

## ROAM Privacy Policy

### **Introduction:**

This privacy policy ("Privacy Policy") outlines ROAM Echo, LLC ("we" or "our") practices with respect to information collected from users who access our website at oldmill.camp (the "Site") or otherwise share personal information with us ("you" or "Users").

### **Grounds for data collection:**

This document details the types of information that we may collect or that you may provide when you access, use or register on our Site (collectively, the "Services") and our practices for using, maintaining, protecting and disclosing that information.

### **Information we collect and how we collect it:**

We collect information in two ways:

- (i) *Information You Provide to Us.* When you use or register on our Site, we may ask you to provide information by which you may be personally identified, such as your name, address, email address, telephone number, location, financial payment information and any other identifier by which you may be contacted online or offline ("Personal Information").
- (ii) *Automatically when you use our Site.* When you download, access or use our Site, it may use technology to automatically collect:
  - a. Usage Details. These are certain details of your access to and use of the Services, including traffic data, location data, logs and other communication data and the resources that you access and use on or through the Services.
  - b. Device Information. This is information about your computer, mobile device and internet connection, including the computer or mobile device's unique device identifier, IP address, MAC address, operating system, browser type, mobile network information and the device's telephone number.

### *Local Storage, Cookies, Web Beacons, and Tracking*

Our Site uses local storage and cookies, which are small text files that are intended to make the Services better for you to use. In general, cookies are used to retain preferences, store information for things like shopping carts, and provide tracking data to third-party applications like Google Analytics. You may, however, disable cookies. The most effective way to do this is to disable cookies in your browser. We suggest consulting the help section of your browser or doing your own web research on how to disable cookies.

Please note that linked third-party websites may also use cookies. We cannot control the use of cookies by these third-party websites. For example, when you link from our Site to a third-party website, that website may have the ability to recognize that you have come from our Site by using cookies. If you have any questions about how third-party websites use cookies, you should contact such third parties directly.

We may also employ software technology known as "web beacons" or "clear GIFs," which helps us keep track of what content on our Service is effective. Web beacons are small graphics with a unique

identifier that are used to track the online movements of Internet users. Web beacons are embedded in the web pages you review, so they are not stored on your hard drive.

#### **Use of Information:**

We may use the Personal Information we collect from you for the following purposes:

- (i) To send you notices regarding our Services, providing you with technical information and responding to any customer service issue you may have;
- (ii) To communicate with you and to keep you informed of our latest updates and Services;
- (iii) To serve you advertisements when you use our Site (see more under “Advertisements”);
- (iv) To market our websites and products (see more under “Marketing”);
- (v) Conducting statistical and analytical purposes, intended to improve the Services.

In addition to the different uses listed above, we may transfer or disclose Personal information to our subsidiaries, affiliated companies and subcontractors.

#### **Third Party Providers:**

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our trusted third-party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- (i) Hosting and operating our Site;
- (ii) Providing you with our Services;
- (iii) Storing and processing such information on our behalf;
- (iv) Serving you with advertisements and assisting us in evaluating the success of our advertising campaigns and helping us retarget any of our Users;
- (v) Providing you with marketing offers and promotional materials related to our Site and Services;
- (vi) Performing research, technical diagnostics or analytics;

Our Privacy Policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

This Privacy Policy does not apply to the practices of companies that we do not own or control, or to individuals whom we do not employ or manage, including any of the third parties which we may disclose information as set forth in this Privacy Policy.

#### **Disclosure of Information:**

In addition to disclosing information to trusted third party providers, we may also disclose information if we have good faith to believe that disclosure of such information is helpful or reasonably necessary to:

- (i) comply with any applicable law, regulation, legal process or governmental request;
- (ii) enforce our policies, including investigations of potential violations thereof;
- (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- (iv) to

establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our Users, or any third party; or (vi) for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

**Data Retention:**

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements). When we have no ongoing legitimate business need to process Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because personal information has been stored in backup archives), then we will securely store Personal Information and isolate it from any further processing until deletion is possible. We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

**How do we safeguard your information?**

We take care in implementing and maintaining the security of the Site and your information. We employ industry standard procedures and policies to ensure the safety of the information we collect and retain, and prevent unauthorized use of any such information, and we require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Site or Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

**Advertisements**

We may use a third-party advertising technology to serve advertisements when you access the Site. This technology uses your information with regards to your use of the Services to serve advertisements to you (e.g., by placing third-party cookies on your web browser).

**Marketing**

We may use your Personal Information, such as your name, email address, telephone number, etc. ourselves or by using our third-party subcontractors for the purpose of providing you with promotional materials, concerning our Services, which we believe may interest you.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important e-mail communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

### **Corporate transaction**

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

### **Minors**

We understand the importance of protecting children's privacy, especially in an online environment. The Site is not designed for or directed at children. Under no circumstances shall we allow use of our Services by minors without prior consent or authorization by a parent or legal guardian. We do not knowingly collect Personal Information from minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at [gaven.petersen@preservepartners.com](mailto:gaven.petersen@preservepartners.com).

### **Updates or amendments to this Privacy Policy**

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy Policy. The last revision will be reflected in the "Last modified" section. Your continued use of the Site, following the notification of such amendments on our Site, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

### **How to contact us**

If you have any general questions about the Site or the information we collect about you and how we use it, you can contact us at [scott@roamamerica.com](mailto:scott@roamamerica.com)

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