# **Privacy Policy**

#### Last updated January 19, 2017

Cohen Research Group, Inc. ("we" or "us") is the owner and operator of the Site and the App and the provider of the Services. Cohen Research Group respects your privacy, and we created this privacy policy (the "Policy") to explain how we collect, use and disclose your information when you access the Site and the App and use the Services. The Policy is only applicable to our Site, the App and our Services and not to any other website, service or online platform. Capitalized terms that are not defined in this Policy have the meaning given them in our Terms of Service. BY ACCESSING THE SITE, THE APP, UTILIZING ANY OF THE SERVICES AND/OR REGISTERING WITH US, YOU SIGNIFY THAT YOU HAVE READ, UNDERSTOOD AND AGREE TO BE BOUND BY THIS POLICY.

# **Types of Information Collected**

Here's what we collect from you when you use the Service:

- User-Provided Information: When you use the Service, and specifically when you do things like enter a search query, register for the Service, or create a profile to use notes, you may be required to provide certain forms of information. When you register for the Service, we may also ask you to provide an e-mail address and to select a password. You may also need to enter information that would be considered "personally identifiable" (that is, information that would allow us to directly identify you, such as your name, e-mail address, mailing address, and telephone number).
- **Communications** When you communicate with us, we collect your email address and the contents of the communication. In addition, we may provide or enable communications with you through third party services and those third party services may provide us with information about you and the content of your communications. We do not own or operate these third-party services, and you should review the terms of use and privacy policies of such services to make sure you are comfortable with the ways in which they use the information you share with them.
- "Automatically Collected" Information: Like many websites and mobile apps, when you use the Service we may automatically record certain information about your visit from your web browser or our mobile app such as your IP address, the pages of the service you view, or details regarding the searches you run on the Service, such as what you are searching for, the date and time when you initiated a search, and the location from which you initiated the search. We collect and may use this information to understand and analyze the aggregate or "big picture" usage trends and preferences of our users.

- "Cookies" Information: One form of "automatically collected" information we record is information stored by "cookies." When you use the Service, we may send one or more cookies to your computer or your mobile device. We use both "session" and "persistent" cookies to collect, store, and sometimes track various types of information. A session cookie is one that disappears after you close your browser or our mobile app. While a persistent cookie remains after you close your browser or the mobile app (and may be used by your browser or the mobile app when you later return to the Service), persistent cookies generally can be removed. You can review the appropriate "Help" file in your Web browser or your mobile device to learn the proper way to modify your cookie settings.
- **Device-Provided Information:** If you install our mobile apps to access the Service, your mobile device makes certain information from the device and other apps installed on the device, which may include personally identifiable information, available to our mobile apps automatically. We may collect, use, share, and disclose this information as described in this Privacy Policy.

### How we use this information:

Cohen Research Group uses the information you provide or that we collect to develop, operate, maintain, enhance, and provide the Service, to develop new products and services, and to customize and target content that may be more interesting, relevant or useful to you, including advertisements, and for other administrative purposes. Here are some examples of how we may use the information you provide or that we collect:

- We may use your e-mail to give you updates on the Service's features and progress. Generally, you have the ability to opt-out of receiving e-mails about Service updates and promotional materials and offers, either through links provided in the e-mail messages we send to you or by writing us directly at privacy@cohenresearchgroup.com.
- We may communicate with you via e-mail or another form of electronic notification regarding security, privacy, and administrative issues relating to your use of the Service.
- If you are logged into your account and using the Service, we may associate information regarding your usage of the Service with your account and with other information that we have collected about you, such as your search history.

# How Is the Information Shared or Disclosed?

We may provide personally identifiable information to third parties for their use in helping us perform our internal business functions. These are things like data analysis, e-mail transmission and processing, or data hosting on our behalf. We will do our best to require these third parties to maintain your information securely, to not use it for purposes other than providing services to us, and to refrain from disclosing the information except when required by law.

We may disclose your personal information if required to do so by law or in the good faith belief that disclosure is necessary to: (1) satisfy legal obligations or comply with legal process (such as a subpoena) served on us; (2) protect Cohen Research Group and others from fraudulent, abusive, predatory, or unlawful uses or activity; (3) investigate and defend Cohen Research Group against any legal claims or threats; (4) protect and defend the rights or property of Cohen Research Group; (5) take action on user complaints, or (6) act in urgent circumstances to protect the personal safety of users of Cohen Research Group, the Service, or the public.

If there is a change in ownership of Cohen Research Group, including through a merger with, acquisition by, or sale of assets to another entity, we may sell or otherwise transfer all information you provide to us, including personally identifiable information, to that entity.

We may disclose aggregated, anonymized, or other types of non-personally identifiable information, including "automatically collected" and "cookies" information that is non-personally identifiable, to third parties for various purposes. For example, we may disclose non-personally identifiable information to select the advertisements shown to you on our Service or on other websites and services, or to enhance your ability to conduct efficient and accurate searches.

# Choice

You may, of course, decline to share certain information with us, in which case we may not be able to provide to you some of the features and functionality found on the Service. Please note that while your changes to your profile information are reflected promptly in active user databases, we may retain all information you previously submitted. If you want your information permanently anonymized, please submit a request to privacy@cohenresearchgroup.com. We may retain any anonymized information for a variety of purposes, including backups and archiving, prevention of fraud and abuse, and analytics.

# Third-Party Advertisers and Advertising Technology Providers

Our advertising technology partners may use technology to send, directly to your browser, the advertisements that appear on the Service. They automatically receive your IP address and other log file information when this happens. Cohen Research Group LLC and our advertising technology partners may also use cookies, pixel tags, or other technology to assist in understanding the usage, viewing, and demographic patterns and activity on the Service or to serve advertisements or other information about travel booking options to you both on our Service and on other websites and services, based on your interaction with promotional e-mails from us or from other services, your visits to and use of the Service, and your visits to third-party sites and services on the Internet, including certain travel partners' sites and services (collectively, "Usage Information") and/or on anonymized user information. Although you may not opt out of receiving online advertisements generally, you may control the collection of data on our site used for targeted Cohen Research Group, Inc. advertising during your visits to other websites. To opt-out of Cohen Research Group, Inc. data collection for targeted advertising on

other sites, click here: <u>Opt Out Now</u>. We may use Facebook custom audiences. You may optout of this technology <u>here</u>. We may use Google Analytics data collection. To opt-out of Google Analytics data collection for targeted advertising on other sites, click here: <u>Opt Out Now</u>. These advertising technology and other travel partners may transmit your Usage Information to Cohen Research Group, and Cohen Research Group may use that Usage Information consistent with this Privacy Policy. Our advertising technology partners also may, in accordance with their privacy policies, permit third parties to target advertisements that are displayed to you, both on and off the Service, based on your Usage Information or anonymized user information. These partners have promised that they will not combine or associate your Usage Information or anonymized user information provided to them by Cohen Research Group with information you have independently provided to those partners.

Aside from what is described above, we do not provide personal information to our advertising technology partners without your consent. To learn more about our advertising technology partners, send us an e-mail at privacy@congressinyourpocket.com. To learn more about online advertising generally and manage your online advertising preferences, you may visit the Network Advertising Initiative's website <u>here</u>.

### Your California Privacy Rights

If you are a California resident, you have the right to receive: (1) information identifying any third-party company or companies to which Cohen Research Group may have disclosed, within the past year, personally identifiable information pertaining to you for that third party's direct marketing purposes, and (2) a description of the categories of personally identifiable information disclosed. To obtain such information, please mail your request to: Cohen Research Group, Attn: Legal, 10 G Street, NE, Suite 601, Washington, DC 20002.

# **Do Not Track**

Our website does not currently respond to a Do Not Track ("DNT") or similar signal as it awaits the results of efforts by the policy and legal community to determine the meaning of DNT and the proper way to respond.

# **Third-Party Services**

Our Service includes links to third-party services, such as the links we provide to websites where you may book travel. When you follow the links to third-party services, you should understand that our Privacy Policy no longer applies, and that the third-party's privacy practices may not be the same as ours. In addition, our Service may incorporate features provided by third parties and you may interface with Cohen Research Group through third-party services, including, for example, the third-party communications services described above. Please keep in mind that we do not own or operate these third-party services, and you should review the

terms of use and privacy policies of such services to make sure you are comfortable with the ways in which they use the information you share with them. We are not responsible for the privacy practices or content of such third parties.

# The Security of Your Information

We employ various physical, managerial, and technical safeguards that are designed to help protect the integrity and security of our systems and to protect against the loss, misuse, and alteration of personally identifiable information that we control. While we take reasonable measures to protect your information, we do not, however, guarantee the security of your information. If we learn of a security systems breach, then we may attempt to notify you electronically, either by e-mail on via our website, so that you can take appropriate protective steps. These methods of communicating with you are only examples. We retain the right to decide which method we will use to notify you of a security breach, and will do so consistent with our legal obligations.

# Where We Operate

Our servers and data centers are located in the United States. If you choose to use the Service from outside the U.S., then you should know that you are transferring your personally identifiable information outside of your region and into the U.S. for storage and processing. By providing your personally identifiable information to us through your use of the Service, you agree to that transfer, storage, and processing in the U.S. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. You should know that each region can have its own privacy and data-security laws, some of which may be less stringent than your own region.

# How Will You Know Whether Cohen Research Group's Privacy Policy Has Changed?

We may occasionally update this Privacy Policy to reflect changes in our information practices. When we do, we will also revise the "last updated" date at the top of the Privacy Policy. We encourage you to review this Privacy Policy from time to time to stay informed about how we are protecting the personally identifiable information we collect. Your continued use of the Cohen Research Group Service following the posting of any changes to the Privacy Policy will constitute your acceptance of any such changes. If you do not agree to the changes, you must stop using the Cohen Research Group Service.