



# PRIVACY POLICY



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SAGE and Spirit Gear Unlimited respects your privacy. In that regard, we have created this Privacy Policy to let you know what information we collect when you purchase or use our products or services, why we collect it, and how it is used and disclosed. By purchasing or using products or services from us, you consent on behalf of yourself and your company to the practices described in this Privacy Policy. We may translate this Privacy Policy into other languages for your convenience. Nevertheless, the English version governs your relationship with SAGE, and any inconsistencies among the different versions will be resolved in favor of the English version.

**1. What information do we collect?** “Personal Information” means any information that may be used to identify you or that is about you, including, but not limited to, first and last name, home or other physical address, an email address, phone number, or other contact information, whether at work or at home. When you request information from us, subscribe to our services, purchase products or otherwise interact with us, we may ask you for your Personal Information. You always have the choice not to provide certain of your Personal Information to us, but not doing so may prevent you from using certain features, products or services. In addition, we may collect a variety of usage and logging information (“Usage Information”) as a result of your use of our products and services.

**2. How do we use Personal Information?** We may use your Personal Information to provide our products and services to you, fulfill your requests, improve the quality of our products and services, engage in research and analysis relating to the products and services, personalize your experience, track usage of the products and services, provide information to third party businesses that are listed on the products or services, display relevant advertising, market the products and services, provide customer support, send messages to you, back up our systems, allow for disaster recovery, enhance the security of the services, and comply with legal obligations. Even when we do not retain such Personal Information, it still must be transmitted to our servers initially and stored long enough to process. We may use your Personal Information in anonymous or aggregate form for a variety of purposes as well.

**3. Information Sharing and Disclosure to Third Parties.** Personal Information may be shared or disclosed to third parties for a variety of reasons. Agents or contractors of SAGE and Spirit Gear Unlimited may have access to your Personal Information for the purpose of performing services on behalf of SAGE and Spirit Gear Unlimited. All such agents or contractors who have access to your Personal Information are required to keep the information confidential and not use it for any purpose other than to carry out the services they are performing for SAGE and Spirit Gear Unlimited. In addition, SAGE maintains a marketing list containing promotional products suppliers, distributors, reps, and/or associations. This list is licensed to third parties who would like to market their products and services. Please note that Sage marketing list does not contain any information related to Spirit Gear Unlimited clients.

**4. How do we use Usage Information?** Usage Information is used in a variety of ways and may be shared with a variety of third parties, to the extent that it does not contain Personal Information. Personal Information contained within Usage Information is treated the same as other Personal Information.

**5. Legal Basis for Processing.** Our legal basis for collecting and using Personal Information will depend on the specific information concerned and the context in which we collect it. We, however, will normally collect Personal information from you only where we have your consent to do so, where we need the Personal Information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person (for instance, to prevent, investigate, or identify possible wrongdoing in connection with the service or to comply with legal obligations). If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible consequences if you do not provide your Personal Information). If we collect and use your Personal Information in reliance on our legitimate interests (or those of any third party), this interest will typically be to operate our services, communicate with you in relation to our services, or for our other legitimate commercial interests, for instance, when responding to your queries, to analyze and improve our platform, engage in marketing, or for the purposes of detecting or preventing fraud. If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us.

6. **Required Disclosure.** We may disclose Personal Information if required to do so by law or in the good faith belief that such action is necessary to: (1) conform to the edicts of the law or comply with legal process served on SAGE, Spirit Gear Unlimited or one of our affiliates; (2) protect and defend the rights or property of SAGE and Spirit Gear Unlimited; or (3) act in urgent circumstances to protect the personal safety of users of SAGE, its web sites or services or the public. If SAGE should ever file for bankruptcy or be a party to an acquisition or merger, we may sell or provide your Personal Information to a third party in connection with such activity.

7. **Opting-Out.** As mentioned above, Sage and Spirit Gear Unlimited keeps a comprehensive database of your contact and marketing preferences. Should you decide to opt-out of any of our information usage practices, please notify us by calling 407-542-7446 or emailing [support@spiritgearunlimited.com](mailto:support@spiritgearunlimited.com). Please specify which communication method(s) you prefer not to be used when contacting you (e.g., postal mail, phone, fax, email) and whether or not you want your contact information disclosed to third parties or not. We will promptly process your request. However, please keep in mind that you may receive mailings that were already in progress when your request was made.

8. **Security of Your Information.** SAGE uses a variety of industry-standard methods to help protect your Personal Information, including secure sockets layer (SSL) encryption, firewalls, secure network facilities, etc. You are solely responsible for maintaining the secrecy of your passwords or any account information. While we strive to protect your Personal Information, SAGE does not ensure or warrant the security of any information you provide to us, and you provide it to us at your own risk.

9. **Cookies.** We, and third parties with whom we partner, may use cookies, web beacons, tags, scripts, local shared objects such as HTML5 and Flash (sometimes called "flash cookies"), advertising identifiers (including mobile identifiers such as Apple's IDFA or Google's Advertising ID) and similar technology ("**Cookies**") in connection with your use of the services, third party websites, and mobile applications. Cookies may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may transmit information about you and your use of the services, such as your browser type, search preferences, IP address, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. Cookies may be persistent or stored only during an individual session.

10. **Third Parties.** Please be aware that other web sites that may be accessed through the use of our site or services may collect personally identifiable information about you. This Privacy Policy does not cover the information practices of those third-party web sites linked to our site or services. We may also share user information in the aggregate with third parties, such as advertisers and content distributors. For example, we may disclose the number of users that have been exposed to or clicked on advertisements. We may also disclose anonymized information about your use of our services.

11. **Controlling Your Personal Information.** You have the right to access, correct, update or request deletion of your Personal Information. You can object to the processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information. Similarly, if we have collected and processed your Personal Information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent. You also have the right to opt-out of marketing communications we send you at any time. The service generally provides you with a reasonable means to view and change your profile information and you can opt-out of marketing communications at any time by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you or in your account settings. However, if you have any questions or concerns about the processing of your Personal Information, you may contact us as outlined in the "Contact" section below. Please note that the "data controller" responsible for protecting your Personal Information related to the services is SAGE.

12. **Data Retention and Account Termination.** You can close your account by contacting Spirit Gear Unlimited. We will remove certain public posts or other information from view and/or dissociate them from your account profile (as applicable), but we may retain information about you for the purposes authorized under this Privacy Policy unless prohibited by law. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the services or to comply with legal obligations. Please note that suppliers cannot remove their business listings, ratings, or reviews by closing their accounts.

13. **Children's Privacy.** Our websites, products and services are not intended for or directed to persons under the age of 13. Any person who provides their information to SAGE and SPIRI GEAR UNLIMITED hereby represents that they are 13 years of age or older.

14. **International Data Transfer.** For residents of the EEA or Switzerland, please note that the Personal Information we obtain from or about you may be transferred, processed and stored outside of the EEA or Switzerland for the purposes described in this Privacy Policy, including in the United States of America.

15. **Consent to this Policy.** By using our website, products or services, you agree to this Privacy Policy. This is our entire and exclusive Privacy Policy with respect to customers and it supersedes any earlier version. If we make material changes to this Privacy Policy, we will provide you with written notice or post a notice on our services prior to or on the effective date of the changes. By continuing to access or use the services after those changes become effective, you acknowledge and consent to the revised Privacy Policy.

16. **Interaction with Agreements.** This policy is not meant to supersede any written agreement between SAGE, Spirit Gear Unlimited and you, including without limitation our Customer Agreement. To the extent of any inconsistency between this policy and any agreement between SAGE and you, such agreement shall prevail.

17. **Contact.** You may contact us at [support@spiritgearunlimited.com](mailto:support@spiritgearunlimited.com) with any questions regarding this privacy policy or write to: SPIRIT GEAR UNLIMITED, Attn: Data Privacy Manager; 130 Remington Drive, suite 1012, Oviedo, FL 32765. We will take such steps as we deem necessary to confirm your identity before sharing any personal data with you. We will respond to proper and confirmed requests relating to personal data within 30 days, or as otherwise required by applicable law.