

# PRIVACY POLICY

VRTCAL Markets, Inc. (“we, our or us”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive when you visit the [www.vrtcal.com](http://www.vrtcal.com) site (the “Site”) and when you use any part of our service or software via our Site or on the websites of our partners or other third parties (collectively, the “Service”). This Privacy Policy applies only to information that you provide to us through the Service when you access, download, purchase or use any information, services, products or content appearing on the Site or offered by us through the Service, or that we collect on your behalf as part of the Service.

This Privacy Policy may be amended or updated from time to time. If we make any material changes to this Privacy Policy, we will post a notice of these changes on our website and in this Privacy Policy. You are advised to consult this Privacy Policy regularly for any changes.

## A. Information Collection

### Personally Identifiable Information.

In the course of using the Services, we will ask you to provide us with certain personally identifiable information that can be used to contact or identify you and administer your account (“Personal Information”). Personal Information may include, but is not limited to, your name, country of residence, email address, financial information, and website address.

### Non Personally Identifiable Information.

When you access the Site or use the Service, (whether such use is performed on the Site or on a website of one of our partners or other third parties), we collect the following:

Information regarding your use of the Service, including without limitation, the subject of your query, the search engines that you use and all information collected by us in performing the Service for you (“Analytical Data”);  Information that your browser sends whenever you visit a website or online service (“Log Data”). This Log Data may include, but is not limited to, your computer’s Internet Protocol address, browser type, the web page you were visiting before you came to the Site and information you search for on the Site; When you use a widget or any other tool offered by us, whether on the Site or on a third party website, including a website owned or operated by you, we may record data related to that activity, the deployment of the widget or tool and any other account related data; Like many websites, we use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. We use “persistent cookies” to save your username and login password for future logins to the Site. We use “session ID cookies” to enable certain features of the Services, to better understand how you interact with the Services and to monitor web traffic routing on the Site and aggregate usage of the Services. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the website you visit. If you do not accept cookies, however, you may not be able to use all portions of the Site or all functionality of the Services. Third party websites which may advertise on the Site and other third parties that you interact with through your use of the Service may also place or read cookies on your computer’s browser, which enables them to collect information about users who view or interact

with their advertisements and content. The collection and use of such information and access of any third party websites are subject to such third party's privacy policy.

#### Information Collected From Others.

We and our licensors allow you to place certain scripts and code which it has developed for installation and use on your website, so that certain VRTCAL applications can be used and accessed by visitors to your website. If you install and deploy an application made available by us, such as a widget (the "Application"), on a website and/or provide the Application for a third party to place on their website or social networking site web page, we may collect on your behalf certain tracking and usage data generated or provided by users ("End Users") of the Application ("Usage Data"). This information includes general Application usage patterns, Analytical Data with respect to searches conducted through the Application, Log Data from users of your website and other information and statistics regarding your website or the domain in which the Application is located. You may also request that we receive or gather personally identifiable information as part of that Usage Data, including but not limited to email addresses of End Users. Other than as necessary to provide you with the Services and subject always to the express consent of an End User, we will not review, access, share or disclose Usage Data.

#### Affiliated Sites

We offer and provide access to the Service in connection with other websites. Personal information that you provide to those sites may be sent to us in order to deliver the Service. We process such information in accordance with this Privacy Policy. The affiliated sites may have different privacy practices and we encourage you to read their privacy policies.

#### Links

We may present links in a format that enables us to keep track of whether these links have been followed.

#### Third Party Sites

This Privacy Policy applies only to the Service. We do not exercise control over the sites that provide administration of the Site and the Service (including without limitation bill and credit card payment processing, ranking or other information), or over banners, other advertisements or links from within the Site or the Service. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the Personal Information that you submit. We encourage you to read the privacy policies and other terms of the other websites before using their services.

## **B. Opt Out**

To learn more about your opt out choices more generally and how to opt out of tailored advertising across a number of services, please visit <http://www.networkadvertising.org/choices/>.

For more information on mobile specific opt-out choices, please visit

<http://www.networkadvertising.org/mobile-choices>.

Alternatively, you can contact the VRTCAL team at: [info@vrtcal.com](mailto:info@vrtcal.com).

## C. Our Policy Toward Children

We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at [info@vrtcal.com](mailto:info@vrtcal.com). If we become aware that a child under 13 has provided us with Personal Information, we will delete such information from our files.

## D. How We Use Personal Information

Personal Information is used for the following purposes: (i) to provide the Services, (ii) to administer your use of the Services and your VRTCAL account, (iii) to personalize your experience, (iv) to provide to you service announcements, (v) to provide you with further information and offers from us or third parties that we believe you may find useful or interesting, such as newsletters, marketing or promotional materials, and (vi) on behalf of and according to instructions of a third party, such as our advertising partners. If you decide at any time that you no longer wish to receive such announcements, information or offers, please follow the unsubscribe instructions provided in the communication.

We use information that is not Personal Information for the above purposes and in order to (i) monitor and analyze use of the Services and for the technical administration of the Site, (ii) improve the Site and the Services, (iii) generate and derive useful data and information concerning the interests, characteristics and website use behavior of our users, and (iv) verify that visitors and users to the Site and of the Services meet the criteria required to process their requests.

In addition, we post ancillary privacy notices with respect to specific services.

## E. Information Sharing and Disclosure

- **Reports.** You acknowledge that parts of the reports generated as a result of your use of the Service include or are based on information that is publicly available. You agree that such parts of the reports will be publicly available, however, your Personal Information and any other information in connection with your request to generate such a Report will be kept confidential and not disclosed.
- **Submissions.** Any information you choose to provide in a comment or a submission should reflect how much you want other users to know about you. We recommend that you guard your anonymity and sensitive information and we encourage VRTCL users to think carefully about what information about themselves they disclose in their comments or submissions.
- **End User Information.** We may share End User information that is based on or includes information that is publicly available, excluding Personal Information of an End User or any other type of information that you reveal the identity of an End User, with the user that has implemented such application.
- **Aggregate Information and Non-Identifying Information.** We may share aggregated information, including reports generated as a result of your use of the Service, that includes non-identifying

information and Log Data with third parties for industry analysis, demographic profiling, other commercial purposes and to deliver targeted advertising about other products and services. Any aggregated information shared in these contexts will not contain your Personal Information. □

• **Service Providers.** We may employ third party companies and individuals to facilitate the Service, to provide the Service on our behalf and to perform services related to administration of the Service or the Site (including, without limitation, bill and credit card payment processing, maintenance, hosting and database management services, web analytics and administration). These third parties have access to your Personal Information only to perform these tasks on our behalf. These third parties that operate through website have their own privacy policies. We encourage you to read the privacy policies and other terms of such websites before using their services. □

**Compliance with Laws and Law Enforcement.** We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. □

**Business Transfers.** We may sell, transfer or otherwise share some or all of our assets, including among others your Personal Information and Log Data, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

## F. Changing or Deleting Your Information

We make good faith efforts so all of our registered users may review, update, correct or delete the Personal Information, if not required to be retained by law or for legitimate business reasons. You may withdraw your consent for the collection, use and transfer of data (including location data) by asking us to do so through the following email [info@vrtcal.com](mailto:info@vrtcal.com); if you completely delete all such information, your account may be deactivated. We may charge for such services, and may retain an archived copy of your records as required by law or for legitimate business purposes.

In addition, we may delete any information provided by you or related to you, pursuant to our policies as then in effect.

## G. Security

We are concerned with safeguarding your information. We employ a variety of measures designed to protect your information from unauthorized access and disclosure. However, we do not promise that your Personal Information or private communications will always remain private and secure.

## H. International Processing or Transfer

Your information may be processed or transferred outside of your state, where the privacy laws may not be as protective as those in your jurisdiction.

## **I. Contacting Us**

If you have any concerns or questions about this Privacy Policy, please contact us at [info@vrtcal.com](mailto:info@vrtcal.com).