

PRIVACY POLICY

Effective Date: January 1, 2020

To review material modifications and their effective dates scroll to the bottom of the page.

The Richmond Group Inc ("Richmond Group") owns and operates this therichmondgroup.com website business. All references to "we", "us", this "website" or this "site" shall be construed to mean Richmond Group.

HOW WE MODIFY THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time, and without prior notice, by posting an amended Privacy Policy that is always accessible by clicking on the "Privacy Policy" link on this site's home page. Your continued use of this site indicates your acceptance of the amended Privacy Policy.

Regarding Personal Information (defined below), if any modifications are materially less restrictive on our use or disclosure of the Personal Information previously disclosed by you, we will obtain your consent before implementing such revisions with respect to such information.

THE TYPES OF INFORMATION WE COLLECT

Personal Information. "Personal Information" includes any information regarding a natural person that may be used directly to identify the person. Personal Information that we collect may vary with each separate purpose for which you provide it, and it may include one or more of the following categories: name, physical address, an email address, phone number, and location data.

Usage Data. We reserve the right to collect information based on your usage of this site which is information collected automatically from this site (or third party services employed in this site), which can include: the IP addresses or domain names of the computers utilized by the users who use this site, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the user, the various time details per visit (e.g., the time spent on each page within the site) and the details about the path followed within the site with special reference to the sequence of pages visited, other parameters about the device operating system and/or the user's IT environment, and data, conversion rates, marketing and conversion data and statistics, reports, analytics data, reviews and surveys ("Usage Data"). Usage Data is essentially anonymous when collected, but could be used indirectly to identify a person.

HOW AND WHEN WE COLLECT INFORMATION

Personal Information. We collect Personal Information at the time you provide it to us. We collect Personal Information through sign-up forms and as part of your registration for an account, product, or service, promotion, or contest from this website. Personal Information that we collect may vary with the each sign-up or registration. In addition, we collect personal information from all communications with site visitors including without limitation, text messages, faxes, telephone calls, and regular "snail mail", as well as from third-party outside sources including database vendors.

Your Communications With Us. We collect Personal Information that we receive from you as you communicate with us. If you complete a sign up form subscribing to information from our site or to participate in our mailing list activities, we will receive your Personal Information from our email services and/or autoresponder service.

Usage Data. We reserve the right to monitor your use of this site. As you navigate through this site, Usage Data may be passively collected (that is, gathered without your actively providing the information) using various analytics and reporting technologies, such as cookies and web beacons.

HOW WE USE YOUR INFORMATION

Passive and Analytical Information. We reserve the right to monitor your use of this site. As you navigate through this site, Usage Data may be passively collected (that is, gathered without your actively providing the information) using various analytics and reporting technologies, such as cookies and web beacons.

We may use your Personal Information for the performance of the services or transaction for which it was given, and in connection with other products, services, promotions, or contests we may offer, and our private, internal reporting for this site, and security assessments for this site.

We reserve the right to make full use of Usage Data. For example, we may use Usage Data to provide better service to site visitors, customize the site based on your preferences, compile and analyze statistics and trends about the use of this site, and otherwise administer and improve this site for your use. Specific uses are described below.

INFORMATION SHARING AND DISCLOSURE

General Disclosure Policy. We reserve the right to disclose your Personal Information as described below. We reserve the right to disclose Usage Data without restriction.

Affiliated Entities. We reserve the right to provide your Personal Information and Usage Data to any affiliated entities we may have, including our subsidiaries. Affiliated entities are entities that we legally control (by voting rights) or that control us.

Service Providers. We reserve the right to provide access to your Personal Information and Usage Data to our trusted service providers that assist us with the operation and maintenance of this site. For example, we may contract with third parties to process payments, host our servers, provide security, and provide production, fulfillment, optimization, analytics, and reporting services. Our service providers will be given access to your information only as is reasonably necessary to provide the services for which they are contracted.

Successors. If we sell or otherwise transfer part or all of our business or assets to another organization, such as in the course of an acquisition, merger, bankruptcy or liquidation, we may transfer your Personal Information and Usage Data. In such an event, we will require the buyer or transferee to agree to our commitments provided in this Privacy Policy.

Legal Process, Enforcement and Security Notice. We reserve the right to disclose your Personal Information and Usage Data if we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary (i) to satisfy any applicable law, regulation, legal process or enforceable governmental request (such as for example, to comply with a subpoena or court order), (ii) to detect, prevent, and address fraud or other illegal activity, and (iii) to investigate, respond to, or enforce violations of our rights or the security of this site.

When We Participate In a Joint Venture With Marketing Partners. We may participate with another company or individual for purposes of jointly promoting our products, services, promotions or contests or their products, services, promotions, or contests. We reserve the right to disclose your Personal Information to them for purposes of (i) compensation, transaction processing, fulfillment, and support, and (ii) for purposes of offering you other products, services, promotions, and contests. These joint venture marketing partners may also contact you regarding other products, services, promotions, or contests.

Disclosures of Personal Information In Our Discretion. If we believe, in our sole discretion, that it's reasonable to disclose Personal Information and any information regarding your use of this site and/or any product, service, promotion, or contest offered through this site, including any information regarding other websites that are accessible through this site, we reserve the unqualified right to do so.

Your California Privacy Rights. Under California Law SB 27, California residents have the right to receive, once a year, information about third parties with whom we have shared information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of personal information shared. To make such a request, please send an email to the email address provided in our contact information below and include the phrase "California Privacy Request" in the subject line, the domain name of the Web site you are inquiring about, along with your name, address and email address. We will respond to you within thirty days of receiving such a request.

SPECIFIC INFORMATION ABOUT COOKIES AND WEB BEACONS

In order to provide better service for our site, we may use Cookies and Web Beacons to collect Usage Data to store your preferences and information about what pages you visit and past activity at our site. We may also employ Web Beacons from third parties in order to help us compile aggregated statistics regarding the effectiveness of our promotional campaigns or other operations of our site.

"Cookies" are tiny pieces of information stored by your browser on your computer's hard drive. Cookies are also used to customize content based on your browser. Most browsers are initially set to accept cookies. If you want to disable cookies, there is a simple procedure in most browsers that allows you to turn off cookies. Please remember, however, that cookies may be required to allow you to use certain features of our site.

Flash Cookies - third party cookies that use an Adobe Flash Media Player local shared object (LSO) - may be used along with other third party cookies for purposes of crediting any purchase you may make on this site to one of our joint venture marketing partners that may have referred you to us. These cookies will be used for purposes of crediting sales to the referring joint venture marketing partner. Flash cookies are not the same as "browser cookies". The Adobe Flash Media Player is software that enables users to view content on their computers. Flash cookies are also accompanied by a browser cookie. If you delete the browser cookie, the Flash cookie may automatically create (or re-spawn) a replacement for the browser cookie.

Web Beacons - sometimes called single-pixel gifs or clear gifs - are used to assist in delivering cookies, and they allow us to count users who have visited pages of our site. We may include Web Beacons in promotional e-mail messages or our newsletters in order to determine whether messages have been opened and acted upon.

ANALYTICS

We reserve the right to participate with third party analytics partners to monitor and analyze Web traffic and can be used to keep track of user behavior on this site.

Google Analytics (Google) - Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the data collected to track and examine the use of this site, to prepare reports on its activities, and to share them with other Google services. Information collected: cookie and Usage Data. Visit Privacy Policy at <https://www.google.com/intl/en/policies/?fg=1> You may optout of the Google Analytics service with the Google's Browser Add-on that's available at <https://tools.google.com/dlpage/gaoptout/>

Clicky Web Analytics (Clicky) - Clicky Web Analytics is a web analysis service provided by Roxr Software, Ltd. ("Clicky"). Clicky utilizes the data collected to track and examine the use of this

site, to prepare reports on its activities, and to share them with other Clicky services.
Information collected: cookie and Usage Data. Visit Privacy Policy at <http://clicky.com/terms>

SOCIAL MEDIA INTERACTIONS

We invite you to socialize and share your participation with this site and purchases. If you choose to use social media platforms such as Facebook, Twitter, Pinterest, and Instagram, you will be allowing interaction with these platforms or other external platforms directly from this site, and in the process you may be sharing certain profile elements, including your comments. This sharing is subject to each social media program's privacy policies.

DO NOT TRACK REQUESTS

Some Web browsers incorporate a "Do Not Track" feature that signals to websites that you visit that you do not want to have your online activity tracked. Each browser communicates "Do Not Track" signals to websites differently, making it unworkable to honor each and every request correctly. In order to alleviate any communication error between browsers and website, we do not respond to "Do Not Track" signals at this time. As the technology and communication between browser and website improves, we will reevaluate the ability to honor "Do Not Track" signals and may make changes to our policy.

DATA SECURITY

We will implement reasonable and appropriate security procedures consistent with prevailing industry standards to protect data from unauthorized access by physical and electronic intrusion. Unfortunately, no data transmission over the Internet or method of data storage can be guaranteed 100% secure. Therefore, while we strive to protect your Personal Information by following generally accepted industry standards, we cannot ensure or warrant the absolute security of any information you transmit to us or archive at this site.

When you transmit Personal Information through our registration process or if you purchase products or services, we encrypt that information in transit using secure socket layer technology (SSL).

ONWARD TRANSFER OUTSIDE YOUR COUNTRY OF RESIDENCE

Any Personal Information which we may collect on this site will be stored and processed in our servers located only in the United States. By using this site, if you reside outside the United States, you consent to the transfer of Personal Information outside your country of residence to the United States.

UPDATING PERSONAL INFORMATION

Upon request, we will permit you to request or make changes or updates to your Personal Information for legitimate purposes. We request identification prior to approving such requests. We reserve the right to decline any requests that are unreasonably repetitive or systematic, require unreasonable time or effort of our technical or administrative personnel, or undermine the privacy rights of others. We reserve the right to permit you to access your Personal Information in any account you establish with this site for purposes of making your own changes or updates, and in such case, instructions for making such changes or updates will be provided where necessary.

LINKS TO JOINT VENTURE MARKETING PARTNER SITES

This site may contain links to other websites operated by our joint venture marketing partners. If you do click on any of the links to their websites or accept any of their promotional offers, your click-through information and any information that you provide in the process of registration or purchase will be transferred to these sites. We have no responsibility or liability for the policies and practices of these sites. You should be careful to review any privacy policies posted on any of these sites before providing information to them.

CHILDREN'S ONLINE POLICY

We are committed to preserving online privacy for all of its website visitors, including children. This site is a general audience site. Consistent with the Children's Online Privacy Protection Act (COPPA), we will not knowingly collect any information from, or sell to, children under the age of 13. If you are a parent or guardian who has discovered that your child under the age of 13 has submitted his or her personally identifiable information without your permission or consent, we will remove the information from our active list, at your request. To request the removal of your child's information, please contact our site as provided below under "Contact Us", and be sure to include in your message the same login information that your child submitted.

CONTACT US

If you have any questions regarding this Privacy Policy, please contact the owner and operator of this website business at:

The Richmond Group Inc
Attn: Privacy Policy Officer
77 Main St Ste 8,
Hopkinton, MA, 01748
Email: mgorman-at-therichmondgroup.com
Telephone: 508.435.9700

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Material Modifications Since January 1, 2020: none.