

# **EPES PRIVACY POLICY**

This privacy policy has been compiled to better serve those who are concerned with how their "Personally Identifiable Information" (PII) is being used online. PII, as described in U.S. privacy law and information security, is information that can be used on its own or with other information to identify, contact or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your PII in accordance with our website.

## What personal information do we collect from the people who visit our blog, website or app?

When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number, Social Security number, driver's license number, work history, number of moving violations and/or DWI/DUI convictions, or other details to help you with your experience.

#### When do we collect information?

We collect information from you when you fill out a form, use live chat or enter information on our site.

#### How do we use your information?

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, visit the website, or use certain other site features in the following ways:

- To administer a contest, promotion, survey or other site feature.
- To send periodic emails regarding your order or other products and services.
- To follow up with them after correspondence (live chat, email or phone inquiries).

#### How do we protect your information?

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular malware scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits or accesses their information to maintain the safety of your personal information.

For your convenience we may store your credit card information for more than 60 days in order to expedite future orders, and to automate the billing process.

#### Do we use "cookies"?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

#### We use cookies to:

- Keep track of advertisements.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, it won't affect the user's experience.

### Third-party disclosure

#### Do we disclose the information we collect to third parties?

We transfer to outside parties your name, address, city, town, any form or online contact identifier email, name of chat account, etc., phone number, SSN, cookie number, IP address device serial number, unique device identifier, photo, video or audio file.

#### We engage in this practice because:

We send PII to client Applicant Tracking System for recruiting purposes at the client's request.

### Third-party links

We do not include or offer third-party products or services on our website.

### Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <u>https://support.google.com/adwordspolicy/answer/1316548?hl=en</u>

We use Google AdSense Advertising on our website.

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the Dynamic, Advertising, Reporting and Targeting (DART) cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

#### We have implemented the following:

- Google Display Network Impression Reporting
- Demographics and Interests Reporting

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

## **Opting out:**

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

## California Online Privacy Protection Act (OPPA)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting PII from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more at: <u>http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf</u>

### According to CalOPPA, we agree to the following:

Users can visit our site anonymously.

Once this privacy policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website.

Our Privacy Policy link includes the word "Privacy" and can easily be found on the page specified above.

You will be notified of any Privacy Policy changes:

• On our Privacy Policy Page

Can change your personal information:

- By emailing us
- By calling us

#### How does our site handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies or use advertising when a Do Not Track (DNT) browser mechanism is in place.

#### Does our site allow third-party behavioral tracking?

It's also important to note that we allow third-party behavioral tracking.

#### **Children's Online Privacy Protection Act (COPPA)**

When it comes to the collection of personal information from children under the age of 13 years old, COPPA puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under the age of 13 years old.

#### Fair Information Practice Principles (FIPP)

The FIPP forms the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding FIPP and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

## In order to be in line with FIPP we will take the following responsive action, should a data breach occur:

• We will notify you via email within 7 business days.

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.