

**Last Updated:** January 1, 2020

## **Venture Launch Labs Marvin Replacement Privacy Policy**

We at Venture Launch Labs, LLC and our affiliates and subsidiaries (together, “**Venture Launch Labs**”, “**we**”, “**us**”, or “**our**”) recognize the importance of privacy. In this Privacy Policy (“**Policy**”), we describe how we collect, use and disclose information that we obtain about users of our website, www.bswhome.org (the “**Site**”), and the services available through our Site and App (collectively, the Site, the App and the services available therein are the “**Services**”). The Services means providing in-home or virtual resources for clinical medical services or non-traditional wellness and health services. This Policy also informs you about your rights and choices with regard to the information collected about you. Your use of our Services, and any dispute over privacy, is subject to this Policy and our Terms of Use, which are available at [www.bswhome.org/legal/terms-of-use](http://www.bswhome.org/legal/terms-of-use), and include applicable limitations on damages and the resolution of disputes.

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### **Information We Collect**

We may collect information about you directly from you, from third parties, and automatically through your use of our Services. We may combine the information we collect from these various sources.

**Registration.** To access certain information or features, we may ask you to register. You can also request or sign up to receive information, updates, news, newsletters and marketing or offers from us. If you register with us, request information or subscribe to our emails, we will collect information from you, such as your name, email address, and other contact information. We may also ask or allow you to provide additional optional information, such as user preferences, age and certain demographics.

**Third-Party Accounts.** We may allow you to sign into our Services using third party accounts, such as Google or Facebook accounts. When you log in through such third-party accounts, we ask you to grant us permission to access and use certain information from these accounts (as explained on the permissions page), including your name, email address, public profile information, as well as (with your permission) your contacts or friends list, your picture or other profile information. Our Services may also include social media buttons, such as the Facebook Like button or other similar social media buttons and we may collect information about how individuals like and share content about us on these social media platforms. Please note, any third-party social networking or other site controls the information it collects from you and what information is disclosed to third parties.

**Customer Support and Services.** We collect personal information when you request information from us, contact us for customer service or other purposes. For instance we may email you to answer your inquiry or send you push-notifications on your smartphone unless you choose to disable the push-notification function in your settings.

**Content.** Our Services may allow Users to submit content to our Services, such as comments, blog posts, pictures, reviews, ratings or other User generated content. When Users submit such content we maintain a copy of this content. We may also collect certain information metadata associated with your content (including location, date/ time stamp, device type).

**Surveys.** We collect your personal information you provide to us if you choose to participate in one of our voluntary surveys.

**Rewards and Loyalty Program.** We collect information you provide to us when signing-up and/or participating in our rewards and loyalty program.

**Your Activities.** We collect information about your use of our Services, such as your order history, purchase and sharing history, including how and with whom you interact or share content and other info.

**Other Information from Third Parties.** We may also collect information, including personal information about you from third parties, which we may combine with other information we have collected. For example, if you take advantage of a third-party or affiliate offer through the Services, we may collect certain information from that third party about your order or interaction with them, such as purchase amount and details. If you connect or integrate our Services with third party services or devices, you are giving us permission to collect information from these sources.

**Usage and Device Data.** We automatically collect information about your use of our Services (including our App and Site) through cookies, web beacons, log files and other methods: including log files, IP address, app identifier, device ID, advertising ID, location info, browser type, device type, domain name, the website that led you to our Services, the website to which you go after leaving our Services, the dates and times you access our Services; language information; device name and model; operating system type, name, and version; the length of time that you are logged into or using our Services, and the links you click and your other activities within the Services (“Usage Data”). With your consent, we also may collect the following information from your device: your precise location (geolocation); contacts from your phone, your camera and/or photographs and videos stored within your phone. You can disable our access to your contacts, photos, and location services by changing your device’s settings. Please see the “Cookies and Other Tracking Mechanisms” section below for more information.

## How We Use Your Information

We may use your information, including personal information, for the following purposes:

- **Providing and Improving Our Services.** To provide and maintain our Services; to improve our Services; to develop new features, products, or services; to authenticate users; to perform technical operations, such as updating software.
- **Customer Support and Service.** We use the personal information we collect for customer service and support purposes. For example, if you send us an inquiry we will use your personal information to address and answer your question.
- **Rewards and Loyalty Program.** To assign, track, issue and post rewards and credits to users accounts; to operate and maintain our customer loyalty program if you participate in such.

- ***Personalizing Content and Ads.*** We may use the information we collect about you to personalize the information and content we display to you, including marketing, promotional and sponsored content, as well as providing you with more relevant ads.
- ***Marketing and Communications.*** To communicate with you about your account, where relevant, and use of our Services via email and push notification, including to send you product updates; to respond to your inquiries; if you ask to hear from us, to provide you with news and newsletters, special offers, promotions, promotional contests, and other information we think may interest you; and if you ask us to provide you with such, for other informational, marketing, or promotional purposes. Please see the Your Choices section for more information about how to change your communications preferences.
- ***Research and Analytics.*** To monitor, analyze and understand usage and activity trends, to conduct analytics on photos and images, and for other research, analytical, and statistical purposes.
- ***Protecting Rights and Interests.*** To protect the safety, rights, property, or security of Venture Launch Labs, the Services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity that we consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Policy or our Terms of Use.
- ***General Business Operations.*** For the administration of our general business, accounting, recordkeeping and legal functions, and as part of our routine business administration, such as employee training, compliance auditing and similar internal activities.
- ***Legal Compliance.*** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding, to respond to a subpoena, warrant, court order, or other legal process, or as part of a law enforcement or a governmental investigation or request, whether formal or informal.

## How We Disclose Your Information

We may disclose your information, including personal information as follows:

- ***Users.*** Any content you post within the Services may be viewable by all other users and Site visitors. This includes comments, pictures, or other content you choose to share on your user profile and your newsfeed within the Services. We cannot prevent such information from being used in a manner that may violate this Policy, our Terms of Use, the law, or your personal privacy.
- ***Partners.*** We may share your information with certain third parties so that they may send you offers and other information we think may interest you in; if you don't want us to share your personal information with our third party marketing partners, you may opt-out as set forth below. If you click an ad or otherwise take advantage of a third party offer in the Services, we may share certain information, including personal information, with that partner to facilitate your interaction with them. Partners are responsible for their own use of your personal information as well as the communications they send to you; you should contact them directly for questions about their handling of your personal information and to opt-out of receiving marketing communications.
- ***Service Providers.*** We may disclose your information to our vendors, service providers, agents, or others who perform functions on our behalf. For example, we may disclose your information to third-party service providers to process payments on our behalf, host data on our behalf or assist us in targeted our advertising campaigns.
- ***Affiliates.*** We may disclose the information we collect from you to our affiliates or subsidiaries; their use and disclosure of your personal information will be subject to this Policy.

- ***Business Transfers.*** We may disclose your information to another entity in connection with an acquisition or merger, sale or transfer of a business unit or assets, bankruptcy proceeding, or as part of any other similar business transfer, including during negotiations related to such transactions.
- ***Protecting Rights and Interests.*** We may disclose your information to protect the safety, rights, property, or security of Venture Launch Labs and our affiliates, the Services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity which Venture Launch Labs, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Policy or our Terms of Use.
- ***Legal Compliance.*** We may disclose your information to comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; in response to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a government official.
- ***Aggregate and De-Identified Information.*** We may disclose aggregate, anonymous, or de-identified information about users for marketing, advertising, research or other purposes.

### **Cookies and Other Tracking Mechanisms**

We and our service providers use cookies, pixels, java script, and other tracking mechanisms to track information about your use of our Services. We or our service providers may combine this information with other information, including personal information, we collect about you.

***Cookies.*** Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site, while others are used to enable a faster log-in process or to allow us to track your activities while using our Site. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you disable cookies, certain features may not function.

***Clear GIFs, pixel tags and other technologies.*** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (also referred to as web beacons, web bugs or pixel tags), in connection with our Services to, among other things, track the activities users of our Services, help us manage content, and compile statistics about usage of our Services. We and our service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates and identify when our emails are viewed or forwarded.

***Third-Party Analytics.*** We may use third-party analytics companies, for example Google Analytics (see [privacy policy](#) and [opt-out](#)), to evaluate use of our Services. We use these tools to help us understand use of, and to improve, our Services, performance, ad campaigns, and user experiences. These entities may use cookies and other tracking technologies, such as web beacons or local storage objects (LSOs), to perform their services.

***Do-Not-Track Signals.*** Our Site does not respond to do-not-track signals. For more information about do-not-track signals, please click [here](#). You may, however, disable certain tracking as discussed in the Cookies and Other Tracking Mechanisms section above (e.g., by disabling cookies).

## Interest-based Ads

We work with third party ad networks, ad exchanges, channel partners, measurement services and others to display more relevant advertising on our Services, and to manage our advertising on third party sites, mobile apps and online services. In order to display more relevant ads on our behalf and others, these third party ad companies may use cookies, pixels tags, and other tools to collect browsing and activity information on our Services, on third-party sites and across different devices, which may be linked with certain offline data they may also collect IP address, device ID, cookie and advertising IDs, and other identifiers, general location information, and, with your consent, your device's geolocation information. These third party ad companies may use this information to provide you more relevant ads and content and to evaluate the success of such ads and content. As a result, our ads may be displayed to you on a search results page or on third party sites. For example, we may work with the following as networks:

- **Facebook Ads:** for more info and choices, see their [privacy policy](#) and [ad preferences page](#)
- **Google/DoubleClick:** for more info and choices, see their [privacy policy](#) and [ads help](#) page

**Custom Audiences and Matching.** We may disclose certain information (such as your email address) with third parties (such as Facebook; more info [here](#)) — so that we can better target ads and content to our users, and others with similar interests on these third parties' platforms or networks (“**Custom Audiences**”). The information is used to target our campaigns, not those of others.

As noted above, you may also control how Facebook and other third parties display certain ads to you, as explained further in their respective privacy policies and ad preferences pages. You can also obtain more information about targeted advertising, and how to opt-out of such ads from many third-party ad networks (including Facebook and Google), through [www.aboutads.info/choices](http://www.aboutads.info/choices). Opting-out of participating ad networks does not opt you out of being served advertising. You may continue to receive generic or “contextual” ads on our Services. You may also continue to receive targeted ads on other websites, from companies that do not participate in the above programs. Many opt-out mechanisms are cookie based. So, if you delete cookies, block cookies or use another device, your opt-out will no longer be effective.

## Third-Party Links and Widgets

Our Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third parties. Our Sites also may include social media features and widgets (collectively “**Widgets**”), such as a “share this” or “like” button or other interactive mini-programs that run on our Services. Widgets can be used to provide you specific services from other companies (e.g., displaying the news, opinions, music, etc.). Widgets displayed on our Sites are hosted by the relevant third party sites. These third party sites may set cookies to enable the Widgets to function properly and they may collect your IP address browsing history. Their information practices are subject to the privacy policies of the third-party site and not this Policy.

## Security

We have taken steps to help protect the personal information we collect. However, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your device and account by, among other things, choosing a robust password that nobody else knows or can easily guess and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

## Your Choices

If you ask to hear from us or request information from us, we may send periodic informational and promotional emails to you. You may opt-out of such communications by following the opt-out instructions contained in the email. If you opt out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any Services you have requested or received from us.

If you don't want us to share your personal information with our third party marketing partners, you may opt-out of future sharing by emailing us at [info@marvinreplacement.biz](mailto:info@marvinreplacement.biz). We may still send you our own marketing and promotional emails about information and third-party ads we think you may be interested in (unless you have opted-out of receiving marketing emails from us).

## **Children**

Our Services are not targeted to children under thirteen (13) years of age and we do not knowingly collect personal information from children under 13. If we discover that a child under 13 has provided us with personal information, we will promptly delete such personal information from our systems.

## **Access to Your Information**

You may access, update and remove much of the personal information in your profile, by logging in and updating your account information accordingly. Please note that we also may retain certain information about you as required by law or as permitted by law for legitimate business purposes. For example, if you request that we delete your information but we believe that you have violated our Terms of Use we may retain information about you in order to attempt to resolve the issue before deleting it.

## **Your California Privacy Rights**

In this section, we provide information for California residents, as required under California privacy laws, including the California Consumer Privacy Act ("CCPA"), which requires that we provide California residents certain specific information about how handle their personal information, whether collected online or offline.

Under the CCPA, "personal information" is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. It does not include publicly available data as defined by the CCPA. This section does not address or apply to our handling of protected health information that is subject to HIPAA or the California Medical Information Act / nonpublic information that is subject to the Gramm-Leach Bliley Act or California Financial Information Privacy Act, or personal information that is otherwise subject to an exemption under Section 1798.145(c) – (f) of the CCPA. Since the CCPA requires that we disclose specific information about how we handle certain personal information collected about all California consumers, the scope of this section may be different than the overall scope of our privacy policy as explained above.

## **Categories of Personal Information that We Collect, Disclose, and Sell**

The table below sets out generally the categories of personal information (as defined by the CCPA) about California residents that we collect, sell, and disclose to others for a business purpose. We collect these categories of personal information from the sources as explained in the Information We Collect section above, and for the purposes explained in How We Use Your Information section above. Our collection, use and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident.

Categories of personal information	Do we collect?	Do we disclose for a business purpose(s)	Do we sell?
<b>Name, Contact Info and other Identifiers:</b> identifiers such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	YES	YES	NO
<b>Usage Data:</b> internet or other electronic network activity information, including, but not limited to, browsing history, clickstream data, search history, and information regarding a resident's interaction with an internet website, application, or advertisement, as well as access logs and other activity information related to your use of any company websites, applications or other online services.	YES	YES	NO

### California Residents' Rights

California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below.

**Do-Not-Sell.** California residents have the right to opt-out of our sale of their personal information. Opt-out rights can be exercised [here](#). We do not sell personal information about residents who we know are younger than 16 years old, without opt-in consent.

**Notice at Collection.** At or before the point of collection, notice must be provided to California residents of the categories of personal information collected and the purposes for which such information is used.

**Verifiable Requests to Delete and Requests to Know.** Subject to certain exceptions, California residents have the right to make the following requests, at no charge:

**Request to Delete:** California residents have the right to request deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exemption applies.

**Request to Know:** California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:

- categories of personal information collected;
- categories of sources of personal information;
- business and/or commercial purposes for collecting and selling their personal information;
- categories of third parties/with whom we have disclosed or shared their personal information;
- categories of personal information that we have disclosed or shared with a third party for a business purpose;

- categories of personal information collected; and
- categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

California residents may make Requests to Know up to twice every 12 months.

**Submitting Requests.** Requests to Know, Request to Delete and Do-Not-Sell requests may be submitted by through our webform at [here](#), as well as by contacting us at at [DATAPROTECTION@BCGDV.COM](mailto:DATAPROTECTION@BCGDV.COM). We will respond to verifiable requests received from California consumers as required by law.

**Right to Non-Discrimination.** The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices, rates, or penalties on residents who exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents' data. A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, provided the incentive is not unjust, unreasonable, coercive or usurious and is made available in compliance with applicable transparency, informed consent, and opt-out requirements.

#### **California Privacy Rights under California's Shine-the-Light Law**

Under California's "Shine the Light" law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third party sharing in the prior calendar year. California residents who would like to make such a request may submit a request in writing to [info@marvinreplacement.biz](mailto:info@marvinreplacement.biz). The request should attest to the fact that the requester is a California resident, and provide a current California address.

For more information about, you may contact us as set forth in the **Contact Us** section above.

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

This Policy is current as of the Last Updated date set forth above. We may change this Policy from time to time, so please check back periodically. We will post any changes to this Policy on our Site, and will take steps to notify you of material changes, such as via email or prominent notice on the Services.

#### **Contact Us**

If you have questions about this Policy or the privacy aspects of our Services, please contact us at [info@marvinreplacement.biz](mailto:info@marvinreplacement.biz).