

Last Updated: December 11<sup>th</sup>, 2017

### **MNG Direct Privacy Policy**

Thank you for visiting the MNG Direct website located at [www.mngdirect.com](http://www.mngdirect.com) (the "Site"). The Site is an Internet property of MNG Direct ("MNG Direct," "we," "our" or "us"). This MNG Direct Privacy Policy ("Privacy Policy") covers our treatment of personal information and other information that we collect when an end-user visitor to the Site ("user," "you" or "your"): (a) accesses or uses the Site; (b) accesses and/or views any of the text, video and/or other information pertaining to MNG Direct's various product and/or service offerings (the "Content"); (c) accesses links to MNG Direct's social media pages/accounts on third party social media websites, such as Facebook® and LinkedIn® (collectively, "Social Media Pages"); and/or (d) utilizes the various contact forms ("Forms") and/or contact information made available on the Site as a means to contact directly, or request to be contacted by, MNG Direct (collectively, the "Contact Services," and together with the Site, Content and Social Media Pages, the "Site Offerings").

Capitalized terms not defined herein shall have the meanings set forth in the MNG Direct Website Terms and Conditions ("Terms and Conditions"). **IF YOU DO NOT AGREE TO TERMS OF THIS PRIVACY POLICY IN THEIR ENTIRETY, YOU MAY NOT ACCESS OR OTHERWISE USE THE SITE OFFERINGS.**

*Facebook® is a registered trademark of Facebook, Inc. ("Facebook"). LinkedIn® is a registered trademark of LinkedIn Corporation ("LinkedIn"). Please be advised that MNG Direct is not in any way affiliated with Facebook or LinkedIn, and the Site Offerings are not endorsed, administered or sponsored by Facebook or LinkedIn.*

#### **Your California Privacy Rights**

If you are a resident of the State of California and would like to learn how your "personal information" (as defined in the Shine the Light Law, Cal. Civ. Code § 1798.83) is shared with third parties, what categories of personal information that we have shared with third parties in the preceding year, as well as the names and addresses of those third parties, please e-mail us at: [info@mngdirect.com](mailto:info@mngdirect.com); call us at: 610-834-9988; or send us mail to: MNG Direct, 3220 Tillman Drive, Suite 500, Bensalem, PA 19020.

#### **Personal Information Collected**

For the purposes of this Privacy Policy, "personal information" shall mean individually identifiable information from or about an individual. We collect personal information when you access certain of the Site Offerings and complete the required information request form and/or otherwise provide such information to us. Where a user attempts to utilize the Contact Services, that user may be required to submit, and MNG Direct may collect, some or all of the following information: (a) the user's e-mail address; (b) the user's full name; and (c) any other information collected via the Contact Services form.

#### **Use of Personal Information**

Other than as set forth in this Privacy Policy, MNG Direct will never share, sell, rent, exchange or barter your personal information to or with any third party for financial gain or marketing purposes. By making that personal information available to MNG Direct, you grant MNG Direct the right, subject to applicable state and federal law, to use that personal information to contact you by telephone, email and to send you various marketing messages that contain promotional offers from MNG Direct, as well as offers from MNG Direct's third party partners, that MNG Direct believes may be of interest to you. If you wish to stop receiving future communications from us, please follow the instructions at the end of each such marketing message, or see the "Opt-Out/Unsubscribe" section below.

Where you submit personal information, we use the personal information that you make available to personalize your experience with the Site and to facilitate the delivery of the applicable Site Offerings to you, including to respond to any inquiries made by you.

You also agree that we may contact you at any time with updates and/or any other information that we may deem appropriate for you to receive in connection with your continued use of the Site Offerings, and to keep you informed of our other products and services.

We may also employ other companies and individuals to perform certain functions on our behalf. Examples include sending direct and electronic mail, removing duplicate information from user lists, analyzing data and providing marketing analysis. The agents performing these limited functions on our behalf shall have access to our users' personal information as needed to perform these functions for us, but we do not permit them to use user personal information for other purposes.

We will also use your personal information for customer service, to provide you with information that you may request, to customize your experience with the Site Offerings and/or to contact you when necessary in connection with your use of the Site Offerings. We may also use your personal information for internal business purposes, such as analyzing and managing our service offerings including, without limitation, the Site Offerings. We may also combine the information we have gathered about you with information from other sources.

By submitting your personal information by and through the Site Offerings, you agree that such act constitutes an inquiry and/or application for purposes of the Amended Telemarketing Sales Rule (16 CFR §310 et seq.), as amended from time to time (the "Rule") and applicable state do-not-call regulations. As such, notwithstanding that your telephone number may be listed on the Federal Trade Commission's Do-Not-Call List, and/or on applicable state do-not-call lists, we retain the right to contact you via telemarketing in accordance with the Rule and applicable state do-not-call regulations.

We reserve the right to release current or past personal information: (A) in the event that we believe that the Site Offerings are being or have been used in violation of the Terms and Conditions or to commit unlawful acts; (B) if the information is subpoenaed; *provided, however*, that, where permitted by applicable law, we shall provide you with e-mail notice, and opportunity to challenge the subpoena, prior to disclosure of any personal information pursuant to a subpoena; or (C) if we are sold, merge with a third party, are acquired or are the subject of bankruptcy proceedings; *provided, however*, that if MNG Direct is involved in a bankruptcy proceeding, merger, acquisition or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on the Site of any change in ownership or uses of your personal information, as well as any choices that you may have regarding your personal information.

You hereby consent to the disclosure of any record or communication to any third-party when we, in our sole discretion, determine the disclosure to be appropriate including, without limitation, sharing your e-mail address with third-parties for suppression purposes in compliance with applicable law, including the CAN-SPAM Act of 2003, as amended from time to time. Users should also be aware that courts of equity, such as U.S. Bankruptcy Courts, might have the authority under certain circumstances to permit personal information to be shared or transferred to third parties without permission.

## **Non-Personal Information Collection and Use**

### *IP Addresses/Browser Type*

We may collect certain non-personally identifiable information about you and your desktop computer and/or mobile device when you visit many of the pages of the Site. This non-personally identifiable information includes, without limitation, the type of browser that you use (e.g., Safari, Chrome, Internet Explorer), your IP address, the type of operating system that you use (e.g., Windows or iOS) and the domain name of your Internet service provider (e.g., Verizon, AT&T). We use the non-personally identifiable information that we collect to improve the design and content of the Site Offerings and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze usage of the Site Offerings.

### Cookies

When a user visits the Site, we send one (1) or more cookies and/or gif files (collectively, "Cookies") to assign an anonymous, unique identifier to the applicable user's computer. A Cookie is a piece of data stored on your hard drive containing non-personally identifiable information about you. Cookies have many benefits to enhance your experience at the Site. To find out more about Cookies, please visit [www.cookiecentral.com](http://www.cookiecentral.com). We use Cookies to improve the quality of the Site Offerings, including for storing user preferences and tracking Site-user trends (such as pages opened and length of stay at the Site).

Most Internet browsers are initially set up to accept Cookies, but you can reset your browser to refuse all Cookies or to indicate when a Cookie is being sent. To disable and reject certain Cookies, follow the instructions associated with your Internet browser. Even in the case where a user rejects a Cookie, he or she may still use the Site Offerings; *provided, however*, that certain functions of the Site Offerings may be impaired or rendered inoperable if the use of Cookies is disabled. We reserve the right to retain Cookie data indefinitely.

### Behavioral Tracking

Neither MNG Direct, nor any third party, uses cookies, pixels or other tracking technology on the Site for purposes of tracking users' activities after they leave the Site. Nevertheless, most Internet browsers contain a "do-not-track" setting. In general, when a "do-not-track" setting is active, the user's Internet browser notifies other websites that the end-user does not want his/her Information and online behavior to be tracked and used, for example, for behavioral advertising.

### Aggregate Data

MNG Direct reserves the right to transfer and/or sell aggregate or group data about users of the Site Offerings for lawful purposes. Aggregate or group data is data that describes the demographics, usage and other characteristics of Site Offerings users as a group, without disclosing personally identifiable information.

## **Social Media Websites**

If you engage in any interaction with MNG Direct, other users or any third party on any Social Media Pages, you should be aware that: (a) the personal information that you submit by and through such Social Media Pages can be read, collected and/or used by other users of these websites/services (depending on your privacy settings associated with your accounts with the applicable Social Media Websites), and could be used to send you unsolicited messages or otherwise to contact you without your consent or desire; and (b) where MNG Direct responds to any interaction on such Social Media Pages, your account name/handle may be viewable by any and all members/users of MNG Direct's social media accounts.

We are not responsible for the personal information that you choose to submit on any Social Media Websites. The Social Media Websites operate independently from MNG Direct, and we are not responsible for such Social Media Websites' interfaces or privacy or security practices. We encourage you to review the privacy policies and settings of the Social Media Websites with which you interact to help you understand those Social Media Websites' privacy practices. If you have questions about the security and privacy settings of any Social Media Websites that you use, please refer to their applicable privacy notices or policies.

## **Third-Party Websites**

This Site may contain links to third-party owned and/or operated websites including, without limitation, the Social Media Websites. MNG Direct is not responsible for the privacy practices or the content of such websites. In some cases, you may be able to make a purchase through one of these third-party websites. In these instances, you may be required to provide certain information, such as a credit card number, to register or complete a transaction at such website. These third-party websites have separate privacy and data collection practices and MNG Direct has no responsibility or liability relating to them.

## **Security**

We endeavor to safeguard and protect our users' personal information. When users make personal information available to us, their personal information is protected both online and offline (to the extent that we maintain any personal information offline). Where we ask users to enter sensitive information, if ever, and when we store and transmit such sensitive information, that information is encrypted with advanced TLS (Transport Layer Security).

Access to your personal information is strictly limited, and we take reasonable measures to ensure that your personal information is not accessible to the public. All of our users' personal information is restricted in our offices, as well as the offices of our third party service providers. Only employees or third party agents who need user personal information to perform a specific job are granted access to user personal information. Our employees are dedicated to ensuring the security and privacy of all user personal information. Employees not adhering to our firm policies are subject to disciplinary action. The servers that we store user personal information on are kept in a secure physical environment. We also have security measures in place to protect the loss, misuse and alteration of personal information under our control.

Please be advised, however, that while we take every reasonable precaution available to protect your data, no storage facility, technology, software, security protocols or data transmission over the Internet or via wireless networks can be guaranteed to be 100% secure. Computer hackers that circumvent our security measures may gain access to certain portions of your personal information, and technological bugs, errors and glitches may cause inadvertent disclosures of your personal information; *provided, however*, that any attempt to breach the security of the network, our servers, databases or other hardware or software may constitute a crime punishable by law. For the reasons mentioned above, we cannot warrant that your personal information will be absolutely secure. Any transmission of data at or through the Site, other Site Offerings or otherwise via the Internet or wireless networks, is done at your own risk.

In compliance with applicable federal and state laws, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your personal information. You will be notified via e-mail in the event of such a breach. Please be advised that notice may be delayed in order to address the needs of law enforcement, determine the scope of network damage, and to engage in remedial measures.

## **Minors**

Visitors under eighteen (18) years of age are not permitted to use and/or submit their personal information at the Site. MNG Direct does not knowingly solicit or collect information from visitors under eighteen (18) years of age. MNG Direct encourages parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children.

## **Opt-Out/Unsubscribe**

To opt-out of receiving e-mail and other forms of communications from us, you can: (a) follow the instructions included in the applicable e-mail message or other communication; or (b) e-mail us at: [info@mngdirect.com](mailto:info@mngdirect.com).

Notwithstanding the foregoing, we may continue to contact you for the purpose of communicating information relating to your request for Site Offerings, as well as to respond to any inquiry or request made by you. To opt-out of receiving Site Offerings-related and/or inquiry response-related messages from MNG Direct, you must cease requesting and/or utilizing the Site Offerings and/or cease submitting inquiries to MNG Direct, as applicable.

## **Deleting, Modifying and Updating Your Information**

At your request, we will: (a) inform you of what personal information we have on file for you; (b) amend the personal information that we have on file for you; and/or (c) remove personal information that you have provided to us, or that we have collected. You may do so by e-mailing us at: [info@mngdirect.com](mailto:info@mngdirect.com). We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and, to the extent permitted by applicable law, we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others or would be extremely impractical (for instance, requests concerning information residing on backup tapes).

Please be advised that deleting your personal information may terminate your access to certain of the Site Offerings. If you wish to continue using the full complement of Site Offerings, you may not be able to delete all of the personal information that we have on file for you.

Please be further advised that, after you delete your personal information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

### **Transfer of Personal Information Internationally**

If you are visiting the Site from a country other than the country in which our servers are located, your communications with us may result in the transfer of information across international boundaries. By visiting the Site and/or otherwise communicating electronically with us, you consent to such transfers. Even if your jurisdiction does not have the same privacy laws as the jurisdiction where our servers are located, we will treat your information as subject to the protections described in this Privacy Policy.

### **Changes to this Privacy Policy**

MNG Direct reserves the right to change or update this Privacy Policy at any time by posting a notice on the Site that we are changing our Privacy Policy. If the manner in which we use personal information changes, MNG Direct will notify users by: (a) sending the modified policy to our users via email; and/or (b) by any other reasonable means acceptable under applicable state and federal law. You will have a choice as to whether or not we use your information in this different manner and we will only use your information in this different manner where you opt-in to such use.

### **Contact Us**

If you have any questions about this Privacy Policy or our privacy practices in general, you may email us as at: [info@mngdirect.com](mailto:info@mngdirect.com); call us at: 1.866.408.9242; or send us mail to: MNG Direct, 3220 Tillman Drive, Suite 500, Bensalem, PA 19020.