

## Privacy Policy

**September 2018**

This Privacy Policy applies to the www.IRIO.com website operated by IRIO, Inc. (“IRIO,” “we” or “our”) and/or all other applications, services, features, and/or content (collectively, the “Site”) offered by IRIO.

This Privacy Policy applies only to information we collect in the Site and in email, text and other electronic communications sent through the Site. This policy DOES NOT apply to information that we collect offline or on any other websites, including websites you may access through the Site. Other websites may have their own privacy policies, which we encourage you to read before providing information on or through them.

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 TO THE TERMS OF THIS PRIVACY POLICY, DO NOT REGISTER WITH OR USE THE SITE. BY REGISTERING WITH OR USING THE SITE, YOU AGREE TO THIS PRIVACY POLICY.

**1. Changes to Our Privacy Policy.** We may update our Privacy Policy from time to time. If we make material changes to how we treat our users’ personal information, we will post the new Privacy Policy on this page and/or provide notice that the Privacy Policy has been updated to you via email. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically visiting this Privacy Policy to check for any changes. Your use of the Site after any update to the Privacy Policy constitutes your agreement to such updated policy.

**2. Children under the Age of 13.** The Site is not intended for children under 13 years of age, and we do not intend or desire to collect personal information from children under 13. If you are a parent or guardian of a child younger than 13 and believe that child has disclosed personally identifiable information to us, you may contact us to review and request the deletion of that information, using the contact information below.

**3. Information Collection and Use.** We collect and use your personal information for a variety of business purposes, including to respond to your requests (for example, to set up an account or place an order), to respond to your inquiries, to provide the services that you request through the Site, to administer a contest, promotion, survey or another site feature, to communicate with you about our Site, to provide you with information about our Site, to register on the Site and to do all things necessary to administer the Site and to manage, protect and improve it. By using the Site, you agree to the collection and use of information in accordance with this Privacy Policy.

“Personal information” is data that can be used to uniquely identify or contact an individual. There are a few ways in which you may explicitly and intentionally provide us with, and consent to our collection of, certain personal information. The Site and some of our services provide you with the opportunity to input information. In order to fulfill your request, we may collect your name, phone number, email, physical address, and/or credit card information. We may also collect your IP address if we suspect that credit card fraud may have occurred. IRIO also collects data input by individual users and may aggregate such data across users. Aggregated information is not intended to identify individual users.

We may receive information about you (including personal information) from third parties, including our service providers. For example, if you donate through one of our donation initiatives with non-profits, our third-party payment processor may share contact information about you after the donation. If you are on another website and you opt-in to receive information from us, that website will forward to us your e-mail address and other information about you so that we may contact you as requested. We may combine the information we receive from these third parties with information we collect through the Site. In those cases, we will apply this Privacy Policy to any personal information received, unless we have disclosed otherwise.

**4. Site Log Data.** When you interact with our Site we may use assorted technologies that automatically or passively collect information about how the Site is accessed and used, such as cookies, web beacons, and various identifiers. For example, when you download or access the Site, we may collect certain information automatically,

including, but not limited to, the type of device you use, your unique device ID, the IP address of your device, your operating system and other statistics (“Log Data”). Log Data is generally non-identifying, but if we associate it with you as an identifiable person, we will treat it as personal information under this Privacy Policy. We may also use third party services that track this information on our behalf, including: remarketing with Google AdSense, Google Display Network Impression Reporting, Demographics and Interests Reporting, and DoubleClick Platform Integration.

We and third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions, and other ad service functions as they relate to our website.

**5. Google.** We use Google AdSense Advertising on our website. Google, as a third-party vendor, uses cookies to serve ads on our site. Google’s use of the DART cookie enables it to serve ads to users based on their visit to our site and other sites on the Internet. You may opt out of the use of the DART cookies by visiting the Google ad and content network privacy policy. Google’s advertising requirements can be summed up by Google’s Advertising Principles. They are put in place to provide a positive experience for users.

You can set preferences for how Google advertises to you using the Google Ad Settings page. You can also opt out by visiting the Network Advertising initiative opt out page or permanently using the Google Analytics Opt Out Browser add on.

**6. Do Not Track Requests.** We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

If you choose to disable or turn off the use of cookies, some of our website functionality will also be disabled. It will turn off some of the features that make your site experience more efficient and some of our services will not function properly. However, you can still place orders over the phone by contacting customer service.

**7. Third Party Behavioral Tracking.** We allow third party behavioral tracking.

**8. Information We Share With Others.** We may use or disclose your personal information to our employees and affiliates, to protect the security and integrity of our Site and Services, to correct technical problems and malfunctions in respect of the same, to process your information, to provide the Site or Services, and to our clients in connection with our provision of the Services to or on behalf of our clients, or to take precautions against liability. We also may provide your personal information to vendors in connection with purchase on the Site or any Services you purchase from us, to your credit card issuer, credit reporting and fraud checking agencies as necessary, and to debt collection agencies if you fail to pay monies owed to us. Other than the above instances, we do not share your information with third parties. There are no limits on our ability to use non-personal information that does not identify you.

We reserve the right to transfer any information we have about you in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of our business. We reserve the right to disclose any personal information as needed if that information is requested by law enforcement agencies or if we are required to do so by law, treaty, regulation, subpoena, court order, or by a government entity. We also may disclose your personal information to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating our Terms of Use or any other agreement with us.

**9. Contact via Email.** We may occasionally email you with information about offers or new services. In addition, you may receive email communications related to your account including information regarding transactions and your relationship with IRIO.

**10. California Privacy Rights.** Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business with which the California resident has an established business relationship what types of personal information, if any, the business shares with third parties for direct marketing purposes by such third parties and the identities of the third parties with whom the business has shared such

information in the immediately preceding calendar year. To access this information, please contact us either by email at [support@irio.com](mailto:support@irio.com) or at the address below:

7160 Dallas Parkway Suite 530 Plano, Texas 75024

877-268-0032

**11. Notice to Residents of Countries Outside of the United States.** IRIO is headquartered in the United States. Personal information may be accessed by us or transferred to us in the United States. If you are located outside of the United States, be advised that any information you provide to us will be transferred to and stored in the United States and that, by submitting information to us, you explicitly authorize its transfer and storage within the United States. We will treat personal information according to this Privacy Policy regardless of where it is processed or stored.

**12. Security.** We use reasonable precautions, including technical, administrative, and physical procedures, to protect personal information from loss, misuse, or alteration. Although guaranteed security does not exist on the Internet or offline, we make commercially reasonable efforts to handle such information consistent with this Privacy Policy and applicable laws. Due to the design of the Internet and other factors outside our control, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties. When you register with the Site, your user account is password protected, but that security measure is only as good as the care you take to protect your password. All credit information you supply to the Site is encrypted via Secure Socket Layer (SSL) technology. All credit card transactions are processed through a secure gateway provider and are not stored or processed on our servers.

**13. Third Party Links.** The Site may contain links to third party websites that are not controlled by us. These links are made available to you as a convenience, and you agree to use these links at your own risk. Please be aware that we are not responsible for the privacy practices or content of such third party websites. Our Privacy Policy only applies to information we collect from you while you are on the Site. If you navigate to a third party website from the Site, we strongly encourage you to review and become familiar with that third party website's own privacy policy and statements.

**14. Your Choices; Opt-Out; Updating or Correcting Your Information.** You can review and change your personal information by logging into the Site and visiting your account page. You may also send us an email at [support@irio.com](mailto:support@irio.com) to correct, update, delete or deactivate your personal information. If you receive any promotional e-mail communication from us, you will be given the option to "unsubscribe" from receiving further e-mail communications from us at any time. Your option not to receive promotional and marketing material will not preclude us from corresponding with you, by e-mail or otherwise, regarding your existing or past business relationships with us, and will not preclude us from accessing and viewing your personal information in the course of maintaining and improving the Site and our services.

**15. Contact Information.** To ask questions or comment about this Privacy Policy and our privacy practices, please contact us at 7160 Dallas Parkway, Suite 530, Plano, Texas 75024, [support@irio.com](mailto:support@irio.com).