

AveNew Activist Privacy Notice

Updated 10/21/2020

As a membership-based organization (“you” or “organization”), we want to thank you for choosing to be part of our community at AveNew LLC (“Company,” “we,” “us,” or “our”). We are committed to protecting your Members’ (“Member,” “User,” “him/her/they,” “he/she/they,” “they,” or “their”) personal information and their right to privacy. If you or your Members have any questions or concerns about this privacy notice, or our practices with regards to their personal information, please contact us at Activist@AveNew.org.

When you or your Members visit our website, www.AveNew.org (the “Website”), use our mobile application, as the case may be (the “App”) and more generally, use any of our services (the “Services,” which include the Website and App), we appreciate that you are trusting us with your Member’s personal information. We take privacy very seriously. In this privacy notice, we seek to explain to you and your Members in the clearest way possible what information we collect, how we use it, and what rights you and they have in relation to it. We hope all parties take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you or a User does not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website and App), as well as any related services, sales, marketing, or events.

Please read this privacy notice carefully as it will help all parties understand what we do with the information that we collect.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE USE MEMBERS’ INFORMATION?
3. WILL MEMBERS’ INFORMATION BE SHARED WITH ANYONE?
4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
5. HOW DO WE HANDLE MEMBERS’ SOCIAL LOGINS?
6. HOW LONG DO WE KEEP USERS’ INFORMATION?
7. HOW DO WE KEEP USERS’ INFORMATION SAFE?
8. DO WE COLLECT INFORMATION FROM MINORS?
9. WHAT ARE USERS’ PRIVACY RIGHTS?
10. CONTROLS FOR DO-NOT-TRACK FEATURES
11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?
12. DO WE MAKE UPDATES TO THIS NOTICE?
13. HOW CAN YOU OR USERS CONTACT US ABOUT THIS NOTICE?

AveNew Activist Privacy Notice

Updated 10/21/2020

1. WHAT INFORMATION DO WE COLLECT?

Personal information Users disclose to us

In Short: We collect information that Users provide to us.

We collect personal information that you and/or your Members voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when Members participate in activities on the Services (such as by posting messages in our online forums or entering competitions, contests or giveaways), or otherwise when a party contacts us.

The personal information that we collect depends on the context of Members' interactions with us and the Services, the choices Members make and the products and features they use. The personal information we collect may include the following:

Personal Information Provided by the Member. We collect names; phone numbers; email addresses; mailing addresses; contact preferences; contact or authentication data; and other similar information.

Social Media Login Data. We may provide Members with the option to register with us using their existing social media account details, including Facebook, Twitter, or other social media account. If Users choose to register in this way, we will collect the information described in the section called "HOW DO WE HANDLE MEMBERS' SOCIAL LOGINS" below.

All personal information that is provided to us must be true, complete and accurate, and it is Members' obligation to notify us of any changes to such personal information.

Information automatically collected

In Short: Some information — such as Users' Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when Members visit our Services.

We automatically collect certain information when Members visit, use, or navigate the Services. This information does not reveal specific identity (like name or contact information) but may include device and usage information, such as IP address, browser, and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when our Services are used, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

AveNew Activist Privacy Notice

Updated 10/21/2020

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic usage, and performance information our servers automatically collect in log files when our Services are accessed or used our Services. Depending on how Members interact with us, this log data may include IP address, device information, browser type, and settings and information about activity in the Services (such as the date/time stamps associated with usage, pages and files viewed, searches, and other actions taken, such as which features the Member uses), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

Information collected through our App

In Short: We collect information regarding Members' push notifications, when they use our App.

If Members use our App, we also collect the following information:

- **Push Notifications.** We may request to send push notifications regarding their account or certain features of the App. If Members wish to opt-out from receiving these types of communications, they may turn them off in their device's settings.

The information is primarily needed to maintain the security and operation of our App, for troubleshooting, and for our internal analytics and reporting purposes.

Information collected from other sources

In Short: We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

In order to enhance our ability to provide approved, relevant services and offerings to Members and to update our records, we may obtain information about them from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, as well as from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or User behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted offerings. If Members interact with us on a social media platform using their social media account (e.g., Facebook or Twitter), we receive personal information about them such as their name, email address, and gender. Any personal information that we collect from their social media account depends on their social media account's privacy settings.

AveNew Activist Privacy Notice

Updated 10/21/2020

2. HOW DO WE USE MEMBERS' INFORMATION?

In Short: We process Members' information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services for a variety of business purposes described below. We process their personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate account creation and logon process. If a Member chooses to link their account with us to a third-party account (such as Member's Google or Facebook account), we use the information the Member has allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed "HOW DO WE HANDLE MEMBERS' SOCIAL LOGINS" for further information.
- To post testimonials. We post testimonials on our Services that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use their name and the content of the testimonial. If a Member wishes to update, or delete his/her/their testimonial, please contact us at Activist@AveNew.org and be sure to include the name, testimonial location, and contact information.
- Request feedback. We may use Users' information to request feedback and to contact you or them about their use of our Services.
- To enable User-to-User communications. We may use User's information in order to enable User-to-User communications with each User's consent.
- To manage User accounts. We may use Member's information for the purposes of managing their account and keeping it in working order.
- To send administrative information to you. We may use personal information to send approved product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- To protect our Services. We may use information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements, or in connection with our contract.
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- Fulfill and manage orders. We may use Member's information to fulfill and manage their orders, payments, returns, and exchanges made through the Services.

AveNew Activist Privacy Notice

Updated 10/21/2020

- Administer prize draws and competitions. We may use Members' information to administer prize draws and competitions when you elect to participate in our competitions.
- To deliver and facilitate delivery of services to the User. We may use information to provide the User with the requested service.
- To respond to User inquiries/offer support to Users. We may use Members' information to respond to their inquiries and solve any potential issues they might have with the use of our Services.
- To send Members approved marketing and promotional communications. We and/or our third-party marketing partners may use the personal information Users send to us for our marketing purposes, if this is in accordance with their marketing preferences – and only with the approval of the organization. For example, when expressing an interest in obtaining information about us or our Services, subscribing to marketing or otherwise contacting us, we will collect personal information from them. Members can opt-out of our marketing emails at any time (see the "WHAT ARE MEMBERS' PRIVACY RIGHTS" below).
- Deliver organizational-approved targeted advertising to Members. We may use Members' information to develop and display personalized content and advertising (and work with third parties who do so) tailored to their interests and/or location and to measure its effectiveness.

3. WILL MEMBERS' INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with Members' consent, to comply with laws, to provide them *with approved services, to protect their rights, or to fulfill business obligations*.

We may process or share data that we hold based on the following legal basis:

Consent: We may process data if we have been given specific consent to use personal information in a specific purpose.

- Legitimate Interests: We may process User data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a Contract: Where we have entered into a contract with the Member, we may process their personal information to fulfill the terms of our contract.
- Legal Obligations: We may disclose Members' information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

AveNew Activist Privacy Notice

Updated 10/21/2020

- **Vital Interests:** We may disclose information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person, and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process User data or share Users' personal information in the following situations:

- **Business Transfers.** We may share or transfer Members' information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share Users' information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Business Partners.** We may share information with our business partners to offer Members certain products, services, or promotions that have been approved by the organization.
- **Offer Wall.** Our App may display a third-party hosted "offer wall." Such an offer wall allows an organization's approved third-party advertisers to offer virtual currency, gifts, or other items to Users in return for the acceptance and completion of an advertisement offer. Such an offer wall may appear in our App and be displayed to the Member based on certain data, such as their geographic area or demographic information. When a Member clicks on an offer wall, he/she/they will be brought to an external website belonging to other persons and will leave our App. A unique identifier, such as their User ID, will be shared with the offer wall provider in order to prevent fraud and properly credit a Member's account with the relevant reward. Please note that we do not control third-party websites and have no responsibility in relation to the content of such websites. The inclusion of a link towards a third-party website does not imply an endorsement by us of such website. Accordingly, we do not make any warranty regarding such third-party websites and we will not be liable for any loss or damage caused by the use of such websites. In addition, when a Member accesses any third-party website, please understand that their rights while accessing and using those websites will be governed by the privacy notice and terms of service relating to the use of those websites.

AveNew Activist Privacy Notice

Updated 10/21/2020

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store Users' information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how a User can refuse certain cookies is set out in our Cookie Notice.

5. HOW DO WE HANDLE MEMBERS' SOCIAL LOGINS?

In Short: If a Member chooses to register or log in to our services using a social media account, we may have access to certain information about them.

Our Services may offer Members the ability to register and login using their third-party social media account details (like a User's Facebook or Twitter logins). Where Members choose to do this, we will receive certain profile information about them from their social media provider. The profile Information we receive may vary depending on the social media provider concerned, but will often include the User's name, email address, friends list, profile picture, as well as other information they choose to make public on such social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to them on the relevant Services. Please note that we do not control, and are not responsible for, other uses of Users' personal information by their third-party social media provider. We recommend that Members review their privacy notice to understand how they collect, use, and share their personal information, and how they can set their privacy preferences on their sites and apps.

6. HOW LONG DO WE KEEP MEMBERS' INFORMATION?

In Short: We keep User's information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep Members' personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping Users' personal information for longer than the period of time in which Users have an account with us.

When we have no ongoing legitimate business need to process Members' personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because their personal information has been stored in backup archives), then we will

AveNew Activist Privacy Notice

Updated 10/21/2020

securely store their personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP MEMBERS' INFORMATION SAFE?

In Short: We aim to protect Members' personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure; therefore, we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify Users' information. Although we will do our best to protect their personal information, transmission of personal information to and from our Services is at their own risk. Users should only access the Services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, Members represent that they are at least 18 or that they are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from Users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you or one of your Members becomes aware of any data we may have collected from children under age 18, please contact us at Activist@AveNew.org.

9. WHAT ARE MEMBERS' PRIVACY RIGHTS?

In Short: Members may review, change, or terminate their account at any time.

If a Member is a resident in the European Economic Area and they believe we are unlawfully processing their personal information, they also have the right to complain to their local data protection supervisory authority: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If a Member is a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

AveNew Activist Privacy Notice

Updated 10/21/2020

If you or your Members have questions or comments about privacy rights, email us at Activist@AveNew.org.

Account Information

If a Member or other User would, at any time, like to review or change the information in their account or terminate their account, they can:

- Log in to their account settings and update their User account.
- Contact us using the contact information provided.

Upon request to terminate an account, we will deactivate or delete the account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use, and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If a Member prefer, he/she/they can usually choose to set their browser to remove cookies and to reject cookies. If he/she/they choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt-out of interest-based advertising by advertisers on our Services visit <http://www.aboutads.info/choices/>.

Opting out of email marketing: Members can unsubscribe from our organization-approved marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. The Member will then be removed from the marketing email list; however, we may still communicate with the Member, for example to send them service-related emails that are necessary for the administration and use of their account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, a Member may:

- Access their account settings and update their preferences.
- Contact us using the contact information provided.

AveNew Activist Privacy Notice

Updated 10/21/2020

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting a User can activate to signal their privacy preference not to have data about their online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates a User's choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform all parties about that practice in a revised version of this privacy notice.

11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if a User is a resident of California, he/she/they is granted specific rights regarding access to their personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our Users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If a Member is a California resident and would like to make such a request, he/she/they should submit a request in writing to us using the contact information provided below.

If a User is under 18 years of age, resides in California, and has a registered account with a Service, the User has the right to request removal of unwanted data that he/she/they publicly posts on the Services. To request removal of such data, he/she/they should contact us using the contact information provided below and include the email address associated with the account and a statement that he/she/they resides in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- 1) Every individual who is in the State of California for other than a temporary or transitory purpose; and
- 2) Every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

All other individuals are defined as "non-residents."

AveNew Activist Privacy Notice

Updated 10/21/2020

If this definition of "resident" applies to a User, certain rights and obligations apply regarding their personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name	NO
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history and financial information	YES
C. Protected classification characteristics under California or federal law	Gender and date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements	NO
G. Geolocation data	Device location	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide our services at a business level, job title as well as work history and professional qualifications if an individual applies for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	YES

AveNew Activist Privacy Notice

Updated 10/21/2020

We may also collect other personal information outside of these categories in instances where a Member interacts with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to inquiries

How do we use and share Users' personal information?

More information about our data collection and sharing practices can be found in this privacy notice.

Users may contact us by email at Activist@AveNew.org, or by referring to the contact details at the bottom of this document.

If a User is using an authorized agent to exercise their right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on a User's behalf.

Will Users' information be shared with anyone else?

With the authorization of the contracting organization, we may disclose Users' personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use a User's personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of their personal data.

AveNew LLC has not disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. AveNew LLC will not sell personal information in the future belonging to website visitors, Users, and other consumers.

Members' rights with respect to their personal data

Right to request deletion of the data - Request to delete

Users can ask for the deletion of their personal information. If he/she/they asks us to delete their personal information, we will respect their request and delete their personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting

AveNew Activist Privacy Notice

Updated 10/21/2020

from a legal obligation or any processing that may be required to protect against illegal activities.

Right to be informed - Request to know

Depending on the circumstances, a User has a right to know:

- Whether we collect and use their personal information;
- The categories of personal information that we collect;
- The purposes for which the collected personal information is used;
- Whether we sell their personal information to third parties;
- The categories of personal information that we sold or disclosed for a business purpose;
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- The business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against any User if he/she/they exercises his/her/their privacy rights.

Verification process

Upon receiving a Member's request, we will need to verify his/her/their identity to determine he/she/they is the same person about whom we have the information in our system. These verification efforts require us to ask a User to provide information so that we can match it with the information previously provided to us. For instance, depending on the type of request submitted, we may ask him/her/they to provide certain information so that we can match the information provided with the information we already have on file, or we may contact him/her/they through a communication method (e.g., phone, text, or email) that he/she/they has previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in a request to verify identity or authority to make the request. To the extent possible, we will avoid requesting additional information from a Member for the purposes of verification. If, however, we cannot verify his/her/their identity from the information already maintained by us, we may request that he/she/they provide additional information for the purposes of verifying his/her/their identity, and for security or

AveNew Activist Privacy Notice

Updated 10/21/2020

fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying the User.

Other privacy rights

- Users may object to the processing of their personal data;
- Users may request correction of their personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data;
- Users can designate an authorized agent to make a request under the CCPA on their behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA; and
- Users may request to opt-out from future selling of their personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, Members or their agents can contact us by email at Activist@AveNew.org, or by referring to the contact details at the bottom of this document. If a Member has a complaint about how we handle their data, we would like to hear from them.

12. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify Users either by prominently posting a notice of such changes or by directly sending them a notification. We encourage all User to review this privacy notice frequently to be informed of how we are protecting Members' information.

13. HOW CAN USERS CONTACT US ABOUT THIS NOTICE?

If Users have questions or comments about this notice, they may contact our Data Protection Officer (DPO), CLO, by email at Activist@AveNew.org, by phone at 213-387-0780, or by post to:

AveNew Solutions, LLC
33 Gateview Drive
Fallbrook, CA 92029

AveNew Activist Privacy Notice

Updated 10/21/2020

HOW CAN USERS REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM THEM?

Based on the applicable laws of a User's country, Users may have the right to request access to the personal information we collect from them, change that information, or delete it in some circumstances. To request to review, update, or delete a User's personal information, please email Activst@AveNew.org. We will respond to the request within 30 days.