

ADAPTIVE SPIRIT PRIVACY POLICY

Effective Date: November 1, 2018

We are committed to protecting your privacy. This statement of policy (“Privacy Policy”) regarding our website, located at www.adaptivespirit.com, and the tools we provide you at such site (the “Site”) and how we collect information about you when you visit the Site and how it uses and discloses that information. This Privacy Policy applies to data that personally identifies you (“personal information”) that is collected on this Site. Your use of this Site constitutes your agreement to this Privacy Policy.

Collection of Personal Information

Information We Collect Directly

We have developed our Site so that you may visit it without being required to provide your name, email address or similar personal information. However, certain features of the Site may include features or services that permit you to enter contact information and other information about you, such as your name, address and e-mail address.

Use and Sharing of Personal Information

We may use information you give us to:

- Communicate with you, including to respond to your inquiries and fulfill your requests;
- Make decisions about approving and funding;
- Detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.

We may share your personal information with third party service providers, affiliates and agents who use the information to help us respond to your requests and to perform services on our behalf. We may also share information with third parties who we think have a similar mission to ours to enable them to reach you with similar or related messages. We do not rent or sell your personal information to third parties.

Additional Information About our Information Collection and Sharing Practices

If the Site contains links to other websites, these websites are governed by their own terms of use and privacy policies, which you should read. We are not responsible for the security or privacy of any information collected by other websites or other services. You should exercise caution, and read the third party privacy policies to understand how the third parties collect, process, share and store your information.

We may make changes to this Policy from time to time. We will post any changes, and such changes will become effective when they are posted. Your continued use of our Site following the posting of any changes will mean you accept those changes.

Subject to applicable law, we reserve the right to use or disclose your personal information to third parties in a good faith belief that such disclosure is reasonably necessary to (a) take action regarding suspected illegal activities; (b) enforce or apply our Terms of Use and Privacy Policy; (c) comply with legal process, such as a search warrant, subpoena, statute, or court order; (d) protect our rights, reputation, personal safety and property, or those of our users, affiliates or the public; or (e) enable our consultants or service providers to help us operate or fulfill your requests more efficiently.

We may change our ownership or corporate organization while providing the Site. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.

Data Storage, Location, and Duration

We do not store your data in a secure manner in a restricted-access database. WE DO NOT REPRESENT OR GUARANTEE THE SECURITY OF PERSONAL INFORMATION OR OTHER INFORMATION IN ANY FORM. Similarly, we disclaim liability for personal information submitted through our Site and you provide us with this data at your own risk. Our databases are located in the United States. If you are outside of the US, you may be located in a region with laws or regulations governing personal data collection, use or disclosure that differ from US laws, which do not have the same data protection laws as the EU and other regions. By providing your data you consent to: (i) the use of your personal data for the uses identified above in accordance with the Privacy Policy; and (ii) the transfer of your personal data to the US as indicated above and the application of US laws to the collection, use and disclosure of your personal information.

Information You Provide About Others

Do not provide or allow others to provide personal information about anyone unless you, on your own behalf and on behalf of anyone whose information you provide: (a) have reviewed and agree with this Privacy Policy, and (b) are authorized to and do consent to have all data used and transferred internationally. By submitting any personal information about others you represent and warrant that you received such authorization beforehand.

Use of the Site by Children

We comply with the Children's Online Privacy Protection Act of the United States and similar laws around the world where applicable. Our Site is not specifically targeted to children, we do not actively solicit information from children, and we do not knowingly collect personal information from children without proper parental consent. If you believe that we may have collected personal information from someone under the applicable age of consent without parental consent, please write to us at the physical address set forth in the site or via email.

To Stop Receiving Messages from Us

If you wish to stop receiving messages from us, click on the “unsubscribe” link at the bottom of any message you receive from us.

Inquiries

Please contact us at the address and numbers listed on the web site with respect to any inquiries about our Privacy Policy.