

This Privacy Policy applies to www.ERCNow.com operated by Ignition Point Media (“we”, “us”, “our”).

This Privacy Policy applies to Personal Identifiable Information (“PII”) that we collect from our clients and from our website and other online users (hereinafter “you”), as well as information that we collect automatically during your visits of our website (e.g., information collected via cookies).

For purposes of this Privacy Policy, “business partners” means any subcontractors, contractors or other legal entities with whom we have an ongoing business relationship to provide services or information.

“PII” means any data, such as your name, telephone number, email address, IP (“Internet Protocol”) address or location data.

We recognize the current lack of consistent and comprehensive Federal and Washington State Privacy legislation and have as such voluntarily adopted the current gold standard deriving from the EU’s General Data Protection Regulation (“GDPR”). Thus, we act as the data controller in accordance with the GDPR. Whilst it is expected that current legislative uncertainty is to be resolved in due course, we would like to ask you to regularly check this policy for any changes.

Legal basis for processing

Our legal basis for collecting and using your PII as described in this Privacy Policy depends on the PII involved and the specific context in which we collect it. Generally, your PII will be collected and processed by us on one or more of the following legal bases:

- Your consent,
- Compliance with contractual obligations,
- Compliance with legal obligations, and
- On the basis of our legitimate interests.

If you have any questions or need more information about the legal basis for the collection of your PII, please contact us.

Information we collect

We may ask you for PII when you

- Use our website and services,

- request quotes, services, support, concepts, or information,
- place orders for services,
- Participate online or otherwise in marketing activities,
- Subscribe to ERC Now programs, marketing and promotional emails or other materials,
- Interact with us on third-party social networking sites (subject to the terms of use and privacy policies of said third parties); or
- Contact us,

Categories of PII we collect may include your name, email address, address, contact telephone numbers. It may also include professional information such as your job title and other business or company information. We may also collect demographic data, such as age, gender, your interests, and preferences. We may also ask you for other information that we need to process payment for our services.

In order to provide you with a more consistent and personalized user experience in your interactions with ERC Now, data collected through one source may also be linked to other data collected by ERC Now through other sources. This may include data that helps us identify you when you access our website through several different devices. We may also enrich the data we collect with data obtained from other parties, such as our business partners or other third parties, to create individual profiles about you. Examples of how we may use this data include using it to improve your user experience when visiting our website, to display options tailored to your preferences, and for targeted advertising.

For more information about our use of cookies and similar tracking technologies, including how to opt out of targeted advertising, please see the Cookie Policy.

Data Automatically Collected by Us

We may automatically collect information about user behavior and usage regarding your visits to our websites, such as the pages you view, the links you click, and other actions you take in connection with our website.

We may also collect certain information about the browser you use to access our website, such as your IP address, device identifier, location data, browser type and language, and your access times, the URL ("Uniform Resource Locator") of the website from which you arrived at our website, and the URL to which you are directed after leaving our website if you clicked on a link on our website.

Data from third party sources

We may obtain data about you from third-party sources, such as public databases, our business partners, joint marketing partners, social networks, and other third parties. We may use this data to better analyze your user behavior to improve our ability to provide you with relevant marketing information and services, and to prevent and combat fraud.

Hosting

To provide our website, we use the services of [Wix.com Ltd](#) which processes the data listed below and all data to be processed in connection with the operation of this website (log file when visiting the website) on our behalf. The legal basis is our legitimate interest.

Our use of PII

ERC Now may use your PII for the following purposes:

- Providing you with solutions, services, and support, and conducting transactions you request,
- Sending notifications to you, including information about the status of your transaction, including information about the services as well as order confirmations, about specific ERC Now programs in which you may wish to participate, about solutions and services available from ERC Now,
- Enabling you to use our website,
- Providing support to respond to your online inquiries,
- Customize, analyze, and optimize our solutions, services (including content to gauge usage trends and determine the effectiveness of our marketing campaigns), technologies, notifications and business relationships with you,
- Better understanding our clients and website users,
- Personalizing content and implementing your preferences,
- Enforcing our terms and conditions, and separate contracts (if any) with you,
- Prevention of fraud and other prohibited or unlawful activities,
- Protecting the security and integrity of our websites, businesses, and services; and
- Other functions and purposes disclosed to you at the time of collection or as required or permitted by law.

Retention of your data

We will retain your personal data as necessary in connection with the purposes described in this Privacy Policy, for as long as you are actively working with us, and in accordance with Washington`s Retention Periods and other applicable laws.

International transfers

ERC Now may transfer your PII to other companies and/or business partners as necessary for the purposes described in this Privacy Policy. In doing so, your personal data may be transferred to countries outside the USA. In order to provide adequate protection for your PII when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organizational measures to protect the personal data we transfer.

Sharing of personal data by us.

We may share your PII with ERC Now affiliates and business partners for the purposes described in this Privacy Policy, including, without limitation, to carry out transactions you request or to respond more quickly to your needs in our (and our affiliates') operations. Our affiliates and/or business partners may contact you with information about ERC Now and ERC Now services and offerings. We will only share your PII with ERC Now affiliates and business partners who have agreed to protect your PII and to use it only for the purposes ERC Now has specified.

With your consent, we may disclose your PII for any purpose.

In addition, we may disclose your PII: in connection with law enforcement, fraud prevention or other legal proceedings; as required by law or regulation; if ERC Now (or a part of ERC Now) is sold to or merged with another company; or if ERC Now has reason to believe that disclosure is necessary to protect ERC Now, its clients or the public.

In all cases other than those described above, PII will not be disclosed by us to third parties for their own marketing purposes without your consent.

Updating your information

If you believe that the information, we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing, please do so by contacting us.

Access Request and updating your PII

In the event that you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are

unable to provide you with any PII or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the respective legal regulations mentioned above).

Your rights

Under the GDPR, you can exercise the following rights:

- Right to information
- Right to rectification
- Right to object to processing
- Right to deletion
- Right to information
- Right to data portability
- Right of objection
- Right to withdraw consent
- Right to complain to a supervisory authority
- Right not to be subject to a decision based solely on automated processing.

Under the CCPA and the CPRA amendment, you can exercise the following rights:

- Right to Know/Access
- Right to Delete
- Right to Opt-out of Sale
- Right to Non-Discrimination
- Right to Rectification
- Right to Limit Use and Disclosure of Sensitive PII

If you have any questions about the nature of the personal data we hold about you, or if you wish to request the erasure or rectification of personal data we hold about you, or to exercise any of your other rights as a data subject, please contact us or send a written request to the postal address provided above.

How we protect your PII

ERC Now takes all reasonable steps to protect your PII from misuse, alteration, and loss, and from unauthorized access, alteration, or disclosure. To this end, we use the following means, among others:

- Use of encryption when collecting and transmitting sensitive data such as credit card information, technical and organizational measures to ensure the continuous integrity, availability and fail-safety of processing systems and services,

- Restricting physical access to our sites,
- Restricting access to data we collect about you,
- Ensuring appropriate safeguards are in place at our facilities and those of our business partners to ensure the security of your personal data; and,
- where required by law, deleting or anonymizing PII.

Collection and Use of Children's PII

ERC Now takes the privacy of children very seriously. We do not knowingly collect PII from children through our website.

Changes

We may update this Privacy Policy from time to time. If we make changes to this Privacy Policy or materially change ERC Now's use of your PII, we will revise the Privacy Policy accordingly and also change the effective date at the end of this section. We encourage you to periodically review this Privacy Policy to be informed of how we use and protect your PII.

Contacting us

If you would like to contact us regarding our privacy practices for any reason, contact us.

Effective Date

Wednesday, January 25, 2023