

# PRIVACY POLICY

Effective Date: \_\_\_\_\_, 2016.

## 1. INTRODUCTION AND OVERVIEW

This Privacy Policy describes how EPSON America, Inc. (“**EPSON**,” “**we**,” “**our**,” or “**us**”) collects, uses, and shares information about you and applies to your use of any online service location (e.g., website or mobile app) that posts a link to this Privacy Policy and all features, content, and other services that we own, control and make available through such online service location (collectively, the “**Service**”). This Privacy Policy does not apply to our data collection activities offline or otherwise outside of our Service (unless otherwise stated below or at the time of collection).

By using our Service, you agree to our [Terms of Use](#) and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy. If you do not agree and consent, discontinue use of the Service.

## 2. INFORMATION COLLECTION

### A. Information You Provide To Us.

We collect information you provide directly to us via the Service. For example, we collect information when you use our Service, sign up as a merchant or application partner, subscribe to our notifications, access our App Market (as defined in the App Market Terms of Use), or communicate with us through the Service.

The information we collect may include Personal Information. “**Personal Information**” is information that can be used to identify you (whether alone or in combination), such as your first and last name, e-mail address, zip code, physical address, phone number, and financial information.

We may also ask you to provide information about your business, such as your business name, business postal address, business phone number, and Federal Tax ID number (or other similar employer identification number).

You may choose to voluntarily submit certain other information to us through the Service, including Personal Information, but you are solely responsible for your own Personal Information in instances where we have not collected such information or requested that you submit such information to us.

Personal Information once “**de-identified**” will not be subject to this Privacy Policy and we and our Service Providers (defined below) may treat it as non-Personal Information and use it without obligation to you except as prohibited by applicable law.

### B. Information We Collect Automatically.

We and our Service Providers may automatically collect certain information about you when you access or use our Service (“**Usage Information**”). Usage Information may include your IP address, device identifier, Ad ID, browser type; operating system characteristics, data regarding network connected hardware (e.g., computer or mobile device), and information about your use of our Service, such as the time and duration of your visit and how you arrived at our Service. Except to the extent required by

applicable law, EPSON does not consider Usage Information to be Personal Information. However, Usage Information may be combined with your Personal Information. To the extent that we combine Usage Information with your Personal Information, we will treat the combined information as Personal Information under this Privacy Policy.

The methods that we and our Service Providers may use to collect Usage Information include:

- **Log Information:** We collect information about your use of our Service, such as IP address, browser type, Internet service provider, referring/exit pages, operating system, date/time stamps, and related data, and store it in log files.
- **Information Collected by Cookies and Other Tracking Technologies:** We may use cookies, web beacons (also known as "tracking pixels"), embedded scripts, location-identifying technologies, in-app tracking methods, and other tracking technologies now and hereafter developed ("**Tracking Technologies**") to collect information about interactions with our Service or e-mails, including information about your browsing and purchasing behavior.

- **Cookies**

A cookie is a small text file that is stored on a user's device. We use both session ID cookies and tracking cookies. Session cookies make it easier for you to navigate our Service and expire when you close your browser. Tracking cookies help us understand how you use the Service, and enhance your user experience. Cookies remain on your hard drive for an extended period of time. If you use your browser's method of blocking or removing cookies, some features and functionalities of our Service may not work.

- **Web Beacons ("Tracking Pixels")**

Web beacons are small graphic images, also known as "Internet tags" or "clear gifs," embedded in web pages and e-mail messages. Web beacons may be used to count the number of visitors to our Service, to monitor how users navigate the Service, and to count how many particular articles or links were actually viewed.

- **Embedded Scripts**

An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from our web server or a third party with whom we work, is active only while you are connected to the Service, and deleted or deactivated thereafter.

We are giving you notice of the Tracking Technologies and your choices regarding them explained in Sections 6 and 7, so that your consent to encountering them is meaningfully informed.

### **C. Information From Other Sources.**

We may also obtain information about you from other sources and combine that with information we collect about you. To the extent we combine such third party sourced information with Personal

Information we collect directly from you on the Service, we will treat the combined information as Personal Information under this Privacy Policy. We are not responsible for the accuracy of the information provided by third parties or third party practices.

### 3. USE OF INFORMATION

We may use information about you for any purposes not inconsistent with our statements under this Privacy Policy or prohibited by applicable law, including to:

- Facilitate, manage, personalize and improve your online experience and your ability to browse, locate or install applications through the Service;
- Transact with you, respond to your comments, questions and requests, provide customer service, send you informational notices, and contact you if we need to obtain or provide additional information;
- Conduct research and analysis, including focus groups and surveys;
- Prevent and address fraud, breach of policies or terms and threats or harm; and
- Send you advertisements and communicate with you regarding our and third party products, services, offers, promotions, rewards and events we think you may be interested in (for information about how to manage these communications, see Section 7).

### 4. SHARING INFORMATION

Our agents, vendors, consultants, and other service providers (collectively “**Service Providers**”) may receive, or be given access to your information, without limitation, Personal Information and Usage Information, in connection with their work on our behalf. These Service Providers are prohibited from using your Personal Information for any purpose other than to provide this assistance, although we may permit them to use aggregate information which does not identify you or de-identified data for other purposes. We may also share information about you with our Service Providers as follows:

- To comply with the law, law enforcement or other legal process, and except as prohibited by applicable law, in response to a government request;
- To protect the rights, property, life, health, security and safety of us, the Service or any third party;
- With our affiliates for internal business purposes; and
- In connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another company.

Without limiting the foregoing, in our sole discretion, we may share aggregated information which does not identify you or de-identified information about you with third parties or affiliates for any purpose.

## 5. THIRD PARTY SERVICES AND SOCIAL FEATURES

Our Service includes hyperlinks to websites, locations, platforms, or services operated by third parties ("**Third Party Service(s)**"). These Third Party Services may use their own cookies, web beacons and other Tracking Technology to independently collect information about you and may solicit Personal Information from you.

Certain functionalities on the Service permit interactions that you initiate between the Service and certain Third Party Services, such as third party social networks ("**Social Features**"). Examples of Social Features include "liking" or "sharing" our content and otherwise connecting our Service to a Third Party Service. If you use Social Features, and potentially other Third Party Services, information you post or provide access to may be publicly displayed on our Service or by the Third Party Service that you use. Similarly, if you post information on a Third Party Service that references our Service (e.g., by using a hashtag associated with ESPON in a tweet or status update), your post may be used on or in connection with our Service. Also, both EPSON and the third party may have access to certain information about you and your use of our Service and the Third Party Service. To the extent we combine information from Third Party Services with Personal Information we collect directly from you on the Service, we will treat the combined information as Personal Information under this Privacy Policy.

The information collected and stored by third parties remains subject to their privacy practices, including whether they continue to share information with us, the types of information shared, and your choices on what is visible to others on Third Party Services. We are not responsible for and make no representations regarding the policies or business practices of any third parties or Third Party Services and encourage you to familiarize yourself with and consult their privacy policies and terms of use.

## 6. ANALYTICS SERVICES, ADVERTISING, AND ONLINE TRACKING

We may engage and work with third parties to serve advertisements on our behalf on the Service and/or on Third Party Services and to provide analytics services about the use of our Service and the performance of our ads and content on Third Party Services. In addition, we may participate in online advertising networks and exchanges that display relevant advertisements to our Service visitors, on our Service and on Third Party Services and off of our Service, based on their interests as reflected in their browsing of the Service and certain Third Party Services. These entities may use cookies and other Tracking Technologies to automatically collect information about you and your activities, such as registering a unique identifier for your device and tying that to your online activities on and off of our Service. We may use this information to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Service and Third Party Services and better understand your online activity. Further, data collected from a particular browser or device may be used with another computer or device that is linked to the browser or device on which such data was collected, or transferred to a non-affiliate for such purposes.

Some information about your use of the Service and certain Third Party Services may be collected across time and services and shared with third parties to deliver ads and/or other content to you on the Service and certain Third Party Services. We may receive information about Third Party Services that you have visited and use it for marketing purposes—a practice sometimes termed "(re)-targeting,"

“interest-based advertising,” and “online behavioral advertising” (collectively, “**Interest-based Ads**”). We are not responsible for third parties or Third Party Services associated with advertising and analytics services, and related tracking activities, and encourage you to familiarize yourself with and consult their privacy policies and terms of use.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note there is not yet an industry consensus as to what site and app operators should do with regard to these signals. Accordingly, we do not monitor or take action with respect to “Do Not Track” signals or other mechanisms. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

You may have certain choices regarding Tracking Technologies as explained in Section 7.

## **7. YOUR CHOICES**

### **A. Accessing and Changing Information.**

You may access, review, correct, update, and remove or make inaccessible Personal Information you have submitted to us by contacting us at [privacy@OmniLinkWorld.com](mailto:privacy@OmniLinkWorld.com). We will make a good faith effort to make the changes in EPSON’s then-active databases as soon as practicable, but it may not be possible to completely change your information. We reserve the right to retain data as required by applicable law and for so long as reasonably necessary to fulfill the purposes for which the data is retained as permitted by applicable law (e.g., business records).

### **B. Tracking Technologies Generally.**

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Please be aware that if you disable or remove these technologies some parts of the Service may not work and that when you revisit the Service your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

### **C. Analytics Services and Interest-Based Ads.**

EPSON may use Google Analytics or other Service Providers for analytics services. You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

Certain companies may participate in the Digital Advertising Alliance (“**DAA**”) AdChoices Program and may display an Advertising Option Icon for Interest-based Ads that links to an opt-out tool which allows you to exercise certain choices regarding targeting. You can learn more about the DAA AdChoices Program at <http://www.youradchoices.com/> and its opt-out program for mobile apps at <http://www.aboutads.info/appchoices>. In addition, certain advertising networks and exchanges may participate in the Network Advertising Initiative (“**NAI**”). NAI has developed a tool that allows consumers to opt out of certain Interest-based Ads delivered by NAI members' ad networks. To learn

more about opting out of such targeted advertising or to use the NAI tool, see <http://www.networkadvertising.org/choices/>. Please be aware that such opt-outs do not affect non-targeted ads. We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs. However, we support the ad industry's 2009 Self-regulatory Principles for Online Behavioral Advertising available at <http://www.iab.net/media/file/ven-principles-07-01-09.pdf> and expect that ad networks EPSON directly engages to serve you Interest-based Ads will do so as well, though we cannot guaranty their compliance.

#### **D. Communications.**

You can opt out of receiving promotional e-mails from us at any time by following the instructions as provided in e-mails to click on the unsubscribe link or by changing your communication preferences by logging onto your account. Please note that your opt-out is limited to the e-mail address used and will not affect subsequent subscriptions or non-promotional communications, such as such as administrative and service announcements.

### **8. YOUR CALIFORNIA PRIVACY RIGHTS**

California's "Shine the Light" law permits customers in California to request certain details about how certain types of their information are shared with third parties and, in some cases, affiliates, for those third parties' and affiliates' own direct marketing purposes. Under this law, a business must either provide California customers certain information upon request or permit California customers to opt-in to, or opt-out of, this type of sharing.

We do not share Personal Information with third parties or affiliates for those third parties' or affiliates' own direct marketing purposes. If you are a California resident, you may request information about our compliance with this law by contacting us at [privacy@OmniLinkWorld.com](mailto:privacy@OmniLinkWorld.com) or by sending a letter to 3840 Kilroy Airport Way, Long Beach CA. Requests must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address or mail address.

### **9. CHILDREN'S PRIVACY**

Our Service is not intended for nor targeted toward children under the age of thirteen (13). We do not knowingly collect personal information as defined by the U.S. Children's Privacy Protection Act ("COPPA") from children under the age of thirteen (13), and if we learn that we have collected such information, we will delete the information in accordance with COPPA. If you are a child under the age of thirteen (13), you are not permitted to use the Service and should not send any information about yourself to us through the Service. If you are a parent or guardian and believe we have collected information in a manner not permitted by COPPA, please contact us at [privacy@OmniLinkWorld.com](mailto:privacy@OmniLinkWorld.com).

### **10. DATA SECURITY**

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the Internet is

not completely secure and we cannot guarantee the security of your information collected through our Service.

## **11. INTERNATIONAL TRANSFER**

We are based in the U.S. and the information we collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

## **12. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Subject to applicable law, your continued use of our Service indicates your consent to the privacy policy posted. If the changes are material, we may provide you additional notice, to your e-mail address.

## **13. CONTACT US**

For any requests relating to your Personal Information, or if you have any questions about this Privacy Policy, please contact us at:

3840 Kilroy Airport Way, Long Beach CA  
[privacy@OmniLinkWorld.com](mailto:privacy@OmniLinkWorld.com)