

PRIVACY POLICY

Last Updated: September 29, 2023

This privacy policy (“Privacy Policy”) details the use and collection of your information by the websites (the “Sites”) operated and owned by **Spirit of American - Rising LLC**, A Massachusetts Limited Liability Company also known as psyopwars.com and psyopwars.buzzsprout.com (“Company”, “Us”, or “We”) and governs your access to the content and services hosted on our platform (the “Services”).

We value your privacy and recognize our role in protecting your personal data. Please read this Privacy Policy carefully before using or proceeding to access the Sites. Your use of the Sites and Services indicate that you are accepting the policies and practices described in this Privacy Policy.

BY USING OUR WEB BROWSER, YOU AGREE THAT YOU HAVE READ, UNDERSTOOD, AND AGREE TO BE BOUND BY THESE TERMS. IF YOU DO NOT AGREE, YOU MAY NOT USE THE PLATFORM.

- 1) **Statements Made.** This website(s) may contain material or creative works of art, literature, video, content, or film—which may be exaggerated, parodied, or contain satiric rhetoric which serves as a criticism or commentary on another person. This is protected by the First Amendment as a form of expression and may also rely on the fair use exception governed by section 107 of the Copyright Act.
- 2) **Information We Collect and Use**
 - a) When we refer to “Personal Data,” we mean any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly, or indirectly, by reference to an identifier such as a name, an identification number, location data, or an online identifier.
 - b) In addition to Personal Data, we collect general information (“Usage Data”) regarding your use of the Services provided on our Sites. This Usage Data can include demographic information, information about your preferences, interests, search queries, and online activity. When Usage Data includes Personal Data, we treat the Personal Data as described by this Privacy Policy.
 - c) Company directly and through third-parties collects information that you provide to us from your use of the Services, and from other sources. The information we collect and how we process it depends on how you use and access the Services and we combine all of the information we have about you so that we can analyze it and provide better Services to you. We collect information, including Personal Data, as follows:
 - i) Your Submissions to Us – Company will collect your Personal Data when you sign up for an online newsletter, register for an event, or contact us with a question or request. For example, if you submit a request to advertise with us, you may provide us with your name, email address, employment information, telephone number, address, and company. We use this information as

necessary to respond to your request or inquiry and to provide and improve the Services and our products.

- ii) Your Content Submissions – Company allows users to submit content, such as comments and images, or other user generated content on some or all of our sites which we post on the Services with your consent. Users who choose to sign up for this service must provide a user name and email address. We receive any Personal Data in the comments or images you submit to us. We process this Personal Data as long as we have a legitimate interest and based on your consent. If, in addition to you, other persons are identifiable in the content you provide, you must obtain consent from those persons prior to publication.
- iii) Your Location – “Location Data” is collected with your consent or inferred as you use the Services. Such information will include the location of the mobile device or computer used to access the Services derived from GPS or WiFi use, your device’s IP Address, or the geographic information you provide to us (e.g. your city). We use this information to analyze the use of the Services, customize and improve the content for you on the Services, send you location-specific content, and show you events or businesses near you. We use and retain the Personal Data for as long as necessary and useful to provide personalized and improved services to you or until you withdraw consent.
- iv) Your Social Media Interactions – We receive Personal Data about you when you interact with us using the social media aspects to our Sites, on our social media pages and channels, or on other channels and content. The Personal Data includes profile name, profile identifier, and the content of your submissions. We use this information to communicate with you and for internal purposes until you withdraw consent, or we do not use the social media pages anymore. Please review the privacy policies and settings of any websites, mobile applications, or social networks should you have any questions about their privacy practices. Please note that any content (e.g. comments, photographs, information, and other materials) that you post directly to our Sites, including our social media pages, is public and can be read, collected, or used by others. Please be cautious when disclosing any Personal Data through public activities or submissions.
- v) Marketing and Other Informational Updates – With your consent and as otherwise permitted by law, we use your email address and other information we receive from and about you to contact you with information about our products and services and others’ products and services, provide special offers and promotions that may be of interest to you. You may withdraw your consent at any time by unsubscribing from such marketing communications. Withdrawing your consent will not affect the lawfulness of the processing before the withdrawal. We may also notify you periodically about important changes to the services. Withdrawing consent from marketing communications does not affect our ability to send you these communications, such as those related to providing services to you or responding to your requests.

- vi) **Automatic Usage Data Collection through Cookies and Similar Technologies –** With your consent or as otherwise permitted by law, when you visit the Services (including our social media pages) or open our emails, we and other third-party vendors, such as advertising networks, social media widgets, affiliate partners, and analytics providers, collect certain information, including Personal Data, by automated means, such as cookies, web beacons and web server logs. The information collected in this manner includes Usage Data, IP address, browser characteristics, unique device IDs and characteristics, operating system version, language preferences, date and time of your access to the Services, referring URLs, and information about the usage of our Services. We use this information, for example, to determine how many users have visited certain websites and social media pages, social media channels, or opened messages or newsletters, to evaluate and improve the Services we provide. See below for more information about our use of cookies and the retention of your Personal Data collected via cookies.
- 3) **How We Share Information.** We share Personal Data within Company Media (including our affiliates and subsidiaries) to fulfill our obligations to you and operate our business consistent with this Privacy Policy and applicable data protection law. In addition to what is already stated in this Privacy Policy, we will also share your Personal Data with third-parties in the following situations and for the following purposes:
 - 4) **Vendors and Suppliers.** We share the Personal Data we collect with our service providers, vendors (including ad networks), and suppliers for the purposes described in this Privacy Policy, including so they can provide their services to us and you and to help us communicate with you about products and services, offers, events and promotions that we believe may be of interest to you. Unless stated in this Privacy Policy, our service providers and vendors are only permitted to access your information in connection with performing such services.
 - 5) **Enabling Services on the Sites.** We offer a variety of services and functions through the Services. Personal Data that is collected through the Services will be used/and or disclosed to third-parties in order to enable us to provide the Services. For example, the Services allow you to interface with third-party websites, content, advertising, and features. To facilitate that interaction, we use your Personal Data and/or disclose your Personal Data to the third-party operating the websites and features.
 - 6) **Legal and Other Similar Uses.** Though we make every effort to preserve user privacy, Company may need to disclose Personal Data when required by law when we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on Company or its affiliates. If we intend to turn over information related to you for any of these reasons we will use commercially reasonable efforts to provide you with advance notice, unless we are prohibited from doing so by law or court order.
 - 7) **Online Advertising.** We use industry standard website tracking to serve you relevant advertising on and off the Services. Our services display advertisements to you via targeted advertising methods. This permits us to show you certain advertising about

products and services tailored to your individual interests based on information we receive from visitors of the Services and by third-parties. You may also see certain ads through your use of the Services because we participate in advertising networks. Ad networks allow us to target our advertising to users through the use of click-stream, demographic, behavioral and contextual information. The use of third-party tracking technologies to collect this information is often subject to their own privacy policies.

- a) Ad Serving – The ads appearing on our Sites are delivered to you by advertising vendors and/or by Company’s own Platform. In order to serve ads to you, we may use information collected during your searches or visits to our websites and information that we specifically acquire from third parties.
 - b) Advertising and Cookies – Some of our third party advertising partners may distribute cookies to users in advertisements that are provided to us. Company has no access to or control over these cookies once we have received the advertisements. Some of these advertisers and services we use to deliver advertising may be engaging in online behavioral advertising as defined by the Digital Advertising Alliance (DAA) and Federal Trade Commission (FTC).
 - c) Affiliate Advertising – We participate in affiliate advertising and allow affiliate links to be encoded on some of our pages. This means that we may earn a commission when you click on or make purchases via affiliate links and affiliate partners may use cookies to understand your use of the Services.
- 8) **Cookies.** Company places small data files called cookies on your device to ensure that the Sites function properly, to track how you use our Sites, to improve our Sites and your user experience, and to tailor our Sites to your interests. Cookies are small text files that are saved on your computer or mobile device when you visit the Sites. They enable the Sites to record and/or remember your actions and preferences. Company uses the following cookies on our Sites:
- a) Strictly Necessary Cookies – These cookies are essential in order to enable you to move around the Website and use its features. These cookies will be placed on your device and used even if you do not consent to the use of cookies.
 - b) Performance Cookies – These cookies collect information about how you use the Sites (e.g. which pages you go to most often) to improve how the Sites work.
 - c) Functionality Cookies – These cookies allow the Sites to remember the choices that you make (e.g. language or the region you are in) and provide enhanced, more personal features.
 - d) Targeting/Advertising Cookies – These cookies are used to deliver online advertisements on and off the Sites that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. The cookies remember that you have visited the site and this information may be shared with other organizations, e.g. advertisers.
 - e) The cookies used by Company are either first party or third-party cookies. First party cookies like the ones used when you log in to your account, are set by

Company and share the same domain. Third party cookies, on the other hand, are stored by third party providers and organizations with different domains.

- f) We use cookies that expire once you close your browser (called session cookies) and cookies that stay on your device until you delete them or they expire (called persistent cookies).
- 9) **Opt-out.** As part of our commitment to transparency and your privacy, we provide the following links to opt-out of cookies provided by both our first party ad server and many third-party advertising partners who may be engaging in online behavioral advertising:
- 10) **Global Privacy Control (GPC).** We honor the GPC signal. If you are on a browser that supports GPC, you may enable GPC through your browser. You will be able to opt-out of the sale/sharing or processing of your personal data or information through the browser.
- 11) **Third-Party Content, Widgets, Links to Other Sites.** Our Sites often contain or link to content that is hosted and served by third-parties. These third-parties may collect information about you through the use of their own cookies and web beacons may independently collect data or solicit Personal Data. Company is not responsible for the content or privacy practices of such other sites. For questions about these sites, please consult their individual privacy policies. This Privacy Policy applies solely to information collected by Company through our Sites. If you choose to purchase a product or service via our site, some special terms apply. Payments are handled by a third-party payment processor, whose own terms and privacy policy will govern your transaction. We do not process, record or maintain your credit card, bank account or payment information, though the third-party payment processor and/or the merchant may provide us with some data relating to your order, such as what you purchased and how much you spent. We expressly disclaim any and all liability related to your use of any third-party payment processor's system, including its privacy practices. When we link to an e-commerce site and you make a purchase on that site, we sometimes receive a small cut of the revenue. The commercial relationships with e-commerce sites are handled by a third-party company. We use the third party to help us automate the process of linking to products, especially as it distances our editorial staff from creating affiliate links themselves.
- 12) **Sale or Other Asset Transfers.** In the event Company goes through a business transition, such as a merger, acquisition by another company, or sale of a portion of its assets, your information may be disclosed in connection with the negotiation of such transaction and/or sold or transferred as part of such a transaction as permitted by law and/or contract.
- 13) **Children's Privacy.** We care about the privacy of children. Accordingly, we do not direct our Sites to children under the age of 16 or knowingly collect Personal Data from them. If we learn that a user is under 16, we will promptly delete any Personal Data that the individual has provided to us.
- 14) **How We Protect Personal Data.** Company has technical, administrative and physical safeguards in place to help protect against unauthorized access to, use or disclosure of Personal Data we maintain. Under our security practices, access to personally

identifiable information is authorized only for those who have a business need for such access, and sensitive records are to be retained only as long as necessary for business or legal needs and destroyed before disposal. Although we work hard to protect personal information that we collect and store, no program is one hundred percent secure and we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use or disclose personal information.

a) If you become aware of a security issue, please email us at SpiritOfAmerica.Rising@Proton.Me. We will work with you to address any problems.

15)How Long We Keep Personal Data. We retain the information we collect about you for as long as necessary to fulfill the purpose we collected it for and for the purpose of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

a) For information about deleting your Personal Data, including your account, see below.

16)Where Personal Data is Used and Stored. We are headquartered in the United States. Users are advised that your Personal Data may be hosted, transferred or processed on servers and databases located outside your resident country or other governmental jurisdictions that are not members of the EEA or recognized by the European Commission as possessing adequate privacy protections. Each of those jurisdictions maintain their own data protection laws. To provide adequate safeguards, standard contractual clauses (SCC) may be used when transferring your personal data internationally and solely as outlined in this Privacy Policy.

17)California Privacy Rights – Notice to California Users. If you are a resident of the state of California, you are entitled to certain rights with respect to your personal information (“Personal Information”) as defined under the California Consumer Privacy Act (“CCPA”) and as amended by the California Privacy Rights Act (“CPRA”). This includes the following rights:

a) The right to know what Personal Information we collect about you.

b) The right to delete the Personal Information we collect from you, subject to certain exceptions.

c) The right to correct inaccurate Personal Information.

d) The right to opt out of “selling” or “sharing” your Personal Information.

e) The right to limit the use of your sensitive personal information (“Sensitive Personal Information”) other than as permitted under the CPRA (see below).

f) The right not to receive discriminatory treatment by our business for exercising these rights.

g) To exercise any of the other rights above, please email SpiritOfAmerica.Rising@Proton.Me with your request. For any of the requests above, you may be asked for further information such as your user account name or your state or country of residence so that we may verify your identity.

18) **Third Parties.** We do not sell or share Personal Information to third parties (as that term is defined under the CCPA. In the past 12 months, we have not sold, shared or disclosed Personal Information to third parties.

19) **Sensitive Personal Information**

- a) We may use or disclose your Sensitive Personal Information as permitted under the CPRA as proportionately necessary and not for any other purpose. This may include:
- b) Performing the goods and services you would reasonably expect from us.
- c) Preventing, detecting and investigating security incidents.
- d) To resist and prosecute malicious, deceptive, fraudulent or illegal actions directed at our business.
- e) To ensure your physical safety.
- f) For short-term, transient use, such as non-personalized advertising shown in connection with your current interaction with our website.
- g) To perform services on behalf of our business, such as maintaining and servicing accounts, processing transactions or analytics services.

20) **Authorized Agent.** You may authorize an agent to submit requests to exercise any of the rights above to us by having them email us at SpiritOfAmerica.Rising@Proton.Me. Under the CCPA, an authorized agent is a person or a business registered with the California secretary of state, authorized on your behalf to submit these requests. We will still need to verify your identity unless your agent has a signed power of attorney on your behalf. We reserve the right to deny any request if an agent cannot provide proof that they are authorized.

21) **Colorado & Connecticut Privacy Rights – Notice to Connecticut Users.** If you are a Colorado and Connecticut resident, you have certain rights with respect to your “Personal Data” as defined and described under the Connecticut Data Privacy Act (“CTDPA”) and the Colorado Privacy Act (“CPA”).

- a) These rights include:
- b) Right to Access/Know
- c) Right to Correct Inaccuracies
- d) Right to Deletion
- e) Right to Data Portability
- f) Right to Opt-Out
- g) Right to Not be Discriminated Against

h) Right to Appeal

22) **Changes to this Privacy Policy.** Company Media may make changes to this privacy policy at any time. If and when we do, we will inform you by posting the revised privacy policy here. You are responsible for periodically visiting this page to check for any changes. Any changes that are made will apply to both personal information that we help prior to the effective date of the amended privacy policy and any personal information that we collect on or after such effective date. Your continued use of the Sites after this privacy policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of the privacy policy, as amended.

23) **How to Contact Us.** If you have any questions about this Privacy Policy, please contact us at SpiritOfAmerica.Rising@Proton.Me, or by mail at

Spirit of America - Rising LLC

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