Privacy Policy

Last modified: October 1, 2019

American Institute of Management, Inc., d/b/a Revela (“Revela” or “Company” or “We” or “Us” or “Our”) respects your privacy and is committed to protecting it through our compliance with this policy.

We want you to understand how we handle the personal information about you that we may obtain and the high standards we employ to safeguard this information. This policy describes the types of information we may collect from you or that you may provide when you visit the websites www.revelagroup.com and www.insightunseen.com (our “Websites”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On the Websites.
- In email, text, and other electronic messages between you and the Websites.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

This policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. IF YOU DO NOT AGREE WITH OUR POLICIES AND PRACTICES, YOUR CHOICE IS NOT TO USE OUR WEBSITES. BY ACCESSING OR USING THE WEBSITES, YOU AGREE TO THIS PRIVACY POLICY. THIS POLICY MAY CHANGE FROM TIME TO TIME. YOUR CONTINUED USE OF THE WEBSITES AFTER WE MAKE CHANGES IS DEEMED TO BE ACCEPTANCE OF THOSE CHANGES, SO PLEASE CHECK THE POLICY PERIODICALLY FOR UPDATES.

Information We Collect

The information we may collect on the Websites includes:

PERSONAL INFORMATION

- Personally identifiable information (“personal information”), such as: name, mailing address, billing address, email address, telephone number, and demographic information,
such as age, gender, hometown, household income, education, and interests. The personal information may be your personal information or the personal information of others (for example, others at your company).

COMMUNICATIONS INFORMATION

• Information that you provide by filling in forms on our Websites. We may also ask you for information when you report a problem with our Websites.

• Records and copies of your correspondence (including email addresses), if you contact us;

PREFERENCES INFORMATION

• Information about your interests in various products or services offered by Us or communication or marketing preferences; usage activity such as purchase history.

OTHER INFORMATION

• Information about your internet connection, the equipment you use to access the Websites, and usage details, including IP address, browser type, operating system, access times, areas of the Websites you viewed, what content you viewed on the Websites, and the pages you viewed directly before accessing the Websites.

How We Collect Your Information

We collect the foregoing information:

• When you provide it to us.
• Automatically as you navigate the Website.

INFORMATION YOU PROVIDE TO US

• We collect information you provide directly to us, for example, when you create an account, participate in interactive features of the Websites, fill out a form, respond to a survey, request customer support, or otherwise communicate with us via the Websites.

INFORMATION WE COLLECT AUTOMATICALLY WHEN YOU USE THE WEBSITES

• When you access or use the Websites, we automatically collect information about you, including the following:

  o We log information about your use of the Websites, including the type of browser you use, access times, pages viewed, your IP address, and the page you visited before navigating to the Website.

• We use various technologies to collect information, including sending cookies to your computer or mobile device and placing web beacons on pages of the Website.
o Cookies are small data files stored on your hard drive or in device memory that help us to improve the Websites and your experience, see which areas and features of the Websites are popular, and count visits. Most browsers are set to accept cookies by default. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages including social media websites, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.

o We use cookies or similar technologies to analyze trends, administer the website, track users’ movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. If you leave a comment on our website or fill out a form, you may opt in to saving your name, email address, and website in cookies. These are for your convenience.

o When visitors leave comments on the website, we collect the data shown in the comments form, and also the visitor’s IP address and browser user agent string to help spam detection. An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: https://automattic.com/privacy/. After approval of your comment, your profile picture (if set) is visible to the public in the context of your comment.

o Web beacons are small electronic files (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related Websites statistics (for example, recording the popularity of certain Websites content and verifying system and server integrity).

THIRD PARTY VENDORS

We are responsible for the processing of personal data we receive and subsequently transfer to a third party acting as an agent on its behalf. The use of information we collect shall be limited to the purpose of providing the service for which our client has engaged us. We will share your personal data with third parties only in the ways that are described in this privacy policy. We share your information with third parties who provide services on our behalf to help with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us, pursuant to written instructions. In such cases, these companies must abide by our data privacy and security requirements, and are not allowed to use personal data they receive from us for any other purpose.

These third parties provide us services including but not limited to the following:

- Improve the Websites, our products, events, and services;
• Network or cybersecurity monitoring and intrusion detection;
• Web or application development/management;
• Shipping material related to our services;
• Payment processing;
• Providing customer service;
• Providing assessments related to our services;
• Technical administration, such as hosting, managing and maintaining our servers

We may also partner with selected third-party vendors to allow tracking technologies and remarketing services on the Websites through the use of first party cookies and third-party cookies to, among other things, analyze and track users’ use of the Websites, determine the popularity of certain content, and better understand online activity.

• Google Analytics: Our Websites use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google. Google will use this information for the purpose of evaluating your use of our Websites, compiling reports on Websites activity, and providing other services relating to Websites activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. Further information about Google’s privacy policy may be obtained from https://policies.google.com/privacy.

• HubSpot: The Websites use a HubSpot tracking code which uses cookies or similar technologies to track visitors and gather demographic information about them. HubSpot keeps track of the Websites and pages you visit within HubSpot. This data is used to deliver customized content and promotions to users whose behavior indicates that they are interested in a particular subject area. Further information about HubSpot’s privacy policy may be obtained from https://legal.hubspot.com/privacy-policy.

By accessing the Websites, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their respective privacy policies and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor’s website or Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

**How We Use Your Information**

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Websites to:

• Deliver targeted advertising, newsletters, and promotions, and other information regarding the Websites and our mobile application to you.
• Send you technical notices, updates, security alerts, and support and administrative messages.

• Increase the efficiency and operation of the Websites.

• Assist law enforcement and respond to subpoenas.

• Monitor and analyze usage and trends to improve your experience with the Websites.

• Notify you of updates to the Websites.

• Offer new products, services, and/or recommendations to you.

• Perform other business activities as needed.

• Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.

• Request feedback and contact you about your use of the Websites.

• Resolve disputes and troubleshoot problems.

• Provide, maintain, and improve the Websites.

• Process and deliver contest entries and rewards.

• Link or combine with information we get from others to help understand your needs and provide you with better service.

• Fulfill any other purpose for which you provided the information.

We store information in the United States. If you live outside of the United States, you understand and expressly agree that we may transfer your information to the United States. We will do so in accordance with applicable law. Please note that U.S. laws may not afford the same level of protection as those in your country. Your personal information may be subject to lawful access by U.S. or foreign law enforcement, courts or governmental authorities.

**Third-Party Use of Cookies and Other Tracking Technologies**

We may link to sites or apps or have third-party services on our platforms we don’t control. For example, articles on this website may include embedded content (e.g. videos, images, articles, etc.) from other websites behaves in the exact way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged into that website.

If you click on a link to a third-party website, you will be taken to a website we do not control. This policy does not apply to the privacy practices of that third-party website. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you. Read the privacy policies of other websites carefully. We are not
responsible for these third-party sites. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third-parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

**Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our Websites users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

**Accessing and Correcting Your Information**

You may send us an email at info@revelagroup.com to request access to, correct or delete any personal information that you have provided to us. We may not accommodate a request to
change information if we believe the change would violate any law or legal requirement or cause
the information to be incorrect.

In your written request, you may request that we provide you with details of your personal
information that we process, the purpose for which it is processed, the recipients of such
information, and the existence of any automated decision making involving your personal
information; request that we rectify any errors in your personal information; request that we delete
your personal information if our continued processing of such information is not justified; request
that we transfer your personal information to a third party; object to automated decision-making
and profiling based on legitimate interests or the performance of a task in the public interest (in
which event the processing will cease except where there are compelling legitimate grounds, such
as when the processing is necessary for the performance of a contract between us); object to direct
marketing from us; and object to processing for purposes of scientific, historical research and
statistics.

Controls For Do-Not-Track Features

Most web browsers and some mobile operating systems include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your
online browsing activities monitored and collected. No uniform technology standard for
recognizing and implementing DNT signals has been finalized. As such, we do not currently
respond to DNT browser signals or any other mechanism that automatically communicates your
choice not to be tracked online. If a standard for online tracking is adopted that we must follow in
the future, we will inform you about that practice in a revised version of this Privacy Policy.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to
us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some
  browser cookies, or to alert you when cookies are being sent. To learn how you can manage
  your Flash cookie settings, visit the Flash player settings page on Adobe’s website. If you
disable or refuse cookies, please note that some parts of this site may then be inaccessible
  or not function properly.

- **Promotional Offers from the Company.** If you do not wish to have your contact information
  used by the Company to promote our own or third parties’ products or services, you can
  opt out by sending an email to info@revelagroup.com. If we have sent you a promotional
  email, you may click on the “manage preferences” link at the bottom of the email and select
  your communication preferences. This opt-out does not apply to information provided to
  the Company as a result of a product purchase, warranty registration, product service
  experience or other transactions.

  You can always choose not to provide information when you are prompted to do so. Note
  that if you do not provide us with certain mandatory information, then you may be unable to take
  advantage of certain features on the Websites.
Your California Privacy Rights

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Website, you have the right to request removal of unwanted data that you publicly post on the Website. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Website, but please be aware that the data may not be completely or comprehensively removed from our systems.

GDPR Notice

In compliance with the European Union (“EU”) General Data Protection Regulation (“GDPR”), we may rely upon one or more legal bases defined in the GDPR to collect, use, share and otherwise process the personal information of individuals located in the EU, including where:

- Necessary to perform a contract we have with you, such as our terms of engagement, and to provide the services;
- You have consented to the processing (in which case you may revoke your consent at any time);
- Necessary for us to comply with a legal obligation, or to establish, exercise or defend legal claims;
- Necessary to protect your vital interests or those of others;
- Necessary in the public interest; and
- Necessary for the purposes of Company’s or a third party’s legitimate interests, provided that those interests are not overridden by your interests or fundamental rights and freedoms.

Where we collect, use, disclose and otherwise process your information based on legitimate interests, we may rely on the following interests:

- Marketing our products: We use your information as necessary to pursue our legitimate interests in marketing our products to you. For example, where permitted by digital marketing law, we may contact you by email to let you know of products you might be interested in.
• Providing, improving and developing our products: We use your information as necessary to pursue our legitimate interests in tailoring and improving our products. For example, we may send you a survey or questionnaire to understand your experience in purchasing from Revela.

If you are located in the EU, under certain circumstances, you may have certain legal rights under the GDPR, including:

• To access the personal data we maintain about you
• To receive information about how we process your personal data
• To correct your personal data
• To have your personal data erased
• To object to or restrict how we process your personal data
• To request your personal data be transferred to a third party
• To withdraw any consent you may have given us to process your personal data

If you are an EU resident, you have the right to object to our processing that is based on legitimate interests by contacting us at the address or number below. If you are located in the EU and you believe that Revela has infringed your rights under the GDPR, please contact us by sending an email to info@revelagroup.com or calling us at: 712-322-1112.

You have the right to lodge a complaint with a supervisory authority, in particular in your applicable Member State.

Data Security

We have implemented reasonable administrative, technical and physical safeguards in an effort to protect your personal information from inadvertent and unauthorized processing, and from corruption, destruction, access, use, alteration, sale, rental and disclosure. We keep personal information as long as it is necessary or relevant for the practices described in this policy. We also keep information as otherwise required by law.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Websites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Websites.
Policy for Children

We do not knowingly solicit information from or market to children under the age of 13. If you are under 13, do not use or provide any information on the Websites or on or through any of their features. If you become aware of any data we have collected from children under age 13, please contact us using the contact information provided below. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.

Changes to Our Privacy Policy

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Updated” date shown at the top of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Website, and you waive the right to receive specific notice of each such change or modification. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Websites after the date such revised Privacy Policy is posted.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Revela
info@revelagroup.com
1508 Leavenworth Street
Omaha, NE 68102
712-322-1112