



# PRIVACY POLICY

## 2019

v.4.2B

## Short Version

At Shore Alliance Group, Inc., we take privacy and the protection of your Personal Data seriously.

Personal Data means information that can directly or indirectly identify you or other individuals (“**Personal Data**”). This typically includes information such as your surname, name, name suffix, date of birth, address, email address, telephone number, date of purchase and financial details provided by you in connection with your purchase. Personal Data can also include other information such as your IP address and your shopping habits.

The categories of Personal Data that we process depends on how our services are utilized. For our customers and clients, Personal Data is utilized to provide certain data management and data translation services in alignment with our customer and client requests or to carry out certain administrative services pursuant to contracted services. All Personal Data is processed in accordance with applicable data protection laws.

We do not disclose your Personal Data to any third party except to our affiliates and to data processors that assist us with providing our services. Only with your consent may we use cookies for marketing, performance and statistical purposes.

## Extended version

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# 1 Our Privacy Principles

We take privacy seriously. Here are our 6 privacy promises to you:

1. We will respond to any questions on processing of your Personal Data without undue delay.
2. We will ensure that your Personal Data is used in line with applicable data protection laws.
3. We will be transparent with you about how we use your Personal Data. This includes informing you about what information we collect, what we do with it, with whom we share it and whom you should contact if you have any concerns.
4. We will provide you simple options to terminate utilization of your Personal Data if you are no longer happy with our marketing communications or other uses.
5. We will protect online and offline data in a similar manner.
6. We will take reasonable steps to make sure no unauthorized person accesses your Personal Data.

## 2 Our Privacy Policy

We are committed to safeguarding your privacy and ensuring that your Personal Data is protected. This Privacy Policy explains the types of Personal Data we collect and how we process and protect that data.

This Privacy Policy applies to Personal Data processed by us in connection with the services and products we offer to you, or which you have authorized a third party to utilize.

## 3 Who is Responsible for what happens with your data?

Shore Alliance Group, Inc. (“**Shore Alliance Group, Inc.**” or “**we**”; “**our**”; “**us**”) is responsible for processing of your Personal Data in relation to the Services. You can contact us via mail at Shore Alliance Group, Inc. LLC, 19716 Front Beach Rd., Panama City Beach, FL 32413, or by phone at 850-588-7279, or by email at [info@ShoreAG.com](mailto:info@ShoreAG.com) if you have any questions.

## 4 When do we ask for your consent?

Only in the event that you, our customers or consumers use our Services directly, do we seek your consent through your acknowledgement that we are processing your Personal Data.

Where we process your Personal Data on the basis of your consent, we will ask for your consent explicitly. We may also ask you to provide additional consent if we need to use your Personal Data for purposes not covered by this Privacy Policy or before sharing your

Personal Data with group companies or relevant subsidiaries of Shore Alliance Group, Inc. for the purposes of marketing.

## 5 For which purposes do we process your Personal Data?

We collect your Personal Data directly when you provide us with Personal Data when you visit our Sites, purchase Services, receive information, use our applications, complete a survey, and/or make a comment or enquiry or contact our customer services. We may also receive Personal Data about you from other sources, including information from commercially available sources, such as public databases and data aggregators, and information from third parties.

## 6 The Data

### **Which Personal Data do we collect about you?**

We may process the following Personal Data: Surname, name, company or other email address, telephone or mobile number, company, country, or other Personal Data you provide us, and the reason for requesting Shore Alliance Group, Inc.'s assistance. Other content or information you voluntarily provide to us, information on the handling of your request, queries from us and further information submitted with your request. unencrypted emails.

### **7 What is the Purpose of processing your Personal Data?**

We process your Personal Data whenever you contact us and respond to your enquiries and comments. We process your Personal Data that you enter when you subscribe for Shore Alliance Group, Inc. information or feedback or when you subsequently update or amend data in your Shore Alliance Group, Inc. account. We process Personal Data to provide you with our Services that you request from us, including responding to your queries or comments.

### **8 How long do we store your Personal Data?**

We will store your Personal Data only until the aforementioned purposes for which we have collected or received your Personal Data are fulfilled and once our statutory obligations to preserve records have expired.

## 9 What is the legal basis for processing or storing your Personal Data?

If you are a subscriber of our newsletter, your express consent in receiving marketing communications shall be the legal basis for processing.

If you are a shopper who or applicant who is seeking additional information, including a quote or other Services, Shore Alliance Group, Inc.'s legitimate interests in offering products you may be interested in shall serve as the legal basis for processing. This shall only apply in relation to Shore Alliance Group, Inc.'s own products and services, i.e. not to products and services of relevant third parties.

## 10 Who is receiving your Personal Data?

### Our service providers (processors)

We may share your Personal Data with the following data processors (i.e. service providers):

- relevant companies of Shore Alliance Group, Inc. and trusted third parties which directly support our activities, Site administration and our Shore Alliance Group, Inc. account;
- trusted third parties to help us process and analyze your Personal Data, to give us insights about you that we can use to improve our products and services, and to track the effectiveness of a particular promotion or campaign;

Unless you provided consent, each trusted third party is not authorized by us to use your Personal Data in any other way. Each trusted third party will be required by us to implement adequate technical and organizational measures to protect your Personal Data.

### Other recipients (controllers)

We may share your Personal Data with the following controllers (i.e. third parties that process your Personal Data for their own purposes):

- law enforcement or other agencies if we are required to do so by law, or by a warrant, subpoena or court order to disclose your Personal Data.

## 11 What are your rights?

You have the right to request from us

- Confirmation as to whether or not we process Personal Data from you and, where that is the case, access to your Personal Data;
- Rectification of inaccurate Personal Data;
- Erasure of Personal Data;
- Restriction of processing of Personal Data; and
- To receive the Personal Data which you have provided to us and to have transmitted those Personal Data to another data controller without hindrance.

## 12 Can you withdraw your consent to the processing of Personal Data?

If your consent is the legal basis for the processing of your Personal Data, you can withdraw your consent at any time. This will not affect the lawfulness of the processing based on your consent before the withdrawal. You can withdraw your consent by sending us an email, or by calling us under the phone number listed in Section 2.1.

## 13 Can you complain with the data protection authorities?

If you think that the processing of Personal Data by us violates applicable data protection laws, you can lodge a complaint with the competent supervisory authority.

## 14 How do we protect your Personal Data?

We maintain appropriate technical and organizational measures to protect the Personal Data you provide to us against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your Personal Data. Our security measures are being improved continuously as new technology develops. Any processing and transmission of data to or through our Sites is encrypted by Secure Sockets Layer protocol (“SSL”), which is an encrypting technology to ensure the highest possible security for the transmission of your data, including Personal Data, between your web browser and our internet system.

## 15 Can we change our Privacy Policy?

We may change this Privacy Policy from time to time by posting the updated version of the privacy policy on our website [www.ShoreAG.com](http://www.ShoreAG.com). To the extent processing of your Personal Data is based on your consent, we will not change the scope of such processing,

unless you have given additional consent to the changed scope of such processing. We encourage you to visit this area frequently to stay informed.

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