

## Privacy Policy

**Last Updated: March 11, 2024**

This Privacy Policy (“**Privacy Policy**”) describes how Tradewinds Studios, Ltd., together with its affiliates and subsidiaries (collectively, “**Tradewinds**,” “**we**,” “**us**,” or “**our**”) may collect, use, and share your personal information in connection with our web application located at <https://louishowe.azurewebsites.net/>, and any other websites we own and operate that link to this Privacy Policy (collectively, the “**Platform**”), and our related services, social media pages, emails, and other electronic communications (collectively, and together with the Platform, the “**Services**”), and the choices you have with respect to your personal information.

Tradewinds reserves the right, at any time, to modify this Privacy Policy. If we modify how we collect, use, or share personal information, we will post the updated Privacy Policy on this page. In some cases, we may notify you about an update by sending you an email, posting a notice about the update on the Services, or other means as may be required by applicable law. In all cases, your continued use of the Services following posting or other notification of changes constitutes your acknowledgement of such changes. Please review this Privacy Policy periodically to keep up to date on our most current policies and practices.

### 1. Personal Information We Collect

We may collect personal information from or about you in the following ways:

**Personal information you provide to us.** We collect personal information when you provide it to us, which may include the following:

- **Contact Information:** We collect contact information that you provide to us, such as name, email address, cell phone number, and social media handle.
- **Account Information:** The personal information you submit to create an account on the Platform will include your username and password (hashed) and any campaign affiliations (such as administrator rights), and you may choose to provide additional profile information, such as your profession or skills, campaign or volunteer interests, information contained in your CV (if you choose to upload it).
- **Communications:** Users may provide us with information when they submit requests or inquiries (such as requests for support, assistance, or event information), interact with us on social media, chat with us, provide feedback, participate in community and forum pages on the Platform, and other communications.
- **Preferences:** Any preferences you set in your account and any marketing or communications preferences.
- **Survey Responses:** Information in responses you provide to our surveys, questionnaires, contests, or other offerings.
- **Volunteer Engagement:** Your interest or attendance at events or activities on the Platform.

**Personal information we collect from third parties.** We may obtain personal information about you from third parties, such as social media platforms and other public sources, third parties that help us advertise our Platform and find new users, service providers, and other third parties.

**Personal information collected automatically.** When you use the Platform, personal information about you, your computer or mobile device will be passively or automatically collected, such as:

- **Online Activity Information.** Personal information about your activity may be collected on our Platform, such as the website you visited before browsing to the Platform, pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- **Device Information.** The Platform may collect device information such as your computer or mobile device operating system type and version number, wireless carrier, manufacturer and model, browser type, screen resolution, IP address, unique Like many online services, we use cookies and similar technologies to facilitate our automatic data collection. Some of these cookies and similar technologies are operated by third parties. Please see the section below titled “Information on the Use of Cookies and Similar Technologies” for more information.

## **2. How We Use Personal Information**

We use the personal information we collect for the below purposes or as otherwise disclosed to you at the time of collection.

**Providing the Platform and Services.** Providing the functionality of the Platform and our services, and fulfilling your requests, such as:

- To create, administer, monitor, and troubleshoot accounts;
- To provide the content, features, and services that you request;
- To improve and personalize your experience on or with the Platform and Services;
- To provide any surveys or questionnaires following participation in an event or program;
- To provide technical support, respond to inquiries, and otherwise send you service-related communications, such as account or security alerts and notifications pertaining to an event to which you have subscribed; and
- For Platform maintenance and reporting and hosting of data.

**Direct Marketing.** We may send you direct marketing communications as permitted by law, including campaigns, events, updates, information, special offers, and promotional material from us and our business partners. You may opt-out of our marketing communications as described in the “Your Choices” section below.

**Research and Development.** We will use personal information for research and development purposes, such as:

- To perform analytics and research aimed at improving the accuracy, effectiveness, usability, or popularity of the Platform;
- For data analysis and testing, for example, to improve the efficiency of our Platform;
- For developing new functionality and services;
- For enhancing, improving, or modifying our Platform and services and/or assisting our developers with this activity;
- For identifying usage trends, for example, understanding which parts of our Platform are of most interest to users; and
- For determining the effectiveness of our promotional campaigns.

**Aggregating and/or Anonymizing Personal Information.** We may 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.

**Compliance and Safety.** We use personal information for compliance, fraud prevention, and protection of safety, property, and rights, such as:

- For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements;
- For fraud and security purposes, for example, preventing fraud or monitoring to detect and prevent cyberattacks or attempts to commit identity theft;
- For the prevention of criminal activity or harm to users of our Platform;
- For maintaining the safety, security, and integrity of our Platform, business, databases, and other technology assets;
- For protecting our, your or others' rights, privacy, safety, or property (including by making and defending legal claims);
- For enforcing the terms and conditions that govern the Platform.

**Promoting the Platform and Finding New Users.** We may work with social media companies and other third parties to help us advertise our business on their platforms and other locations, and to help us find new users. These companies may use cookies and similar technologies to collect information about you on the Platform and other websites and services, including the Online Activity Information and Device Information described above in the section called "Personal information collected automatically," and use that information to serve ads that they think will interest you on their own platforms, such as the social media sites where you have an account. This practice is called "interest-based advertising." In addition, some of these companies may use hashed customer lists that we share with them to deliver ads to you and to similar users on their platforms. You can learn more about your choices for limiting interest-based advertising in the "Your Choices" section below.

### **3. How We Share Personal Information**

We may share personal information with the following third parties or as otherwise described in this Privacy Policy or at the time of collection.

**Service Providers.** We share personal information with companies that we work directly with to facilitate services they provide to us and to you. These can include providers of services such as website hosting, data analysis, email deployment, surveys, auditing, and other services.

**Other Users and the Public.** By using the Platform, you may elect to disclose personal information, such as your name, email, skills or profession through your account profile, or through other services to which you are able to post information and content (including, without limitation, our social media pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public. We do not control how other users or third parties use any personal information that you make available to other users or the public.

**Authorities and Others for Compliance and Safety Purposes.** Under certain circumstances, we may be required to disclose personal information to law enforcement, government authorities, and other parties if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency). We may also disclose personal information in the good faith belief that such action is necessary to comply with a legal obligation or for the purposes described above in the section titled “Compliance, Fraud Prevention, and Safety.”

**Business Transaction Participants.** We may disclose personal information to third parties in connection with any business transaction (or potential transaction) involving a merger, acquisition, sale of shares or assets, financing, consolidation, reorganization, divestiture, or dissolution of all or a portion of our business (including in connection with a bankruptcy or similar proceedings).

**Related Companies.** We may disclose personal information to our subsidiaries and affiliates, where applicable, for purposes consistent with this Privacy Policy.

**Professional Advisors.** We may disclose your personal information to our professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**Social Media Companies and Promotional Partners.** As described above in the section titled “Promoting the Platform and Finding New Users,” we may work with social media companies and other companies to help us promote our Platform and find new users, and may share personal information in connection with those activities.

#### **4. Security**

We use reasonable efforts to protect your personal information from the risks presented by unauthorized access or acquisition. However, please note that no method of transmission over the Internet, or method of electronic storage, is fully secure, and we cannot guarantee the security of your personal information.

#### **5. International Transfers of Personal Information**

Tradewinds is based in the United States, and we have service providers in the United States and potentially other countries. Your personal information may be collected, used, and stored in these countries or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country. By providing your personal information, where applicable law permits, you specifically

and expressly consent to such transfer and processing and the collection, use, and disclosure set forth herein.

## 6. Use of Cookies and Similar Technologies

We may utilize cookies and similar technologies in connection with the Platform in order to collect certain information and facilitate the automatic data collection described above, including the following:

- **Cookies.** Cookies are small text files stored on your device by your web browser. We use first-party cookies and we allow our third-party service providers and advertising partners to use cookies for their services. These cookies store your login details, preferences, or other information in order to provide a more efficient and personalized experience. You can learn more about cookies [here](#).
- **Flash cookies**, or locally-stored objects, which are used on websites for purposes similar to cookies but allow storage of a larger amount of data.
- **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.
- **Local storage**, which is used to save data on a visitor's device. We may use data from local storage to, for example, turn on web navigation, store multimedia preferences, customize what we show you based on your past interactions with our Platform, and remember your preferences.
- **Session-replay technologies**, which are third-party software used to record a video replay of users' interactions on the Platform. The video replay may include users' clicks, mouse movements, scrolls, mobile app touches, typing, and other activity taken during the session. We use these replays for research and development purposes, such as to help us troubleshoot problems with the Platform, understand how users interact with and use the Platform, and identify areas for improvement.

## 7. Your Choices

**Correct, Access, or Delete Account Information.** You can update your personal information directly within your account settings. If you are unable to change your personal information from your account, please contact us to make the request using the contact information listed at the bottom of this Privacy Policy.

**Email Marketing Communications.** You may opt out of marketing-related emails received from us by following the opt-out or unsubscribe instructions at the bottom of the email. After opting-out, note that you may continue to receive service-related (event notifications) and other non-marketing emails.

**Text Messages.** We may offer communications via text messages sent by Tradewinds or any of our service providers, such as for notifications pertaining to the event for which you have registered, customer service, or account-related purposes. To stop receiving text messages from us, reply STOP to any text message you receive from us, or update your account profile. Note that we may send you a message to confirm receipt of your STOP request.

**Cookies.** Most browsers let you remove and/or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Platform and it may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Analytics.** The Platform may use Google Analytics to help us analyze how the Platform is being accessed and used. You can learn more about Google Analytics cookies by clicking [here](#) and about how Google protects your data by clicking [here](#). To opt-out of Google Analytics, you can download and install the Google Analytics Opt-out Browser Add-on, available [here](#).

**Choices Relating to Certain Cookies and Technologies on Our Platform.** As noted above, when you visit our Platform, some of the social media companies and other businesses we work with to help us promote the Platform and to find new users engage in a practice called "interest-based advertising." That means that they may be using cookies and similar technologies on our Platform and on other websites and online services to collect information about you over time and across the internet so that they can serve you with advertisements on their own platforms and in other locations (including advertisements to promote the Platform in other locations on the internet). Some of these companies are members of the Network Advertising Initiative (NAI) or are subject to the Self-Regulatory Principles for Online Behavioral Advertising published by the Digital Advertising Alliance (DAA). You can obtain more information about these companies' information collection practices, and opt-out of receiving interest-based advertising from participating NAI and DAA members, by managing your opt-outs through the [NAI](#) and the [DAA in the USA](#). When browsing the web, you may also be able to limit collection of your personal information for interest-based ads by blocking third party cookies in your browser settings or using privacy plug-ins or ad blocking software that help you block third party cookies. In addition, your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for targeted online advertising purposes. If you opt-out of interest-based advertisements, you will still see advertisements online but they may be less relevant to you. Many of the opt-out preferences described in this section must be set on each device or browser for which you want them to apply. Please note, some companies may offer their own opt-out options that you can use to limit their use of your information for interest-based advertising or do not participate in the opt-out mechanisms described above. Even after using these opt-out mechanisms, you may still receive interest-based advertising from other companies.

**"Do Not Track" Signals.** We do not currently support "Do Not Track" signals. "Do Not Track" is a preference you can set in your web browser to inform websites that you do not want to be tracked. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

## 8. Privacy of Children

Our Platform and Services are not intended for use by anyone under the age of 18, and we do not knowingly collect personal information from children under 18.

## 9. Other Sites and Services

The Platform may contain links to other websites and online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or online services that are not

associated with us. We do not control third party websites or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and online services you use.

#### **10. Notice to California Residents – Your California Privacy Rights**

Under California Civil Code sections 1798.83-1798.84, California residents who have an established business relationship with Tradewinds are entitled to ask us once a year for information regarding the personal information we have shared, if any, with third parties for their direct marketing purposes. If you are a California resident and would like to submit such a request, please submit your request in writing to the address listed in the section titled “Contact” below and include the words “Shine the Light” in your correspondence. The request must include your name, street address, city, state, and ZIP code and an attestation that you are a California resident. We are not responsible for requests that are not labeled or sent properly, or that do not have complete information.

#### **11. Notice to Nevada Residents – Your Privacy Rights**

Nevada Revised Statutes Chapter 603A allows Nevada residents to opt-out of the “sale” of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to another person. If you are a Nevada resident who wishes to exercise your “sale” opt-out rights, you may submit a request to us using the contact information listed below.

#### **12. Contact Us**

Should you have any questions or concerns regarding this Privacy Policy, please do not hesitate to contact us. Tradewinds Studios Ltd. 1046 Johnson Lane, Louisville, CO 80027, USA [support@tradewindsstudios.us](mailto:support@tradewindsstudios.us).