



ABRAMSON PARTNERS PRIVACY POLICY

Last Modified: August 1, 2025

I. Introduction

Abramson Partners LLC (“Abramson Partners”) (“Company,” “us,” or “We”) respects your privacy and is committed to protecting it through this policy. Abramson Partners values the privacy of users of our website, and believe it is important for you to know how we handle the information we receive from or about you.

This policy describes the types of information we may collect from you or that you may provide when you use our services, visit our website at <https://abramsonpartners.ai/> and related websites, subdomains, tools (including but not limited to mobile applications), software, or other services (collectively, the “Website”).

This policy applies to information we collect:

- On this Website, including on or through any website or software application related to this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download to access this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from the Website. Customers are solely responsible for collection of data from employees and obtaining and maintaining the appropriate consents and safeguards.

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 Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 18

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to us through use of the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at the information provided below.

As you interact with us, we may collect information about you from the following sources:

- Directly from you, through interactions such as clicking the “Get in Touch” button and sending us an email, when you communicate with us and when you use our Website.
- From third party platforms that you provide account information to link to, and publicly-available information from those accounts (such as social media accounts).
- From automated technology when you visit our Website.

We may combine information that we receive from the sources described in this policy, including third party sources and public sources, and use or disclose it for the purposes described below.

II. What Information Do We Collect?

We collect the following information:

- Your contact details, such as name, e-mail address, and phone number
- Communications with us, such as calls and emails
- Information about how you use the Website
- Information collected automatically through technology when you use our Website, such as your IP address; browser type and language; operating system; domain server; type of computer or device; and other information about the device you use to access or utilize our Website; as well as internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our Website or advertisements
- Inferences, drawn from any of the above to create a profile about our users

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your browsing actions and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, site maps, analytics, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.
- Cookies, pixels, beacons, scripts, clear gifs, and other tracking technologies.

The information we collect automatically is only statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

As an example, the technologies we may use for this automatic data collection may include or be similar to:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web Beacons.** Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- **Pixels.** A pixel is a tiny snippet of code that gathers information about visitors on a website, which may include how you browse, what type of ads you click on, and other behaviors. One type of pixel is a clear gif, which are transparent, 1x1 pixel images that allow us to track the effectiveness of our marketing efforts and understand user behavior by collecting data on page views, email opens, and other interactions. This information helps us improve our services and tailor content to better meet the needs of our users.
- **Scripts.** A tracking script is a snippet of code written in languages such as JavaScript, which is added to the HTML of a web page or within an application. This script runs in the background when the page loads or when specific events occur, collecting data that is then sent to a server for analysis, such as page views, click events, form submissions, and session durations. A script may be used to transmit user information.

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. 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. For example, Google Analytics is a third-party tracking technology that has its own privacy practices, which you can find at <http://www.google.com/intl/en/policies/privacy/>.

III. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us, including promotions and featured products you may be interested in and to generate reports for branch managers.
- To provide you with insights, analytics, and predictions.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection and providing our services
- To notify you about changes to our Website or any products or services we offer or provide through it.

- To allow you to participate in interactive features on our Website, or to personalize the Website and content featured to your preferences.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

IV. Retention of Your Information

Your information is retained while you are a current or potential customer or as needed to provide our services to you. 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 and as reasonably necessary and proportionate to provide our services and to achieve the purposes discussed herein. We will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

You may request deletion of your data by contacting us at the information provided below.

V. 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 to:

- **Affiliated companies:** We may share some or all of your information to our parent companies, subsidiaries, and affiliates or if we undergo a merger or acquisition or other change of control.
- **Service providers:** We also may transmit or share your personal information with its third-party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and other technology and services required to design, improve, operate and maintain the Website, as well as other third-party services, such as payment and fulfillment.
- **Analytical insights.** We may share your data with partners to study analytical trends and marketing effectiveness, and may utilize analytics with large language models or artificial intelligence to view insights, connections, predictions, and patterns.
- **Professional Advisors.** We may share your information with our accountants, lawyers, and other professional advisers that assist us in carrying out our business activities.
- **For legal, safety and security reasons:** We may disclose your information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We also may share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law.
- **With third parties regarding corporate changes:** We might buy or sell businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the information we collect may be part of the transferred assets.
- **Consent.** We may share personal information that we hold about you with your consent or at your direction with non-affiliated third parties.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. Where applicable, we may 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. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If we plan to share your personal information with unaffiliated or non-agent third parties for promotional purposes, we will provide you the option to opt-out by logging into the Website and adjusting your user preferences in your account profile or by sending us an email at the information below.
- **Promotional Offers from Company.** If we plan to use your contact information to promote our own or third parties' products or services, we will provide you the option to opt-out by logging into the Website and adjusting your user preferences in your account profile or by sending us an email at the information below. This opt-out does not apply to information provided to Company as a result of a product purchase, warranty registration, product service experience or other transactions.
- **Targeted Advertising.** If we plan to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, we will provide you the option to opt-out by adjusting your user preferences in your account profile or by sending us an email stating your request to the email address provided below.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

VI. Accessing and Correcting Your Information

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at address provided below to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. 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.

Data Security

We endeavor to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. However, 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 Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

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 Website. 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 Website.

Data Transfers

This Website is intended for use only by persons located in the United States, as described in our Terms of Use. We are headquartered in the United States and may use service providers that also operate in the US or in other countries outside the country in which you reside. Therefore, your personal information may be transferred to countries which may not provide for the same level of data protection as guaranteed under the applicable data

protection laws of the country in which you reside. For all such transfers we ensure that these countries are either considered adequate according to the applicable data protection law or that appropriate safeguards are in place, such as standard contractual clauses.

VII. Your Rights

As previously described herein, you may have the right to:

- Access your information;
- Correct your information;
- Delete your information;
- Opt out of certain processing of your information;
- Obtain a portable copy of your information;
- Opt out of sales of your information;
- Opt out of processing of your sensitive data;
- Initiate a private cause of action for data breaches;
- Opt out or control use of automated decision making of your information, and
- Not be discriminated against for exercising one or more of these rights.

You may have additional or complementary rights under one or more state or local laws, including but not limited to:

- California Consumer Privacy Act (2018; effective Jan. 1, 2020)
- California Privacy Rights Act (2020; fully operative Jan. 1, 2023)
- Colorado Privacy Act (2021; effective July 1, 2023)
- Connecticut Data Privacy Act (2022; effective July 1, 2023)
- Delaware Online Privacy Protection Act (2022; effective Jan. 1, 2022)
- Florida Consumer Data Privacy Act (2023; effective July 1, 2024)
- Indiana Consumer Data Protection Act (2023; effective Jan. 1, 2026)
- Iowa Consumer Data Protection Act (2023; effective Jan. 1, 2025)
- Montana Consumer Data Privacy Act (2023; effective Oct. 1, 2024)
- New York Privacy Act (Introduced in 2023, not yet passed)
- Oregon Consumer Privacy Act (2023; effective July 1, 2024)
- Tennessee Information Protection Act (2023; effective July 1, 2025)
- Texas Data Privacy and Security Act (2023; effective July 1, 2024)
- Utah Consumer Privacy Act (2022; effective Dec. 31, 2023)
- Virginia Consumer Data Protection Act (2021; effective Jan. 1, 2023)
- Washington Privacy Act (Proposed, not yet enacted)

Please note that references to specific privacy laws in this policy does not imply that such laws apply to all users or consumers, nor that Abramson Partners is necessarily subject to these laws. The applicability of certain laws depends on your jurisdiction, and your rights under those laws may vary accordingly. It is your responsibility to review the laws that govern your rights based on your location and circumstances.

European Union's General Data Protection Regulations ("GDPR")

While this Website is intended only for use in the United States, European residents may have certain rights under the European Union's GDPR 2016/679. The GDPR is a complex regulatory scheme and we do not intend to provide every detail here. The GDPR provides the right, where applicable, to (a) access, (b) publication, (c) erasure, (d) restrict processing, (e) object to processing, (f) data portability, (g) complain to a supervisory authority, and (h) withdraw consent. You may have one or more of these rights if you are a European Resident.

VIII. To Exercise Your Rights:

If applicable, you may exercise any of your rights in relation to your data, such as to request your data be deleted, amended, corrected, accessed, or to opt out of certain processing of your data, by emailing us at Gregg@abramsonpartners.ai

Changes to Our Privacy Policy

If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account or through a notice on the Website. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

This Policy was last updated August 1, 2025.

IX. Contact Information

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

gregg@abramsonpartners.ai