

Affiliated Distributors Privacy Policy

Affiliated Distributors

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Introduction

This Privacy Policy describes how Affiliated Independent Distributors, Inc. and its subsidiaries and affiliates (“AD”, “we”, “us” or “our”) collect, use, store, and share your information when (1) you access and/or use our websites, applications, and other digital properties where this Privacy Policy is posted, including www.adhq.com (“Websites”); (2) when you engage with our services, partner with us, become a member, or work with us as a distributor, supplier, or partner (“Services”); (3) when you communicate with us in any manner, including by e-mail or telephone (“Communications”); and when we interact with certain third parties.

For individuals in California, please see our [California Privacy Notice](#) below.

1. What Type Of Information Do We Collect?

Depending on how you interact with our Websites and Services, the nature of our Communications, and how we may interact with certain third-party partners, we may collect the following pieces of your information:

- **Basic Identifying Information.** Information you provide such as your full name, postal address, e-mail address, phone number, account name and password, username, and other similar identifiers.
- **Corporate Information.** Information about your company, position, and other related business and professional information.
- **Device Identifier and other Unique Identifiers.** Information such as your device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, and other unique identifiers.
- **Internet or Other Network Activity.** Information such as your browsing or search history, and other information regarding your interactions with our Websites, emails, and advertisements.
- **Geolocation Data.** Information that permits us to determine your location so that we can determine the best place for you visit us.
- **Commercial Information.** Information such as the nature of the Services you’ve considered, and related information.
- **User Content.** Information such as your Communications with us and any other content you provide, such as social media profiles, photographs of receipts, images, videos, survey responses, comments, product reviews, testimonials, and other content.
- **Audio and Visual Information.** Information such as photographs, images, videos, and recordings of your voice (such as when we record customer service calls for quality assurance).

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- **Inferences.** Information such as inferences drawn from or created based on the information identified above.

2. How Do We Collect Your Information?

We collect your information in three ways: (1) directly from you when you use our Websites, Services, and Communicate with us; (2) automatically using online technologies when you engage with our Websites, Services, and Communications; and (3) from our third-party partners, distributors, and related parties.

- **Directly from you.** We collect information directly from you when you become a member, enter into an agreement with us, engage with our Services, enter your information through our Websites, access our content, take a survey or a poll or enter a contest, engage in Communications with us, or sign-up to receive emails, text messages, or certain other Communications from us.
- **Automatically Using Online Technologies.** When you visit our Websites, open or click on emails we send you or related Communications, or interact with our advertisements, we or other third parties may automatically collect certain information about you using online tracking technologies such as cookies, pixels, web beacons, software developer kits, and related technologies. For more information, see “Cookies and Similar Online Tracking Technologies” below.
- **From Our Partners.** We collect information from our third-party partners, such as distributors, suppliers, other members, partners, data analytics providers, marketing or advertising providers, fraud prevention service providers, and vendors that provide services.

3. Cookies and Related Online Tracking Technologies

We and our third-party partners use cookies, pixels, web beacons, software development kits, and other similar online tracking technologies to gather information about you when you use our Websites, interact with some of our Products, and engage with our Communications. Some of the online tracking technologies are used to maintain the security of our Websites, manage your account, prevent crashes, fix bugs, save your preferences, assist with basic Website functions, advertising, analytics, and other performance functions.

- **Cookies:** Cookies are small bits of data cached or stored on your computer based on Internet activity. Information collected through cookies may be obtained directly by or shared with third parties so that those third parties can provide analytics and advertising services to us. We use first party and third-party cookies and other tools to monitor individual activity in aggregate to improve the Site. The information we gather includes IP address, user language, the operating system, browser type, screen resolution, connection type, browsing behavior, and information that identifies the cookie.
- **Pixels:** Pixels (also known as web beacons) are types of code embedded in a website, video, email, or advertisement that sends information about your use to a server. When

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you access a website, video, email, or advertisement that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser.

- **Analytic Tools:** We use third-party analytics providers such as Google Analytics on the Sites. Google Analytics uses cookies and similar technologies and IP address to collect and analyze information about use of the Services and report on activities and trends. Google Analytics may also collect information regarding the use of other websites, apps, and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/.

4. How Do We Use Your Information?

We use your information for a variety of purposes, including to:

- **Provide our Websites and Services to You.** We use your information to provide our Websites and Services to you, including to: (1) create and manage your account when you sign-up to be a member; (2) facilitate our engagement with you as a distributor or supplier; (3) facilitate your access and use of our Websites; (3) send you notifications relating to your account and participation in our Services; (4) answer your Communications; and (5) perform other related business functions.
- **Communicate with You.** We use your information to engage in Communications with you, such as to respond to your requests, inquiries, issues, feedback, and to provide customer service.
- **Market and Advertise.** We use your information for marketing and advertising purposes, including sending marketing, advertising, and promotional communications to you by email, text message, or postal mail. We also use your information to show you advertisements for Services.
- **Conduct Analytics and Personalization.** We use your information to conduct research and analytics, including to improve our Websites and Services. We also use your information to understand your interaction with our Websites, advertisements, Services, and our Communications with you. We also use your information to personalize your experience, to save you time when you visit our Websites and use our Services, to better understand your needs, and to provide personalized recommendations for our Services.
- **Security and Fraud Prevention.** We use your information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions. We also use your information to enforce our terms and procedures, prevent against security incidents, and prevent the harm to other users of our Services.
- **Legal Obligations.** We use your information to comply with our legal and regulatory obligations, to establish and exercise our rights, and to defend against legal claims.
- **Business Functions.** We use your information to support our core business functions, including to maintain records related to business management, loss prevention, collecting amounts owed, and identifying and repairing errors or problems in the Websites.

5. How Do We Disclose Your Information?

We may disclose or share your information with non-affiliated third-parties, including in the following scenarios:

- **With your Consent.** We may disclose or share your information with your consent, which may be obtained in writing; online, through “click-through” agreements; when you accept the terms of use on our Websites; orally, either in person or on the phone; or by other means.
- **In a Business Transfer.** We may disclose or share your information as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the unlikely event of insolvency, bankruptcy, or receivership, in which such information could be transferred to third parties as a business asset in the transaction.
- **To Non-Affiliated Third Parties.** We may disclose or share your information with certain non-affiliated third parties to facilitate your access and use of our Websites, our Services, to facilitate with distributors and suppliers, and to provide us with certain business functions, including but not limited to sharing your information with partners, internet service providers, advertising networks, data analytics providers, governmental entities, operating systems and platforms, social medial networks, and service providers who provide us a service (e.g., customer service, distribution, supply, auditing, marketing, debugging to identify and repair errors that impair existing intended functionality on our Websites, and/or protecting against malicious, deceptive, fraudulent, or illegal activity).
- **For Legal Process And Protection.** We may disclose or share your information to satisfy any law, regulation, legal process, governmental request, or where we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to: (1) enforce or apply our agreements; (2) protect our interests, property, or safety of others; (3) in connection with claims, disputes, or litigation; and (4) to protect our Websites.

6. How Do We Protect Your Information?

Although no system can guarantee the complete security of your information, we take all commercially reasonable steps to ensure your information is protected in alignment with all applicable laws and regulations, as appropriate to the sensitivity of your information.

7. How Long Do We Keep Your Information?

We keep your information for as long as is necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to the nature of the information subject to disposal.

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8. Links To Third Party Sites

Our Websites and Services may contain links to third party websites and services. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review.

9. Your Choices

A. Account

You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings or sending an email to the email address set out in the Contact Us section below. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

B. Cookies and Tracking Technologies

The following disclosures relate to your choices in connection with cookies and other tracking technologies:

- **Do Not Track**. Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. We do not currently monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.
- **Cookies and Pixels**. Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations. Below are links to instructions for managing cookies on commonly used browsers:
 - o Google Chrome: <https://support.google.com/chrome/answer/95647>
 - o Microsoft Edge: <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
 - o Mozilla Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>
 - o Safari (macOS): <https://support.apple.com/en-us/H+T201265>

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

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C. Communications

For all individuals, you can stop receiving promotional e-mails at any time by clicking on the “unsubscribe” link at the bottom of any promotional e-mail you receive from us. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or our ongoing business relations.

D. Analytics and Interest-Based Advertising

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.

The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services).

To opt out of us using your data for Matched Ads, please contact us as set forth in the Contact Us section below and specify that you wish to opt out of matched ads. We will request that the applicable technology service not serve you Matched Ads based on information we provide to it. Alternatively, you may directly contact the applicable technology service to opt out.

- **Google Ads**: Users can opt out of cookies used by Google for advertising. Each site where the privacy policy is posted must provide users with at least one of the following two options for opting out:
 - o Opting out of Google advertising cookies: Users can opt out of Google's use of cookies for advertising, including DoubleClick cookies, by visiting Google's Ads Settings page at <https://www.google.com/settings/u/0/ads/onweb/>.
 - o Opting out of cookies from all participating advertisers: Users can opt out of third-party advertising cookies from a wide range of advertising services, including Google, by visiting the Network Advertising Initiative's Opt-Out page at http://www.networkadvertising.org/managing/opt_out.asp.

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- **Twitter Ads:** You can opt out of Twitter’s interest-based advertising by using the methods described in Twitter’s Privacy Controls, currently available at: <https://twitter.com/settings/personalization>.

E. Specific U.S. State Privacy Rights

For individuals in California, please see our [California Privacy Notice](#).

10. California Privacy Notice

The following disclosures are made pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act and its implementing regulations (collectively, the “CCPA”).

Definitions

- **Personal information.** This is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you or your household.
- **Sensitive personal information.** This is information such as your social security number, driver’s license number, state identification card, passport number, account log-in and password, financial account and password, debit or credit card number and access code, precise geolocation information, race, ethnic origin, religious or philosophical beliefs, union membership, the content of your mail, email or texts other than those communications you have with us, genetic data, biometric information, health information, or information that concerns your sex life or sexual orientation.
- **Sell, sale, or sold.** This means the selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or other means, your personal information to a third party for money or other valuable consideration.
- **Share, shared, or sharing.** This means the sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or other means, your personal information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

Your Rights

You or an authorized agent you designate on your behalf may submit the individual requests outlined below. Upon receipt, we will take reasonable steps to verify you and your authorized agent’s identity prior to responding to the request, which may include in certain circumstances you signing a declaration under penalty of perjury. If an authorized agent is submitting a request on your behalf, you must submit a copy of: (1) a written authorization demonstrating you have authorized the agent to submit a request on your behalf; and (2) provide separate proof verifying your identity.

- **Right to Know.** You have a have a right to request that we disclose, subject to certain exceptions, information concerning: (1) the categories of personal information we have

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collected from or about you; (2) the categories of sources from which we have collected that personal information, and the business or commercial purpose for the collection; (3) the categories of third parties with whom we have shared, sold, or disclosed your personal information, including the business or commercial purpose for said sharing, selling, or disclosure; and (4) specific pieces of your personal information, subject to appropriate exceptions.

- **Right to Delete.** You have a right to request that we delete your personal information, subject to certain exceptions.
- **Right to Correct.** You have a right to request that we correct your personal information, subject to certain exceptions.
- **Right to Non-Discrimination.** You have a right to exercise the above rights without being discriminated against under the CCPA.
- **Right to Opt-Out of Sale / Sharing.** We may disclose your personal information with certain third-party partners so that they may send direct marketing messages to you. This constitutes a “sale” of personal information under the CCPA, and you therefore have the right to opt-out of this practice.
- **Exercising Your Rights.** To submit a request, you may send an e-mail to privacy@adhq.com. You may also designate an authorized agent to submit a request on your behalf by sending an e-mail with written proof of such authorization to privacy@adhq.com.
- **Responding To Requests.** Once you have submitted your request, we will respond within the time frame permitted by applicable law.

Notice of Collection

- To learn more about the categories of personal information we collect about California residents, please see [What Type Of Information Do We Collect?](#) above.
- For more information about how we use those categories of personal information, please see [How Do We Use Your Information?](#) above.
- For more information about how we collect categories of personal information, please see [How Do We Collect Your Information?](#) and [Cookies And Related Online Tracking Technologies](#) above.
- To learn more about how we disclose categories of personal information, and the categories of third parties with whom we disclose such information, please see [How Do We Disclose Your Information?](#) above.
- To learn more about how long we keep your information, please see [How Long Do We Keep Your Information?](#) above.

Notice of Disclosure for a Business Purpose

To learn more about the categories personal information we have disclosed for a business purpose, and the categories of third parties with whom we’ve disclosed such information, please see [How Do We Disclose Your Information?](#) above.

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Notice of Sale of Personal Information

We do not share the personal information of California residents. We do, however, sell the personal information of California residents to certain third-party partners who may use that information for their own commercial purposes. This type of disclosure may constitute a “sale” under the CCPA. We have no actual knowledge that we sell the personal information of California residents who are under 16 years of age.

Notice of Use of Sensitive Personal Information

We do not use California resident sensitive personal information for any purpose other than is permissible under the CCPA. Specifically, we do not use sensitive personal information of California residents to derive characteristics about California residents.

11. Children

Our Websites and Products are not intended for children under the age of 13. This includes any links to other websites that we provide for our convenience. We don't knowingly collect the information of children under 13 for any reason.

12. Changes To Our Privacy Policy

We may change this Policy from time to time. Any and all changes will be reflected on this page, and where appropriate provided in person or by another electronic method. The effective date will be stated at the top of this Policy. You should regularly check this page for any changes to this Policy.

13. Accessibility

To print a copy of this Privacy Policy, please click here [[PRIVACY POLICY HYPERLINK TO PDF](#)].

If you require a copy of this Privacy Policy in an alternative format, please Contact Us.

14. Contact Us

Affiliated Distributors, Inc
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Phone: 610-977-3100
Email: Privacy@adhq.com