



Privacy Policy

Effective Date: April 1, 2021

1. Introduction

The purpose of this Privacy Policy is to allow you (the “User”) to understand how we, Chowder, LLC. (“Chowder”, “we”, and “us”) collect, use, and disclose the personal information you provide to us through this website(s) that we own and operate (in each case, the “Services”).

This Privacy Policy applies to information collected by Chowder and does not apply to information collected by any third-party sites to which Chowder may link or to information provided to, or collected by, third parties through cookies, web beacons, or other third-party technologies served during your visit to the Services.

2. Information We Collect and How We Use It

Personal Account Information: If you choose to engage in a sweepstakes or sign-up for notifications through our Services or engage in other transactions or activities through our Services, you may be asked to provide the following basic information: your name, your e-mail address, your mailing address, and your telephone number. We need these categories of information to provide the services you have requested, including entering you into sweepstakes. All this information that you submit will be subject to this Privacy Policy and is called “Personal Account Information.”

As part of our services to you, we may use Personal Account Information to contact you or send you notifications about sweepstakes, products, services, newsletters, marketing, promotional materials, and other information that you have requested or which we think may be of interest to you. To unsubscribe from our emails, please use this contact form and put “Unsubscribe Request” in the subject line.

Log Data: When a User visits the website Services, our servers automatically record information regarding the User’s browser type, browser version, browser language, platform type, IP address, web request, number of clicks, domain names, the pages you visit, the amount of time spent on particular pages, and the date and time of use of services and interactions with the Services (“Log Data”). In addition, we may use third party services, such as Google Analytics, that collect, monitor, and analyze this Log Data.

We store Log Data through use of cookies, pixels, or other similar technologies. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer’s hard drive. You can set your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. However, if you set your browser to disable all cookies, some features of the Services may not function properly, or you may be unable to use some portions of the Services.

Chowder uses Log Data for the following legitimate business purposes:

(a) to diagnose and prevent service or technology problems that are associated with the IP addresses;

- (b) to help us provide you with customized content and promotions that match your stated preferences;
- (c) to prepare geographical or other statistical data to help us better serve our Users;
- (d) to create new features, promotions, and services in connection with the Services;
- (e) to monitor the use of the Services;
- (f) to confirm that Users have visited previously; and
- (g) to perform other functions on the Services.

3. Disclosure of your Information

Chowder may provide your Personal Account Information and Log Data to third-party service providers that we engage to assist us with the operation of the Services and the provision of products and services. Such access is provided with the understanding that these parties will use the information for these limited purposes and in accordance with our Privacy Policy.

Unless otherwise disclosed at the time of collection of information, Chowder does not share Personal Account Information and Log Data with third parties for their own direct marketing purposes. We may, however, use your information to send you advertisements or display our targeted advertisements when you visit other web properties. Chowder will only provide your information to those web publishers or their advertising intermediaries for them to display the relevant Chowder ad to you and pursuant to a service provider contract limiting their use and disclosure of your information.

Chowder may also provide your information to service-providers who provide marketing insights, such as lookalike models or other statistical research. Chowder may also provide general demographic, aggregated, or identified information about Users and customers and their preferences to advertisers and other existing or prospective business partners.

In addition, Chowder reserves the right to share Personal Account Information and Log Data with authorized third parties if:

- (a) we believe we are required to do so in accordance with a law or to respond to a subpoena, court order, or other lawful request by a public authority, including to meet national security or law enforcement requirements;
- (b) we believe that such disclosure is necessary or appropriate to enforce our Terms of Use;
- (c) we believe that such disclosure is necessary or appropriate to take precautions against liability;
- (d) we believe that such disclosure is necessary or appropriate to investigate and defend ourselves against any third-party claims or allegations;
- (e) we believe that such disclosure is necessary or appropriate to assist government agencies;
- (f) we believe that such disclosure is necessary or appropriate to protect the security or integrity of the Services;



(g) we believe that such disclosure is necessary or appropriate to protect the rights, safety or property of Chowder, our Users, or others;

(h) Chowder becomes involved in a merger, acquisition, or other transaction resulting in a change of control of Chowder or a sale of substantially all the assets of the business or of a particular product line or division of the business, in which case Personal Account Information may be transferred in connection with the transaction and may become subject to the privacy policy of another entity.

4. Third-Party Advertising

We have partners who serve advertisements on our Services. Advertisers may download cookies onto your computer, or use other technology like web beacons, to enable them to recognize your computer each time they send you an advertisement even when you are visiting another site. As a result, the advertiser would have the ability to deliver targeted advertisements that they believe would be of most interest to you. Chowder does not have access to or control of the cookies that may be placed on your computer by third-party advertisers.

In some instances, you can opt-out of receiving personalized ads from third party advertisers and ad networks. Advertisers and ad networks that are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising provide opt-out choices at the following websites: [NAI Website](#) [DAA Website](#)

5. Security

We take reasonable and appropriate measures to help keep information secure and to help prevent it from becoming disclosed. Even though we follow reasonable procedures to try to protect the information in our possession, no security system is perfect so we cannot guarantee, and you should not expect, that your information will be secure in all circumstances.

6. Choice

We do not collect, use, or disclose your Personal Account Information in any ways or for any purposes that are materially different from those set forth herein. However, if we wish to do so in the future, we will obtain your consent first, and offer you the choice to opt-out of such collection, use, or disclosure.

7. Data Quality, Access, and Rectification

We will make reasonable efforts to ensure your Personal Account Information is accurate and complete and we will update or correct your information as needed when notified by you. If you would like to request access to your personal information, request to verify your personal information, identify any inaccuracy in your personal information, or change your personal information in any way, please contact us.

8. Retention

We will keep your Personal Account Information in active files or systems as long as needed to meet the purposes for which it was collected or to fulfill the other purposes outlined herein.



9. Other Sites

As noted above, this Privacy Policy only applies to our Services. Our Services may include links to other sites, but Chowder does not control the privacy practices of other sites. Chowder is not responsible for the privacy practices of other websites.

10. Changes to this Policy

Chowder may change its Privacy Policy from time to time. We reserve the right to update or change our Privacy Policy at any time, and you should check this Privacy Policy continually. Any updated policy will be posted on this page and the effective date of the updated policy will be indicated at the top of the page. Your continued use of the Services after we post any modifications to the Privacy Policy will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

11. How We Communicate with You

If we need, or are required, to contact you concerning any event that involves your information, you agree that we may do so by email.

12. Requirement

We provide and offer sweepstakes, products, or services only to those who are the age of 18 years or older.

13. Questions or Complaints

If you have any questions or complaints regarding our Privacy Policy, please email us at info@chowderfinancial.com.

