

## **New Constructs' Privacy Policy**

### **Commitment to Privacy**

New Constructs, LLC, takes seriously its responsibilities to protect and keep private all data exchanged between New Constructs and its customers, and we emphasize to our employees the confidential nature of customer information and the high level of importance we place on it.

We only collect and have access to information that you voluntarily give us via email or other direct contact. New Constructs is committed to protecting all customer-sensitive data and will never share any customer-sensitive data with any outside parties, unless required by applicable law or to limit our legal liability and to protect our rights. This Privacy Policy sets forth our current policies and demonstrates our continued commitment to your privacy, and will notify you of what rights you have over your data, how long we'll keep your data, and the security of your data.

Your use of this web site indicates to us that you have read and accepted our privacy practices, as outlined in this Privacy Policy.

### **Data Collection and Use**

As a user of the public portion of this web site, you are not required to provide New Constructs with personal data. If you register to use the password protected portions of our web site, you will be required to provide us with personal data about you and any entity you are affiliated with. If you choose not provide us with personal data we request from you, we may not be able to respond to you and/or provide you with a requested service.

All data is collected under a Legitimate Interests, Consent, or Contract basis.

### **Data Retention Period**

We will retain your personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you via your subscription; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is legally advisable (for example, in regard to applicable statutes of limitations, litigation or regulatory investigations)."

### **Registration/Subscription**

In order to use the password protected portions of our web site, you must purchase a subscription. During the purchase or registration process, you will be required to provide us with personal data about yourself, such as name, email address, and credit card information. We will share that information only with our credit card payment processors so that we can complete your subscription request.

### **Comments**

When you leave comments on the site we collect the data shown in the comments form, and also your IP address and browser user agent string to help prevent spam comments.

An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available [here](#). After approval of your comment, your profile picture is visible to the public in the context of your comment.

### **Links to Other Web Sites**

Where applicable, New Constructs may provide links to one or more third party websites. We encourage you to read the individual privacy policies of these websites before providing any of your personal information to them.

### **Automatically Collected Information**

When you access our site or open one of our emails, we may automatically record and store certain information about your system by using cookies and other types of technologies. Examples of information we automatically collect may include Internet Protocol address ("IP Address"), a unique user ID, device and browser types and identifiers, referring and exit page addresses, software and system type, and information

about your usage of our site. Some examples of how we use that data include: keeping you logged in to the site so you won't have to re-enter your login information, providing custom content, monitoring the effectiveness of marketing campaigns, and monitoring site usage metrics.

### **Cookies**

To provide customizable and personalized services, New Constructs uses cookies to store and sometimes track information about you. A cookie is a small amount of data that is sent to your browser from a Web server and stored on your computer's hard drive. All sections of the site, where you are prompted to sign in or that are customizable, may require your web browser to accept cookies. The cookies are used to remind us of who a current signed-in user is and to access the current user's account information (stored on our computers) in order to provide a better and more personalized service. This cookie is set when the user registers or "signs in" and is modified when you "sign out" of our services.

### **Analytics**

We may use third-party Web analytics services in connection with the Site, such as those of Google Analytics, its advertising features, and Infusionsoft. These service providers use a variety of tracking technologies such as cookies to analyze how users use the Site. The information collected (described above in "Automatically Collected Information") will be collected directly by these service providers to evaluate your use of the site. For more information on how Google Analytics uses data from our websites and how you can control the information sent to Google, click here. To learn about opting out of Google Analytics, please click here. Because these opt-outs are cookie-based, please note that if you get a new computer or device, install or start using a new browser, or erase or alter your browser's cookie file, you may need to opt out again.

We use Infusionsoft as our marketing automation platform. The information you provide will be transferred to Infusionsoft for processing in accordance with their Privacy Policy and Terms.

### **Your Rights Regarding Your Personal Data**

You may opt out of our contacting you at any time (except for contact directly related to your subscription) by emailing [support@newconstructs.com](mailto:support@newconstructs.com).

You also may, at any time, by contacting [support@newconstructs.com](mailto:support@newconstructs.com):

- Request a copy of personal data we have about you, if any.
- Request that we update any personal data we have about you.
- Request that we delete any personal data we have about you (please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it).
- Express any concern you have about our use of your personal data.
- All requests will require your confirmation in order for us to complete them.

We will complete your request within 30 days, except as provided in "Data Retention Period" above. Please note that in the case of removal of personal data, we will confirm the removal with you when it's complete and then begin removing the request itself from our systems.

### **Data Security**

New Constructs' Network utilizes the following security mechanisms to protect the integrity of customer information and systems:

- Your account is only accessible with the correct user name and password.
- A Digital System ID is stored on the registered system and is used to authenticate each transaction between New Constructs' systems and the client's system.
- All data transfer between New Constructs' internal systems is across private, non-advertised, non-accessible networks.
- All New Constructs' Network servers operate with New Constructs' products with all security updates applied.

- All transactions involving client-sensitive data are encrypted using a 128-bit Secure Sockets Layer (SSL) connection.
- Although New Constructs strives to create a secure and reliable web site for our users, we do not guarantee the confidentiality of any communication or transfer of data or material via our web site or via email. When disclosing personal or financial information, all users should remain mindful of the fact that this information is potentially accessible to others, and thus may be collected and used by others without your consent. Therefore, you should consider carefully whether you should submit sensitive information that you would not want disclosed and should recognize that your use of the Internet and New Constructs' web site is at your own risk. New Constructs has no responsibility or liability for the security of personal information or financial data transmitted via the Internet.

### **Transferring Your Personal Information Outside the EEA (if GDPR applies)**

The data that we collect from you is transferred to, and will be stored at, a destination outside the European Economic Area ("EEA") that is not subject to equivalent data protection laws. For our purposes, the information we collect is processed and stored in the US.

We may transfer your personal information outside the EEA:

- In order to store it.
- In order to enable us to provide your subscription.
- Where we are legally required to do so.
- In order to facilitate the operation of our business, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards and that it is treated securely and in accordance with this Privacy Policy.

You may contact us at any time at [support@newconstructs.com](mailto:support@newconstructs.com) if you would like further information.

### **How "Do Not Track" requests are handled**

New Constructs' website does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

### **Changes and Updates to this Policy**

Please revisit this page from time to time to stay informed of any changes to this Privacy Policy. Your continued use of this web site following any modifications to this Privacy Policy indicates that you have read, understood and agreed to the current version of the Policy.

If you feel that we are not abiding by this Privacy Policy, you should contact us immediately at [support@newconstructs.com](mailto:support@newconstructs.com).