



MUSCOGEE INTERNTIONAL, LLC

Customer, Client & Employee Data Privacy Policy

("Privacy Policy")

EFFECTIVE DATE: OCTOBER 25, 2018

I. Corporate Commitment to Privacy

Muscogee International LLC, MI, and any other entity that directly or indirectly controls, is controlled by, or is under common control with Muscogee International (MI) (collectively "MI" "our," "we" or "us") are committed to respecting your privacy. This Privacy Policy describes how we collect, use, disclose, store and otherwise process information through <http://www.muscogeeinternational.com> and through the services provided by or through MI. In addition, this policy states how you can control the collection, correction and/or deletion of information. We will not use or share your information with anyone except as described in this Privacy Policy.

We urge you to read this Privacy Statement so that you understand our commitment to you and your privacy, and how you can participate in that commitment.

II. Scope

This Privacy Policy applies to personal information and other information collected by MI or its service providers from or about:

- (i) visitors to, or users of, its websites;
- (ii) current customers using the Services pursuant to a written agreement with MI;
- (iii) service providers and business partners;
- (vi) other third-parties that use the Services, including without limitation including without limitation the end users of prospective and current customers.

As used in this Privacy Policy, "you" or "your" means, collectively, the entities or individuals set forth in (i) – (vi) of this Section II.

III. Compliance

MI protects the personal data and privacy of data subjects.



IV. Enforcement Power

MI is subject to the investigatory and enforcement powers of the Federal Government.

V. Personal Information

Definition of Personal Information

Personal information refers to any information relating to an identified or identifiable natural person, such as an identification number, physical, physiological, mental, economic, cultural, or social identifiers.

Definition of Personal Information (Special Categories of Information)

Special categories of personal data refer to genetic and biometric data which can identify a unique individual. These categories require additional privacy protections.

VI. Definition of Non-Personal Information

We may also collect information that is related to you but that does not personally identify you ("Non-personal Information"). Non-personal Information also includes information that could personally identify you in its original form, but that we have modified (for instance, by aggregating, anonymizing or de-identifying such information) in order to remove or hide any Personal Information.

VII. Consent

MI collects personal information about you in connection with many of our services. When working or using our company, you may be prompted to make an account which may hold personal information such as your name, mailing address, email address, or credit card information. Prior to collecting this information, MI will obtain your consent. At any point in time, you can revoke consent and we will cease using and processing your data immediately.

VIII. Information Collected Automatically

MI may also collect Technical Information about you when you visit our websites, which your web browser automatically sends whenever you visit a website on the Internet. "Technical Information" is information that does not, by itself, identify a specific individual but which could be used to indirectly identify you. Our servers automatically record this information, which may



include your Internet Protocol ("IP") address, browser type, browser language, and the date and time of your request. Gathering your information helps us ensure our websites and other services work correctly and support our customer analytic efforts.

IX. Information Collected Automatically (Examples)

Email communication

We may use pixel tags and cookies in our marketing emails so that we can track your interaction with those messages, such as when you open the email or click a URL link that's embedded within them. When recipients click on one of those URLs, they pass through a separate web server before arriving at the destination page on a company website. We use tools like pixel tags and cookies so that we can determine interest in particular topics and measure and improve the effectiveness of our communications.

Mobile communication

When you download or use our mobile-device applications, or access one of our mobile-optimized websites, we may receive information about your mobile device, including a unique identifier for your device.

Cookies and Similar Technologies

We may collect information about your use of the websites through cookies and similar technology. A "cookie" is a unique numeric code that we transfer to your computer so that we can keep track of your interests and/or preferences and recognize you as a return visitor to the websites. For example, we may use these technologies to collect information about the ways visitors use our websites, to support the features and functionality of our websites, and to personalize your experience when you use our websites.

X. Information Collected from Other Sources

MI may also collect information about you from other sources to help us correct or supplement our records, improve the quality or personalization of our service to you, and prevent or detect fraud. We work closely with third parties (for example, business partners, service providers, sub-contractors, advertising networks, analytics providers, search information providers, fraud protection services) and may receive information about you from them. The following are some examples:



Third-Party Vendors

In order to provide the services and improve MI's services, we may engage the services of third-party vendors. In the process of supplying services to MI, these third-party vendors may need to collect Personal Information about you.

Log Files

Log files record website activity on our services and enable us to gather statistics about our users' browsing habits. These entries help MI determine (among other things) how many and how often users have accessed or used our services, which pages they've visited, and other similar data.

Clear GIFs

Clear GIFs, sometimes called "web bugs" or "web beacons," are small electronic images that are placed on a web page or in an email message. We use clear GIFs to monitor user behavior, deliver cookies, collect information, count visits, understand usage and campaign effectiveness, and to tell if a recipient has opened and acted upon an email.

XI. Permitted Use of Personal Information

MI only uses your personal information to support our business functions, such as fraud prevention, marketing, and legal functions. To do this, we combine personal and non-personal information, collected online and offline, including information from third party sources. The following are some examples:

Fulfill Requests

To fulfill your requests for services and communicate with you about those requests;

Legal

To comply with legal and/or regulatory requirements;



Responding to Customer

To respond to reviews, comments, or other feedback you provide us;

Industry Benchmarking

For industry benchmarking and analysis consistent with our legitimate business purpose;

XII. Messaging

MI uses your contact information for services that might be of interest to you, to send you messages such as newsletters, announcements, or to notify you about our upcoming events.

XIII. Disclosure of Personal Information to Third Parties

MI will not rent or sell your Personal Information to others but may disclose personal information with third-party service providers that work with MI. We will only share personal information to these service providers to help us provide a service to you.

XV. Disclosure of Personal Information for Business Purposes

If MI transfers any part of its operations to another company, MI may transfer personal information in connection with that transfer. .

XVI. Disclosure of Personal Information

Reasons

MI may be required to disclose personal information to the authorities, law enforcement agencies, government agencies, or legal entities. We may disclose information by law, litigation, or as a matter of national security to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law. We may also need to disclose personal information in the event of an emergency that threatens an individual's life, health, or security.



XVII. Disclosure of Personal Information Via Links to Third-Party

Services, and Applications

Using our website may link to third party web websites, services, and applications. MI is not responsible for any personal information collected through these means. Information collected is governed through the third party's website's Privacy Policy. Any interactions you have with these web websites, or applications are beyond the control of MI. When you post information to or through such services, those websites' privacy policies and cookie usage policies apply directly. We urge you to read the privacy and security policies of any external websites before providing any personal information while accessing those websites.

XVIII. Use of Cookies and Other Technologies (e.g. Web Beacons)

MI uses cookies to operate and improve our website as well as to simplify the interaction with you. When you visit our websites, our servers send a cookie to your computer or mobile device to help personalize your experience and advertisements. Cookies help us better understand user behavior and facilitate effectiveness of advertisements. Cookies only stand to recognize your web browser, but information collected from cookies is not personally identifiable. MI may also use web beacons or other technologies in conjunction with cookies to gather information about your visit to our websites. Web beacons may be embedded through our website or electronic communications and can allow servers to collect information related to your visit. Web beacons are primarily used to provide content and advertisements that are more relevant to you.

XIX. Ability to Disable Technologies

Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer, tablet or mobile device. Although you are not required to accept cookies, if you block or reject them, you may not have access to our services.



XX. Consequences of Disabling Technologies

Please note that if you disable your web browser's cookies and other technologies, certain features of our website and services will be disabled and you will limit the functionality we can provide when you visit our site.

XXI. Security Measures Taken to Protect Personal Information

Company

Security of all information is of the utmost importance for MI. MI uses technical and physical safeguards to protect the security of your personal information from unauthorized disclosure. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. In the case of a data breach, we will notify you without delay of any loss, misuse or alteration of personal information that may affect you.

XXII. Security Measures to Protect Personal Information

Parties

We require that our third-party service providers agree to keep all confidential information we share with them and to use the information only to perform their obligations in the agreements we have in place with them. These third-party service providers are expected to maintain privacy and security protections that are consistent with MI's privacy and information security policies.

XXIII. Data Retention and Storage

MI retains your information for business purposes as long as is reasonably necessary to provide you with our services, but in no event for longer than twenty-seven (27) months. MI will also retain your information as reasonably necessary to comply with our legal obligations, resolve disputes and enforce our agreements. We may also retain cached or archived copies of your information for a reasonable period of time, but in no event for longer than twenty-seven (27) months. At any point in time, you can withdraw consent and we will immediately stop processing your data.



XXV. Choice: Your Privacy Rights

MI gives you choices about the ways we collect, use, and share your personal information. If at any point in time you wish know what data we process about you, you can request to access the information by contacting our IT Web Administrator at administrator@muscogeeinternational.com.

XXVI. International Transfer of Personal Information

MI may share customer information within our family of companies for a variety of purposes, for example to provide you with the latest information about our services.

XXVII. Questions/Updates to Policy

Inquiry, Compliant, and Dispute Process

MI commits to resolve complaints about your privacy and our collection/use of your personal information. If you have an inquiry or complaint regarding this privacy policy, please contact our IT Web Administrator at administrator@muscogeeinternational.com

XXIX. Contact Point to Update/Delete Personal Information

You have the right to access and limit the use and disclosure of your personal data. If you would like to express your point of view, challenge an explanation of data use, or otherwise obtain further information, contact our IT Web Administrator, administrator@muscogeeinternational.com . If at any time your personal information changes, notify us and we will update your contact information. Please note, at any time, if you desire to obtain or transfer your information, we will provide you with your personal data in a structured and commonly used electronic format.

XXX. Location of Data Processing/Storage

Personal information collected via our website or our Services is processed in the United States by MI or by a third party acting on our behalf. When you provide personal information to MI, you consent to the processing of your information in the United States. Our websites are hosted in the United States.



XXXI. Rights

Right of Access

At any point in time, you can confirm your data is being processed and request to access your data.

Right to Consent

Before collecting and using your personal data, MI will obtain consent.

Data Breach Response

Security of all information is of the utmost importance for MI. MI uses technical and physical safeguards to protect the security of your personal information from unauthorized disclosure. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. In the case of a data breach, we will notify you of any loss, misuse or alteration of personal information that may affect you.