Contravans, LLC, (Contravans), is committed to keeping any and all personal information collected of those individuals that visit our website and make use of our online facilities and services accurate, confidential, secure and private. Our privacy policy has been designed and created to ensure those affiliated with Contravans, LLC of our commitment and realization of our obligation not only to meet but to exceed most existing privacy standards.

This privacy policy governs the manner in which Contravans collects, uses, maintains and discloses information collected from users (each, a "user") of the contravans.com website ("Site"). The Site is operated by Contravans, LLC. (the "Company", "we", or "us") for users of the Site ("you"). This privacy policy sets forth our policy to information that is collected from visitors to the Site. Under applicable law, Contravans, LLC. is the "data controller" of personal data collected through the Site.

COLLECTION OF INFORMATION

When you interact with us through the Site, we may collect information from you, as further described below:

Information You Provide: We collect information from you when you voluntarily provide such information, such as when you register for access to the Services or use certain Services. Information we collect may include but not be limited to username, email address, and any messages, images, transient VOIP data (to enable communication delivery only) or other content you send via the chat feature.

OTHER INFORMATION: WHERE THE INFORMATION IS PROCESSED

- **Data We Collect Automatically:** When you interact with us through the Site, we receive and store certain information such as an IP address, device ID, and your activities within the Services. We may store such information or such information may be included in databases owned and maintained by affiliates, agents or service providers. The Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site or the sites which refer visitors to Contravans.

- **Aggregated Information:** In an ongoing effort to better understand and serve the users of the Site, we may conduct research on our customer demographics, interests and behavior based on the information collected. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregate data with our affiliates, agents and business partners. We may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

- **Info through other Services:** You may give us permission to collect your information in other services. For example, you may connect a social networking service ("SNS") such as Facebook or
Twitter to your Contravans account. When you do this, it allows us to obtain information from those accounts (for example, your friends or contacts).

- **Cookies:** We employ cookies and similar technologies to keep track of your local computer’s settings such as which account you have logged into and notification settings. Cookies are pieces of data that sites and services can set on your browser or device that can be read on future visits. We may expand our use of cookies to save additional data as new features are added to the Site. In addition, we use technologies such as web beacons and single-pixel gifs to record log data such as open rates for emails sent by the system.

- **Third-Party Cookies:** We may use third party web site analytic tools such as Google Analytics on our website that employ cookies to collect certain information concerning your use of our Site. However, you can disable cookies by changing your browser settings. Further information about the procedure to follow in order to disable cookies can be found on your Internet browser provider’s website via your help screen.

- **Advertisements:** You may see our Site advertised in other applications or websites. After clicking on one of these advertisements and viewing our Site, you will become a user of the Site. Advertising platforms, which include Google, Facebook, and Twitter (and whose SDKs are integrated within our Service), may collect information for optimizing advertising campaigns outside of the Site.

If you do not wish to receive personalized advertising that is delivered by third parties outside of the Contravans Site, you may be able to exercise that choice through opt-out programs that are administered by third parties, including the Network Advertising Initiative (NAI), the Digital Advertising Alliance (DAA). Our Site currently do not respond to “Do Not Track” (DNT) signals and operate as described in this Privacy Policy whether or not a DNT signal is received, as there is no consistent industry standard for compliance.

**WHERE THE INFORMATION IS PROCESSED OUR LEGAL BASIS FOR HANDLING YOUR PERSONAL DATA**

We use the information you provide in a manner that is consistent with this Privacy Policy. If you provide information for a certain reason, we may use the information in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the information you provide to answer your question or resolve your problem. Also, if you provide information in order to obtain access to the Site, we will use your information to provide you with access to such Site and to monitor your use of such Site. The Company and its subsidiaries and affiliates (the “Related Companies”) may also use your information collected through the Site to help us improve the content and functionality of the Site, to better understand our users and to improve the Site. The Company and its affiliates may use this information to contact you in the future to tell you about Site we believe will be of interest to you. If we do so, each marketing communication we send you will contain instructions permitting you to “opt-out” of receiving future marketing communications. In addition, if at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below.

**OUR LEGAL BASIS FOR HANDLING YOUR PERSONAL DATA YOUR RIGHTS AND CHOICES**
The laws in some jurisdictions require companies to tell you about the legal ground they rely on to user disclose your personal data. To the extent those laws apply, our legal grounds are as follows:

- **To honor our contractual commitments to you:** Much of our processing of personal data is to meet our contractual obligations to our users, or to take steps at users’ request in anticipation of entering into a contract with them. For example, we handle personal data on this basis to create your account and provide our Services.

- **Legitimate interests:** In many cases, we handle personal data on the ground that it furthers our legitimate interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals: This includes:
  - Providing a safe and enjoyable user experience;
  - Customer service;
  - Marketing, e.g. sending emails or other communications to let you know about new features;
  - Protecting our users, personnel, and property;
  - Analyzing and improving our business, e.g. collecting information about how you use our Site to optimize the design and placement of certain features;
  - Processing job applications;
  - Managing legal issues.

- **Legal Compliance:** We need to use and disclose personal data in certain ways to comply with our legal obligations

- **To protect the vital interests of the individual or others:** For example, we may collect or share personal data to help resolve an urgent medical situation.

- **Consent:** Where required by law, and in some other cases, we handle personal data on the basis of your implied or express consent.

**OUR DISCLOSURE OF YOUR INFORMATION**

The Company is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your information with certain third parties, as set forth below:

- **Business Transfers:** As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, bankruptcy, dissolution or similar event, your information may be part of the transferred assets.

- **Consent:** We may transfer your information with your consent.

- **Related Companies:** We may also share your information with our Related Companies for purposes consistent with this Privacy Policy.

- **Developers:** Developers using our SDK or API will have access to their end users’ information, including message content, message metadata, and voice metadata. Developers must use such information only to provide the SDK/API functionality within their applications and/or services.

- **Agents, Consultants and Related Third Parties:** Like many businesses, we sometimes hire other companies or individuals to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and processing payments.

- **Legal Requirements:** We may disclose your information if required to do so by law or in the
good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of the Company or Related Companies, (iii) protect the personal safety of users of the Services or the public, or (iv) protect against legal liability.

- **Aggregated or Non-identifiable Data**: We may also share aggregated or non-personally identifiable information with our partners or others for business purposes.

**UNSOLICITED INFORMATION**

You may provide us with ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, “Unsolicited Information”). All Unsolicited Information shall be deemed to be non-confidential and we shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

**CHILDREN**

Our Site are for users age 13 and over and we do not knowingly collect personal information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personal information to us please contact us at team@contravans.com. For residents of the EEA, where processing of personal information is based on consent, Contravans will not knowingly engage in that processing for users under the age of consent established by applicable data protection law. If we learn that we are engaged in that processing with such users, we will halt such processing and will take reasonable measures to promptly remove applicable information from our records.

**LINKS TO OTHER WEB SITES**

This Privacy Policy applies only to the Site. The Site may contain links to other websites not operated or controlled by us (the “Third Party Sites”). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Site do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

**DATA RETENTION**

We generally retain personal data for so long as it may be relevant to the purposes identified herein. To dispose of personal data, we may anonymize it, delete it or take other appropriate steps. Data may persist in copies made for backup and business continuity purposes for additional time.

**SECURITY**

We take reasonable steps to protect the information provided via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from the Site may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any information via the Internet.

**YOUR RIGHTS AND CHOICES**
We believe that users should be treated equally no matter where they are, and so we are making the following options to control your data available to all users, regardless of their location.

You can update certain information by accessing your profile via “Customer Profile”. You can also unsubscribe from certain emails by clicking the “unsubscribe” link they contain. You can opt out from certain cookie-related processing by following the instructions above in “Other Information.”

Individuals in the European Economic Area, Canada, Costa Rica and some other jurisdictions outside the United States have certain legal rights to obtain confirmation of whether we hold personal data about them, to access personal data we hold about them (including, in some cases, in portable form), and to obtain its correction, update, amendment or deletion in appropriate circumstances. They may also object to our uses or disclosures of personal data, to request a restriction on its processing, or withdraw any consent, though such actions typically will not have retroactive effect. They also will not affect our ability to continue processing data in lawful ways.

CONTACT US

If you have any questions or concerns regarding the Privacy Policy Agreement related to our website, please feel free to contact us at the following email, telephone number or mailing address.

Email: team@contravans.com
Telephone Number: 720-515-1088
Mailing Address: Contravans, 6321 Washington St Unit P. Denver, CO 80216

11/30/2018