

Affiliated Monitors, Inc. Privacy Policy

Effective Date 4/18/22

Affiliated Monitors, Inc. (“AMI”) is committed to protecting your privacy and preventing the misuse or unauthorized disclosure of any personal information it collects and maintains in connection with the provision of its services. This Privacy Notice sets forth the types of personal information AMI may gather, how it may collect and use that information, with whom it is shared, and what rights you have regarding such information. For more information about the Terms of Use of this site, please see our Terms of Use Policy [here](#).

Privacy

Applicability of This Policy

This policy applies to visitors to the www.AffiliatedMonitors.com website (the “Site”). If you are present in the European Union, Switzerland or Canada when you access the Site, please refer to the [European Union, Switzerland & Canada Privacy Addendum](#).

AMI is committed to maintaining the privacy and security of your personally identifiable information. As part of our commitment to information privacy, we have adopted this Privacy Policy to inform you of our information gathering practices and the ways in which we may use the information we receive. This Privacy Policy applies to all personal information submitted to AMI for use with or in connection with the Site. By providing your personal information to us on our Site, you consent to the collection and use of that information in accordance with this Policy.

Information AMI Collects and How We Use It

“**Personal Information**” means any information by which you can be identified, including name, postal address, e-mail address, location IP address and telephone number.

AMI gathers Personal Information about you in order to respond to your requests and provide you with appropriate information about AMI services. The information is collected and used in the following ways:

Contacting AMI By E-mail: When you send AMI an e-mail, you may be required to provide some or all of the following Personal Information: name, email address, company name and address, title, telephone contact information. AMI may use this information to respond to your requests, including retaining the information you provide, the content of your e-mail, our response, and any follow-up questions and further requests and inquiries you may have. Please be advised that e-mail and other communications to or from AMI are collected via technology that automatically captures certain personal contact information contained in the signature blocks of the e-mail received by AMI professionals and stores that information in AMI systems.

Contacting AMI by Telephone: AMI utilizes “Voice over Internet Protocol” (VOIP) for its corporate telephones. With VOIP you transmit your voice over the internet (broadcast transmission) and through our servers. You should be aware that VOIP can be recorded and re-transmitted by AMI’s third-party VOIP service, Spade Technologies, Inc. (“the receiver”). AMI cannot control this use of your data by the receiver and does not assume any responsibility of such use. You should be aware of this possible further use of your data and act accordingly, e.g. do not disclose confidential or sensitive information via VOIP as it might be spread to an undefined audience. You may view the receiver’s privacy policy here: <https://www.spadetechnology.com/privacy-policy/>. The types of personal data we or the receiver may collect when you contact AMI’s corporate telephones may include:

- Your IP address
- Hardware type
- Browser
- Operating system type and version
- MAC address
- Geographic region
- Name
- Mobile or Telephone number source number
- Time of call
- Date of call
- Duration of call
- Completion status
- Voice messaging, which may be converted to text

If you participate in any cloud-based web and video conferencing meetings or calls (“teleconference” or “teleconferencing”) organized and hosted by AMI, AMI or its third party providers (“providers”) may collect personal data. Examples of providers of teleconferencing applications include, but are not limited to “Zoom,” “Cisco Webex,” “Microsoft Teams,” “Skype,” and “GoToMeeting.” You should be aware that teleconferencing meetings or calls can be recorded and re-transmitted by AMI’s providers. AMI cannot control this use of your data by the provider and does not assume any responsibility of such use. Because teleconferencing enables collaboration among its users, as described below, your personal data is required in order to participate in the teleconferences AMI hosts. When AMI hosts a teleconference, we may collect personal information from or about you. If you participate in teleconferences hosted by AMI, AMI will control any meeting recordings or files shared during the meeting, which will be subject to AMI’s corporate policies regarding access, use, monitoring, deletion, preservation, and export of information. AMI retains the option to record meetings, which may be shared with others or discoverable in a legal matter. AMI endeavors to inform all meeting attendees prior to recording and most providers’ applications provide visual and/or audio prompts (“notifications”) to all participants indicating that the meeting is being recorded. AMI assumes no responsibility for the providers’ notifications, or the providers’ security. Note, AMI has no control over, and is not responsible or liable for the privacy of any information that you share with others. The types of personal data that may be collected by AMI during AMI-hosted teleconferences may include:

- Your Name
- Email Address
- Browser
- Phone Number
- IP Address
- User Agent Identifier
- Hardware Type
- Operating System Type and Version
- IP Addresses Along the Network Path
- Actions Taken
- Geographic Region (i.e., Country Code)
- Meeting Session Information (e.g., date and time, frequency, average and actual duration, quantity, quality, network activity, and network connectivity)
- Number of Meetings
- Number of Screen-Sharing and Non-Screen-Sharing Sessions
- Number of Participants
- Names of Participants
- Screen Resolution
- Join Method
- Performance, Troubleshooting, and Diagnostics Information
- Meeting Title
- Meeting start and end time
- Texts of chats held during the teleconferencing session
- Any photos or avatars used by you during the teleconferencing session

Contacting AMI in Our Capacity as a Monitor to Another Entity: When you submit information to AMI in an e-mail specific to AMI's role as a Monitor to a third party, you may be required to provide some or all of the following Personal Information: name, email address, company name and address, title, telephone contact information, nature of complaint, details of your allegation against the third party to whom AMI is the appointed Monitor, and in some instances, financial data related to claims against the third party. AMI may use this information to respond to your requests, including retaining the information you provide, the content of your e-mail, any supporting documentation, our response, and any follow-up questions and further requests and inquiries you may have. Please be advised that e-mail and other communications to or from AMI are collected via technology that automatically captures certain personal contact information contained in the signature blocks of the e-mail received by AMI professionals and stores that information in AMI systems.

In the course of Monitoring third parties at the direction of the courts and regulatory agencies, AMI may collect personal information that either identifies an individual or may be used together with other information to identify an individual.

AMI may collect personal information directly from claimants through complaint forms submitted to AMI via a postal service or via websites developed and maintained for clients in connection with its duties as a Monitor (the “Websites”). AMI may also collect personal information when it communicates with claimants by telephone or email. Such personal information may include names, email addresses, postal addresses, telephone numbers, social security numbers, health related information, legal representation information, and/or financial account information. AMI may also collect personal information necessary to verify an individual’s standing to bring a complaint against a Monitored client, such as transactional account data, documentation substantiating the purchase of an item or service, or verification of past or present contractual agreement. Additionally, as discussed below, AMI may collect internet or other electronic network activity information associated with the use of the Websites.

AMI may also collect personal information from its clients, as well as authorized third parties or publicly available sources. For example, AMI may collect personal information from third parties engaged to assist AMI in effectuating a Monitorship, to comply with applicable reporting requirements, or to otherwise fulfill AMI’s monitoring responsibilities for a particular matter as directed by a client, or ordered by a court or regulator. With respect to the Websites, AMI’s clients and/or any courts that may be supervising a matter are ultimately responsible for determining whether it is reasonably necessary for AMI to collect certain types of personal information in connection with the administration of a matter.

AMI retains personal information only so long as is necessary to accomplish the purposes for which it was provided subject to, as applicable, orders of the court, AMI’s document retention policies, contractual provisions, and the direction of AMI’s clients. All personal information provided to AMI relating to AMI’s role as a Monitor to a client is disposed of or destroyed in a manner that prevents loss, theft, misuse, reconstitution, or unauthorized access to the information.

Cookies and Tracking Technologies Policy

Cookies: AMI uses technology such as “cookies” and other tracking technologies on our Site (referred to together from this point forward as “cookies,” unless otherwise stated) including HTTP cookies, HTML5 and Flash local storage, web beacons/GIFs, embedded scripts and e-tags/cache browsers as defined below. “Cookies” are small files placed on your hard drive that assist us in providing our services and help us analyze the use of our website. We use cookies for different reasons, such as letting you navigate between pages efficiently, remembering your preferences and generally improving the user experience.

“Cookies” are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a site. The files allow a site to recognize your device and include cookies, web beacons, embedded script and ETag or entity tag. Cookies can be created through a variety of web-related protocols and technologies, such as HTTP (sometimes referred to as “browser cookies”), and HTML. Certain features on our Site may only be available through the use of “cookies.” In this policy, you will find information on cookies, why we use cookies, what we do with cookies, what cookies may be set when you visit our website and how to reject or delete those cookies.

The controller is Affiliated Monitors, Inc. ("AMI"). We maintain our websites www.AffiliatedMonitors.com and www.SutterAntitrustMonitor.com and our other related mobile websites, services, tools and other applications (collectively, the "Site"). We, along with our vendors, use a variety of technologies to learn more about how users use the Site. You can find out more about these technologies and how to control them in the information set out below. This policy forms part of the AMI Privacy Policy.

- **Web Beacons:** Small graphic images or other web programming code called web beacons (also known as "1×1 GIFs" or "clear GIFs") may be included in our Site's pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or email can act as a web beacon. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to HTTP cookies, which are stored on a user's computer hard drive, clear GIFs are embedded invisibly on web pages and are about the size of the period at the end of this sentence.
- **Embedded Script:** An embedded script is programming code that is designed to collect information about your interactions with the Site, such as the links you click on. The code is temporarily downloaded onto your device from our web server or a third-party service provider, is active only while you are connected to the Site, and is deactivated or deleted thereafter.
- **ETag, or Entity Tag:** A feature of the cache in browsers, an ETag is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of device identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.

We also use other tracking technologies on our sites such as social plugins. The social plugins used on the Site are hosted by social media networks such as Facebook, Twitter, LinkedIn, and Pinterest. Your browser sends this cookie data to that social media network when loading the social plugin inside your browser. These data contain information on your use of the Site. If you are registered with the social media network, the data will be associated with your data already stored in the social media network.

WHY AND HOW WE USE COOKIES

We use cookies for different reasons, such as letting you navigate between pages efficiently, remembering your preferences and generally improving the user experience.

We use both session and persistent tracking technologies. Tracking technologies (e.g., cookies) can either be persistent (i.e., they remain on your computer until you delete them) or temporary (i.e., they last only until you close your browser). We also use first- and third-party cookies. First-party cookies are used and controlled by us to provide services on the Site.

In particular, our Site uses the following categories of cookies:

(a) Strictly Necessary Cookies: These are cookies which are needed to provide the Site and the services and features you have specifically requested. We use cookies and tracking technologies required to prevent fraudulent activity, improve security, for system administration and/or allow you to use Site functionality. We use these cookies to provide you with basic use on our Site and based upon our legitimate interest. Your consent is not required for our use of these cookies.

(b) Performance and Functionality Related Cookies: We use performance cookies to assess the performance of our Site, for example which pages you go to most often, how long it takes for certain pages to load and similar information in order to improve how the Site works. These cookies may also be used to prevent fraudulent activity and improve security. We use functional cookies to tell us, for example, whether you have visited the Site before or if you are a new visitor and to help us identify the features in which you may have the greatest interest. We use these performance and functionality related cookies only if you have consented.

We are not responsible for third-party sites and their privacy practices as it relates to opt-outs from tracking activities.

Other Web Technologies

AMI uses additional technologies, including through the use of third-party analytics providers, that let us know what type of browser you are using, the website from which you enter our Site, the type of device you are using, the pages you view as you visit the Site, and other information related to your technology or use of the Site. This technology does not identify you personally – it simply helps us compile aggregate statistics about our guests and their use of our Site. We use these statistics and analytics services to improve our Site design and content, to evaluate how the Site is used, analyze traffic patterns, and to prepare and deliver our marketing programs and materials.

To Whom AMI Discloses Information

AMI will not share your Personal Information with third parties, except as follows:

- AMI will share your Personal Information with some of its affiliates, business partners, and service providers who perform services for us.
- AMI will disclose Personal Information without your permission when we believe in good faith that such disclosure is required by law or is necessary to investigate and protect against harmful activity to AMI, its clients, its employees and others, or its property, including this Site.
- If AMI or a substantial part of its assets are transferred to another entity (by merger, consolidation, sale, or bankruptcy process), Personal Information may be one of the assets transferred.

- AMI may share aggregate data developed from Personal Information with third parties for research, education or marketing purposes. Such aggregate data will not include any information that can be used to identify any particular individual.

The extent and type of Personal Information AMI collects depends on the information you provide to us through our e-mail and/or through other online communication channels via the Site. You may choose not to provide us with any Personal Information.

YOUR COOKIE CHOICES AND HOW TO OPT-OUT

By clicking “I accept” in the cookie bar on our Site, you consent to the use of cookies and tracking technologies and the corresponding processing of information. You may withdraw your consent at any time either using the toggle buttons provided that say “Opt-In/Opt-Out” or by deleting placed cookies and disabling cookies in your browser. If you withdraw your consent, you may still browse the website; however, you may not be able to use the full functionalities of the Site. Please note that deleting or blocking may not be effective for all types of tracking technologies, such as Local Storage Objects (LSOs) like Flash Objects or HTML5.

Controlling the HTML5 local storage on your browser depends on which browser you use. For more information regarding your specific browser please consult the browser’s website (often in the Help section).

Most browsers are initially set up to accept HTTP Cookies. The “help” feature of the menu bar on most browsers will tell you how to stop accepting new cookies, how to receive notification of new cookies, and how to disable existing cookies. For more information about HTTP cookies and how to disable them, you can consult the information at <http://www.networkadvertising.org/choices/> and <http://www.allaboutcookies.org/manage-cookies/>.

Some web browsers have a “Do Not Track” preference that transmits a “Do Not Track” message to the websites you visit with information indicating that you do not want your online activity to be tracked. At this time, AMI does not respond to browser “Do Not Track” signals.

We are not responsible for the effectiveness of any opt-out options referenced in the links provided above.

The effect of an opt-out, if successful, will be to stop tracking for certain purposes (e.g., marketing), but it will still allow the collection of usage data for certain purposes (e.g., research, analytics, and internal Site operation purposes).

If you wish to view more details on (the type of) cookies used on AMI’s Site, see [below](#).

California Residents

California residents are entitled to specify they do not wish to be tracked, under the “California Online Privacy Protection Act,” California Business & Professions Code Section 22575(b)(7).

AMI does not track your activities online over time and across third-party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

Individuals who reside in California and have provided their Personal Information to AMI may request information about our disclosures of certain categories of Personal Information to third parties. Such request must be submitted to us at the following address: **P.O. Box 961791, Boston, Massachusetts 02196, Attn: Chief Privacy Officer or Privacy@AffiliatedMonitors.com**. Within 30 days of receiving such a request, we will provide a list of the categories of Personal Information disclosed to third parties during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

Just-in-Time Notice for Mobile Users

AMI and/or third parties collect the following types of information about you when you use our Site from a mobile device. You either enter this information into the Application or agree to its collection automatically by the Application. We may share the information collected with third parties. If you do not consent to our collection and sharing of the data as indicated below, please do not use this Application.

- **Location (GPS, WiFi, or User-entered)** – Your precise past or current location and the history of where you have gone. We need and use this information to respond to your requests to locate AMI office locations.
- **Dialer** – functionality on this device used to make phone calls.
- **Calendar Information** – any information in this device’s calendar that is shared with us when scheduling a meeting with AMI.
- **Unique Device ID (UDID)** – The unique series of numbers and letters assigned to your device.
- **Social Network Credentials** – The username, password and any other log in information required to log into Facebook and LinkedIn when you visit AMI pages there.

Further information about the third parties we share your information with:

- **“Data Analytics Providers”** are companies that collect and analyze the information we collect about you.
- **“Social Networks”** are companies that connect individuals around common interests and facilitate sharing (e.g., Facebook, LinkedIn, etc.).

To learn more about LinkedIn’s Widgets, Performance/Functional and Advertising/Target Social Networking Analytics and Advertising tools see:

<https://developer.linkedin.com/plugins#>

<https://www.linkedin.com/legal/privacy-policy>

To learn more about Meta Company's Facebook's Performance/Functional and Advertising/Target Social Networking Analytics and Advertising tools see: <https://www.facebook.com/help/111814505650678>.

To learn more about Twitter's Performance/Functional and Advertising/Target Social Networking Analytics and Advertising tools see: <https://twitter.com/en/privacy>

By using this Site, you are agreeing to AMI collecting the information above and sharing with third parties pursuant to AMI's Privacy Policy and Terms of Use.

Our Commitment to Children's Privacy

AMI understands the importance of protecting children's privacy. For that reason, we do not collect and maintain information from those we actually know are under 13 years of age, and no part of the Site is structured to attract anyone under 13 years of age.

Data Security

AMI will take reasonable precautions to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration, and destruction. However, these measures, standing alone, are not sufficient to ensure the security of your Personal Information. It is also important for you to guard against unauthorized access to your passwords and the unauthorized use of your computer.

Updates to This Policy

AMI may periodically update our Privacy Policy. Changes to this Policy will be noted by the effective date.

CONTACT US

For any queries in relation to this Cookies and Tracking Technologies Policy please contact us at Privacy@AffiliatedMonitors.com or Chief Privacy Officer, AMI, P.O. Box 961791, Boston, Massachusetts 02196, United States.

Compliance with the European Union General Data Protection Regulation and Canada's Personal Information Protection and Electronic Documents Act (PIPEDA)

Addendum to Privacy Policy

This Addendum to our Privacy Policy applies to you only if accessing the Site from within the confines of the European Union or Canada. **THIS ADDENDUM TO THE PRIVACY POLICY DOES NOT APPLY TO THE UNITED STATES OF AMERICA OR ANY OF ITS TERRITORIES.**

Additional Information requirements pursuant to Art. 13 GDPR (General Data Protection Regulation)

This privacy policy addendum applies solely to our processing of the personal data of data subjects who are in the European Union, where they use, browse or interact with our Site.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

This privacy policy addendum is issued on behalf of Affiliated Monitors, Inc. (“AMI”) and our related site, SutterAntitrustMonitor.com (collectively, the “AMI Sites”), so when we mention "AMI," "we," "us" or "our" in this privacy policy, we are referring to websites controlled by AMI responsible for processing your data. AMI is the controller and responsible for these Sites.

We have appointed a Chief Data Privacy Officer (“CDPO”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the CDPO using the details set forth below.

Contact Details:

Full Name of Legal Entity: Affiliated Monitors, Inc.

Name of Chief Privacy Officer: Mikhail Reider-Gordon

Email Address: Privacy@Affiliatedmonitors.com

Postal Address: P.O. Box 961791, Boston, Massachusetts, 02196, United States

Telephone: (617) 275-0620

Fax: (617) 345-0102

Changes to the Privacy Policy and Your Duty to Inform AMI of Changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The Data AMI Collects About You On or Through the Site

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first and last name and company name.
- **Contact Data** includes email address.
- **Technical Data** may include internet protocol (IP) address, geolocation data, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Site.
- **Usage Data** may include information about how you use our website and services.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is **not** considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How Is Your Personal Data Collected?

As noted above, we use different methods to collect data from and about you including through:

Direct Interactions. You may give us your Identity and Contact Data by corresponding with us by email using one of the email addresses posted to our Site, or contact us via VOIP (by calling our Corporate headquarters or using a VOIP service such as Skype). This includes personal data you provide when you:

- Submit a question or comment through the “contact us” feature on our Site; or
- When you send an email to any email address posted to our Site;

- Call AMI’s corporate offices;
- Call us via VOIP using your computer or mobile device.

Automated technologies or interactions. As you interact with our Site, we will automatically collect Technical Data about you, your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies, if any. A list of cookies we use on our Site is available upon request.

We use the following analytics providers to help us understand traffic and manage our Site. Depending on the Site or Service you are using, the answers vary. While we do our best to keep this table updated, please note that the number and names of cookies, pixels and other technologies may change from time to time:

Cookie Table

Analytics Product	Provider Name (company name)	Duration	Type of Data Collected
Google Analytics _ga _gid _gat _gac _utma _utmb _utmc _utmz _utmv AMP_Token	Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States	_ga – 2 years _gid – 24 hours _gat – 1 minute _gac – 90 days _utma – Persistent _utmb – Session only _utmc – Session only _utmz – 6 months _utmv – Persistent AMP_Token	Technical Data Match user visits, origin, geolocation, and targeting
Google API	Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043 United States	20 minutes	Technical Data Geolocation
Google Tag Manager	Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043 United States	14 days	Technical Data
Castos	Castos, Inc. 1209 North Orange Street Wilmington, DE 19801 United States	30 days	Technical Data; Tracking; Analytics
Facebook “Like” button	Meta Platforms, Inc. Privacy Operations 1601 Willow Road Menlo Park, CA 94025	3 months	Persistent 3 rd “Targeting” cookie

Analytics Product	Provider Name (company name)	Duration	Type of Data Collected
	United States		
Twitter “Share” button _twitter_sess _ct0 external_referer guest_id	Twitter, Inc. Attn: Privacy Policy Inquiry 1355 Market Street, Ste 900 San Francisco, CA 94103	Session 4 hours 1 week 2 years	Session 3 rd Persistent 3 rd Persistent 3 rd Persistent 3 rd “Targeting” Cookies
LinkedIn “Share” button JSESSIONID UID bcookie bscookie lang leo_auth_token lidc visit	LinkedIn Corporation Attn: Legal (Privacy) 1000 W. Maude Avenue Sunnyvale, CA 94085	Session 1 year 2 years 2 years Session Instant 1 day 2 Years	Session 3 rd Persistent 3 rd Persistent 3 rd Persistent 3 rd Session 3 rd Persistent 3 rd Persistent 3 rd Persistent 3 rd “Targeting” Cookie
Pinterest “Pin It” button _pin_unauth _pinterest_referrer _pinterest_sess	Pinterest, Inc. 651 Brannan Street San Francisco, CA 94107	1 year 1 day 1 year	Persistent 3 rd Persistent 3 rd Persistent 3 rd “Targeting” cookies
Cloudflare Cdnjs	Cloudflare, Inc., 101 Townsend St., San Francisco, CA 94107, Attn: Data Protection Officer	12 months	Technical Data
New Relic	New Relice, Inc. 188 Spear Street, Suite 1200, San Francisco, CA 94105	8 – 90 days	Technical Data
Better Business Bureau Boston Site Seal	Better Business Bureau 290 Donald Lynch Blvd, Ste 102 Marlborough, MA 01752-4705	Session	User tracking link to the vendor.
GoDaddy Site Seal	United States: Attn: Office of the Data Protection Officer, 2155 E. GoDaddy Way, Tempe, AZ 85284 United States	Session	User tracking link to the vendor.

By using our Site, you consent to our use of such service providers and services, and the collection of your personal data.

How AMI Uses Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- When you contact us or submit a request for information via email on our Site, so that we can respond to your request;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. We do not share your personal data with third-party direct marketers. You have the right to withdraw consent to marketing at any time by contacting us or using the ‘unsubscribe’ link in our e-mails to you.

Purposes for Which AMI Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register your interest in our services	(a) Identity (b) Contact (c) Technical	Performance of a contract with you
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business re-organization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you	(a) Identity (b) Contact (c) Usage (d) Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
customer relationships and experiences		services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Opting Out

Cookies

Please see the [section above](#) in our general [Privacy Policy](#) regarding our use of cookies on our Site.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the rules set forth in this Privacy Policy, where this is required or permitted by law.

Disclosures of Your Personal Data

We may share your personal data with certain third parties, as required for the operation of our business, which includes processors and sub-processors.

- Internal Third Parties as set out in the Glossary below.
- External Third-Parties as set out in the Glossary below.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We contract with our third-party service providers to require that they do not use your personal data for their own purposes and to authorize them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We may occasionally share your personal data within AMI and firms with whom we partner with on a matter-by-matter basis in Europe, which may involve transferring your data outside the European Economic Area.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data Security

Please see the section above in our general Privacy Policy regarding data security measures used in an attempt to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, or disclosed to unauthorized third parties.

Data Retention

We are developing a data retention policy which will dictate how long we retain your personal data collected through or on our Site, with the intent that we will retain your personal data only for so long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data to:

- *Request access to your personal data*
- *Request correction of your personal data*
- *Request erasure of your personal data*
- *Object to processing of your personal data*
- *Request restriction of processing your personal data*
- *Request transfer of your personal data*
- *Right to withdraw consent*

If you wish to exercise any of the rights set out above, please [contact us](#).

Affiliated Monitors, Inc.

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No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What AMI May Need From You

We may need to request specific information from you to help us confirm your identity and support your right to access your personal data (or to exercise any of your other rights). This is a security measure to protect personal data from being disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a Legal Obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors or sub-processors, who provide information technology services, software/web development services, website management services,

hosting services to make our Site available to you or to store the data collected through or on the Site, and search engine marketing and optimization services. We will provide a list of such parties upon reasonable request.

- We may share your personal data with our legal and insurance advisers, such as our attorneys and insurance brokers. Such parties are not listed herein for security reasons.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used,

machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.