

# Privacy Policy

This privacy policy (“Policy”) describes how the personally identifiable information (“Personal Information”) you may provide on the consumerrating.org website (“Website” or “Service”) and any of its related products and services (collectively, “Services”) is collected, protected and used. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information. This Policy is a legally binding agreement between you (“User”, “you” or “your”) and Consumer Rating LLC (“Consumer Rating LLC”, “we”, “us” or “our”). By accessing and using the Website and Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

## Collection of information

Our top priority is customer data security and, as such, we exercise the no logs policy. We may process only minimal user data, only as much as it is absolutely necessary to maintain the Website and Services. Information collected automatically is used only to identify potential cases of abuse and establish statistical information regarding the usage and traffic of the Website and Services. This statistical information is not otherwise aggregated in such a way that would identify any particular user of the system.

## Use and processing of collected information

In order to make the Website and Services available to you, or to meet a legal obligation, we may need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services. Any of the information we collect from you may be used for the following purposes:

- Improve products and services
- Send marketing and promotional communications
- Request user feedback
- Improve user experience
- Deliver targeted advertising
- Run and operate the Website and Services

Processing your Personal Information depends on how you interact with the Website and Services, where you are located in the world and if one of the following applies: (i) you have given your consent for one or more specific purposes; this, however, does not apply, whenever the processing of Personal Information is subject to California Consumer Privacy Act or European data protection law; (ii) provision of information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof; (iii) processing is necessary for compliance with a legal obligation to which you are subject; (iv) processing is related to a task that is carried out in the public

interest or in the exercise of official authority vested in us; (v) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

Note that under some legislations we may be allowed to process information until you object to such processing (by opting out), without having to rely on consent or any other of the following legal bases below. In any case, we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **Feedback and testimonials**

We may ask you to provide feedback or testimonials related to your experience using our website. Your response is optional, and if you do respond we reserve the right to display your response on our website, or in any advertising material presented in any medium. In using your feedback and testimonials, we will not reveal any of your personal identification information, other than your first name.

### **Disclosure of information**

Depending on the requested Services or as necessary to complete any transaction or provide any service you have requested, we may share your information with your consent with our trusted third parties that work with us, any other affiliates and subsidiaries we rely upon to assist in the operation of the Website and Services available to you. We do not share Personal Information with unaffiliated third parties. These service providers are not authorized to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. We may share your Personal Information for these purposes only with third parties whose privacy policies are consistent with ours or who agree to abide by our policies with respect to Personal Information. These third parties are given Personal Information they need only in order to perform their designated functions, and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes.

We will disclose any Personal Information we collect, use or receive if required or permitted by law, such as to comply with a subpoena, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

In the event we go through a business transition, such as a merger or acquisition by another company, or sale of all or a portion of its assets, your user account, and Personal Information will likely be among the assets transferred.

### **Retention of information**

We will retain and use your Personal Information for the period necessary to comply with our legal obligations, resolve disputes, and enforce our agreements unless a longer retention period is required or permitted by law. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but

not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of the retention period.

### **Transfer of information**

Depending on your location, data transfers may involve transferring and storing your information in a country other than your own. You are entitled to learn about the legal basis of information transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by us to safeguard your information. If any such transfer takes place, you can find out more by checking the relevant sections of this Policy or inquire with us using the information provided in the contact section.

### **The rights of users**

You may exercise certain rights regarding your information processed by us. In particular, you have the right to do the following: (i) you have the right to withdraw consent where you have previously given your consent to the processing of your information; (ii) you have the right to object to the processing of your information if the processing is carried out on a legal basis other than consent; (iii) you have the right to learn if information is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the information undergoing processing; (iv) you have the right to verify the accuracy of your information and ask for it to be updated or corrected; (v) you have the right, under certain circumstances, to restrict the processing of your information, in which case, we will not process your information for any purpose other than storing it; (vi) you have the right, under certain circumstances, to obtain the erasure of your Personal Information from us; (vii) you have the right to receive your information in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that your information is processed by automated means and that the processing is based on your consent, on a contract which you are part of or on pre-contractual obligations thereof.

### **The right to object to processing**

Where Personal Information is processed for the public interest, in the exercise of an official authority vested in us or for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the objection. You must know that, however, should your Personal Information be processed for direct marketing purposes, you can object to that processing at any time without providing any justification. To learn whether we are processing Personal Information for direct marketing purposes, you may refer to the relevant sections of this document.

### **Data protection rights under GDPR**

If you are a resident of the European Economic Area (EEA), you have certain data

protection rights and Consumer Rating LLC aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information. If you wish to be informed what Personal Information we hold about you and if you want it to be removed from our systems, please contact us. In certain circumstances, you have the following data protection rights:

You have the right to request access to your Personal Information that we store and have the ability to access your Personal Information.

You have the right to request that we correct any Personal Information you believe is inaccurate. You also have the right to request us to complete the Personal Information you believe is incomplete.

You have the right to request the erase your Personal Information under certain conditions of this Policy.

You have the right to object to our processing of your Personal Information.

You have the right to seek restrictions on the processing of your Personal Information. When you restrict the processing of your Personal Information, we may store it but will not process it further.

You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

You also have the right to withdraw your consent at any time where Consumer Rating LLC relied on your consent to process your Personal Information.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### **California privacy rights**

In addition to the rights as explained in this Policy, California residents who provide Personal Information (as defined in the statute) to obtain products or services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the Personal Information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of Personal Information and the names and addresses of those businesses with which we shared such personal information for the immediately prior calendar year (e.g., requests made in the current year will receive information about the prior year). To obtain this information please contact us.

### **How to exercise these rights**

Any requests to exercise your rights can be directed to Consumer Rating LLC through the contact details provided in this document. Please note that we may ask you to verify your identity before responding to such requests. Your request must provide sufficient information that allows us to verify that you are the person you are claiming to be or that you are the authorized representative of such person. You must include sufficient details to allow us to properly understand the request and respond to it. We cannot respond to your request or provide you with Personal Information unless we first verify your identity or authority to make such a request and confirm that the Personal Information relates to you.

## **Privacy of children**

We do not knowingly collect any Personal Information from children under the age of 18. If you are under the age of 18, please do not submit any Personal Information through the Website and Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the Website and Services without their permission. If you have reason to believe that a child under the age of 18 has provided Personal Information to us through the Website and Services, please contact us. You must also be at least 16 years of age to consent to the processing of your Personal Information in your country (in some countries we may allow your parent or guardian to do so on your behalf).

## **Do Not Track signals**

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. The Website and Services do not track its visitors over time and across third party websites. However, some third party sites may keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

## **Advertisements**

We may display online advertisements and we may share aggregated and non-identifying information about our customers that we or our advertisers collect through your use of the Website and Services. We do not share personally identifiable information about individual customers with advertisers. In some instances, we may use this aggregated and non-identifying information to deliver tailored advertisements to the intended audience.

We may also permit certain third party companies to help us tailor advertising that we think may be of interest to users and to collect and use other data about user activities on the Website. These companies may deliver ads that might place cookies and otherwise track user behavior.

## **Affiliates**

We may engage in affiliate marketing and have affiliate links present on the Website and Services. If you click on an affiliate link, a cookie will be placed on your browser to track any sales for purposes of commissions.

## **Links to other resources**

The Website and Services contain links to other resources that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other resources or third parties. We encourage you to be aware when you leave the Website and Services and to read the privacy statements of each and every resource that may collect Personal Information.

## **Information security**

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of Personal Information in its control and custody. However, no data transmission over the Internet or wireless network can be guaranteed. Therefore, while we strive to protect your Personal Information, you acknowledge that (i) there are security and privacy limitations of the Internet which are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between you and the Website and Services cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

## **Data breach**

In the event we become aware that the security of the Website and Services has been compromised or users Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law. When we do, we will post a notice on the Website.

## **Cookies**

The Website and Services use “cookies” to help personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

We may use cookies to collect, store, and track information for statistical purposes to operate the Website and Services. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the features of the Website and Services.

## **What are cookies?**

Cookies are small pieces of data stored in text files that are saved on your computer or other devices when websites are loaded in a browser. They are widely used to remember you and your preferences, either for a single visit (through a “session cookie”) or for multiple repeat visits (using a “persistent cookie”).

Session cookies are temporary cookies that are used during the course of your visit to the Website, and they expire when you close the web browser.

Persistent cookies are used to remember your preferences within our Website and remain on your desktop or mobile device even after you close your browser or restart your computer. They ensure a consistent and efficient experience for you while visiting the Website and Services.

Cookies may be set by the Website (“first-party cookies”), or by third parties, such as those who serve content or provide advertising or analytics services on the Website (“third party cookies”). These third parties can recognize you when you visit our website and also when you visit certain other websites.

## **What type of cookies do we use?**

### **Necessary cookies**

Necessary cookies allow us to offer you the best possible experience when accessing and navigating through our Website and using its features. For example, these cookies let us recognize that you have created an account and have logged into that account to access the content.

### **Functionality cookies**

Functionality cookies let us operate the Website and Services in accordance with the choices you make. For example, we will recognize your username and remember how you customized the Website and Services during future visits.

### **Analytical cookies**

These cookies enable us and third party services to collect aggregated data for statistical purposes on how our visitors use the Website. These cookies do not contain personal information such as names and email addresses and are used to help us improve your user experience of the Website.

Click [here](#) for further information about Google cookies. Click [here](#) to opt-out of Google Analytics.

### **Advertising cookies**

Advertising cookies allow us and third parties serve relevant ads to you more effectively and help us collect aggregated audit data, research, and performance reporting for advertisers. They also enable us to understand and improve the delivery of ads to you and know when certain ads have been shown to you.

Your web browser may request advertisements directly from ad network servers, these networks can view, edit, or set their own cookies, just as if you had requested a web page from their website.

Although we do not use cookies to create a profile of your browsing behavior on third party websites, we do use aggregate data from third parties to show you relevant, interest-based advertising. We do not provide any personal information that we collect to advertisers. However, if you do not want any information to be collected and used by

tracking technologies, you can visit the third-party vendor or the [Network Advertising Initiative Opt-Out Tool](#) or [Digital Advertising Alliance Opt-Out Tool](#).

### **Social media cookies**

Third party cookies from social media sites (such as Facebook, Twitter, etc) let us track social network users when they visit or use the Website and Services, or share content, by using a tagging mechanism provided by those social networks.

These cookies are also used for event tracking and remarketing purposes. Any data collected with these tags will be used in accordance with our and social networks' privacy policies. We will not collect or share any personally identifiable information from the user.

### **Do we use web beacons or tracking pixels?**

We may use web beacons, tracking pixels, and other tracking technologies on the Site to help customize the Site and improve your experience. When you access the Site, your personal information is not collected through the use of tracking technology. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

### **What are your cookie options?**

If you don't like the idea of cookies or certain types of cookies, you can change your browser's settings to delete cookies that have already been set and to not accept new cookies. Visit [internetcookies.com](http://internetcookies.com) to learn more about how to do this.

Please note, however, that if you delete cookies or do not accept them, you might not be able to use all of the features the Website and Services offer.

### **Changes and amendments**

We reserve the right to modify this Policy or its terms relating to the Website and Services from time to time in our discretion and will notify you of any material changes to the way in which we treat Personal Information. When we do, we will revise the updated date at the bottom of this page. We may also provide notice to you in other ways in our discretion, such as through contact information you have provided. Any updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Website and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different than what was stated at the time your Personal Information was collected.

### **Acceptance of this policy**

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Website and Services you agree to be bound by



this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Website and Services.

**Contacting us**

If you would like to contact us to understand more about this Policy or wish to contact us concerning any matter relating to our use of cookies, you may send an email to [info@totusdog.com](mailto:info@totusdog.com)

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