

Legal

ALE Privacy & Data Protection Policy

Protecting your personal data is important to us. This page sets out our commitment to handle all personal data in a transparent, compliant and responsible way.

This ALE Privacy and Data Protection Policy (the “Policy”) was last updated on November 15, 2022.

This Policy applies worldwide to ALE International and its affiliated entities (collectively, “ALE,” “we,” “us,” or “our”).

This Policy explains what information we collect about you and why, what we do with that information, how we share it, and how we handle the personal information created, inputted, submitted, posted, transmitted, stored, or displayed by you when accessing and using our Services.

If you reside in California, we are required to provide additional information to you about how we use and disclose your personal information, and about your rights relating to such information. Please refer to the below California Consumer Privacy Act (the “CCPA”) Privacy Policy for further details.

What This Policy Covers

- The websites that link to this Policy
- The Services to which you have subscribed or registered
- Personal Data submitted by web forms

ALE recognizes that, in order to conduct a successful business in an increasingly electronic economy, the processing of personal data, which includes, but is not limited to, collecting, using, retaining/storing, accessing, and/or disclosing by ALE is often necessary.

In addition, ALE recognizes the legal rights and expectations of its employees, third-party workers, or similar personnel, customers, and other third parties conducting business with or on behalf of ALE (“Individuals” or “Data Subjects”) as they relate to the privacy and protection of the Individual’s personal data.

Personal data or personally identifiable information (“Personal Data”) means information about or related to an identifiable individual, or information that can be used, directly or indirectly, to identify an individual. Information collected by ALE about Individuals, to a large extent, is likely to be considered Personal Data.

It is the goal of ALE to balance the benefits of a global and centralized business with the Individual’s valid interests in privacy and having his or her Personal Data protected. ALE is committed to respecting the Individual’s privacy rights and legitimate expectations and to protecting the Individual’s Personal Data collected by ALE from unauthorized access, use, retention/storage, and/or disclosure.

Meeting this commitment is a primary management objective and the individual and collective responsibility of ALE and employees, as well as third parties conducting business with or on behalf of ALE.

To that end, ALE is committed to:

Transparency: Providing required notices to Individuals relating to the processing of their Personal Data by ALE, employees, and third parties acting with or on behalf of ALE. ALE will provide required notices to its employees and all interested third parties, which notices shall disclose to Data Subjects as required the purpose(s) for which such Individuals’ Personal Data are being collected, used, retained/stored, disclosed, or otherwise processed, as well as any other information on the data processing required by applicable law.

Choice and Consent: Informing Individuals of the available choices they may have relating to the processing of their Personal Data and, when required, obtaining the required consent of such Individuals, either implicit or explicit. Wherever appropriate, Individuals will be informed of their available options in providing such personal data (e.g., “opt-in” or “opt-out”). In addition, ALE will seek to obtain, where required, the implicit or explicit consent of such Individuals with respect to the collection, use, retention, and disclosure of their Personal Data.

Data Subject Access: Providing Data Subjects with access to their Personal Data for review and updates. Individuals will have the right to review their Personal Data and make corrections or updates, request data blocking where applicable or to object, for legitimate reasons, to the processing of their Personal Data. Individuals also may have the right to withdraw their consent, if necessary, to the collection, use, retention, and disclosure of their Personal Data. ALE shall have processes in place to ensure that the Individual requesting review or updates to his or her Personal Data is the correct person.

Proportionality: Collecting personal data only as required for lawful and legitimate purposes, using Personal Data only for the purpose(s) for which the Personal Data have been collected or for which required consent has been obtained, and retaining such Personal Data only for the period of time required to fulfill the purpose(s), subject to local laws.

ALE will collect Personal Data as legally permitted and will collect only the Personal Data that are relevant and useful for lawful business purposes consistent with notices provided to the Data Subject, and proportional to those purposes. ALE will use Personal Data only for the purpose(s) for which the data were collected, or for additional lawful purposes for which implicit or explicit consent has been obtained, when required.

Personal Data may be retained only as long as necessary to fulfill the permitted purpose(s) and in compliance with the retention period(s) permitted by the applicable country's laws, and ALE will then appropriately dispose of such information.

Disclosure: Disclosing Personal Data to third parties only for a legitimate and identified purpose(s) and, where required by law, with the implicit or explicit consent of the Data Subject. ALE and employees will disclose Personal Data to third parties only for valid business reasons. The Individual's implicit or explicit consent will be obtained when required.

In addition to the execution of a non-disclosure agreement for the protection of confidential information, ALE will require a commitment by third parties receiving Personal Data to adhere to all applicable requirements of this Policy and related procedures, as well as the data privacy and protection law(s) of the applicable countries.

Data Protection: Securing Personal Data from unauthorized access and use. Appropriate information security safeguards, in accordance with the Information Security Policy, will be used to protect both physical and electronic Personal Data, in any format or media, against unauthorized access and use.

Data Quality: Working to ensure the quality of the Personal Data collected, used, retained, and disclosed. ALE will have in place processes and procedures intended to ensure that the Personal Data collected remain accurate, complete, and relevant for the purpose(s) described in the applicable notice made available to Individuals at the point of collection.

Monitoring and Enforcement: Monitoring and enforcing compliance with this Policy and the privacy and data protection laws of the applicable countries. It is the responsibility of ALE personnel, affiliates, and joint ventures to comply with this Policy and associated procedures, and the applicable laws providing for the privacy rights of Individuals and protection of their Personal Data. ALE shall have processes and procedures in place for periodically assessing and verifying compliance with these requirements.

Please send your questions or requests regarding data protection/privacy and the rights associated with it to dataprivacy@al-enterprise.com. The Data Protection Officer will reply to your inquiry. In addition, ALE will have processes and procedures in place to handle complaints and disputes relating to the collection, use, retention, and disclosure of Personal Data.

Management and Accountability: Assigning and supporting the management and accountability of its Policy and associated procedures. ALE shall maintain a Privacy & Data Protection governance structure (“core team”) under which the Information security officer and the Data Protection Officer and such other positions and bodies as may be required or useful, shall have defined responsibilities for defining, documenting, promoting, and communicating the Policy and related programs, and for developing and implementing processes and procedures to ensure compliance with the Policy and related procedures, as well as applicable privacy and data protection laws.

Log File Information: When you use the ALE Sites, our servers automatically record certain information that your “client” (either your connect through your computer and/or mobile) sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type, browser language, referring/exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time of your request, one or more cookies that may uniquely identify your browser, your email address you are requesting the Content of and various Content information.

When you use ALE Services, our servers log certain general information that our application sends whenever the Services are used.

Purposes of Retaining Your Data: Your Personal Data may be stored or processed in the EU as well as outside the EU. To opt out communications, visit our [preference center](#) to change your selections, and we will not contact you unless you give your consent again by opt-in or other method. Or you may [request to be forgotten](#).

The purposes for which ALE is using your Personal Data are:

- Maintenance of prospects and customer data bases, and
- Management and the communication of newsletters, invitations to events or webinars, and sending information on ALE products, solutions, promotions and offers. Recipients of such data are ALE internal departments (sales, marketing, communication, IS), and some of ALE's sub-contractors.

Types of Data Collected

Personal Data: While accessing our Services, we may ask you to provide us with your Personal Data that can be used to contact or identify you. Personal Data may include, but is not limited to, the following:

- Email address
- First name and last name
- Phone number
- Home address
- Usage Data
- Identification number
- Physical characteristics
- Information about performance and/or behavior

Usage Data: Usage Data is collected automatically when using our Services.

Usage Data may include information such as your device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Services by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever you visit our Services or when you access our Services by or through a mobile device.

Tracking Technologies and Cookies: For information about the cookies we use and your choices regarding cookies, please visit our Cookie Policy.

Use of Your Personal Data

We may use your Personal Data for the following purposes:

- **To provide and maintain our Service:** Including to monitor the usage of our Services.
- **To manage Your Account:** To manage your registration as a user of the Services. The Personal Data you provide can give you access to different functionalities of the Services that are available to you as a registered user.
- **For the performance of a contract:** The development, compliance, and undertaking of the purchase contract for the products, items, or Services you have purchased, or of any other contract with us through the Services.
- **To contact you:** To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including security updates, when necessary or reasonable for their implementation.
- **To provide you with news:** Special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- **To manage your requests:** To tend and manage your requests to us.
- **For business transfers:** We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about our Services' users is among the assets transferred.
- **For other purposes:** We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and evaluating and improving our Services, products, services, marketing, and your experience.

We may share your Personal Data in the following situations:

- **With service providers:** We may share your Personal Data with service providers to monitor and analyze the use of our Services, for payment processing, to contact you.
- **For business transfers:** We may share or transfer your Personal Data in connection with, or during negotiations of, any merger, sale of our assets, financing, or acquisition of all or a portion of our business to another company.
- **With affiliates:** We may share your Personal Data with our affiliates, in which case we will require those affiliates to honor this Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **With business partners:** We may share your Personal Data with our business partners to offer you certain products, services, or promotions.

- **With other users:** when you share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With your consent:** We may disclose your Personal Data for any other purpose with your consent.

Retention of Your Personal Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when Usage Data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain Usage Data for longer time periods.

Transfer of Your Personal Data

Your Personal Data is processed at our operating offices and in any other places where the parties involved in the processing are located. This means that this information may be transferred to—and maintained on—computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those of your jurisdiction. Your consent to this Policy followed by your submission of such information represents your agreement to that transfer. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy and that no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your Personal Data.

Disclosure of Your Personal Data

Business Transactions: If we are involved in a merger, acquisition, or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different privacy policy.

Law Enforcement: Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Other Legal Requirements: We may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation

- Protect and defend our rights or property
- Prevent or investigate possible wrongdoing in connection with the Services
- Protect the personal safety of users of the Services or the public
- Protect against legal liability

Security of Your Personal Data

The security of your Personal Data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Analytics

The service providers that we use may have access to your Personal Data. These third-party vendors collect, store, use, process, and transfer information about your activity on our Services in accordance with their privacy policies.

Google Analytics collects statistical information about how you use the site so that we can improve the site. Google Analytics does not collect specific user information itself. We do use Google Tag Manager to install Google Analytics, and tracking pixels to support reporting and re-marketing via agencies. Our agencies use Adwords, Doubleclick, Facebook, LinkedIn, and possibly some other tracking pixels for remarketing.

For more information, please visit this resource:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

California Consumer Privacy Act (the “CCPA”) Privacy Policy

This CCPA Privacy Policy applies solely to visitors, users, and others who reside in the State of California.

Categories of Personal Information Collected: We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. The following is a list of categories of Personal Data that we may collect or that may have been collected from California residents within the last 12 months.

Please note that the categories and examples provided in below are those defined in the CCPA. This does not mean that all examples of that category of Personal Data were in fact collected by us, but reflects our good faith belief to the best of our knowledge that some of that Personal Data from the applicable category may be and may have been collected. For example, certain categories of Personal Data would only be collected if you provided such Personal Data directly to us.

- **Category A: Identifiers**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers

Collected: Yes

- **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))**

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: Yes

- **Category C: Protected classification characteristics under California or federal law**

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)

Collected: No

- **Category D: Commercial information**

Examples: Records and history of products or services purchased or considered

Collected: Yes

- **Category E: Biometric information**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data

Collected: No

- **Category F: Internet or other similar network activity**

Examples: Interaction with our Service or advertisement

Collected: Yes

- **Category G: Geolocation data**

Examples: Approximate physical location

Collected: No

- **Category H: Sensory data**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information

Collected: No

- **Category I: Professional or employment-related information**

Examples: Current or past job history or performance evaluations

Collected: No

- **Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))**

Examples: Education records directly related to a student maintained by an educational institution or a party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records

Collected: No

- **Category K: Inferences drawn from other personal information**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

Collected: No

Under the CCPA, Personal Data does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, or clinical trial data
- Personal Data covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994

Sources of Personal Information: We obtain the categories of Personal Data listed above from the categories of sources which follow.

- Directly from you. For example, from the forms you complete on our Services, preferences you express or provide through our Services, or from your purchases on our Services.
- Indirectly from you. For example, from observing your activity on our Services.
- Automatically from you. For example, through cookies we or our service providers set on your device as you navigate through our Services.
- From service providers. For example, third-party vendors to monitor and analyze the use of our Services, third-party vendors for payment processing, or other third-party vendors that we use to provide our Services to you.

Use of Personal Information for Business Purposes or Commercial Purposes: We may use or disclose personal information we collect for "business purposes" or "commercial purposes" (as defined under the CCPA). Examples of such purposes include the following:

- To operate our Services and provide you with our Services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our Services.
- To fulfill or meet the reason you provided your Personal Data. For example, if you share your contact information to ask a question about our Services, we will use that Personal Data to respond to your inquiry. If you provide your Personal Data to purchase a product or service, we will use that information to process your payment and facilitate delivery.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Data, or as otherwise set forth in the CCPA.

- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity, including, when necessary, to prosecute those responsible for such activities.

Please note that the examples provided above are illustrative and not intended to be exhaustive. For more details on how we use this information, please refer to the "Use of Your Personal Data" section.

If we decide to collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes, we will update this Policy.

Disclosure of Personal Information for Business Purposes or Commercial Purposes:

We may use or disclose and may have used or disclosed in the last 12 months the categories of Personal Data for business or commercial purposes which follow.

- Category A: Identifiers
- Category B: Personal Data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

Please note that the categories listed above are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact disclosed, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When we disclose Personal Data for a business purpose or a commercial purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Data confidential and not use it for any purpose except performing the contract.

Sale of Personal Information: As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Data by the business to a third party for valuable consideration. This means that we may have received some kind of benefit in return for sharing Personal Data, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in the CCPA. This does not mean that all examples of that category of Personal Data were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

We may sell and may have sold in the last 12 months the following categories of Personal Data:

- Category A: Identifiers
- Category B: Personal Data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

Share of Personal Data: We may share your Personal Data identified in the above categories with the categories of third parties which follow.

- Service Providers
- Payment processors
- Our affiliates
- Our business partners
- Third party vendors to whom you or your agents authorize us to disclose your Personal Data in connection with products or services we provide to you

Sale of Personal Information of Minors Under 16 Years of Age: We do not knowingly collect personal information from minors under the age of 16 through our Services, although certain third-party websites that we link to may do so. These third-party websites have their own terms of use and privacy policies and we encourage parents and legal guardians to monitor their children's Internet usage and instruct their children to never provide information on other websites without their permission.

We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to the sale of Personal Data may opt-out of future sales at any time. To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by contacting us.

If you have reason to believe that a child under the age of 13 (or 16) has provided us with Personal Data, please contact us with sufficient detail to enable us to delete that information.

Your Rights Under the CCPA

The CCPA provides California residents with specific rights regarding their personal information. If you are a resident of California, you have the following rights:

- **The Right to Notice:** You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.

- **The Right to Request:** Under the CCPA, you have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes, and sharing of personal information. Once we receive and confirm your request, we will disclose to you:
 - The categories of personal information we collected about you
 - The categories of sources for the personal information we collected about you
 - Our business or commercial purpose for collecting or selling that personal information
 - The categories of third parties with whom we share that personal information
 - The specific pieces of personal information we collected about you
 - If we sold your personal information or disclosed your personal information for a business purpose, we will disclose to you:
 - The categories of personal information categories sold
 - The categories of personal information categories disclosed
- **The Right to Say No to the Sale of Personal Data (Opt-Out):** You have the right to direct us to not sell your personal information. To submit an opt-out request please contact us.
- **The Right to Delete Personal Data:** You have the right to request the deletion of your Personal Data, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our Service Providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our Service Providers to:
 - Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities
 - Debug products to identify and repair errors that impair existing intended functionality
 - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.)

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us
- Comply with a legal obligation
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it
- **The Right to Correct Personal Data:** You have the right to correct inaccurate personal information maintained by us. Once we receive and confirm your request, we will use commercially reasonable efforts to make corrections (and direct our Service Providers to make corrections).
- **The Right Not to Be Discriminated Against:** You have the right not to be discriminated against for exercising any of your consumer rights, including by:
 - Denying goods or services to you
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
 - Providing a different level or quality of goods or services to you
 - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

We typically retain your personal information for the period necessary to fulfill the purposes outlined in our Privacy Policy, unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes.

Exercising Your CCPA Data Protection Rights: To exercise any of your rights under the CCPA, and if you are a California resident, you can contact our Senior Attorney by mail, telephone, or email:

ALE USA Inc.
Legal Department
26801 W. Agoura Road
Calabasas, CA 91301
(747) 388-7468
salvatore.zoida@al-enterprise.com

Only you, or a person registered with the California Secretary of State that you authorize on your behalf, may make a verifiable request related to your personal information.

Your request to us must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it we cannot respond to your request or provide you with the required information if we cannot:
- Verify your identity or authority to make the request
- And confirm that the personal information relates to you
- We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures we provide will only cover the period of 12 months preceding the verifiable request's receipt.

For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

Do Not Sell My Personal Information: You have the right to opt-out of the sale of your personal information. Once we receive and confirm a verifiable consumer request from you, we will stop selling your personal information. To exercise your right to opt-out, please click on the "CA - Do Not Sell My Personal Information" link in the footer of our website homepage.

The service providers we partner with (for example, our analytics partners) may use technology on our Services that sells personal information as defined by the CCPA. If you wish to opt-out of the use of your personal information for these potential sales as defined under the CCPA, you may do so by clicking on the "CA - Do Not Sell My Personal Information" link in the footer of our website homepage.

Please note that any opt-out is specific to the browser you use. You may need to opt out on every browser that you use.

Children's Privacy

Our Services do not address anyone under the age of 13. We do not knowingly collect Personal Data from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers. If we need to rely on consent as a legal basis for processing your Personal Data and your country requires consent from a parent, we may require your parent's consent before we collect and use that Personal Data.

Links to Other Websites

Our Services may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly recommend that you review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Changes and Updates to This Policy

This Policy may be revised periodically and this will be reflected by the date at the start of this Policy indicating when changes to the Policy were last made. Please revisit this page to stay aware of any changes. Your continued use of the ALE Site and ALE Services constitutes your agreement to this Policy and to any of its amendments.

Print or Download the Policy

[A PDF version of this Policy](#) is available for printing or reading offline.