

# Privacy Policy of ppcentourage.com

This Website collects some Personal Data from its Users.

## **Owner and Data Controller**

PPC Entourage, Plutus Systems LLC, 5 Edwards St 1G Roslyn, New York 11577 United States (929) 356-5008

Owner contact email: info@ppcentourage.com

# Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies; Usage Data; email address; first name; last name; phone number; company name; country; Data communicated while using the service; username; geographic position; city; address; password; fax number; state; province; ZIP/Postal code; various types of Data; billing address; shipping address; house number; data relating to the point of sale; budget.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

# Mode and place of processing the Data

# Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

## Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some
  legislations the Owner may be allowed to process Personal Data until the User objects to
  such processing ("opt-out"), without having to rely on consent or any other of the following
  legal bases. This, however, does not apply, whenever the processing of Personal Data is
  subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data 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 the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

#### **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

#### Therefore:

- Personal Data collected for purposes related to the performance of a contract between the
   Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be
  retained as long as needed to fulfill such purposes. Users may find specific information
  regarding the legitimate interests pursued by the Owner within the relevant sections of this
  document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data 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 expiration of the retention period.

# The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Managing landing and invitation pages, Handling payments, Managing contacts and

sending messages, Interaction with data collection platforms and other third parties, Analytics, Contacting the User, Managing support and contact requests, Interaction with live chat platforms, Interaction with support and feedback platforms, Remarketing and behavioral targeting, Commercial affiliation, Location-based interactions, User database management, Registration and authentication, Displaying content from external platforms and Advertising.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

# **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

# Advertising

This type of service allows User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on this Website, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the Network Advertising Initiative opt-out page.

#### **Direct Email Marketing (DEM) (this Website)**

This Website uses the User Data to propose services and products provided by third parties or unrelated to the product or service provided by this Website.

Personal Data collected: email address.

# Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

# Google Analytics with anonymized IP (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

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

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States - Privacy Policy - Opt Out. Privacy Shield participant.

# Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

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

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

# Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Website. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States - Privacy Policy. Privacy Shield participant.

# Google Ads conversion tracking (Google Inc.)

Google Ads conversion tracking is an analytics service provided by Google Inc. that connects data from the Google Ads advertising network with actions performed on this Website.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States - Privacy Policy. Privacy Shield participant.

# **Analytics collected directly (this Website)**

This Website uses an internal analytics system that does not involve third parties.

Personal Data collected: Cookies; Usage Data.

#### Commercial affiliation

This type of service allows this Website to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Website.

For details of which data are collected, please refer to the privacy policy of each service.

#### Amazon Affiliation (Amazon)

Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

# Contacting the User

## **Contact form (this Website)**

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data collected: company name; email address; first name; last name; phone number.

# Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data collected: city; company name; Cookies; country; email address; first name; last name.

# Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### YouTube video widget (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

# Handling payments

Payment processing services enable this Website to process payments by credit card, bank transfer or other means. To ensure greater security, this Website shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction. Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

### ChargeBee (ChargeBee Inc.)

ChargeBee is a payment service provided by ChargeBee Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

#### Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service. Place of processing: United States – Privacy Policy. Privacy Shield participant.

#### • Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Website for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

# GetResponse widget (Implix Sp. z o.o.)

The GetResponse widget is a service for interacting with the GetResponse email address management and message sending service provided by Implix Sp. z o.o.

Personal Data collected: Cookies; email address; first name; Usage Data.

Place of processing: Poland - Privacy Policy.

# GetSiteControl Promo widget (GetWebCraft Limited)

GetSiteControl Promo widget is a (lightbox) popup management service provided by GetWebCraft Limited.

Personal Data collected: Cookies; Usage Data.

Place of processing: Cyprus - Privacy Policy.

## Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Website, for contacting and being contacted by this Website support service. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

#### Location-based interactions

## Geolocation (this Website)

This Website may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Website. Personal Data collected: geographic position.

#### Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

## GetResponse (Implix Sp. z o.o.)

GetResponse is an email address management and message sending service provided by Implix Sp. z o.o.

Personal Data collected: Cookies; email address; first name; last name.

Place of processing: Poland - Privacy Policy.

# Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

## Instapage (Instapage, Inc.)

Instapage is a landing page management service provided by Instapage, Inc., that allows this Website to collect the email addresses of Users interested in its service.

Instapage allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

Personal Data collected: Cookies; email address; Usage Data.

Place of processing: United States – Privacy Policy.

#### Leadpages (Avenue 81, Inc.)

Leadpages is a landing page management service provided by Avenue 81, Inc., that allows this Website to collect the email addresses of Users interested in its service.

Leadpages allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

Personal Data collected: email address; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy.

# Managing support and contact requests

This type of service allows this Website to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

# Registration and authentication

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication

services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes.

## Login with Amazon (Amazon)

Login with Amazon is a registration and authentication service provided by Amazon.com, Inc. Personal Data collected: various types of Data as specified in the privacy policy of the service. Place of processing: United States – Privacy Policy.

# **Direct registration (this Website)**

The User registers by filling out the registration form and providing the Personal Data directly to this Website.

Personal Data collected: address; billing address; budget; city; company name; country; data relating to the point of sale; email address; fax number; first name; house number; last name; password; phone number; province; shipping address; state; various types of Data; ZIP/Postal code.

# Remarketing and behavioral targeting

This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity. In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the Network Advertising Initiative opt-out page.

# Google Ads Remarketing (Google LLC)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie. Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States - Privacy Policy - Opt Out. Privacy Shield participant.

## User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Website.

## **HubSpot CRM (HubSpot, Inc.)**

HubSpot CRM is a User database management service provided by HubSpot, Inc. Personal Data collected: email address; phone number; various types of Data as specified in the privacy policy of the service. Place of processing: United States – Privacy Policy. Privacy Shield participant.

# **Further information about Personal Data**

#### Klaviyo

Klaviyo is an e-mail sending mechanism that we use to occasionally send users updates on software and/or services. We also use Klaviyo for marketing purposes. All opt-ins to our e-mail lists are manual, effective May 25 2018 in compliance with GDPR regulations. No Klaviyo data is ever stored locally by PPC Entourage, and no contact information is ever shared with any third party. Opt out may be controlled by PPC Entourage members from their Account page. Opt out may be controlled by non-members by clicking the Unsubscribe link at the bottom of any Klaviyo generated/sent correspondence. Information on Klaviyo's privacy policy as it relates to GDPR can be found at https://www.klaviyo.com/privacy/dpa

### Fomo

Fomo tracks basic sales data and displays recent purchases in the form of a widget. No Fomo data is stored locally by PPC Entourage. For more information on Fomo's privacy policy, visit https://www.usefomo.com/privacy.

#### Zapier

Zapier connects applications and triggers actions based upon sets of conditions (example: if you sign up for a service, the billing portal you pay through tells Zapier that a payment was successful, and Zapier could then tell an email platform such as Klaviyo to send you a receipt).

No Zapier data is stored locally by PPC Entourage. For more on Zapier's privacy policy please visit https://zapier.com/privacy/

# Amazon API

Your Amazon data, specifically sales and SKU data and information found in Search Term Reports, is transmitted back and forth between Amazon and PPC Entourage via a secured API. This is integral to the performance and functionality of PPC Entourage. No data is ever shared by PPC Entourage with a third party unless with explicit permission by the user. Your Amazon username and password are not stored locally by PPC Entourage.

#### Redshift

User data for Entourage members is stored temporarily on internal servers. This data is secured and complies with all international security guidelines. Non-members do not have data stored on internal servers.

## Survey Monkey

We will, occasionally, ask users and clients to fill out online surveys via Survey Monkey. No data is stored locally by PPC Entourage. For information on Survey Monkey's privacy policy, please visit https://www.surveymonkey.com/mp/legal/privacy-policy

#### Refersion

PPC Entourage offers a referral/affiliate program through the third party site Refersion. No data is stored locally by PPC Entourage. For information on Refersion's privacy policy, visit https://www.refersion.com/privacy

# The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to
  receive their Data 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 the Data is processed by automated means and that

- the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

# Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

# How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

# **Cookie Policy of ppcentourage.com**

Cookies consist of portions of code installed in the browser that assist the Owner in providing the Service according to the purposes described. Some of the purposes for which Cookies are installed may also require the User's consent.

Where the installation of Cookies is based on consent, such consent can be freely withdrawn at any time following the instructions provided in this document.

# Technical Cookies and Cookies serving aggregated statistical purposes

## Activity strictly necessary for the functioning of the Service

This Website uses Cookies to save the User's session and to carry out other activities that are strictly necessary for the operation of this Website, for example in relation to the distribution of traffic.

# Activity regarding the saving of preferences, optimization, and statistics

This Website uses Cookies to save browsing preferences and to optimize the User's browsing experience. Among these Cookies are, for example, those used for the setting of language and currency preferences or for the management of first party statistics employed directly by the Owner of the site.

# Other types of Cookies or third parties that install Cookies

Some of the services listed below collect statistics in an anonymized and aggregated form and may not require the consent of the User or may be managed directly by the Owner - depending on how they are described - without the help of third parties.

If any third party operated services are listed among the tools below, these may be used to track Users' browsing habits – in addition to the information specified herein and without the Owner's knowledge. Please refer to the privacy policy of the listed services for detailed information.

## Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

## Google Analytics with anonymized IP (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

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

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP

address be sent to a Google server and shortened within the US.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

# Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

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Personal Data collected: Cookies and Usage Data.

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## Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.)

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Personal Data collected: Cookies and Usage Data.

Place of processing: United States - Privacy Policy. Privacy Shield participant.

# Analytics collected directly (this Website)

This Website uses an internal analytics system that does not involve third parties.

Personal Data collected: Cookies and Usage Data.

#### Commercial affiliation

This type of service allows this Website to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Website.

For details of which data are collected, please refer to the privacy policy of each service.

# Amazon Affiliation (Amazon)

Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - Privacy Policy.

# Contacting the User

# Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data collected: city, company name, Cookies, country, email address, first name and last name.

# Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

### YouTube video widget (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

### Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Website for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

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Personal Data collected: Cookies, email address, first name and Usage Data.

Place of processing: Poland – Privacy Policy.

#### GetSiteControl Promo widget (GetWebCraft Limited)

GetSiteControl Promo widget is a (lightbox) popup management service provided by GetWebCraft Limited.

Personal Data collected: Cookies and Usage Data.

Place of processing: Cyprus – Privacy Policy.

# Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Website, for contacting and being contacted by this Website support service. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

## Interaction with support and feedback platforms

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of this Website.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

# Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

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Personal Data collected: Cookies, email address, first name and last name.

Place of processing: Poland – Privacy Policy.

# Managing landing and invitation pages

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Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

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Instapage allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

Personal Data collected: Cookies, email address and Usage Data.

Place of processing: United States - Privacy Policy.

# Remarketing and behavioral targeting

This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity. In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the Network Advertising Initiative opt-out page.

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Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie. Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out. Privacy Shield participant.

# How to provide or withdraw consent to the installation of Cookies

In addition to what is specified in this document, the User can manage preferences for Cookies directly from within their own browser and prevent – for example – third parties from installing Cookies.

Through browser preferences, it is also possible to delete Cookies installed in the past, including the Cookies that may have saved the initial consent for the installation of Cookies by this website.

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses: Google Chrome, Mozilla Firefox, Apple Safari and Microsoft Internet Explorer.

With regard to Cookies installed by third parties, Users can manage their preferences and withdrawal of their consent by clicking the related opt-out link (if provided), by using the means provided in the third party's privacy policy, or by contacting the third party.

Notwithstanding the above, the Owner informs that Users may follow the instructions provided on the subsequently linked initiatives by the EDAA (EU), the Network Advertising Initiative (US) and the Digital Advertising Alliance (US), DAAC (Canada), DDAI (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

# **Owner and Data Controller**

PPC Entourage, Plutus Systems LLC, 5 Edwards St 1G Roslyn, New York 11577 United States (929) 356-5008

# Owner contact email: info@ppcentourage.com

Since the installation of third-party Cookies and other tracking systems through the services used within this Website cannot be technically controlled by the Owner, any specific references to Cookies and tracking systems installed by third parties are to be considered indicative. In order to obtain complete information, the User is kindly requested to consult the privacy policy for the respective third-party services listed in this document.

Given the objective complexity surrounding the identification of technologies based on Cookies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of Cookies by this Website.

# **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

## **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

## **Data Subject**

The natural person to whom the Personal Data refers.

# **Data Processor (or Data Supervisor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

# **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures

concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.
This Website (or this Application)
The means by which the Personal Data of the User is collected and processed.
Service
The service provided by this Website as described in the relative terms (if available) and on this site/application.
European Union (or EU)
Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.
Cookies
Small sets of data stored in the User's device.
Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Latest update: May 30, 2018