

## MCG Digital Marketing Privacy Policy

Last Updated: March 1, 2015

We, MCG Digital Marketing LLC, are concerned about privacy issues and want you to be familiar with how we collect, use and disclose Personal Information (as defined below). This Privacy Policy describes our practices in connection with Personal Information that we collect through <http://marketingconsultantgroup.com> (the "Site") and offline in connection with the services we provide.

By providing Personal Information to us, you agree to the terms and conditions of this Policy. If you do not agree to the terms and conditions of this Policy, please do not provide any Personal Information to us. We reserve the right to change this Policy. You can determine when this Policy was last revised by referring to the "LAST UPDATED" legend at the top of this page. Any changes to our Policy will become effective upon our posting of the revised Policy on the Site. Use of the Site following such changes constitutes your acceptance of the revised Policy then in effect.

### What Types of Information Do We Collect From You?

Personal Information is information that identifies you as an individual. In order for you to take advantage of particular opportunities provided by us (for example, to become an advertiser with us or to provide comments, submit a problem, or request information from us), we may require that you furnish Personal Information. We collect Personal Information from you, such as your name, postal address, telephone number, e-mail address, credit card number or other payment account number, only when you voluntarily provide it to us.

Non-Personal Information is aggregated information, demographic information and any other information that does not reveal your specific identity. We and our third party service providers may collect Non-Personal Information from you, including your MAC address, computer type, screen resolution, OS version, Internet browser, demographic data (for example your country), as well as information collected through the use of cookies, pixel tags, web beacons, and other similar technologies and by observing browser functions and the files (pages) users access to better serve you with more tailored information and facilitate your ongoing use of our Site and our services. For example, our servers collect about the most frequently searched terms to help provide the most relevant search results, information about usage to check for fraudulent behavior or other abnormalities. We and our third party service providers may also aggregate Personal Information in a manner such that the end-product does not personally identify you or any other person, for example, by using Personal Information to calculate the number of customers we have in a particular state. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. You can also delete the cookie we set for you. This will eliminate

our ability to link your past behavior with future behavior, but we will be able to monitor your future behavior based on a new cookie we supply. To learn more about cookies, please visit <http://www.allaboutcookies.org/>.

**IP Addresses.** Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). This number is identified and logged automatically in our server log files whenever users visit the Site, along with the time(s) of such visit(s) and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many web sites.

#### How Does We Use Information Collected From You?

**Personal Information.** We may use Personal Information: for the purpose for which it was provided (e.g., to provide services to you and contact you regarding these services, to sign you up as a advertiser, customer or partner and/or to send requested information to you). for billing and customer care purposes (e.g., to fulfill your purchase of services). to respond to your problems and comments. to approve and enable your participation in the Site and Site services (e.g., to permit you to subscribe to our blogs and RSS feeds, as applicable). to send you important information regarding the Site, changes to our terms, conditions, and policies and/or other administrative information. Because this information may be important, you may not opt-out of receiving such communications. for our internal business purposes, such as data analysis, audits, developing new products, enhancing our website, improving our services, identifying usage trends and determining the effectiveness of our promotional campaigns.

**Non-Personal Information.** Because Non-Personal Information does not personally identify you, we may use such information for any purpose. In addition, we reserve the right to share such Non Personal Information, which does not personally identify you, with affiliates and other third parties, for any purpose. In some instances, we may combine Non-Personal Information with Personal Information (such as combining your name with your geographical location). If we do combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information hereunder as long as it is so combined.

**IP Addresses.** We use IP addresses for purposes such as calculating Site usage levels, helping diagnose server problems, administering the Site, and tracking your Internet usage, including identifying your geographic location, which may be disclosed to advertisers, search engines and other partners. We may also use and disclose IP Addresses for all the purposes for which we use and disclose Personal Information. Please note that we treat IP Addresses, server log files and related

information as Non-Personal Information, except where we are required to do otherwise under applicable law.

**How Is Personal Information Disclosed?** We may disclose Personal Information: to our affiliates so that they may use such Personal Information for the purposes described in this policy. MCG Digital Marketing LLC is the party responsible for the management of the jointly-used Personal Information.

to our third party service providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, infrastructure provision, IT services, customer service, email delivery services, credit card processing and other similar services to enable them to provide services. For example, we may use third party analytics services, and they may place cookies on your computer and record data about your Site usage on our behalf.

if you choose to utilize third-party services, to third-party partners for the purpose of providing requested services to you (for example, if you choose to use our search engine marketing services, your keywords and other search engine placement criteria, which may include Personal Information, may be provided to the applicable search engines). We are not responsible for the use and disclosure of your Personal Information by any such third party.

to an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

as we believe to be appropriate: (a) under applicable law including laws outside your country of residence; (b) to comply with legal process (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain.

#### Other Important Notices Regarding Our Privacy Practices.

**Third Party Sites.** This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including without limitation any of our affiliates and any third party operating any site to which this Site contains a link. The inclusion of a link on the Site does not imply endorsement of the linked site by us or by our affiliates.

**Third Party Advertisers.** We may use third-party advertising companies to serve ads serve ads on the Site and/or on the sites on which we advertise. Please note that these companies may use information (not including Personal Information) about your visit to the applicable site in order to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements, these companies may place or recognize a unique cookie on your browser. In

addition, we may use web beacons provided by third-party advertising companies to help manage our online advertising. These web beacons enable us to recognize a browser's cookie when a browser visits this site and to learn which banner ads bring users to our Site. To learn more about our third-party advertising companies, cookies, and how to "opt-out," please go to [http://www.networkadvertising.org/consumer/opt\\_out.asp](http://www.networkadvertising.org/consumer/opt_out.asp).

**Security.** We use reasonable organizational, technical and administrative measures to protect Personal Information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. Please do not send us sensitive information through email. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us in accordance with the "Contacting Us" section below (note that if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the problem).

**Changing or Suppressing Personal Information.** If you would like to change, suppress or otherwise limit our use of your Personal Information that has been previously provided to us, you may contact us by sending an email containing your request to [privacy@marketingconsultantgroup.com](mailto:privacy@marketingconsultantgroup.com). For your protection, we will only implement such requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

In each event, you must clearly indicate the information that you wish to have changed or suppressed or clearly indicate the limitations you wish to put on our use of your Personal Information. We will endeavor to comply with your request as soon as reasonably practicable. We may need to retain certain information for record keeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed therefrom.

**Retention Period.** We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

**Note Regarding the Use of the Site by Children:** The Site is not directed to individuals under the age of thirteen (13), and we request that such individuals do not provide Personal Information through the Site.

**Jurisdictional Issues.** We do not represent or warrant that the Site, or any part thereof, 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. By using the Site and submitting any Personal Information, you consent to the transfer of Personal Information to other countries, such as the United States, which may provide a different level of data security than in your country of residence.

Contacting Us. If you have any questions regarding this Privacy Policy, please contact us by email at [privacy@marketingconsultantgroup.com](mailto:privacy@marketingconsultantgroup.com), or please write to the following address or fax number:

Legal Department  
MCG Digital Marketing LLC  
200 E Front Street  
Traverse City MI 49868  
Fax: (231) 222-5100

Please note that email communications will not necessarily be secure; accordingly you should not include credit card information in your email correspondence with us.