

This Privacy Policy sets forth SFG Business Management (SFG) policies regarding the collection, use and disclosure of certain personally identifiable information ("Personal Information") relating to an individual's use of this Site. Your use of this Site signifies your understanding and acceptance of the terms of this Privacy Policy. This Privacy Policy applies to Personal Information collected through this Site.

## **Under What Circumstances Do We Collect Your Personal Information?**

### **Personal Information**

When you send us an e-mail request or inquiry through the "Contact Us" section of this Site, we obtain your name, postal address, phone number, e-mail address and other information relating to your inquiry/request. We also obtain Personal Information as part of our recruitment processes, and when you submit an online employment application form, you create an "Online Profile" of yourself and provide to us Personal Information, which includes your name, postal address, phone number, e-mail address and other employment-related information. Such Personal Information is only kept for the period required for fulfilling your request or dealing with your job application. We also may collect additional Personal Information from you from time to time through other forms on this Site, through e-mail correspondence, and through other online means. The information required will be the minimum to enable SFG to deal with your request. Where additional information is requested this will be marked and its provision is voluntary. Additional information is only requested to enable us to provide the most appropriate response to your request. Sensitive information is not sought through this Site except where legally required as part of the recruitment process. Sensitive information includes data relating to: race or ethnic origin; political opinions; religious or other similar beliefs; physical or mental health; sexual orientation or criminal record. Where you do provide sensitive information this will be accepted as explicit consent to use that information in connection with the purpose for which it has been provided.

### **Technical Information**

When you visit this Site, we may collect technical information that does not, by itself, identify you by name. This information may include, for example, your IP (Internet Protocol) address, which pages you visit on this Site, other pages you visit on the Web, and which browser you used to view this Site. This technical data is used to measure and improve the effectiveness of this Site, to help diagnose problems with our server, to administer this Site, to see where Site traffic is coming from and to identify our users. We may also collect other non-personally identifiable information via this Site, such as Site usage activity and preferences, also known as demographic or profile data. We do not currently, but reserve the right to, combine the data described in this paragraph with your Personal Information.

### **Do We Use Cookies?**

We may use "cookies" to keep, and sometimes track, information about you. Cookies are small data files that are sent to your browser or related software from a Web server and stored on your computer's hard drive. Cookies track where you travel on the Site and what you look at. In doing so, a cookie may enable us to relate your use of the Web site to your Personal Information. Many other Web sites use cookies for very similar purposes.

Most Web browsers can be set to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. Additionally, your Flash player can be set to reject or delete Flash cookies. Refusing a cookie will generally not interfere with your use of the Web site. However, refusal of a cookie may, in some cases, preclude you from using or negatively impact the display or function of the Web site or certain areas or features of the Web site.

### **Do We Use Web Bugs**

We may use "web bugs" (described in more detail below) in this Site or in our communications with you to verify your viewing and/or receipt of communications. A "web bug" is typically a one-pixel, transparent image (although it can be a visible image as well), located on a Web page or in an e-mail, which is retrieved from a remote site on the Internet enabling the verification of an individual's viewing or receipt of a Web page or e-mail message.

## **Use of Personal Information**

We use Personal Information collected on and through this Site for a variety of purposes in the course of business and as otherwise set forth herein. When requesting material or asking someone to contact you there will be the option to receive other information that may be of interest. For example:

- To respond to your requests that you send to us via e-mail or "Contact Us";
- To process your requests and deliver to you requested materials;
- To contact you when you request further information;
- To send you mail and e-mail messages promoting our products and services. (You may opt-out of receiving certain promotional e-mail messages from us as described in the "Opt-out" section below.)

## **Do We Share Your Personal Information?**

We may contract with other companies or individuals to provide you the services that you request from us or to otherwise operate this Site or our business activities. Such companies may be given access to your Personal Information for their use in connection with those purposes on our behalf.

We may use third party service providers to develop and/or host our web site, to host and maintain our databases, to transmit our e-mail messages, and to provide other back-end services for this Site. In connection with this, such service providers may have access to your Personal Information for use on our behalf consistent with this Privacy Policy.

We may, as a result of a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of our company (a "Reorganization Event"), transfer, sell or assign your Personal Information to third parties involved in the Reorganization Event.

From time to time, we may be required to provide Personal Information in response to a court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful, and to disclose any information concerning you as necessary or appropriate to satisfy any law, regulation or other governmental request, to operate this Site properly, or to protect or defend our rights or the rights or well-being of our users or if you are involved (or are reasonably suspected to be involved) in any illegal or harmful activity, even without a subpoena, warrant or court order. We may release certain Personal Information when we believe that such release is reasonably necessary to protect the rights, property, and safety of others and ourselves.

## **Do You Have Choices Regarding How Your Personal Information Used?**

### **Opt-Out**

If you would like to opt not to receive promotional or marketing e-mail from us in the future, you may let us know by sending us an e-mail to [opt-out@guber.com](mailto:opt-out@guber.com) stating the e-mail address you wish to be removed from our mailing list. However, your option not to receive promotional and marketing e-mail shall not preclude us from corresponding with you, by e-mail or otherwise, regarding your existing relationship with us. Your opt-out request will also not apply to correspondence that has already been initiated.

### **Consent to Processing**

By providing any Personal Information to this Site, you fully understand and unambiguously consent to the transfer of such Personal Information to, and the collection and processing of such Personal Information in, the United States, provided, however, only to the extent permitted in this Privacy Policy.

### **Security**

Generally accepted standards of technology and operational security have been implemented to protect Personal Information from loss, misuse, alteration or destruction. All partners, employees and principals are required to keep Personal Information confidential and only authorized personal have access to this Information.

Please be careful whenever sending Personal Information to us via e-mail. E-mail is commonly not a secure means of transferring information.

Due to the open nature of the Internet, we cannot guarantee that any information stored on our servers, or transmitted to or from you, will be free from unauthorized access. By using this Site, you acknowledge that you understand and agree to assume these risks.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your e-mail address, we may notify you by e-mail.

### **Access and Correction**

SFG does not assume responsibility for confirming the ongoing accuracy of your Personal Information. When practically possible, if you inform SFG that your Personal Information is no longer accurate, appropriate corrections will be made.

### **Third Parties**

We have no control over what information third parties track or collect, and we have no responsibility or liability for any tracking, data collection or other activities of third parties. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

### **Domicile Requirement for Use of the Site**

You represent and warrant that you are domiciled in the United States. You agree that United States law will apply to this Privacy Policy and your Personal Information without regard to laws relating to choice or conflicts of laws.

### **Who Can You Contact if You Have Questions or Concerns**

Please contact us at [privacy@guber.com](mailto:privacy@guber.com) to report any known or suspected privacy or security breaches or to submit privacy-related questions or complaints.

### **Data Controller**

The data controller collecting the information described in this statement is SFG Business Management.

### **Will This Privacy Policy Change?**

If there are changes or additions to this Privacy Policy, we will notify you by posting those changes here. Changes and additions to this Privacy Policy are effective when they are posted.