

PRIVACY NOTICE

Effective Date: 7/23/2020

We (“PHATS-SPHEM”) collect certain information through our website, located at www.phatssphem.com (our “Website”). This page (this “Privacy Notice”) describes our policies and procedures surrounding the collection and handling of data about any living individual who can be identified from that data or from that data and other information either in our possession or likely to come into our possession (“Personal Data”).

This Privacy Notice applies only to our Website and to the products and services provided through our Website. It does not apply to any third party site or service linked to our Website or recommended or referred by our Website, through our products or services, or by our staff.

By use of our Website, you agree to the collection and use of information described in this Privacy Notice.

1. Personal Data We Collect

We may collect the following personal data from users: We may collect the following personal data from users: first name, last name, e-mail address, telephone, team name, **company name, address, credit card number.**

We also collect data on how our website is used: number of page visits and duration, type of browser, etc. (collectively, “Usage Data”). This Usage Data may include personal data, like your Internet Protocol (IP) address. We also use “cookies” to collect certain information from all users, including Web visitors. Data collected through cookies may include Usage Data (whether or not personal) and Personal Data. A cookie is a string of data our system sends your computer and then uses to identify your computer when you return to our Website. You can set up most browsers to refuse all cookies or to notify you of any cookies you receive. But if you don’t accept cookies, you won’t be able to make as efficient use of our Website, and you may not be able to use some features at all. Our Website is not intended to collect data from children or from anyone under 18.

2. Our Use of Personal Data

We may use your Personal Data in a variety of ways; to create an account for you, to communicate with you about PHATS-SPHEM, and to offer you additional PHATS-SPHEM services, We also use that information to the extent necessary to enforce our Website terms of service and to prevent imminent harm to persons or property. We use cookies so that our Website can remember you and provide you with the information you’re most likely to need. We also use information gained through cookies to compile statistical information about use of our Website, such as the time users spend at the site and the pages they visit most often.

Do Not Track Notice

Do Not Track (“DNT”) is a setting in a web browser that directs websites not to track your behavior. You can activate the DNT settings through most browsers. We have not authorized any third party to track consumers or visitors while they are on our Website, and we are aware of no such tracking.

3. Retention of Personal Data

We retain your Personal Data so long as it serves the purposes listed in this Privacy Notice, including to operate our services, send you notices other general messages (unless you've unsubscribed), to collect and monitor traffic and other usage statistics at our Website, to resolve disputes, to enforce the terms of this Website's contracts, and to comply with our legal obligations.

4. Transfer of Personal Data

We may store or process your data outside your city, province, state, or country. Data storage venues include, without limitation, the United States. These and other data storage jurisdictions may operate under privacy and data protection laws different from those of your home jurisdiction. Your submission of data to our Website and your consent to this Privacy Notice include consent to such storage and processing outside of your jurisdiction.

5. Contractor and Other Third Party Access to Personal Data

We give certain independent contractors access to Personal Data. Those contractors assist us with Website and database management. All those contractors are required to sign contracts in which they promise to protect Personal Data using procedures reasonably similar to ours. (Users are not third party beneficiaries of those contracts.) We also may disclose Personal Data to attorneys, or law enforcement authorities to address potential AUP violations, other contract violations, or illegal behavior. And we disclose any information demanded in a court order or otherwise required by law or to prevent imminent harm to persons or property.

Except as set forth in this Privacy Notice, we do not share Personal Information with third parties.

6. Protection of Personal Data

We employ the data security tools to protect Personally Data. We also take reasonable steps select vendors who make limited and legal use of your Personal Data. Unfortunately, even with these measures, we cannot guarantee the security of Personal Data. By using our Website, you acknowledge and agree that we make no such guarantee, and that you use our Website at your own risk.

7. Accessing and Correcting Your Personal Data

You can access and change any Personal Data we store by contacting us via e-mail, at aramsay@phatssphem.com.

8. Amendment of This Privacy Notice

We may change this Privacy Notice at any time by posting a new version on this page or on a successor page. The new version will become effective on the date it's posted, which will be listed at the top of the page as the new Effective Date.

9. Contacting Us

For questions concerning the PHATS-SPHEM privacy policy, please contact our General Counsel, jdaffner@mbdcounsel.com.