

Privacy Policy

Effective Date: July 25, 2019

Protecting your privacy is important to Anchor Labs, Inc. and our affiliates including Anchorage Hold LLC and Anchorage Trust Company (collectively, "Anchorage," "us," "our," or "we"). Please take a few minutes to review this Privacy Policy (the "Privacy Policy" or "Policy") before using the Site. The "Site" refers to our publicly-available website (www.anchorage.com) and all related and publicly-available websites and subdomains provided by us and on which a link to this Policy is displayed. The "Site" does not include any subdomains of our websites that require a password or other permission-based access credentials, which shall be not be governed by this Policy. This Policy does not apply to other products or services, including mobile applications, we may offer. By using the Site, you are consenting to the collection, use, and disclosure of your information as set forth herein. If you do not agree with this, please do not use the Site.

Scope of the Policy

This Policy is part of the Terms and Conditions for the Site. This Policy includes any separate privacy notices and/or notices posted on particular pages of this Site that may provide more detail regarding the information we collect on those pages, why we need that information, and choices you may have about the ways we use that information.

Your information is currently collected and stored on servers located in the United States, although we may transfer your information to our service providers and others located in another country for the purposes described in this Policy. No matter where your information is collected, used, transferred or stored, if it was collected through this Site, it will be subject to the terms of this Policy.

Types of Information We Collect

Anchorage collects information you knowingly and voluntarily provide when you use this Site. For example, we may collect the information you submit when you contact us or provide feedback through the Site.

We receive information from your devices, including IP address, http referrer fields, web browser type, mobile operating system version, phone carrier and manufacturer, unique device identifiers, and other information about your device and your usage of our Site. We also collect information that is sent to us automatically by your Web browser. We automatically receive information about your interactions with our Site, such as the pages or other content you view and the dates and times of your visits.

We may collect different types of information about your location, including general information (e.g., IP address, zip code) and with your consent, more specific information about your location (e.g., GPS-based functionality on mobile devices used to access the Site). If you no longer wish for us to collect and use GPS location information, you may disable the location features on your device, provided your device allows you to do this. Please see your device manufacturer settings. Please note that if you disable such features, you will not be able to access or receive some or all of the services, content, or features of the Site.

We use cookies, web beacons, and other electronic tools to manage and track your interaction with the Site. A cookie is a piece of data that a website you visit can set on your browser or elsewhere on your device. These technologies collect information that helps us better serve our users and enhance this Site, such as by tracking return visits, collecting Site usage information, and performing research, analysis, and Site analytics. Third parties whose products or services are accessible via links from the Site may also use cookies or similar tools, and we advise you to check their privacy policies for information about their

cookies and other privacy practices. If you prefer not to accept cookies through our Site, you can set your browser to warn you before accepting cookies or disable them altogether.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., [Internet Explorer](#); [Google Chrome](#); [Mozilla Firefox](#); or [Apple Safari](#)). You can also manage the use of Flash technologies, including flash cookies and local storage objects with the Flash management tools available at [Adobe's website](#). Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Site.

We also use third-party web analytics services on the Site, such as those provided by Google Analytics and others. These service providers use electronic tools to help us analyze how our users use the Site and may collect information from you (including your IP address) that can be used to track users over time, for general location purposes, and across third party websites. To learn about opting out of Google Analytics, please [click here](#).

This Privacy Policy places no restriction on the use of information we automatically collect from your visit to the Site.

How We Use Your Information

In general, we use information we collect through this Site:

- to provide the information, products, and services you request;
- to better understand your needs and interests;
- to analyze how you use the Site;
- to provide you with a personalized experience when you use this Site;
- to process and respond to inquiries, such as customer support questions and requests;
- to improve, expand, and promote the content, functionality and usability of this Site;
- to contact you with information and notices related to your use of this Site;
- to communicate with you, either directly or through one of our service providers, including for marketing and promotional purposes;
- to invite you to participate in surveys and provide feedback to us (in accordance with any privacy preferences you have expressed to us);
- to improve our products and services;
- to find and prevent fraud;
- to resolve disputes, to protect the rights, property, or safety of Anchorage, our Site visitors, customers, or the public, and to enforce any legal terms that govern your use of the Site or our other services and products;
- to improve our marketing and promotional efforts; and
- for any other purpose identified in any other agreement between us.

We may combine the information that we collect through the Site with information that we receive from other sources, both online and offline.

We may aggregate and/or de-identify information collected through the Site. We may use de-identified or aggregated data for any purpose, including without limitation for research and marketing purposes and may also share such data with any third parties, including without limitation, advertisers, promotional partners, sponsors, event promoters, and/or others.

How We Share Your Information

We may share your information with third parties in the following cases:

- Where disclosure is required or appropriate to comply with laws, regulations, legal process, or a governmental request;
- With law enforcement officials, government authorities, or third parties, if we think doing so is necessary to protect the rights, property, or safety of Anchorage, our Site visitors, customers, or the public;
- To protect the security or integrity of the Site or our other services and products;
- To enforce our agreements, policies, and Terms and Conditions;
- To respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person;
- To investigate and defend ourselves or others against any third-party claims or allegations;
- With third-party service providers who act for or on behalf of Anchorage;
- With Anchorage employees and any related companies;
- While negotiating or in relation to a business transaction, such as a merger, sale of assets, insolvency, reorganization, receivership, assignment for the benefit of creditors, change of control, or bankruptcy; or
- With your consent.

Accessing and Controlling Your Information

If you have any questions regarding the information we have collected about you, please contact us as described below.

How Long We Keep Your Information

We generally retain information for so long as it may be relevant to the purposes above, consistent with any applicable agreement with a client. To dispose of information, we may anonymize it, delete it or take other appropriate steps. Data may persist for additional time in copies made for backup, business continuity purposes, or as required to comply with laws, regulations, or legal process.

Security

We maintain administrative, technical, and physical safeguards to protect information that you submit to us. However, no system is completely secure or error-free. We do not, and cannot, guarantee the complete security of your information.

Children's Privacy

The Site is not intended for children or minors under the age of eighteen years. We do not knowingly collect personal information from, or market online to, children under 13. If we become aware that a child under 13 (or a higher age threshold where applicable) has provided us with personal information as defined by the Children's Online Privacy Protection Act, we will take steps to comply with any applicable legal requirement to remove such information.

Links to Third-Party Websites

Please note that the Site may contain links to third-party websites. Since we do not control third-party sites and are not responsible for any information you may provide while on such sites, we encourage you to read the privacy policies on those websites before providing any of your information on such sites.

California Do-Not-Track Notice

This Site does not recognize or respond to browser-initiated Do-Not-Track signals.

This Policy May Change

We reserve the right to update or modify this Policy at any time, without prior notice, by posting the revised version of this Policy behind the link marked "Privacy Policy" at the bottom of each page of the Site. Please check this page periodically for updates. Your continued use of this Site after we have posted the revised Policy constitutes your agreement to be bound by the revised Policy.

Contact Us

If you have questions about this Privacy Policy, please contact us at legal@anchorage.com.