



PRIVACY POLICY

Effective date: May 17, 2018

Marc A. Steinberg operates the website

- <http://www.marcsteinberg.com>

This page informs you of my policies regarding the collection, use, and disclosure of personal data when you use my Service and the choices you have associated with that data.

I use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in my Terms and Conditions.

Definitions

Service

Service means the <http://www.marcsteinberg.com> website and any future mobile application operated by me.

Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in my possession or likely to come into my possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, I am a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.



I may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using my Service and is the subject of Personal Data.

Information Collection And Use

I collect several different types of information for various purposes to provide and improve my Service to you.

Types of Data Collected

Personal Data

While using my Service, I may ask you to provide me with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

I may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from me by following the unsubscribe link or instructions provided in any email I send.

Usage Data

I may also collect information that your browser sends whenever you visit my Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of my Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Tracking Cookies Data

I use cookies and similar tracking technologies to track the activity on my Service and hold certain information.



Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze my Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of my Service.

Examples of Cookies I use:

- **Session Cookies.** I use Session Cookies to operate my Service.
- **Preference Cookies.** I use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** I use Security Cookies for security purposes.

Use of Data

I use the collected data for various purposes:

- To provide and maintain my Service
- To notify you about changes to my Service
- To allow you to participate in interactive features of my Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that I can improve my Service
- To monitor the usage of my Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which I offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), my legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data I collect and the specific context in which I collect it.

I may process your Personal Data because:

- I need to perform a contract with you
- You have given me permission to do so
- The processing is in my legitimate interests and it's not overridden by your rights
- For payment processing purposes



- To comply with the law

Retention of Data

I will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. I will retain and use your Personal Data to the extent necessary to comply with my legal obligations (for example, if I are required to retain your data to comply with applicable laws), resolve disputes, and enforce my legal agreements and policies.

I will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of my Service, or I are legally obligated to retain this data for longer time periods.

Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Saint Kitts and Nevis and choose to provide information to me, please note that I transfer the data, including Personal Data, to Saint Kitts and Nevis and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

I will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure Of Data

Legal Requirements

I may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of I
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability



Security Of Data

The security of your data is important to me, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While I strive to use commercially acceptable means to protect your Personal Data, I cannot guarantee its absolute security.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. I aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data I hold about you and if you want it to be removed from my systems, please contact me.

In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information I have on you.

Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact me to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to my processing of your Personal Data.

The right of restriction. You have the right to request that I restrict the processing of your personal information.

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

The right to withdraw consent. You also have the right to withdraw your consent at any time where I relied on your consent to process your personal information.

Please note that I may ask you to verify your identity before responding to such requests.

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



Service Providers

I may employ third party companies and individuals to facilitate my Service ("Service Providers"), to provide the Service on my behalf, to perform Service-related services or to assist me in analyzing how my Service is used.

These third parties have access to your Personal Data only to perform these tasks on my behalf and are obligated not to disclose or use it for any other purpose.

Analytics

I may use third-party Service Providers to monitor and analyze the use of my Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of my Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Behavioral Remarketing

I uses remarketing services to advertise on third party websites to you after you visited my Service. I and my third-party vendors use cookies to inform, optimize and serve ads based on your past visits to my Service.

Google AdWords

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Twitter

Twitter remarketing service is provided by Twitter Inc.



You can opt-out from Twitter's interest-based ads by following their instructions:

<https://support.twitter.com/articles/20170405>

You can learn more about the privacy practices and policies of Twitter by visiting their

Privacy Policy page: <https://twitter.com/privacy>

Facebook

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this

page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from

Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook

and other participating companies through the Digital Advertising Alliance in the USA

<http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in

Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising

Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile

device settings.

For more information on the privacy practices of Facebook, please visit Facebook's

Data Policy: <https://www.facebook.com/privacy/explanation>

Payments

I may provide paid products and/or services within the Service. In that case, I use third-party services for payment processing (e.g. payment processors).

I will not store or collect your payment card details. That information is provided directly to my third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors I work with are:

PayPal or Stripe

Their Privacy Policy can be viewed at

<https://www.paypal.com/webapps/mpp/ua/privacy-full>

Links To Other Sites

My Service may contain links to other sites that are not operated by me. If you click on a third party link, you will be directed to that third party's site. I strongly advise you to review the Privacy Policy of every site you visit.



I have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

My Service does not address anyone under the age of 18 ("Children").

I do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided me with Personal Data, please contact me. If I become aware that I have collected Personal Data from children without verification of parental consent, I take steps to remove that information from my servers.

Changes To This Privacy Policy

I may update my Privacy Policy from time to time. I will notify you of any changes by posting the new Privacy Policy on this page.

I will let you know via email and/or a prominent notice on my Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Me

If you have any questions about this Privacy Policy, please contact me:

- By email: contact@marcsteinberg.com