the actions taken on the websites or applications.

To learn how to opt out of ad network interest-based advertising in the U.S., please visit <https://aboutads.info/choices> and <http://www.networkadvertising.org/choices/>. In the European Union, please visit <https://youronlinechoices.eu>.

## **HOW WE USE PERSONAL INFORMATION**

We use the Personal Information we obtain on the Site for legitimate business purposes, including the following:

- We provide you with our services; processing, evaluating, and responding to your requests and inquiries; and sending you administrative information such as changes to our terms, conditions, and policies. We will perform these activities to manage our contractual relationship with you and/or to comply with a legal obligation.
- To market our Services to you. We will do this with your consent or where we have a legitimate interest.
- Conduct, evaluate, and improve our business (including developing new services; developing and improving our services; analyzing our services; managing our communications; conducting data analytics and market research; and performing accounting, auditing, and other internal functions). We will perform these activities to comply with a legal obligation and/or because we have a legitimate interest.
- Protect against, detect, and prevent fraud, security breaches, and other criminal activity and risks. We will engage in these activities to comply with a legal obligation and/or because we have a legitimate interest.
- Comply with and enforce applicable legal requirements, relevant industry standards, and our policies, including this Website Privacy Notice and/or Agency's Terms and Conditions or Terms of Use. We will engage in these activities to comply with a legal obligation and/or because we have a legitimate interest.
- Aggregate and/or anonymize Personal Information so that it will no longer be considered personal information. We do so to generate other data for our use, which we may use and disclose for any purpose.

## **PERSONAL INFORMATION SHARING**

We share your Personal Information with:

- UMI Capital Holding (“UMI”) agencies, companies, or investments, for the purposes described in this Website Privacy Notice. You can consult the list and location of such entities [here](#). UMI is the holding company of the Agency.
- Our service providers perform services on our behalf, such as hosting this Site or data analytics. We do not authorize our service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also disclose information about you (1) if we are required to do so by law or legal process (such as a court order or subpoena), including laws outside your country of residence; (2) in response to requests by, or cooperate with, government agencies, such as law enforcement authorities, including outside of your country of residence; (3) to establish, exercise, or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to protect our rights, privacy, safety, or property and/or that of our affiliates, you, or others; (5) in connection with an investigation of suspected or actual illegal activity; (6) in connection with the sale or transfer of all or a portion of our business, assets, or stock (including in the event of a reorganization, dissolution, or liquidation); or (7) otherwise with your consent.

## **CROSS-BORDER TRANSFER**

Your personal information may be processed and stored in any country where we have facilities or engage our service providers, and by using the Site, you acknowledge that your information may be transferred to countries outside of your country of residence, including the United States, which may have different data protection rules than your country. In certain circumstances, courts, law enforcement, regulatory or security authorities in other countries may have the right to access your personal information.

## **YOUR RIGHTS AND CHOICES**

We provide you with certain choices regarding the personal information we obtain about you. If you would like to receive an electronic copy of your personal information for the purpose of reviewing, correcting, updating, suppressing, restricting, or deleting personal information, objecting to the processing of personal information, or transmitting it to another company (to the extent these rights are provided to you by applicable law), please contact us as set out in the [How to Contact Us](#) section of this Website Privacy Notice. We will respond to your request in accordance with applicable law.

To help protect your privacy and ensure security, we take steps to verify your identity before allowing you access to your information. To the extent permitted by applicable law, a fee may apply before we provide you with a copy of the personal information we hold.

You can unsubscribe from our marketing mailing lists by following the “Unsubscribe” link in our marketing emails. If you would like to unsubscribe from any other type of marketing you receive from us, please contact us as specified in the [How to Contact Us](#) section of this Website Privacy Notice.

## **OTHER ONLINE SERVICES AND THIRD-PARTY FEATURES**

The Site may provide links to other online services and websites for your convenience and information and may include third-party features such as apps, tools, widgets, and plug-ins (e.g., LinkedIn, Instagram, and Facebook buttons). These services and websites may operate independently from us. The privacy practices of these third parties, including details on the information they collect about you, are subject to their own privacy statements. To the extent any linked online services or third-party features are not owned or controlled by us, the Agency is not responsible for these third parties’ information or other practices.

## **RETENTION OF PERSONAL INFORMATION**

We maintain personal information for as long as necessary or permissible considering the purposes for which we acquired it and in accordance with relevant laws. Our criteria for determining retention periods encompass:

- The length of time we have an ongoing relationship with you and provide the Site or our services to you;
- Whether there is a legal obligation to which we are subject; and
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitation, litigation, or regulatory investigations).

## **HOW WE PROTECT PERSONAL INFORMATION**

We aim to employ rational administrative, technical, and physical measures crafted to safeguard personal information within our institution. We hold our staff members accountable for complying with policies, procedures, and regulations regarding the protection and confidentiality of personal information. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the [How to Contact Us](#) section of this Website Privacy Notice.

## **CHILDREN'S PERSONAL INFORMATION**

This site is intended for a general audience and is not aimed at individuals under the age of 16. We do not intentionally gather or request personal information from individuals under the age of 16 through this website. If you suspect that a person under the age of 16 may have furnished us with personal information via this site, kindly reach out to us using the contact details provided in the [How to Contact Us](#) section of this Website Privacy Notice.

## **UPDATES TO OUR WEBSITE PRIVACY NOTICE**

This Website Privacy Policy for the Site will undergo periodic updates, and these updates will be implemented without prior notification to you in order to align with modifications in our handling of personal information. The most recent update date will be clearly stated at the top of this notice. Any alterations will take effect upon the publication of the revised Privacy Notice for the Website on the Site.

## **HOW TO CONTACT US**

Marketing House located at 1 Liberty St, 3rd Floor, New York, NY 10006, is the company responsible for collection, use, and disclosure of your personal information under this Website Privacy Notice.

If you want to utilize any of your privacy entitlements or desire to get in touch with us regarding this Privacy Notice or any privacy-related issue, including how we utilize your personal information, please make use of the following contact information:

By Post:

**Privacy Enquiries**  
**Marketing House**  
**1 Liberty St, 3rd Floor**  
**New York, NY 10006**  
**USA**