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## Privacy Policy

*Effective Date: February 4, 2020*

This Privacy Policy covers Bold Buffer, LLC dba Safe Lighthouse (“Safe Lighthouse”) policies on the collection, use, and disclosure of any and all personally identifiable information, personal data, and personal information as defined by applicable law (collectively “Personal Data”) when visitors and users (collectively “Users”) access [www.safelighthouse.com](http://www.safelighthouse.com) (“Site”) and/or the Safe Lighthouse mobile applications (collectively the “Platform”) and the software and services made available through the Platform (collectively the “Services”).

***Safe Lighthouse, Inc. is a California corporation with offices in the United States. Safe Lighthouse collects Personal Data from its users around the world and processes, transfers and stores data within the United States.*** By optionally providing your Personal Information within the Platform, you consent to the collection, use and disclosure practices identified in this Privacy Policy. Users may withdraw your consent at any time by email at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com).

[Section 8](#) is intended to provide the Notice of Collection required under the California Consumer Privacy Act.

### 1. Personal Data Collected by Safe Lighthouse

**Account Creation Information:** When purchasing a product or service through the Site, Users must provide their first name, last name, email and payment information. The collection of this information is necessary to fulfill our contractual obligations and to provide the Services to you. Your email may also be utilized to (i) provide information regarding our Services; and/or (ii) communicate material changes to our Terms of Service and Privacy Policy.

**Email Addresses & Contact Information:** Users may optionally provide their email address and/or other contact information to Safe Lighthouse to contact us through the Platform with questions about our Platform and Services. Users may also optionally subscribe to our newsletters and may unsubscribe at any time through the opt-out link contained within those communications.

**IP Address.** A user’s “IP Address” is identified and logged automatically in our server log files whenever you visit the Platform, along with the time of the visit and the page(s) that were visited. Safe Lighthouse uses IP Addresses for calculating usage levels of the Platform, helping diagnose server problems, and administering the Platform and Services.

**Web Beacons.** Pages of our Site and/or emails from Safe Lighthouse may contain small electronic files known as web beacons that permit Safe Lighthouse, for example, to count users who have visited those pages or opened an email and for other related Site statistics.

**Cookies.** Safe Lighthouse’s Site uses cookies to provide users with a better browsing experience -- cookies are only collected with your express consent. In addition, by accepting Safe Lighthouse’s Privacy Policy upon purchase of the Services, you are consenting to Safe Lighthouse’s use of cookies in connection with the Services itself. Safe Lighthouse utilizes cookie technology to gather information on Internet use in order to serve you more effectively. Cookies are files with a small amount of data, which may include an

anonymous unique identifier. Cookies are sent to your browser from a website and transferred to your device. You can set your browser to remove or reject cookies; however some Platform features or Services may not work properly without cookies. When accessing the Platform, third party advertising services may place a cookie on your browser, which may be used to target relevant advertisements to you when you visit third party websites. Users may opt-out from receiving targeted advertisements by visiting the (1) [Network Advertising Consumer Opt-Out](#) page, (2) [Digital Advertising Alliance Opt-Out](#) page, and/or (3) the opt-out provisions pertaining to the applicable advertising services/retargeting provider.

## 2. Personal Data Received by Safe Lighthouse or Disclosed or Shared by Safe Lighthouse

Personal Data is collected to facilitate the Services offered, for direct marketing of our services and products, or for internal analysis relating to product improvements and data security. Safe Lighthouse shares Personal Data with only those contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Data confidential and to limit such use only for the purpose for which it is disclosed. Personal Data collected is processed by service providers to facilitate provision of the Services on the Platform or as otherwise disclosed at the time of collection to:

**Provide Services.** Personal Data is used to:

- Provide, operate and improve the Platform and Services;
- Process payments and complete transactions;
- Update you and provide marketing communications about new features and services;
- Respond to inquiries and provide customer support and feedback;
- Detecting, preventing, and investigating security incidents that compromise the availability, authenticity, integrity or confidentiality of stored or transmitted personal information;
- Protecting against malicious, deceptive, fraudulent or illegal activity directed at Safe Lighthouse;
- Debugging to identify and repair errors that impair existing intended functionality.
- Analyze data to assess, understand and improve the services and personalize user experiences, including creation of anonymized aggregated, statistical and benchmark data. Aggregated data is utilized to help develop and market products or services and present targeted content and advertising
- Enable functionality of the services to authenticate a user, prevent fraud, and implement security measures
- Undertaking activities to verify or maintain the quality of a service or product that is developed or provided, and to improve, upgrade, or enhance any service or product that is developed or provided by Safe Lighthouse.

Service Providers utilized to provide the Services are as follows:

- **Integrated API's:** Safe Lighthouse has integrated an API from Location, Inc. to utilize geolocation information to provide demographic, crime, business and other information relating to the location of various properties, neighborhoods and regions identified by User. Please see [Location, Inc. Privacy Policy](#)
- **Web Hosting Services:** The Site and Personal Data collected is stored on cloud servers maintained by WP Engine. For more information on its privacy policy, please see the [WP Engine Privacy Policy](#).
- **Customer Services Support:** Safe Lighthouse utilizes [MailChimp](#) to communicate with you by exchanging service-related notifications. Please see the MailChimp hyperlink for more information on their data collection and use practices.
- **Payment Processing: Payment Processing Information:** Safe Lighthouse does not itself store debit or credit card information on its servers. Safe Lighthouse may utilize one of several third party payment processors to manage and process payments in order to guarantee the security of Personal

Data. For more information on these processors, please see: [Apple Store In-App Payments](#), [Google Play In-App Payments](#), [Stripe](#), [Braintree](#), [2Checkout](#), [SagePay](#), [Fastspring](#), [Authorize.Net](#), [Square](#), [GoCardless](#), [Elavon](#), [Verifone](#), [WeChat](#), [AliPay](#)

**Safe Lighthouse uses the following analytics services:**

- **Google Analytics:** Safe Lighthouse utilizes Google Analytics for data analytics to generate insights and recommendations. For more information please see Google's [Privacy Policy](#). However, if you do not want your Personal Information to be used by Google Analytics, you may opt-out by installing [Google Analytics Opt-out Browser Add-on](#).

**Compliance and Protection.** Personal Information may be disclosed to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) if Safe Lighthouse is involved in a merger, acquisition, or sale of all or a portion of its assets, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify you about law enforcement or court-ordered requests for data unless otherwise prohibited by law.

**Third Party Links.** To enable Users to access relevant information from a wide variety of sources, Safe Lighthouse may place third party links to enable Users to access information directly from such third parties (for example, the Center for Disease Control or the U.S. State Department for health and travel safety-related information). Safe Lighthouse is not responsible for the data collection and privacy policies of the entities supporting the third party links, and Users should review the applicable privacy policies for more detail about information collected from these sites.

### **3. Personal Information of Minors**

Safe Lighthouse does not knowingly collect Personal Information from anyone under the age of 16. If we learn we have collected or received Personal Information from anyone under the age of 16 without verification of parental consent, we will delete that information. If a parent or guardian becomes aware that his or her child under the age of 16 has provided Safe Lighthouse with Personal Information without their consent, he or she should contact Safe Lighthouse at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com). Safe Lighthouse will delete such Personal Information from our files within a commercially reasonable time, but no later than required under the applicable law.

### **4. Retention and Deletion of Personal Information; De-Identified Data**

Unless erasure is otherwise requested under applicable law or as otherwise stated in this Privacy Policy, Safe Lighthouse will retain account data as long as it is necessary to provide services to our customers. Personal Information obtained from Platform visitors will be maintained as long as it is necessary to provide requested communications and information-based services or until a visitor exercises the right to opt-out of requested communications or information-based services. Anonymized and pseudo-anonymized data will be retained as long as Safe Lighthouse determines such data is commercially necessary for its legitimate business interests.

To the extent Safe Lighthouse de-identifies any Personal Information, Safe Lighthouse shall maintain and use such de-identified data without attempting to re-identify the data.

### **5. Safe Lighthouse's Security Practices.**

We have implemented reasonable administrative, technical and physical security measures to protect Personal Information against unauthorized access, destruction or alteration. However, although we endeavor to provide reasonable security for Personal Information we process and maintain, no security system can ever be 100% secure.

## 6. Response To “Do Not Track” Signals

Do Not Track” is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-website user tracking.

Safe Lighthouse shall treat any user-enabled global privacy controls, such as a browser plug-in or privacy setting, device setting, or other mechanism, that communicate or signal the consumer’s choice to opt-out of the sale of their Personal Information as a valid request submitted pursuant to the CCPA for that browser or device, or, if known, for the consumer.

## 7. Changes to this Privacy Policy

If we make material changes to our Privacy Policy, we will notify you by (1) changing the Effective Date at the top of the Privacy Policy, *or* (ii) sending an electronic notification to all active account holders, *or* (iii) adding a banner/notification to the Site itself.

## 8. Supplemental U.S. State-Specific Notices – Notice of Collection

This supplemental notice sets forth the disclosures and rights applicable to residents of California, Colorado, Virginia, Connecticut, and Utah. Such consumer privacy notices and rights shall also apply to other state residents to the extent other state consumer privacy laws are implemented following the last effective update to this Privacy Policy.

Safe Lighthouse collects, uses and/or discloses Personal Information as follows:

Personal Information Collected, Used and/or Disclosed in Preceding 12 Months				
Categories of Personal Information Collected	Source of Collection	Purpose of Use	Categories to Whom Personal Information is Disclosed	Purpose of Disclosure
Name/Alias	User	Account Creation; Account Verification; Payment Processing; Support and Services Requests; Perform Services	Yes; Service Provider	Provide Services; Auditing; Analytics; Security; Payment Processing
Email	User	Account Creation; Account Verification; Payment Processing; Support and Services Requests; Perform Services	Yes; Service Provider	Provide Services; Auditing; Analytics; Security; Payment Processing
Address	User	Account Creation; Account Verification; Payment Processing; Support and Services Requests; Perform Services	Yes; Service Provider	Provide Services; Auditing; Analytics; Security; Payment Processing
Cell or Telephone #	User	Support and Services Requests; Perform Services	Yes; Service Provider	Support and Services Requests; Perform Services;
Unique/Online ID (cookies)	Device	Perform Services; Auditing; Analytics	Yes; Service Provider	Perform Services; Auditing; Analytics

IP Address	Device	Perform Services; Auditing; Analytics	Yes; Service Provider	Perform Services; Auditing; Analytics
Credit or Debit Card # /ACH	User	Payment Processing *token only	Yes; Service Provider	Payment Processing *token only
Geolocation (generalized)	User; Device	Performing Services	Yes; Service Provider	Performing Service

**Safe Lighthouse does not retain a consumer's Personal Information for longer than is reasonably necessary for each disclosed purpose.**

**Other Potential Disclosures:** Personal Information may also be disclosed to serve our legitimate business interests as follows: (a) as required by law, such as to comply with a subpoena, or similar legal process, (b) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (c) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (d) enforce our agreements with you, and/or (e) investigate and defend ourselves against any third-party claims or allegations.

**A. Sale of Personal Information; Sharing of Personal Information; Right to Opt-Out**

Safe Lighthouse does not and will not sell your Personal Information.

**B. Collection of Sensitive Information**

Safe Lighthouse does not collect Sensitive Information

**C. Consumer Rights.** Consumers may contact Safe Lighthouse to exercise the following consumer rights:

**1. Request Safe Lighthouse Disclose At No Charge (“Right to Know”):**

- Specific pieces of personal information it has collected about you;
- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected;
- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared; and

Right to Know Requests can be submitted to Safe Lighthouse by email at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com).

**2. Request Safe Lighthouse to Delete At No Charge (“Right to Delete”):**

Deletion Requests can be submitted to Safe Lighthouse by email at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com) or by mail to Safe Lighthouse at: Safe Lighthouse, Inc., Attention: Privacy Request to Delete, 22647 Ventura Blvd., Suite 238, Woodland Hills, CA. 91364 or by email at: [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com).

#### **D. Request Safe Lighthouse Correct At No Charge (“Right to Correct”):**

Requests that Safe Lighthouse correct any inaccurate Personal Information collected by Safe Lighthouse can be submitted by email to [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com)

#### **E. Verified Request Process**

Safe Lighthouse will verify all consumer requests prior to taking any action in response to such request. For consumers that maintain an account with Safe Lighthouse, it may verify the identity of the consumer making the request by either matching information with the account information on file or through existing account authentication credentials.

Under applicable state law, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. Authorized agents must demonstrate they have written authorization from you to make requests on your behalf. Safe Lighthouse may additionally require the consumer to confirm their identity and verify the authorized agent’s permission before complying with any request.

#### **F. Consumer Request Limitations**

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the applicable state laws, including, but not limited to:

- Safe Lighthouse is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a personal information request twice in a 12-month period.
- Deletion is not required if it is necessary for Safe Lighthouse to maintain the Personal Information to fulfill applicable permissible purposes enumerated pursuant to applicable state consumer privacy laws.

Safe Lighthouse will confirm and respond to all requests within the timeframe required under applicable state law. In responding to any request to disclose/delete, Safe Lighthouse shall maintain a record of the requests as required under applicable state law.

#### **G. Non-Discrimination Policy**

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA and VCDPA. Safe Lighthouse shall not discriminate against a consumer for exercising any statutory consumer privacy rights, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Safe Lighthouse for the Personal Information, (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services, or (d) providing a different level of quality of goods/ services.

Employees, applicants and independent contractors have the right not to be retaliated against for the exercise of their CCPA rights.

#### **H. Your Virginia Privacy Rights under VCDPA**

If Safe Lighthouse is unable to process requests relating to your Personal Information and denies your request, Virginia residents have the right to appeal by emailing Safe Lighthouse at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com). Safe Lighthouse will respond to your appeal request within 60 days of receiving the request to appeal.

#### **I. Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581**

California law permits Consumers to request and obtain from Safe Lighthouse once a year, free of charge, certain information about their Personally Identifiable Information (“PII”) (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

#### **J. Accessibility of this Policy.**

- You can download and print a copy of this Notice [here](#)

#### **K. Contact Us**

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: Safe Lighthouse, Inc., Attention: Privacy Department, 22647 Ventura Blvd., Suite 238, Woodland Hills, CA. 91364 or by email at: [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com).

### **9. Applicable EU GDPR Notices**

**Data Processor.** Safe Lighthouse is the processor of all Customer Data (as defined in the applicable Terms of Service), including Personal Information input by a Customer, and its Authorized Users, in connection with a Customer’s use of the Safe Lighthouse Services. Safe Lighthouse’s Data Protection Offer can be reached at Safe Lighthouse, Attention: Privacy Department, 22647 Ventura Blvd., Suite 238, Woodland Hills, CA. 91364. You may contact us at any time through by emailing us at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com)

For applicable EU Users, we will only collect and process Personal Information about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you, and “legitimate interests.” Where we rely on your consent to process Personal Information, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your Personal Information, please submit a request through email Safe Lighthouse at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com)

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: <http://ec.europa.eu/justice/data->

[protection/bodies/authorities/index\\_en.htm](#). If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. In some cases our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

## **How to Review, Transfer, Restrict the Use of or Request Erasure of Personal Information**

### **IF YOU WOULD LIKE TO:**

- Access, review, restrict processing of, or otherwise request erasure of your Personal Information;
- Obtain the identity of the source of any Personal Information collected;
- Request correction of any errors contained within your Personal Information;
- Request Safe Lighthouse transfer your Personal Information to another service provider;
- Object to the manner in which your Personal Information is processed;
- Lodge a complaint with an EU supervisory authority; or
- Withdraw consent to the collection of your Personal Information

**Requests under this Section can be made through** email at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com). We will respond in the timeframes required under applicable law. For all requests made pursuant to this section, Safe Lighthouse will (a) respond as required under applicable law, (b) provide a copy of any requested Personal Information in a structured, commonly used and machine-readable format, and/or (c) transmit such Personal Information to another service provider without restriction in accordance with applicable law

## **10. Contact Us**

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: **Safe Lighthouse, Inc., Attention: Privacy Department, 22647 Ventura Blvd., Suite 238, Woodland Hills, CA. 91364** or by email at: [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com).