

# Privacy Policy

## 1. Introduction

1.1 We here at Financially Tuned Media Group are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.

## 2. Collecting personal information

2.1 We may collect, store and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation path);
- (b) information that you provide to us when registering with our website (including your email address);
- (c) information that you provide when completing your profile or other applicable registration forms on our website (including, but not limited to, your name, email address, phone number);
- (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
- (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services;
- (f) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts); and
- (g) information contained in or relating to any communications that you send to us or send through our website (including, but not limited to, the communication content and meta data associated with the communication).

2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

## 3. Using your personal information

3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

3.2 We may use your personal information to:

- (a) administer our website and business;
- (e) contact you regarding our services described on our website;
- (f) send statements, invoices and payment reminders to you, and collect payments from you;
- (g) send you non-marketing commercial communications;
- (h) send you email notifications that you have specifically requested;

(i) send you marketing communications relating to our business [or the businesses of carefully-selected third parties] which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);

(j) provide third parties with statistical information, including but not limited to traffic patterns, customers, sales, and services, about our users (but those third parties will not be able to identify any individual user from that information);

(k) deal with inquiries and complaints made by or about you relating to our website;

(l) keep our website secure and prevent fraud; and

(m) verify compliance with the terms and conditions governing the use of our website.

**3.3** If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

**3.4** We will not, without your express consent or as required by law, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

#### **4. Disclosing personal information**

**4.1** We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy and/or to complete the services requested by you.

**4.2** We may disclose your personal information to any member of our group of affiliated companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy and/or to complete the services requested by you.

**4.3** We may disclose your personal information:

(a) to the extent that we are required to do so by law;

(b) in connection with any ongoing or prospective legal proceedings;

(c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);

**4.4** Except as provided in this policy, we will not provide your personal information to third parties.

#### **5. Retaining personal information**

**5.1** This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

**5.2** Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

**5.4** Notwithstanding the other provisions of this Section 5, we will retain documents (including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **6. Security of your personal information**

**6.1** We will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.

**6.2** We will store all the personal information you provide on our secure (password-protected, encrypted and firewall-protected) servers.

**6.3** You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## **7. Amendments**

**7.1** We may update this policy from time to time by publishing a new version on our website.

**7.2** You should check this page each time you use this site to ensure you are aware of any changes in our privacy practices. Your continued use of our site after we have posted any privacy policy changes indicates your agreement to the changes unless you notify us otherwise.

## **8. Your rights**

**8.1** You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee; and
- (b) the supply of appropriate evidence of your identity.

**8.2** We may withhold personal information that you request to the extent permitted by law.

**8.3** You may instruct us at any time not to process your personal information for marketing purposes.

**8.4** In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **9. Third party websites**

**9.1** Our website includes hyperlinks to, and details of, third party websites.

**9.2** We have no control over, and are not responsible for, the privacy policies and practices of third parties.

**9.3** We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information.

## **10. Updating information**

**10.1** Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **11. Our details**

**11.1** This website is owned and operated by Gradient Positioning Systems, LLC d/b/a Financially Tuned Media Group.

**11.2** Our principal place of business is at 4105 Lexington Ave. N Suite 110 Arden Hills, MN 55126.

**11.3** You can contact us by email at [info@gradientps.com](mailto:info@gradientps.com), by using our website contact form, or by telephone at (877) 901-0894.

## **12. Cookies**

**12.1** Financially Tuned Media Group is using cookies. Additionally, Google Analytics, a web analysis service, may collect personal data while you are navigating on [www.gradientps.com](http://www.gradientps.com), such as cookie and usage data. Google Analytics utilizes this information to record and examine data, to deliver reports and stats on its activities, as well as share them with other Google services.

**12.2** Google Analytics is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of [www.example.com](http://www.example.com), to prepare reports on its activities and share them with other Google services.

**12.3** Google may use the data collected to contextualize and personalize the ads of its own advertising network.

**12.4** Personal data collected: Cookie and Usage Data. Place of processing: USA. Find Google's privacy policy at [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/).