

## Privacy Notice for WellingtonGroup, LLC (“Company,” “we,” “us,” or “our”)

This privacy notice for WellingtonGroup, LLC describes how and why we might collect, store, use, and/or share (“process”) your information when you use our services (“Services”), such as when you:

- Visit <https://WellingtonGroup.com/>
- Engage with us in other related ways, including any sales, marketing, or events.

### Questions or concerns?

This privacy notice explains your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [info@WellingtonGroup.com](mailto:info@WellingtonGroup.com).

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### SUMMARY OF KEY POINTS

- **What personal information do we process?**  
When you visit, use, or navigate our Services, we may process personal information depending on how you interact with WellingtonGroup, LLC and the Services, the choices you make, and the products and features you use.
- **Do we process any sensitive personal information?**  
We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.
- **Do we receive any information from third parties?**  
We do not enrich our customer profiles with any information from third parties.
- **How do we process your information?**  
We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.
- **In what situations and with which parties do we share personal information?**  
We may share information in specific situations and with specific third parties.
- **How do we keep your information safe?**  
We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.
- **What are your rights?**  
Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

- **How do you exercise your rights?**

The easiest way to exercise your rights is by filling out our data subject request form available here: <https://WellingtonGroup.com/contact/>, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

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## **1. WHAT INFORMATION DO WE COLLECT?**

### **Personal Information You Disclose to Us**

In short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

### **Personal Information Provided by You**

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Email addresses
- Names
- Phone numbers
- Usernames
- Passwords
- Contact or authentication data

## **Sensitive Information**

When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Financial data

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

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## **Information Automatically Collected**

In short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information), but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

## **The information we collect includes:**

- **Log and Usage Data:** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings, and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take, such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings).
- **Device Data:** We collect device data, such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Location Data:** We collect location data, such as information about your device’s location, which can be either precise or imprecise. The amount of information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your

Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

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## 2. HOW DO WE PROCESS YOUR INFORMATION?

In short: We process your information to provide, improve, and administer our Services, communicate with you, ensure security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To respond to user inquiries/offer support to users:** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To fulfill and manage your orders:** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- **To request feedback:** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications:** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time (for more information, see “WHAT ARE YOUR PRIVACY RIGHTS?” below).
- **To protect our Services:** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends:** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns:** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual’s vital interest:** We may process your information when necessary to save or protect an individual’s vital interest, such as to prevent harm.