

## **Privacy Policy**

**HIGOL.CO** (hereinafter also referred to as “we” or “our”) understands the importance of your personal privacy. Therefore, we have created this Privacy Policy so that you know how we use and disclose your information when you make it available to us. The Privacy Policy below discloses our practices regarding information collection and usage website located at <http://higol.co>, the related mobile website, and the mobile application (collectively, the “Websites”) and the service provided thereon (the “Service”).

By using or accessing the Websites and the Service, you signify your agreement to be bound by this Privacy Policy. **IF YOU DO NOT AGREE TO THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE OUR SERVICE OR PARTICIPATE IN OUR SERVICES.**

Key aspects of our privacy practices described in this Privacy Policy include the following explanations:

- The information we collect and why we collect it;
- How we use that information;
- How we share information; and
- The choices we offer.

### **Personally Identifiable Information That We Collect:**

We may ask you for, or you may voluntarily submit, personally identifiable information when you are using the Service. The personally identifiable information which you may provide to us could include, but is not limited to:

- Your name
- Your contact information (including, without limitation, address and email address);
- Your IP address; and
- Other personal information.

### **Non-Personal Or Aggregate Information That We Collect:**

When you access our Service, we may automatically collect non-personally identifiable information from you, such as IP host address, web pages viewed, browser type, operating system, referring service, search information, device type, page views, usage and browsing habits on the Service and similar data. We may also aggregate demographic information collected from our users (such as the number of users in a particular geographical location) in a manner which does not identify any one individual. We may also aggregate information collected offline in connection with the Service, obtain non-personally identifiable information from third party sources and develop aggregate information by anonymizing previously collected personally identifiable information.

It is possible at times when collecting non-personally identifiable information through automatic means that we may unintentionally collect or receive personally identifiable information that is mixed in with the non-personally identifiable information. While we will make reasonable efforts to prevent such incidental data collection, the possibility still exists. If you believe that we have inadvertently collected your personal information, please notify us at [info@higo.co](mailto:info@higo.co).

### **Information Usage:**

We will only use your personally identifiable information as described below, unless you have specifically consented to another type of use, either at the time the personally identifiable information is collected from you or through some other form of consent from you or notification to you:

We may use your personally identifiable information to respond to your inquiries or requests. We may use your personally identifiable information to send you emails from time to time about our services, but we will not provide your personally identifiable information to third parties for them to contact you directly unless otherwise permitted by this Privacy Policy or you provide your consent.

We may share your personally identifiable information with third parties (collectively, the “Third Party Vendors”) to further the purpose for which you provided such information to us. For example, we may share your information with Aweber Email, for the purpose of sending emails. **We urge you to read the privacy practices of all of our Third Party Vendors before submitting any personally identifiable information through the Service.**

We may disclose personally identifiable information as required by law or legal process. We may disclose personally identifiable information to investigate suspected fraud, harassment or other violations of any law, rule or regulation, or the terms or policies for our services or our sponsors. We may transfer your personally identifiable information in connection with the sale or merger or change of control of <http://higo.co> or the division responsible for the services with which your personally identifiable information is associated.

**We will NEVER sell your personal information to third parties outside our company, unless our entire company is sold.**

### **Cookies and Similar Technologies:**

“Cookies” are pieces of information that may be placed on your computer by a service for the purpose of facilitating and enhancing your communication and interaction with that service. Many services use cookies for these purposes. We may use cookies (and similar items such as clear gifs, web beacons, tags, etc.) on our Service to customize your visit and for other purposes to make your visit more convenient or to enable us to enhance our Service. We may also use and place cookies (and similar items) on your computer from our third party service

providers in connection with the Service, such as an analytics provider that helps us manage and analyze Service usage, as described more fully below. In addition, our advertisers and business partners may set cookies and similar items on your computer when you use our Service. You may stop or restrict the placement of cookies on your computer or flush them from your browser by adjusting your web browser preferences, in which case you may still use our Service, but it may interfere with some of its functionality. Cookies and similar items are not used by us to automatically retrieve personally identifiable information from your computer without your knowledge.

If you delete your cookies, change browsers or use a different cookie, our cookie (or an opt-out cookie) may no longer work and you will have to reinput (or opt-out) again.

## **Cookie Policy:**

### *What's a cookie?*

- A “cookie” is a piece of information that is stored on your computer’s hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyze traffic and for advertising and marketing purposes.
- Cookies are used by nearly all websites and do not harm your system.
- Cookies are either:
  - Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or
  - Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. [We may use persistent cookies for Google Analytics.]
- Cookies can also be categorized as follows:
  - Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when buying a product and / or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- Functionality cookies: These cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymized.

[Please note that third parties who advertise on our website (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

*How do we use cookies?*

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website as well as products and / or services in response to what you might need or want.

### **Analytics and Conversion Tracking:**

We may use analytics services that use cookies, javascript and similar technologies to help us analyze how users use the Service. The information generated by these services about your use of the Service (including your IP address or a truncated version of your IP address) is transmitted to and stored by analytics service providers on their servers. Those service providers will use this information for the purpose of evaluating your, and other users', use of the Service, compiling reports for us on website activity and providing other services relating to website activity and Internet usage.

We may collect information about your computer, including your IP address, operating system and browser type, for system administration and in order to create reports. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For example, we use cookies on our site for Google Analytics (the "Analytics Service"). The Analytics Service is a web-based analytics tool that helps website owners understand how

visitors engage with their website. The Analytics Service customers can view a variety of reports about how visitors interact with their website so that they can improve it.

Like many services, the Analytics Service uses first-party cookies to track visitor interactions as in our case, where they are used to collect information about how visitors use our site. We then use the information to compile reports and to help us improve our site.

Cookies contain information that is transferred to your computer's hard drive. These cookies are used to store information, such as the time that the current visit occurred, whether the visitor has been to the site before and what site referred the visitor to the web page.

The Analytics Service collects information anonymously. They report website trends without identifying individual visitors. You can opt out of the Analytics Service without affecting how you visit our site. For more information on opting out of being tracked by Google Analytics across all websites you use, visit <https://tools.google.com/dlpage/gaoptout>.

We may also use Google conversion tracking and/or similar services to help us understand your and other users' use of the Service.

#### **Automatically Collected Information:**

When you access the Service or open one of our HTML emails, we may automatically record certain information from your system by using cookies and other types of tracking technologies. This "automatically collected" information may include Internet Protocol address ("IP Address"), a unique user ID, device type, device identifiers, browser types and language, referring and exit pages, platform type, version of software installed, system type, the content and pages that you access on the Service, the number of clicks, the amount of time spent on pages, the dates and times that you visit the Service, and other similar information. Depending on the law of your country of residence, your IP address may legally be considered personally identifiable information.

#### **Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR):**

If you are from the European Economic Area (EEA), **HIGOL.CO**'s legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

**HIGOL.CO** may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes

- To comply with the law

### **Retention of Data:**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

### **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### **Disclosure of Data:**

#### *Business Transaction*

If **HIGOL.CO** is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

#### *Disclosure for Law Enforcement*

Under certain circumstances, **HIGOL.CO** may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### *Legal Requirements*

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of **HIGOL.CO**
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

### **Your Data Protection Rights Under General Data Protection Regulation (GDPR):**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

**The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where we relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. If you are in the EU, you have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### **Service Providers:**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.]

### *Analytics*

We may use third-party Service Providers to monitor and analyze the use of our Service.

#### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

### **Security:**

The security of your personally identifiable information is very important to us. When we collect your personally identifiable information online, we use reasonable efforts to protect it from unauthorized access. However, due to the inherent open nature of the Internet, we cannot guarantee that your personally identifiable information will be completely free from unauthorized access by third parties such as hackers and your use of our Service demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your personally identifiable information. For more information on protecting your privacy, please visit [www.ftc.gov/privacy](http://www.ftc.gov/privacy).

### **Your Disclosures In Blogs And Other Social Media:**

You should be aware that personally identifiable information which you voluntarily include and transmit online on the Service or in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum such as an in-person panel or survey, may be viewed and used by others without any restrictions. We are unable to control such uses of your personally identifiable information, and by using the Service or any other online services you assume the risk that the personally identifiable information provided by you may be viewed and used by third parties for any number of purposes.

### **Protection for Children:**

We generally do not collect personally identifiable information from children under the age of 13. If at any time in the future we plan to collect personally identifiable information from children under 13, such collection and use, to the extent applicable, shall, when required, be done in compliance with the Children's Online Privacy Protection Act ("COPPA") and appropriate consent from the child's parent or guardian will be sought where required by COPPA. When we



become aware that personally identifiable information from a child under 13 has been collected without such child's parent or guardian's consent, we will use all reasonable efforts to delete such information from our database.

**"Do Not Track" Signals Under California Online Privacy Protection Act (CalOPPA)**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

**Other Services:**

As a convenience to you, we may provide links to third-party Services from within our Service. We are not responsible for the privacy practices or content of these third-party sites. When you link away from our Service, you do so at your own risk.

**Changes to this Privacy Policy:**

We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. However, if at any time in the future we plan to use personally identifiable information in a way that materially differs from this Privacy Policy, including sharing such information with more third parties, we will post such changes here and provide you the opportunity to opt-out of such differing uses. Your continued use of the Service and our services following the posting of any changes to this Privacy Policy means you accept such changes.

**Opt-Out Process:**

All unsubscribe or opt-out requests may be made by clicking the "unsubscribe" link at the bottom of the relevant email or simply reply to an email and indicate you no longer wish to receive further emails. We will process your request within a reasonable time after receipt. However, we are not responsible for, and in some cases we are incapable of, removing your personally identifiable information from the lists of any third party who has previously been provided your information in accordance with this Privacy Policy or your consent. You should contact such third parties directly. If you would like to update or correct any personally identifiable information that you have provided to us, please email us at [info@higol.co](mailto:info@higol.co) and once we confirm your information, we will update such information within a reasonable amount of time.

**Communications with Higol.co:**

By providing your contact information to us (including, without limitation, your email address, physical address, and phone number) (collectively the "Channels") to us, you expressly consent to receive communications from us. We may use the Channels to communicate with you, to

send information that you have requested or to send information about other products or services developed or provided by us or our business partners, provided that, we will not give your contact information to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

By using the Service, you expressly consent to receive in-product communications from us. By providing your phone number to us, you expressly consent to receive phone calls and/or text messages from us. We will not give your phone number to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

Any phone calls and/or text messages delivered to your phone or device may cause you to incur extra data, text messaging, or other charges from your wireless carrier. MESSAGE AND DATA RATES MAY APPLY. You are solely responsible for any carrier charges incurred as a result of phone and/or text communications from <http://higol.co>.

### **No Rights of Third Parties:**

This Privacy Policy does not create rights enforceable by third parties, nor does it require disclosure of any personal information relating to users of the Service.

### **Site Terms of Use:**

Use of this Service is governed by, and subject to, the Terms of Use located at <https://higol.co/wp-content/uploads/2018/06/Terms-of-Service-Higol-06-13-2018.pdf> (the "Terms"). This Privacy Policy is incorporated into the Terms. Your use, or access, of the Service constitutes your agreement to be bound by these provisions. IF YOU DO NOT AGREE TO THE TERMS AND THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE THE SERVICE.

### **Servers:**

Our servers are maintained in the United States. By using the Service, you freely and specifically give us your consent to export your personally identifiable information to the United States and to store and use it in the United States as specified in this Privacy Policy. You understand that data stored in the United States may be subject to lawful requests by the courts or law enforcement authorities in the United States.

### **Governing Law:**

This Privacy Policy and our legal obligations hereunder are subject to the laws of the State of North Carolina regardless of your location. You hereby consent to the exclusive jurisdiction of and venue in the courts located in the State of North Carolina, County of Durham, in all disputes arising out of or relating to the Services.

**Contact:**

For questions or concerns relating to privacy, we can be contacted at [info@higol.co](mailto:info@higol.co).

**Effective Date:**

This Privacy Policy was last updated on 6/13/18.