

# Building Wings LLC

## Company Communications Privacy Policy

***Effective Date: January 1<sup>st</sup>, 2022***

**Please note:** We have a separate Privacy Policy for our products and services.

Building Wings LLC (“BW”) values your privacy and desires to ensure your experience with Building Wings and related companies (collectively “Building Wings”, “we,” “our” or “us”) and all our communication websites and all our related subdomains and all our blogs, forums, channels and sharing (the “Sites”) are as satisfying and safe as possible. In that regard, we have established for the Sites the following privacy policy to explain and describe what personal information Building Wings collects on our Sites, how Building Wings uses it and your options regarding information Building Wings may collect about you. We are a US-based company and it is our intent to market to North American companies only. By accepting this Privacy Policy, you expressly consent to the information handling practices described in this Policy. Your continued use of our Sites or any other content, other services covered by this Policy constitutes your acceptance and agreement to this Policy and any updates.

**If you have questions about this policy, please feel free to contact us at:**

**Building Wings LLC**

**Attn:** Legal Department

26799 West Commerce Drive

Volo, Illinois 60073

**Email:** [info@buildingwings.com](mailto:info@buildingwings.com)

**Subject Line:** Legal

## Information We Collect

“Personal Information”, as used in this **Company Communications Privacy Policy**, is personally identifiable information, which is information that directly identifies an individual, such as first and last name, mailing address, email address, billing information, telephone number, IP addresses, demographics, passwords or other online contact information. We collect Personal Information, as well as non-personally identifiable information on Building Wings Sites.

We collect Personal Information in two ways. First, we collect information you provide to us in optional, voluntary submissions, such as in registration forms, license forms, user profiles, promotional signups, sweepstakes/contest entries, requests for customer service, software and mobile applications downloads. Second, some Personal Information may be collected automatically. This is described below in “Passive Data Collection.”

We may also obtain information, including Personal Information, from third party sources. If we directly combine information from third parties with Personal Information that we have collected, we will treat the combined information as Personal Information and handle it in accordance with this Policy. In addition, please note that we may solicit third parties to collect Personal Information on our behalf and in such cases we instruct those third parties to comply with this Policy and all applicable data protection laws.

### **Passive Data Collection**

We may receive passively-collected information through a variety of methods including, but not limited to:

#### **Cookies**

We may use a variety of methods, including “cookies” to collect information.

#### ***What is a cookie?***

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user’s device and customize the experience. You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org) and <http://www.youronlinechoices.com/uk/>.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that advertisements you see online are more relevant to you and your interests.

The cookies used on our Sites have been categorized based on the categories found in the ICC UK Cookie guide. A list of all the cookies used on our Sites by category is set out below.

1. **Performance Cookies.** Building Wings collects cookies on our Sites to capture information about page visits (e.g. “performance cookies.”) This information is anonymous and Building Wings uses this information only internally – to deliver the most effective content to our visitors. Information from the cookie is used to gauge page popularity, analyze traffic patterns on our Sites and guide development of other improvements to our Sites.
2. **Targeting, Performance, and Functionality Cookies.** In our email programs, Building Wings employs some tracking methods (e.g. “targeting, performance, and functionality cookies”). We track “opens” via a tracking pixel in the email- meaning we track who opens our emails messages and when our e-mail messages are opened; and we track “clicks” via encoded URLs-meaning we track whether you click on the links contained in our e-mail messages. This information is used internally only to help us deliver relevant messaging, and is not shared with any third parties.
3. **Functionality and Necessary Cookies.** Building Wings does not require that you accept cookies and/or you may withdraw your consent to our use of cookies at any time by adjusting your browser’s privacy settings, however, some functionality on our Sites (e.g. “functionality cookies”), our product or service check-out process, and Services may be disabled if you decline to accept cookies (e.g. “necessary cookies”).

### ***Opting Out of Cookies***

You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. You may also change your cookie settings through preference options in our Sites, where applicable. We will indicate that upon selecting your preferences, that we will use a cookie to remember your preferences.

Building Wings never gives away information about our users. If you choose to provide Personal Information about yourself, Building Wings will use this information only to communicate directly with you. Building Wings will not sell, rent or otherwise disclose that information to third parties unless such disclosure is necessary for the purposes set forth in this Policy, by law or a policy or notice contained or associated with a specific Site(s) and/or Service(s).

### **Analytics Tools**

We use analytics tools and other third party technologies, such as Google Analytics, to collect non-personal information in the form of various usage and user metrics when you use our online Sites. These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage and purchase history, MAC Address, mobile unique device ID, and other similar information.

The third party analytics companies who collect information on our Sites and other online products may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

You may opt out of Google Analytics by visiting the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Google has additional information available about their Remarketing Privacy Guidelines, Policies, and Restrictions at <https://support.google.com/adwordspolicy/answer/143465>.

## How We Use Information

**Personal Information.** Generally, we use Personal Information to establish and enhance our relationship with our users through three main categories: (1) Communication; (2) Optimization; and (3) Sharing Features. Below, we provide some specific examples of how we use the Personal Information and other information we collect.

**Communication and Responding to Requests.** We use your information, including Personal Information, to provide you with customer support, process transactions, responses, requests, send newsletters and updates, send special offers, seek opinions and feedback, and connect users to Building Wings Sites, and to products and services of our partners and licensees.

**Optimization.** We use user information, including Personal Information, behavioral metrics, and other non-personally identifiable information to operate, provide, improve, and maintain our Sites and Services, to develop new products and services, to prevent abuse and fraud, to personalize and display advertisements and other content for you, and for other administrative and internal business purposes.

**Sharing Features.** We use your information, including Personal Information and any other information you submit directly or through passive means to provide you with various ways to connect and share content (e.g., web content, user generated content, text, pictures, media, tools, services) with third parties. For example, we may provide you with the opportunity to email a link to certain content to another person. To use this feature, we may require you to provide certain Personal Information including your email address and the email address of each person to whom you send the link.

We also may allow you to share links to content with users of various third party services (e.g., social networking, search and sharing services). When sharing links using one of these third party services, if you are not already logged in to the third party service, you will need to supply login credentials for it. If you are not a registered user of the third party service, you will need to sign up for it. You are supplying the registration information or login credentials for the third party service directly to that third party, and not to us. By using any of these third party services to share links to content, you permit us to access, use and disclose any information relating to

your account on each such third party service (such as your user name and profile information) that is available to us through the third party service, including through its application programming interface (API) pursuant to this Policy.

## When We Disclose Information

We do not share Personal Information with third parties except in the limited circumstances described in this Policy.

**Service Providers.** We may provide Personal Information to third parties for their use in performing internal business functions (e.g., payment processing, customer service, maintenance, security, data analysis, email transmission, beta testing, or data hosting) on our behalf. Additionally, some third party service providers may collect information, including Personal Information, on our behalf. Whenever possible, we require such third-parties to only collect and use Personal Information in accordance with this Policy, to maintain the confidentiality, security, and integrity of such Personal Information, and for no purpose other than providing us with our requested services.

**Legal Requirements.** We may disclose Personal Information if we have a good-faith belief that doing so is required by a subpoena, warrant, or other judicial or administrative order or otherwise required by law. Additionally, we may disclose Personal Information where we, in good faith, deem it appropriate or necessary to prevent violation of our other agreements; take precautions against liability; protect our rights, property, or safety, or those of a partner, any individual or the general public; maintain and protect the security and integrity of our Sites or infrastructure; protect ourselves and our Sites from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against third party claims or allegations; or assist government regulatory agencies.

**Change of Ownership.** Information about our users, including Personal Information, may be disclosed as part of any bankruptcy, merger, sale, transfer of company assets, acquisition, or similar transaction. In the event of such a transaction in which your Personal Information would be transferred to a third party, we will make reasonable efforts to notify you. For example, we will post a notice of the transfer of Personal Information on our Sites and, if we have your email address, we will send notice of the transfer of Personal Information to that email address.

**Interactive Features.** If you use a forum, blog, channel, bulletin board, chat room, user commenting features, or other interactive sharing or social features that may be offered through any of our Sites, you should be aware that any Personal Information you submit, display, or publish there is considered publicly available and can be read, collected, used, and disclosed by other users of those features, by us, and other third parties without restriction, except to the extent limited access features are available, if any. To request removal of your personal

information from our blog, sharing service or community forum, for example, contact us at the information provided in this Policy. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.

## Information Practices for Children

Children under 13 years old are not allowed to send information about themselves to anyone over the internet without a school, parent or guardian's express consent. Building Wings recommends that minors over the age of 13 ask their parents for permission before sending any information about themselves to anyone over the Internet.

If you are a student, please do not send any Personal Information about yourself to us. In the event that Building Wings learns that it has collected personal information from a student without parental consent, or if Building Wings learns a student has provided Personal Information, Building Wings will delete that information as quickly as possible. If you believe that a student may have provided Building Wings Personal Information, please contact Building Wings at [info@buildingwings.com](mailto:info@buildingwings.com), Subject Line: Legal.

Users under 13 years of age: your continued use of the Site will be considered by Building Wings as confirmation that your parent or guardian has expressly consented to the handling of your personal information as described in this Policy as further indicated in the opening paragraph of this Policy.

## Your Choices

**Submitting Personal Information.** If you do not want to submit Personal Information that is necessary to provide or use our Sites or to fulfill your request, you will not be able to access and/or participate in certain Building Wings Sites. For example, you will not be able to participate in certain contests or promotions. In addition, your refusal to submit Personal Information may limit our ability to respond to your customer support inquiry in a timely fashion.

**Editing Personal Information.** You may, at any time, update, correct, or delete certain Personal Information by contacting us at the mailing or email address provided set forth in this Policy. If you wish to obtain a report of the Personal Information Building Wings has about you, please send us a written request at the address set forth in this Policy.

**Marketing Choices.** If you want to remove yourself from individual communications, including marketing promotions, advertisements, updates and email newsletters, simply click the unsubscribe link in the communication. You also acknowledge and agree that there may be instances where we may elect to notify you about administrative notices regarding your account with us, such as to inform you about changes to our terms, conditions, and policies, that your

account may be expiring, or to provide you with other relevant administrative information about your account. Because this information is important to your interaction with us, you may not opt out of receiving these communications.

**Account Deletion.** If you submit Personal Information, you may delete your account with us at any time. If you delete your account, your Personal Information and any and all other account related information including, but not limited to, user profile data, purchasing history, sharing data and any other data, credits, or content specifically associated with your account are also permanently deleted. Deletion of your data may take up to 30 days from accessible systems and up to 90 days from backup systems. If you choose to have an account with us in the future, you will have to sign up for a new account as none of the information you previously provided or saved within your account will have been saved.

## Security

We take reasonable measures, including the implementation and maintenance of physical, electronic, and managerial procedures, in an effort to assure the security, integrity, and accuracy of all Personal Information that we collect. Our efforts include procedures designed to avoid unauthorized access, alteration, misuse or disclosure of Personal Information. If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Building Wings Sites covered by this Policy and providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your account information and usage.

## Data Integrity and Data Retention

We collect and use Personal Information in accordance with this Policy and only for the purposes stated in this Policy and/or at the time we request such Personal Information from our users, or for such purposes to which a user may otherwise consent. We do not use or share our users' Personal Information in a way that is incompatible with the purposes for which such Personal Information was requested and authorized for use by us. We retain Personal Information for no longer than is commercially useful to carry out our business purposes, or as we believe may be legally required. When Personal Information is deleted or updated by you, it may take up to 30 days from accessible systems, and up to 90 days from backup systems, for us to delete such Personal Information. Furthermore, third party processors that had access to Personal Information may take longer to delete or update Personal Information stored on its systems.

## Third Party Services and Links

Building Wings content, including forums, contests, products, services, newsletters and communications that we send to our users, may contain links to content provided by third-parties. For example, our communications may contain links to third party merchants (i.e. ecommerce store) from whom you may purchase products. To purchase products from these third party merchants, you may be required to provide Personal Information, including your credit card or other payment information.



## California Privacy Rights

In addition to the rights set forth in this Privacy Policy, California Civil Code Section 1798.83 permits California residents who are individual consumers or users of Building Wings Sites to request certain information regarding its disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us via mail or email at the address identified above.

## Changes and Updates to This Policy

We may update this Policy from time to time. If we do, we will update the “effective date” at the top of the Policy. We will post the updated Policy on the affected Sites, and on our website.

We encourage you to review this Policy periodically to stay informed about our collection, use and disclosure of Personal Information. Your continued use of our Sites or any other content, products or other services covered by this Policy constitutes your agreement to this Policy and any updates.

## International Users and US-EU Switzerland Safe Harbor

Building Wings Sites may be hosted in the United States. If you utilize our Sites from the European Union or Switzerland, or any other region with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personal data outside of those jurisdictions to the United States. The United States does not have the same data protection laws as the European Union, Switzerland and other regions. By providing Personal Information under this Policy, you consent to the use of your Personal Information in accordance with this Policy and the transfer of your Personal Information to the United States.

The Personal Information practices set out in this Privacy Policy apply to all Building Wings Sites, and customers worldwide. You have a right of access and to correct such data and/or Personal Information. To exercise these rights, or for other data privacy questions, please contact/send an email to [info@buildingwings.com](mailto:info@buildingwings.com).

Building Wings is committed to complying with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland.

## Enforcement

Building Wings regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Policy or Building Wings’s treatment of Personal Information by contacting us through this Site(s) and/or Service(s) at [info@buildingwings.com](mailto:info@buildingwings.com) or



by writing to us at Privacy Group, c/o Building Wings LLC at the address set forth in the contact section above. When Building Wings receives a formal written complaint at this address, it is Building Wings's policy to contact the complaining party regarding his or her concerns. Building Wings will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved by Building Wings and an individual.

## **No Error-Free Performance**

Building Wings does not guarantee error-free performance under this Privacy Policy. Building Wings will use reasonable efforts to comply with this Privacy Policy and will take prompt corrective action when Building Wings learns of any failure to comply with our Privacy Policy. Building Wings shall not be liable for any incidental, consequential or punitive damages relating to this Privacy Policy. This Privacy Policy shall be governed by the laws of the State of Illinois and the United States, to the extent applicable.