

Crossfire Hurricane Privacy Policy

Effective Date: December 6, 2023

Please click [here](#) for a printable PDF version of this notice.

Scope of this Policy

This privacy policy ("Policy") applies to:

- Crossfire Hurricane Holdings, L.P. and our affiliates ("Crossfire Hurricane," "we," "us," "our").
- Crossfire Hurricane's online properties (including our websites and websites or mobile applications that link to it), our social media pages or handles, and our products and services (the "Services").

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we do, we will notify you by posting the updated version.

Privacy Disclosures for Specific Jurisdictions: California; Colorado, Connecticut, Utah, and Virginia; European Economic Area, United Kingdom, and Switzerland

Information We Collect

We collect personal information ("Information") from you directly, from the devices you use to interact with us, and from third parties. We may combine Information from the Services together and with other Information we obtain from our business records. We may use and share Information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip Information of all unique identifiers so that it cannot be linked to a particular individual) at our discretion.

Information you give us

You may provide the following Information to us directly:

- Contact Information, including name, email address, and telephone number.
- Demographic Information.
- Your birthdate.
- Content you may include in survey responses.
- Information contained in your communications to us, including call recordings of customer service calls.
- Information you make available to us via a social media platform.
- Information you submit to inquire about or apply for a job with us.
- Any other Information you submit to us.

Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following Information from the device you use to interact with our Services. We also create records when you make purchases or otherwise interact with the Services.

- *Device Information*, including IP address, device identifiers, and details about your web browser.
- *Analytical Information*, including details about your interaction with our website, app, and electronic newsletters.
- *Diagnostic Information*, including web traffic logs.
- *Advertising Information*, including special advertising and other unique identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect Information about you when you visit third-party websites or use third-party apps. They may use that Information to better target advertisements to you on our behalf.
- *Business record Information*, including records of your purchases of products and Services.
- *Other Information*: The California section below describes additional specific types of Information collected.

Information We Collect From Other Sources

We may collect the following Information about you from third-party sources.

- Contact Information that we receive from third-party payment processors.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share Information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.

We use a third party to handle payments for transactions involving products and Services. We do not receive your payment card Information as part of that process, but the third party may provide us with Information related to your purchase such as confirmation of payment and Information associated with your purchase.

How We Use Your Information

We may use any of the Information we collect for the following purposes.

- **Service functionality**: To provide you with our products and services, including to take steps to enter a contract for sale or for services, fulfill orders, send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits. We process Information for this purpose on the basis of your consent, because it is necessary to perform a contract with you, to comply with legal obligations, and for our legitimate interests.
- **Service improvement**: To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing. We process Information for this purpose on the basis of your consent, and for our legitimate interests.
- **Personalization**: To offer you recommendations and tailor the Services to your preferences. We process Information for this purpose on the basis of your consent, and for our legitimate interests.
- **Advertising and marketing**: To send you marketing communications, personalize the advertisements you see on our Services and third-party online properties, and measure the effectiveness of our advertising. We may share your Information with business partners, online advertising partners, and social media platforms for this purpose. We process Information for this purpose on the basis of your consent, and for our legitimate interests.
- **Security**: To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal. We process Information for this purpose on the basis of your consent, to comply with legal obligations, and for our legitimate interests.

- **Legal compliance:** To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements. We process Information for this purpose to comply with legal obligations.

How We Share Your Information

We may share any of the Information we collect with the following recipients.

- **Affiliates:** We share Information with other members of our group of companies.
- **Service providers:** We engage vendors to perform specific business functions on our behalf, and they may receive Information about you from us or collect it directly. These vendors are obligated by contract to use Information that we share only for the purpose of providing these business functions, which include:
 - *Supporting Service functionality*, such as vendors that support event registration, customer service and customer relationship management, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email, fax).
 - *Auditing and accounting firms*, such as firms that assist us in the creation of our financial records.
 - *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
 - *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
 - *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
 - *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
 - *Marketing vendors*, such as entities that support distribution of marketing emails.
- **Online advertising partners:** We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect Information to personalize, retarget, and measure the effectiveness of advertising.
- **Social media platforms:** If you interact with us on social media platforms, the platform may be able to collect Information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of Information, please review the privacy policy of the relevant social media platform.
- **Government entities/Law enforcement:** We may share Information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.
- **Other businesses in the context of a commercial transaction:** We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all Information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your Information as described in this policy.

Security

We use a combination of physical, technical, and administrative safeguards to protect the Information we collect through the Services. While we use these precautions to safeguard your Information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

Your Options and Rights Regarding Your Information

Email Unsubscribe: If you do not wish to receive marketing Information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

Ad Choices: You have options to limit the Information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties.
- The following industry organizations offer opt-out choices for companies that participate in them: the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#).
- You may use our cookie settings menu.
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you.

If you delete your cookies, you may also delete your opt-out preferences.

Do Not Track and Global Privacy Control: Crossfire Hurricane responds to the Global Privacy Control signal for U.S. residents. However, we do not respond to "Do Not Track" signals because there is no formal "Do Not Track" standard. Please click on the link below to learn more about enabling the Global Privacy Control: <https://globalprivacycontrol.org/#download>.

Jurisdiction-specific rights: You may have certain rights with respect to your Information depending on your location or residency. Please see "privacy disclosures for specific jurisdictions" below. Please contact us to exercise your rights.

Special Information for Job Applicants

When you apply for a job with us, we may collect Information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

Other Important Information

Data retention

We may store Information about you for as long as we have a legitimate business need for it or lawful basis to do so.

Cross-border data transfer

We may collect, process, and store your Information in the United States and other countries. The laws in the United States regarding Information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

Information about children

The Services are intended for users who are 21 years old and older. We do not knowingly collect Information from people under that age. If we discover that we have inadvertently collected Information from anyone younger than the age of 21, we will delete that Information. Please contact us with any concerns.

Privacy Disclosures for Specific Jurisdictions

European Economic Area, United Kingdom, and Switzerland

We process "personal data," as that term is defined in the European Union's General Data Protection Regulation ("GDPR"), and references in this section to Information include personal data. We are the "controller" of your Information, and our contact Information is at the end of this Policy.

Your rights under the GDPR: Users who are located in the European Economic Area ("EEA"), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available here:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are located in the EEA, U.K., or Switzerland, you have the following rights.

- **Access and Portability:** Request access to personal data we hold about you or request transmission of your data to a third party.
- **Correction:** Request that we rectify inaccurate or incomplete personal data we store about you.
- **Erasure:** Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- **Restriction of processing:** Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- **Objection to processing:** Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- **Transfers:** Obtain Information about and a copy of the safeguards we use to transfer personal data across borders.

Please contact us to exercise these rights.

The purposes for processing your Information and the lawful bases for processing your Information are in the "How We Use Your Information" section of this Policy. The categories of Information collected are described in the "Information You Give Us" and "Information We Collect Automatically" sections. Recipients of your Information are in the "How We Share Your Information" section.

California

Your California Privacy Rights - California Consumer Privacy Act

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of Information about them, as well as rights to know/access, correct, delete, and limit disclosure of Information. You have the right to be free from discrimination based on your exercise of your CCPA rights. To the extent that we collect Information that is subject to the CCPA, that Information, our practices, and your rights are described below.

Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of certain Information about our data collection, use, and disclosure. The following table summarizes the categories of Information we collect; the categories of sources of that Information; whether we disclose, sell, or share that Information to service providers or third parties, respectively; and the criteria we use to determine the retention period for such Information. The categories we use to describe Information are those enumerated in the CCPA. We collect this Information for the purposes described above in "How We Use Your Information."

Category	Information Type	Source	We disclose to:	We sell to/share with:
Identifiers	<ul style="list-style-type: none"> Contact Information or personal characteristics (name; email address; postal address; telephone number; signature) Social media handles 	You; our social media pages; third party subscription service providers	Service Providers	Business partners
Protected Classifications and Other Sensitive Data	<ul style="list-style-type: none"> Date of Birth 	You	Service Providers	Not sold/shared
Commercial Information	<ul style="list-style-type: none"> Transaction Information Billing and payment records Order history 	You	Service Providers	Not sold/shared
Internet or Electronic Network Activity Information	<ul style="list-style-type: none"> IP address Device identifier (e.g., MAC) Advertising identifier (e.g., IDFA, AAID) Information provided in URL string (e.g., search keywords) Cookie or tracking pixel Information Information about your interaction with our website, app, email correspondence, or products Browsing history Search history Diagnostic Information (e.g., crash logs, performance data) 	You; our analytics and advertising partners	Service Providers	Advertising partners

Professional or Employment-Related Information	<ul style="list-style-type: none"> • Current employer • Job title 	You	Service Providers	Not sold/shared
Education Information	<ul style="list-style-type: none"> • Education history • Level of education 	You	Service Providers	Not sold/shared
Content of Communications	<ul style="list-style-type: none"> • Contents of phone calls, emails, or text messages • Photos 	You	Service Providers	Not sold/shared

We determine the retention period for each of the categories of Information listed above based on (1) the length of time we need to retain the Information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such Information, (3) internal operational needs, and (4) any need for the Information based on any actual or anticipated investigation or litigation.

Entities to whom we disclose Information for business purposes are *service providers*, which are companies that we engage to conduct activities on our behalf. We restrict service providers from using Information for any purpose that is not related to our engagement.

Entities to whom we “sell” or with whom we “share” Information are *third parties*. Under the CCPA, a business “sells” Information when it discloses Information to a company for monetary or other benefit. A company may be considered a third party either because we disclose Information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using Information for purposes unrelated to the service it provides to us. A business “shares” Information when it discloses Information to a company for purposes of cross-context behavioral advertising.

Your rights under the CCPA

- *Opt out of sale or sharing of Information:* You have the right to opt out of our sale or sharing of your Information to third parties. To exercise this right, please visit our Do Not Sell or Share My Personal Information webpage or contact us. Your right to opt out does not apply to our disclosure of Information to service providers.
- *Know and request access to and correction or deletion of Information:* You have the right to request access to Information collected about you and Information regarding the source of that Information, the purposes for which we collect it, and the third parties and service providers to whom we sell, share, or disclose it. You also have the right to request in certain circumstances that we correct Information that we have collected about you and to delete Information that we have collected directly from you. Please contact us to exercise these rights.

California “Shine the Light” Law

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of Information to third parties for their own direct marketing purposes in the preceding calendar year. Please contact us to obtain this information. We do not currently share your Information with third parties for those third parties’ direct marketing purposes.

Colorado, Connecticut, Utah, and Virginia

Residents of the States of Colorado, Connecticut, Utah, and Virginia have the following rights:

- *Opt out of “sales” of Information and use of their Information for “targeted advertising,”* as those terms are defined under applicable law.

- *Opt out of "profiling"* under certain circumstances, as defined under applicable law. (Residents of Colorado, Connecticut, and Virginia only.)
- *Confirm processing of and access to Information* under certain circumstances.
- *Correct Information* under certain circumstances. (Residents of Colorado, Connecticut, and Virginia only.)
- *Delete Information* under certain circumstances.

Residents of these states can exercise their rights by contacting us at using one of the methods listed below.

Nevada

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their Information to third parties. Currently, we do not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.

Contact information, submitting requests, and our response procedures

Contact

Please contact us if you have questions or wish to take any action with respect to Information to which this privacy policy applies.

Email:

Address:

Telephone:

Making a request to exercise your rights

Submitting requests: You may request to exercise your rights by submitting the form on this page or making a request using the contact information above.

If you are a resident of California, Colorado, or Connecticut, you may, under certain circumstances, authorize another individual or a business, called an authorized agent, to make requests on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Verification: We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against Information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use Information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

Appeals

Residents of California, Colorado, Connecticut, and Virginia have the right to appeal a denial of their request by contacting us as described in the notice of denial.