

EWR, INC.'S PRIVACY POLICY REGARDING PERSONAL AND CORPORATE INFORMATION

The privacy of your personal and/or corporate information (collectively referred to as "Personal Information" and "information" even if corporate) is important to EWR, INC. ("EWR, Inc."). We provide you with our Privacy Policy to describe what information we may collect about you; how we use your information; how we protect it; and what choices you have on how that information is used. EWR, Inc. understands that you may provide us with information that you may consider to be sensitive, and we want you to feel as comfortable as possible visiting our websites and online services ("websites"). Use of EWR, Inc.'s systems, websites, software, and mobile applications are always subject to this Policy.

We will post privacy policy changes on our website in a timely manner.

Your Consent

By using our websites, software, systems, and mobile applications, you agree with the terms of this Policy. Whenever you use our system, websites or our mobile application, you consent to the collection, use, and disclosure of that information in accordance with this Policy.

The following articles make up our Policy. We hope that reading them gives you a clear idea of how we manage your Personal Information.

- I. Personal Information We Collect
- II. Personal Information Usage
- III. Protection of Personal Information
- IV. Your Privacy Choices
- V. Updating Your Personal Information

When we refer to ourselves as "we" or "EWR, Inc.", we mean our entire company, including any company we control or an affiliated or related entity or any contractor working under our direction and control. We may share information among our subsidiaries we own or control, or an affiliated or related entity, but it is always protected under the terms of this Policy.

This Policy applies to all of EWR, Inc.'s websites, systems, software, and mobile applications and only to these items. We are not responsible for your information on other websites, once you leave EWR, Inc.'s websites. You should read the Policy at each website that you visit after you leave one of our websites.

I. Personal Information We Collect

In this section of our Policy, we discuss the different types of information we may collect about you and the ways we collect information.

Information We Collect From Visitors

Visitors to each of our websites can access the home page and browse some areas of the website without disclosing any personally identifiable information. We may track information provided to us by your browser, including the referring URL, your browser type, the time and date of access, and other information that does not personally identify you. However, on some of our websites, you must register with us to use portions of the website. When you use our mobile applications, we collect information identifying your device.

Information We Collect When You Register

Persons registering for services on our websites or through our application process are asked to provide identifying information, such as contact information. Registration may feature required and optional information.

Information From Outside Sources

We may ask customers of our services for financial (including banking and credit card) information. We may contact financial or credit organizations to confirm customer financial information and/or to complete the transaction.

Other Information

- We may collect information that you voluntarily provide to us through responses to surveys, polling, questionnaires, and the like.
- When you are using a forum or message board on our websites, you are posting a message with your username available for all registered users to see. When you are posting publicly, any user of our websites can see your message. You should not post any information you want to keep private to a forum or message board or any other public forum on our websites.
- We may ask you to provide additional information such as your email address if you want to obtain additional services or information or to resolve complaints or concerns.

In addition, we gather information about you that is automatically collected by our web server, such as your IP address, domain name and/or mobile device identifier. EWR, Inc. may use this information to personalize its offerings

and presentations to you, facilitate your movements throughout our websites, provide personalized services, and communicate with you individually.

Use of Cookies and Other Tracking Systems

Cookies are a technology used by EWR, Inc. to identify a user as the user moves through our websites. Your browser allows us to place some information on your device for identification. Cookies are used to personalize our websites and to track your usage across all of our websites.

Your web browser can be set to allow you to control whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to you. If your browser is set to reject cookies, websites that are cookie enabled will not recognize you when you return to the website, and some website functionality may be lost. For example, our websites may not be able to authenticate you, and you may not be able to access parts of the websites.

On occasion, we contract with third parties to place cookies on your device. We have required these third parties to observe our Policy.

The help section of your browser will tell you how to prevent your browser from accepting cookies.

Cookies do not normally contain personally identifiable information. If you have provided us information about yourself, we may associate your registration information with cookies our website places on your device. Associating a cookie with your registration information allows us to offer increased personalization and functionality.

II. Information Usage

In this section of our Policy, we identify the ways we may use collected information.

Aggregate Data

We aggregate data about visitors to our websites and users of our systems, software, and mobile applications for the development and improvement of our activities. We may also use it for market analysis. We may provide information from our websites in aggregate form, with identifying information removed, to third parties. Past information, in aggregate form, may be provided to third parties even if knowledgeable persons might be able to ascertain from the aggregated data that a given company was the probable source of certain activities. Depending on our agreement with the third parties, we may or may not charge for this information.

Marketing

We may target our marketing depending on information we have collected.

Our staff may use personally identifiable information, including financial data, in determining approval for participation.

We may use the information we collect as otherwise permitted in this Policy, subject to the terms of our agreement with you.

III. Protection of Information

How EWR, Inc. Handles Privacy Internally

In this section of our Policy, we discuss the security measures we take to protect information that we have collected about you.

Security

EWR, Inc. uses security methods to determine the identity of its registered users so that appropriate rights and restrictions can be enforced for that user. Reliable verification of a user's identity is called authentication. EWR, Inc. utilizes usernames, passwords, and unique identifiers to authenticate. In certain restricted and limited situations, IP addresses may be used for authentication. Users are responsible for maintaining the confidentiality and security of authentication data.

EWR, Inc. is committed to operating its website, software, and systems with customary internal controls and the highest ethical standards. EWR, Inc. uses customary information security measures and techniques to protect users' data. However, transmitting information over the internet is never completely secure and any computers linked to the internet run the risk of being hacked, i.e., your information runs the risk of being intercepted, collected, used or disclosed by others. Thus EWR, Inc. cannot and does not guarantee complete security.

Third Parties

In addition to aggregated information (discussed previously), we may share some kinds of information with third parties as described below.

- **Companies and People Who Work for Us:** We may contract with other companies and individuals to help us provide services. For example, we may host some of our websites on another company's devices, hire

technical consultants to maintain our systems and websites, or work with companies to remove repetitive information from customer lists, analyze data, provide marketing assistance, and provide customer service. In order to perform their jobs, these other companies may have limited access to some of the personal information we maintain about our users. We require all such companies to comply with the terms of our privacy policies, to limit their access to any personal information to the minimum necessary to perform their services, and not to use the information they may access for purposes other than fulfilling their responsibilities to us. We use our best efforts to limit the use of other companies in areas where personally identifiable information may be involved.

- EWR, Inc. performs some of its services under the auspices of the U.S. government, including acting as a provider of ewr services under a license from the USDA. Your data and information may be shared with the government as the government or EWR, Inc. determines is necessary or desirable.
- Legal Requirements: We may release account and other personal information when we believe release is required to comply with law. We may release protected information, if, in our judgment and after review by an attorney, the release is compelled by law or regulation, or if the release may be necessary to prevent violation of law or serious injury.

IV. Your Privacy Choices

On certain of our websites, when you complete registration, you may be given the option of receiving informational/promotional emails from EWR, Inc. and/or third parties. You may opt-out from receiving these emails at any time. You can unsubscribe from such emails by following the unsubscribe instructions on such email or contacting EWR, Inc.'s customer support.

V. Updating Your Personal Information

You have access to your personal contact information so that you may update the contact that you have provided to us.