**Privacy Policy**

Last modified: September 28, 2020

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**1. INTRODUCTION.** LJ Sullivan LLC (**“Company”** or **“We”**) respects your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website(s) www.ljsullivan.com or use and/or purchase any of our products, mobile applications, or services (all website(s), products, mobile applications, and services collectively deemed “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

1. On the Website.
2. In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

1. Us offline or through any other means, including on any other website operated by the Company or any third party (including any of our affiliates and subsidiaries); or
2. Any third party (including any of our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see the section titled Changes to Our Privacy Policy below). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

**2. CHILDREN UNDER THE AGE OF 18.** Our Website is not intended for children under 18 years of age. No one under the age of 18 may provide any information to or on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or on or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at joe@joetopfive.com.‌

**3. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT.** We collect several types of information from and about users of our Website, including information:

1. By which you may be personally identified, such as name, postal address, e-mail address, or telephone number (“**personal information**”);
2. That is about you but individually does not identify you; and/or
3. About your internet connection, the equipment or device you use to access our Website and usage details.

We collect this information:

1. Directly from you when you provide it to us.
2. Automatically as you navigate through the site, including usage details, IP addresses, and information collected through cookies and other tracking technologies.

**(a) Information You Provide to Us**. The information we collect on or through our Website may include:

1. Information that you provide by filling in forms on our Website. This includes information provided at the time of or making any requests to us. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
2. Records and copies of your correspondence (including email addresses) such as support requests, if you contact us.
3. Your responses to surveys that we might ask you to complete for research purposes.

**(b) Information We Collect Through Automatic Data Collection Technologies.** As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

1. Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
2. Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

1. Estimate our audience size and usage patterns.
2. Store information about your preferences, allowing us to customize our Website according to your individual interests.
3. Speed up your searches.
4. Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

1. **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
2. **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see the section titled Choices About How We Use and Disclose Your Information.
3. **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

**4. HOW WE USE YOUR INFORMATION.** We use information that we collect about you or that you provide to us, including any personal information:

1. To present our Website and its contents to you.
2. To provide you with information, products, or services that you request from us.
3. To fulfill any other purpose for which you provide it.
4. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
5. To notify you about changes to our Website or any products or services we offer or provide though it.
6. To prevent fraud.
7. For research and development purposes, we may use the information we collect for testing, research, analysis, and product development. This allows us to improve and enhance the safety and security of our services, develop new features and products, and facilitate insurance and finance solutions in connection with the Website.
8. To improve the Website and any products, we may provide third parties with statistical information we gather from your information.
9. In any other way we may describe when you provide the information.
10. For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties’ goods and services that may be of interest to you. If you do not want us to use your information in this way, notify us at joe@joetopfive.com. For more information, see the section titled [Choices About How We Use and Disclose Your Information](#bookmark=id.1t3h5sf).

We may use the information we have collected from you to enable us to display advertisements to our advertisers’ target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

**5. DISCLOSURE OF YOUR INFORMATION.** We may disclose aggregated information about our users and information that does not identify any individual without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

1. To our subsidiaries and affiliates.
2. To contractors, service providers, and other third parties we use to support our business.
3. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of LJ Sullivan LLC’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by LJ Sullivan LLC about our Website users is among the assets transferred.
4. To fulfill the purpose for which you provide it.
5. For any other purpose disclosed by us when you provide the information.
6. With your consent.

We may also disclose your personal information:

1. To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
2. To enforce or apply our terms and conditions <https://ljsullivan.com/Website-Terms-And-Conditions-LJ-Sullivan-LLC-9.22.2020.docx> and other agreements, including for billing and collection purposes.
3. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of LJ Sullivan LLC, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

**6. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION.** We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

1. **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s [website](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
2. **Promotional Offers from the Company.** If you do not wish to have your personal information used by the Company to promote our own or third parties’ products or services, you can opt-out by sending us an email stating your request to joe@joetopfive.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (”**NAI**”) on the NAI’s website.

**7. ACCESSING AND CORRECTING YOUR INFORMATION.** You can review and change your personal information by notifying us at joe@joetopfive.com.

You may also send us an email at joe@joetopfive.com to request access to, correct or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you are an EU resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below. Additionally, you are entitled to see information third parties provide us as part of our fraud detection, prevention and risk assessment efforts if all of the following factors apply: (i) we use third parties to carry out automated checks or risk assessments, (ii) we make a decision which has legal consequences for you or which significantly affects you, and (iii) such decision is based solely on such automated checks or risk assessments.

Requests should be addressed to:

LJ Sullivan LLC

1836 Via Di Salemo

Pleasanton, California 94566

**8. YOUR CALIFORNIA PRIVACY RIGHTS.**Under the California Consumer Privacy Act of 2018 (“**CCPA**”), California residents have certain rights around our collection, use, and sharing of their personal information. We do not sell your personal information and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. Similarly, we do not offer financial incentives associated with our collection, use, or disclosure of your personal information.

We collect various categories of personal information when you use the Website, that may include, but not be limited to, identifiers, commercial information, and internet or other electronic network or device activity information. A more detailed description of the information we collect and how we use it is provided above in Section 3. Sections 4 and 5 describe the categories of third parties, if any, with whom we share personal information, and what information may be shared under different circumstances.

If you are a resident of California, you have the right to request to know what personal information has been collected about you, and to access that information. You also have the right to request deletion of your personal information, though exceptions under the CCPA may allow us to retain and use certain personal information notwithstanding your deletion request. You may also send your request by email to joe@joetopfive.com or through regular mail to 1836 Via Di Salemo, Pleasanton, California 94566. We will not discriminate against you for exercising your rights under the CCPA. An agent may submit a request on your behalf, but you must verify that your agent is authorized to do so.

Separate from the CCPA, California's “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to joe@joetopfive.com.

**9. DATA SECURITY.** We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

**10. DATA RETENTION & PROCESSING.** We will keep information you store with us for as long as we need it to provide you the Website and we may store, use, and/or transmit information in locations around the world, including those outside your country. We will keep this information and any data collected regarding all activities you have already engaged pursuant to your use of the Website for a period of time as allowed by state and federal law.

For EU residents, upon written request to joe@joetopfive.com, any personal data we would have been processing on your behalf would be deleted permanently within 30 calendar days.

After such a period of time passes, we will delete this information but there may be some latency in deleting this information from our servers and back-up storage, and we may keep this information if necessary, to comply any legal obligations such as resolving disputes or enforcing our relevant agreements. We may also retain cached or archived copies of your information until it is deleted on our servers within a period congruent with our normal course of business. For EU residents, upon written request to joe@joetopfive.com, any personal data we would have been processing on your behalf would be deleted permanently within 30 calendar days.

For users outside the United States: We are headquartered in California, and in order to provide the Website to you we must transfer your data to the United States and process it there. By visiting or using the Website, you consent to storage of your data on servers located in the United States. If you are using the Website from outside the United States, you consent to the transfer, storage, and processing of your data in and to the United States or other countries. Specifically, personal data collected in Switzerland and the European Economic Area (“**EEA**”) is transferred and stored outside those areas. That data is also processed outside of Switzerland and the EEA by us, or our service providers, including to process transactions, facilitate payments, and provide support services. By submitting your data or using the Website, you consent to this transfer, storage, and processing by us and our processors.

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**11. CHANGES TO OUR PRIVACY POLICY.** It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users’ personal information, we will notify you through a notice on the Website home page, an email, or other such means to bring the changes to your attention. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes. By continuing to use or access the Website after the revisions come into effect, you agree to be bound by the revised Privacy Policy.

**12. CONTACT INFORMATION.** To ask questions or comment about this privacy policy and our privacy practices, contact us at:joe@joetopfive.com.