# **CDTech Privacy Policy**

Last modified: June 28, 2023

#### Introduction

CDTech ("CDTech" or "We") respect 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 to us when you use our services on the platform ("**Services**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- When you use our Services.
- In email, text, and other electronic messages between you and CDTech via our Services.
- When you interact with our advertising and applications on third-party platforms and services if those applications or advertising include links to our Services.

It does not apply to information collected by:

- Us offline or through any other means, including on any other third-party platform, services, or websites; or
- Any third party, including through any application or content (including advertising) that may link to our Services.

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 Service. By accessing or using our Services, you agree to this privacy policy. This policy may change from time to time (see <a href="Changes to Our Privacy Policy">Changes to Our Privacy Policy</a>). Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

# **Children Under the Age of 18**

Our Services are not intended for children under 18 years of age. No one under age 18 may provide any information via our Services. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information using our Services or through any of the features offered through our Services. 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:

Savannah GA 31401

privacy@CDtech.com

(470) 509-3903

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights for more information.

#### Information We Collect About You and How We Collect It

We collect several types of information from and about users who use our Services:

- By which you may be personally identified, such as name, postal address, e-mail address, mobile telephone number, password, social media account information or any other identifier by which you may be contacted online or offline ("personal information");
- That is about you but individually does not identify you, such as aggregated or unidentifiable personal information; and/or
- About your internet connection, the mobile device you use to access our Services, and usage details.

### We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate using our Services. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, we use Discord to organize topic-based channels or Whop to process payments.

#### Information You Provide to Us

The information we collect on or through use of our Services include:

- Information that you provide by filling in forms that are available when you sign up for our Services. This includes information provided at the time of registering to use our Services, subscribing to our service, posting material, or requesting further services.
- 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 Services.
- Messages which include information you provide when you compose, send, or receive
  messages through our messaging services. Please be aware that messages you choose to
  send to other users of the Service will be accessible by those users and that we are not
  responsible for the manner in which such users use or share the messages.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

- Details of transactions you carry out through our Services and of the fulfillment of your order for Services. You may be required to provide financial information before using our Services.
- Your search queries on our platform.
- Dates and times you use our Services.

You also may provide information to be published or displayed (hereinafter, "posted") publicly or transmitted to other users using our Services or other third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Services with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

# Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information about your devices, browsing actions, and patterns, including:

- Details of your activities when you last used our Services, including traffic data, geolocation data, logs, and other communication data and the resources that you access and use when accessing our Services.
- Information about your devices and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party services or other online services (behavioral tracking). See Choices About How We Use and Disclose Your Information on how you can opt out of behavioral tracking using our Services and how we respond to signals and other mechanisms that enable users to exercise choice about behavioral tracking.

The information we collect automatically does 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 Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the platform to access our Services.

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

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your
  devices or 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 web-based Services. 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 Web-based Services.
- Flash Cookies. Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our platform. 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 Choices About How We Use and Disclose Your Information.
- Web Beacons. Access to our Services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit CDTech, 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).
- We may aggregate or de-identify the information described below. Aggregated or de-identified data is not subject to this Privacy Policy.

# Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the platform are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Services. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see <a href="Choices About How We Use and Disclose Your Information">Choices About How We Use and Disclose Your Information</a>.

#### How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Services and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Services or any products or services we offer or provide though it.
- To allow you to participate in interactive features of our Services.
- To personalize your experience on our Services such as by providing tailored content.
- To understand and analyze how you use our Services and develop new products, services, features, and functionalities.
- To send you SMS messages and push notifications.
- In de-identified and aggregated form for any lawful purpose.
- To facilitate transactions and payments.
- To find and prevent fraud and respond to trust and safety issues that may arise.
- For compliance purposes, including enforcing our <u>Terms of Services</u> or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- For other purposes for which we provide specific notice at the time the Personal Information is collected.
- For any other purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile. For more information, see <a href="#">Choices About How We Use and Disclose Your Information</a>.

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.

### **General User Risks and Mitigation**

Our services offer various unique utilities that might pose certain risks due to user misuse or misunderstanding. While we have endeavored to design our services to minimize these risks, it is important that our users understand that they should use our services responsibly and ethically. Any form of misleading representation, identity fraud, or usage that might breach third-party services' terms of service is explicitly discouraged. We actively monitor usage patterns to identify any potential misuse and maintain the right to suspend or terminate the services for any user we suspect of violating these guidelines.

Remember, our services are meant to enhance your experience, not to exploit or manipulate other platforms unfairly. Please use our services responsibly at all times. Any misuse can lead to legal consequences, for which we will not accept any liability.

We implore you to raise any concerns or report any activity you find suspicious or seemingly unethical, allowing us to maintain optimal service quality and legality across the board.

### **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:

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- 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 CD Tech's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by CD Tech about our users is among the assets transferred.
- To advertising, marketing, and analytics vendors, who may receive the information you
  provide, information from other sources, and automatically collected information but would
  not receive your payment information or messaging data.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our <u>Terms of Services</u> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of CDTech, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **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:

- 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 <u>website</u>. If you
  disable or refuse cookies, please note that some parts of this site may then be inaccessible
  or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt out by checking the relevant box located on the form on which we

collect your data (the order/registration form) or contacting us at privacy@cdtech.online. You can also always opt out by logging into the Service and adjusting your user preferences in your account profile, by checking or unchecking the relevant boxes or by sending us an email stating your request to privacy@cdtech.

- Promotional Offers from the CD Tech. If you do not wish to have your contact information
  used by CD Tech to promote our own or third parties' products or services, you can opt out
  by checking the relevant box located on the form on which we collect your data (the
  order/registration form) or by contacting us at privacy@cdtech.online. If we have sent you a
  promotional email, you may send us a return email asking to be omitted from future email
  distributions.
- Targeted Advertising. If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt out by checking the relevant box located on the form on which we collect your data (the order/registration form) or by privacy@cdtech.online or at any other time by logging into your account and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to privacy@cdtech.online.

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.

California residents may have additional personal information rights and choices. Please see <u>Your California Privacy Rights</u> for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address set forth below or call us at: (912) 940-9495. However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into your account and visiting your account profile page.

You may also send us an email at <a href="mailto:privacy@cdtech.online">privacy@cdtech.online</a> to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. 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.

You may be able to control some of the information we collect through your device browser settings to refuse or disable cookies. Because each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of cookies. In addition, your choice to disable cookies is specific to the

particular browser or device that you are using when you disable cookies, so you may need to separately disable cookies for each type of browser or device. If you choose to refuse, disable, or delete Cookies, some of the functionality of the Services may no longer be available to you. Without this information, we are not able to provide you with all of the requested services.

California residents may have additional personal information rights and choices. Please see <u>Your California Privacy Rights</u> for more information.

#### **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit the CCPA privacy notice for California Residents.

California's "shine the Light" law (Civil Code Section § 1798.83) permits users of our App 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 <a href="mailto:privacy@cdtech.online">privacy@cdtech.online</a> or write us at: 1305 Barnard Street, 2047, Savannah GA 31401.

## **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Any payment transactions will be encrypted.

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 our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information to the public through our Services like message boards. The information you share in public areas may be viewed by any user of our Services.

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 through our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures within our Services.

# **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account and/or through a notice on the platform home page. 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 reviewing this privacy policy to check for any changes.

# **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

1305 Barnard Street, 2047

Savannah GA 31401

privacy@cdtech.online

(470) 509-3903