



PRIVACY POLICY

November 12 2018

ThumbStopper LLC, a Florida limited liability company (referred to as "ThumbStopper", "we", "us" or "our"), recognizes the importance of protecting personal data we may collect from visitors and any other individual or entity ("Users," "you," or "your") who visit our websites. This Privacy Policy applies to data collection by ThumbStopper and shall apply to your use of the website, www.ThumbStopper.com, and other ThumbStopper-related sites, mobile applications, communications, capabilities and services ("Services") accessible on or by any top-level ThumbStopper domain owned by us (each, a "Site" and collectively the "Sites"), but excluding services that state that they are offered under a different privacy policy.

Our Privacy Policy explains: (1) what information we collect; (2) why we collect it; (3) how we use that information; (4) how we may share it; and (5) the choices we offer, including how to access and update information. Specifically, our Privacy Policy covers the following topics:

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When this Privacy Policy Applies

Our Privacy Policy applies to all of the services offered by ThumbStopper and its affiliates, including but not limited to LotVantage LLC ("the ThumbStopper Related Companies") and services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our services. In addition, certain companies associated with ThumbStopper, such as facebook, have their own privacy statements that we do not control. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Terms of Use

By accessing or using the Sites in any manner, you also agree to be bound by ThumbStopper's [User Agreement](#). Please read the [User Agreement](#) carefully. If you do not accept all of the terms and conditions contained in or incorporated by reference into the [User Agreement](#), please do not use the Sites.



Our Services

ThumbStopper offers a suite of social media, classified marketing and other software applications and services. ThumbStopper software and services enable manufacturers and retailers to curate, modify and share content and also sell inventory across social and classified online channels. ThumbStopper focuses on minimal user interaction to complete these tasks of managing multiple content and inventory sources via multiple third party marketplaces.

Information We Collect

We collect information, including personal data, to provide better services to all our Users. We use the term "Personal Data" to refer to any information that identifies or can be used to identify you. Common examples of personal data include: full name, home address, email address, date of birth, digital identity, such as a login name or handle, information about your device, and certain metadata.

"Sensitive Personal Data" refers to a smaller subset of personal data which is considered more sensitive to the individual, such as race and ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric information, physical or mental health information, medical insurance data, or sexual orientation. ThumbStopper does not collect or use Sensitive Personal Data and asks that you do not provide Sensitive Personal Data to us.

We collect Personal Data in the following ways:

1. Information You Give to Us

You may choose to provide us with Personal Data about yourself, including your name, email, and phone number, when you complete forms on our website, such as when you request information about our services. You may also provide us with Personal Data in the following ways:

- **Account Information.** You may provide us with information in connection with the creation and management of your account for the Services, such as a name, email address, and a password to create a ThumbStopper account.
- **Billing Information.** If you have purchased a paid version of the Services, or if you make another financial transaction using our Services, we will collect information about the purchase or transaction.
- **Other Information.** You may choose to provide us with information when you contact our customer support or report a problem or have a question about our services. You may also provide us with other personal data as part of your account profile, including your usernames and links to social media accounts. The Sites offer interactive and social features that permit you to submit content and communicate with other users. You may provide personal data to us when you post information in these interactive and social features. Please note that your postings in these areas of the Sites may be publicly accessible or accessible to other users.
- **Content.** The content which you upload, download, or view on our Services may, but does not necessarily, contain Personal Data. When we refer to "Content" in this notice, we mean the Personal Data that we process at your direction. In legal terms, we act as data processors for the Personal Data included in the Content.

2. Information We Obtain from Your Use of Our Services

We collect certain information automatically, such as your operating system version, device identifier, browser type, and internet service provider. When you use our Site, we automatically collect and store this information in service logs. This includes: details of how you used our Site; Internet protocol address; and cookies that uniquely identify your browser. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Data, but we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties.



3. Cookies and Similar Technologies

We and our partners use various technologies to collect and store information when you visit one of our services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third party advertising and analytics partners include Google, Facebook, Instagram, and similar partners. These companies compile information from various online sources (including mobile-enabled browsers and applications) to match you with ads that will be the most relevant, interesting, and timely for you. If you would like to opt-out of interest-based advertising, please visit <http://optout.networkadvertising.org/#/>. Please note that you will be opted out of all interest-based advertising from all business members of the Network Advertising Initiative for that specific browser on that specific device. If you opt-out, you may continue to see ThumbStopper's or our partners' online advertisements; however, these ads will not be as relevant to you.

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

Cookies. A cookie is a small file placed on the hard drive of your 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 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 services. In jurisdictions that require informed consent for the storing and access of cookies on your device, we will obtain your consent before placing any cookies on your device. For more information about our use of cookies, including details on how to opt-out of certain cookies, please see our [Cookie Policy](#).

Web Beacons. Pages of our services or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Clickstream Data. Clickstream data is information collected by our computers when you request Web pages from the Sites. Clickstream data may include information such as the page served, the time spent viewing the page, source of the request, type of browser making the request, the preceding page viewed and similar information. Clickstream data permits us to analyze how visitors arrive at the Sites, what type of content is popular, what type of visitors in the aggregate are interested in particular kinds of content on the Sites.

How We Use Information We Collect

We use your personal data in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

1. To inform you about services available from ThumbStopper;
2. To authorize access to our Sites and Services, such as to identify you when you log in to your Account;
3. To provide you with Services and Products;
4. To offer and administer programs;
5. To administer content, promotion, sweepstakes, surveys, voting polls or other Site features;
6. To communicate about, and administer your participation in, special programs, surveys, contests, online campaigns, online programs, sweepstakes, and other offers or promotions, and to deliver pertinent emails;
7. To verify your transactions, for purchase confirmation, billing, security and authentication (including security tokens for communication with installed Third-Party Apps);



8. To improve our customer service;
9. To respond to and support users regarding their use of the Sites and Services;
10. To comply with all applicable legal requirements.
11. To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users.

We use the information we collect from our Sites to provide, maintain, and improve them, to develop new services, and to protect our Company and our users.

We use information collected from cookies and other technologies, to improve your user experience and the overall quality of our services. We may use your personal information to see which web pages you visit at our Site, which web site you visited before coming to our Site, and where you go after you leave our Site. We can then develop statistics that help us understand how our visitors use our Site and how to improve it. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

Our Legal Basis for Collecting Personal Data

Whenever we collect Personal Data from you, we may do so on the following legal bases:

1. Your consent to such collection and use;
2. Out of necessity for the performance of an agreement between us and you, such as your agreement to use our Services or your request for Products;
3. Our legitimate business interest, including but not limited to the following circumstances where collecting or using Personal Data is necessary for:
 - Intra-organization transfers for client data for administrative purposes;
 - Product and Services development and enhancement, where the processing enables ThumbStopper to enhance, modify, personalize, or otherwise improve our services and communications for the benefit of our users, and to better understand how people interact with our Sites;
 - Communications and marketing, including processing data for direct marketing purposes, and subject to your opt-in for these purposes, and to determine the effectiveness of our promotional campaigns and advertising;
 - Fraud detection and prevention;
 - Enhancement of our cybersecurity, including improving the security of our network and information systems; and
 - General business operations and diligence;

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

Information We Share

We do not share personal information with companies, organizations and individuals outside of the Organization unless one of the following circumstances applies:

- **With your consent.** We will share personal data with companies, organizations or individuals outside of ThumbStopper when we have your consent to do so and when required by applicable law.
- **For external processing.** We provide personal information to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include payment processors, such as financial institutions and their vendors and



contractors that process transactions, customer relations management vendors, marketing and communications vendors, social media partners, including Facebook, classified marketing partners, and similar third parties. It is our policy to only share Personal Data with contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having us share your information with our business partners and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business partners or vendors may limit your access to their services through the Sites. We do not share personal information with third parties for their own marketing purposes.

- **For Legal Reasons.** We will share Personal Data with companies, organizations or individuals outside of ThumbStopper if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - meet any applicable law, regulation, legal process or enforceable governmental request.
 - enforce applicable terms of service as described in our [User Agreement](#), including investigation of potential violations.
 - detect, prevent, or otherwise address fraud, security or technical issues.
 - protect against harm to the rights, property or safety of ThumbStopper, our Users or the public as required or permitted by law.

We attempt to notify Users about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

- **Business Transfers.** If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, Personal Data about our users is often a transferred business asset. In the event that ThumbStopper itself or substantially all of our assets are acquired, Personal Data about our users may be one of the transferred assets.
- **Aggregate Site Use Information.** We may share aggregate and anonymized/pseudonymized Personal Data to third parties in order to promote or describe use of the Sites, for research, marketing, advertising, or similar purposes.

Your Failure to Provide Personal Data

Your provision of Personal Data is required in order to use certain parts of our services and our programs. If you fail to provide such Personal Data, you may not be able to access and use our Services and/or our programs, or parts of our Services and/or our programs.

Our Retention of Your Personal Data

We may retain your Personal Data for a period of time consistent with the original purpose for collection. For example, we keep your Personal Data for no longer than reasonably necessary for your use of our programs and Services and for a reasonable period of time afterward. We also may retain your Personal Data during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

Your Choices and Accessing, Updating or Deleting Your Personal Data

Whenever you use our services, we aim to provide you with choices about how we use your personal data. We also aim to provide you with access to your Personal Data. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of personal information we maintain about you or you may update or correct inaccuracies in that information through your ThumbStopper account at www.ThumbStopper.com, or by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that Personal Data we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.



Depending on where you reside, you may have the right to exercise additional rights available to you under applicable laws with regard to the personal data ThumbStopper holds about you as a data controller, including:

1. **The right to be informed.** You are entitled to be informed of the use of your Personal Data. This Privacy Policy provides such information to you.
2. **The right of access.** You have the right to request a copy of your Personal Data which we hold about you.
3. **The right of correction:** You have the right to request correction or changes of your Personal Data if it is found to be inaccurate or out of date.
4. **The right to be forgotten:** You have the right to request us, at any time, to delete your Personal Data from our servers and to erase your Personal Data when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Data will likely impact your ability to use our services.
5. **The right to object (opt-out):** You have the right to opt-out of certain uses of your Personal Data, such as direct marketing, at any time.
6. **The right to data portability:** You have the right to a "portable" copy of your Personal Data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Data stored on our servers / IT environment to another service provider's servers / IT environment.
7. **The right to refuse to be subjected to automated decision making, including profiling:** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
8. **The right to lodge a complaint with a supervisory authority.**

To make a request, you may also contact us using the contact information below, and we will consider your request in accordance with applicable laws.

- **Changing or Deleting Your Information**

You may update or correct information about yourself by making changes to your profile, or emailing us at privacy@ThumbStopper.com. If you completely delete all such information, then your account may become deactivated. We may retain an archived copy of your records as required by law, to comply with our legal obligations, to resolve disputes, to enforce our agreements or for other legitimate business purposes.

We may contact you to request that you update your Personal Data on a regular basis to ensure its integrity for the purposes of ongoing data management.

- **Our Opt-in/Opt-out Policy**

By providing an email address on the ThumbStopper Sites, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any service related notices, or to provide you with information about our events, invitations, or related educational information.

For purposes of this Privacy Policy, "opt-in" is generally defined as any affirmative action by a user to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from the service.



2. At any time, you can contact us through privacy@ThumbStopper.com or the address or telephone number provided below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Data.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

Third Party Links

The Sites may contain links to webpages operated by parties other than ThumbStopper. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Site or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the User will be subject to upon linking to the third party's website. ThumbStopper strongly recommends that each User review the third party's terms and policies.

International Transfer

We are committed to complying with applicable laws, regulations and mandatory government standards regarding the protection of Personal Data. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

If we transfer your Personal Data out of your jurisdiction, we will implement suitable safeguards and rely on legally-provided mechanisms to lawfully transfer data across borders to ensure that your Personal Data is protected.

How We Protect Personal Data

ThumbStopper maintains administrative, technical and physical safeguards designed to protect the User's Personal Data and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, taking into account technological reality, cost, the scope, context and purposes of processing weighted against the severity and likelihood that the processing could threaten individual rights and freedoms. For example, we use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Data.

If ThumbStopper collects account information for payment or credit, ThumbStopper will use the information only to complete the task for which the account information was offered.

Children

ThumbStopper does not target its offerings toward, and does not knowingly collect any personal information from, users under 18 years of age. No one under age 18 may provide any personal information to or on our web site. We do not knowingly collect personal information from children under 18. 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 privacy@ThumbStopper.com.

Direct Marketing and "Do Not Track" Signals

California residents are entitled to contact us to request information about whether we have disclosed personal information to third parties for the third parties' direct marketing purposes. We do not disclose personal information to third parties for the third parties' direct marketing purposes. California users may request further information about our compliance with this law by e-mailing us at the address listed



in the "How to Contact Us" section.

ThumbStopper does not track its users over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

Changes to this Privacy Policy

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or programs, email notification or privacy policy changes). We will also keep our most recent prior version of this Privacy Policy in an archive for your review.

How to Contact Us

If you have any specific questions about this Privacy Policy, you can contact us via email or writing to us at the address below:

Send e-mail to: privacy@ThumbStopper.com

Send mail to our address:

ThumbStopper.
Attn: Privacy Policy Inquiry
3415 E Frontage Rd, Suite B
Tampa, FL 33607 U.S.A.
813-470-7094