

## Privacy Policy

Updated as of March 14, 2014

This ProValues website (“Site”) is controlled by and/or maintained by The Sparrey Consulting Group, Inc. and/or one or more of its subsidiaries or affiliates (individually and collectively, “Owner,” “we,” “us,” or “our”). We recognize that many visitors to our Site are concerned about the information they provide to us and how we treat that information. We respect your privacy and are committed to protecting your personally identifiable information. We have adopted this privacy policy (“Privacy Policy”) to explain what information may be collected on our Site and how such information may be used and/or shared with others. This Privacy Policy applies solely to information collected through our Site and not through any other sources. This Privacy Policy is subject to the terms and conditions posted on our Site (“Terms and Condition”). Please review this Privacy Policy each time you visit our Site to ensure that you have read and agree with the current policy, as it may be amended without notice. The date of our Privacy Policy is set forth at the top of the document. Any changes to this Privacy Policy will be effective immediately upon the posting of the revised Privacy Policy on our Site. Your use of our Site constitutes your agreement to the Terms and Conditions set forth in this Privacy Policy.

### 1. Personal Information.

Personally identifiable information is information that identifies you or can be used to identify or contact you (“Personally Identifiable Information”). Such Personally Identifiable Information may include your name, address, email address, telephone number, birth date (primarily for eligibility purposes) and billing and payment information. We may request Personally Identifiable Information from you when you register on the Site, subscribe to our online products, or in connection with other online products we may make available on our Site from time to time. In all of these cases, we will collect Personally Identifiable Information from you only if you voluntarily submit such information to us. Unless you give us permission to do so, we will not sell, share, license, trade or rent your Personally Identifiable Information other than as specified in this Privacy Policy.

You do not have to provide us with any Personally Identifiable Information to visit the Site. However, if you choose to withhold requested information, you may not be able to visit all sections of the Site or use all of our online products, such as subscribing to our online tools or posting content to any Community Area on the Site. A “Community Area” means any blog, personal page, group page, chat room, message board, bulletin board, recipe swap, or similar activity. In addition, we may not be able to provide you with some of the other online products dependent upon the collection of such information

- **Non-account Activity.** You can view certain information posted on the Site without having an account. You can also contact us about information without having an account.
- **Account-Related Activity.** Certain other activities on the Site require you to have an account. We ask for some personal information when you create an account, including your email address and a password, which is used to protect your account from unauthorized access.

- **Usage Information.** We may record information about your usage, such as when you use the Site, the channels, groups, and favorites you subscribe to, the contacts you communicate with, and the frequency and size of data transfers, as well as information you display or click on in the Site. If you are logged in, we may associate that information with your account.
- **Content Uploaded to Site.** Any personal information or content that you voluntarily disclose and upload on the Site (in postings, videos, survey reports, discussion boards, in messages or profile pages, etc.) becomes publicly available and can be collected and used by others.

## 2. Uses

- If you submit Personally Identifiable Information to us through the Site, we use your personal information to operate, maintain, and provide to you the general and personalized features and functionality of the Site, and to process any flagging activity or correspondence you send to us.
- We do not use your email address or other Personally Identifiable Information to send commercial or marketing messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may, however, use your email address without further consent for non-marketing or administrative purposes (such as notifying you of major Site changes or for customer service purposes).
- When you become a registered user of the Site, subscribe to one of our current online products, or in connection with other online products we may make available on the Site from time to time, we also may collect information that by itself cannot be used to identify or contact you, such as demographic information (like age, profession or gender) (“Non-Personally Identifiable Information”). Non-Personally Identifiable Information may also include user IP addresses, browser types, domain names, clickstream data and other anonymous statistical data involving the use of our Site. Non-Personally Identifiable Information is used to help us understand who uses our Site and to improve and market our Site in general and our online products in particular. We use any information you upload, your Personally Identifiable Information and Non-Personally Identifiable Information to improve the content, quality and design of the Site and to create new features, promotions, functionality, and services by storing, tracking, analyzing, and processing user information, as well as user activity and communications.
- We may use cookies, clear gifs, and log file information to: (a) store information so that you will not have to re-enter it during your visit or the next time you visit the Site; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our marketing campaigns; (d) monitor aggregate metrics such as total number of visitors, pages viewed, etc.; and (e) track your entries, submissions, and status in promotions, sweepstakes, and contests.
- The Site does not intend to collect and prohibits collection of information from children age [18] or under within the meaning of the Children’s Online Privacy Protection Act (“COPPA”). If it is evidenced or even suspected that a user is under 18 years of age, or if a claim or protest is made against a child under the age of 18, we will discard the Posting claim or protest.

### **3. Information That is Publicly Available**

- When you create an account on the site, the content that you upload, including but not limited to surveys, videos and reports will be provided and/or sold to other users of the site. You agree that you have authorization and/or ownership rights to all the information you upload to the Web site.
- Your account name (not your email address) is displayed to other Users when you engage in certain activity on the site.
- You may also choose to add business or personal information that will visible to other Users.]

### **4. Your Choices**

- As stated above, you may, of course, decline to upload information or submit business or Personally Identifiable Information to the Site, but we may not be able to provide certain services to you.
- You may update or correct your profile information, other uploaded information and email preferences at any time by visiting the “EDIT” page and entering your login id and password.

### **5. Third-party Advertisers, Links to Other Sites**

We allow other companies, called third-party ad servers or ad networks, to serve advertisements within the Site. These third-party ad servers or ad networks use technology to send, directly to your browser, the advertisements and links that appear on the Site. They automatically receive your IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content you see.

We do not provide any Personally Identifiable Information to these third-party ad servers or ad networks without your consent.

You should consult the respective privacy policies of these third-party ad servers or ad networks for more information on their practices and for instructions on how to opt-out of certain practices. Our Privacy Policy does not apply to, and we cannot control the activities of, such other advertisers or web sites. Any data obtained by third-party ad servers subsequently shared with us is maintained and dealt with by us in accordance with this Privacy Policy.

## **6. Further Disclosure**

We reserve the right to disclose any Personally Identifiable Information or Non-Personally Identifiable Information if we are required to do so by law or if we reasonably believe that such action is necessary in order to: (i) fulfill a government request; (ii) conform with the requirements of the law or to comply with legal process served on us; (iii) protect or defend the legal rights or property of The Sparrey Consulting Group, Inc., the Site or its users; or (iv) in an emergency to protect the health and safety of our Site's users or the general public.

## **7. Keeping Your Information Secure**

We have reasonable and appropriate electronic and physical security measures in place to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your Personally Identifiable Information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us and cannot be responsible for the theft, destruction, or inadvertent disclosure of your Personally Identifiable Information.

## **8. Transfer of Assets**

As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or substantially all of our assets, Personally Identifiable Information, Non-Personally Identifiable Information, and any other information that we have collected about the users of the Site may be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

## **9. Jurisdictional Issues**

The Site is controlled and operated by us from the United States, and is not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. We do not represent or warrant that the Site, or any part of the Site, is appropriate or available for use in any particular jurisdiction. Those who choose to access the Site do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. We may limit the Site's availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion.

## **10. More Information**

For questions concerning the service or your account, please check out our Home page available here: [www.ProValues.com](http://www.ProValues.com).

For more information about our privacy practices, please click on the "Contact Us" button on the menu bar.

**BY USING THE SITE, YOU SIGNIFY YOUR ACCEPTANCE OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU SHOULD NOT USE THE SITE.**

YOUR CONTINUED USE OF THE SITE FOLLOWING THE POSTING OF CHANGES TO THIS PRIVACY POLICY WILL MEAN THAT YOU ACCEPT THOSE CHANGES.