

Privacy Policy

This Privacy Policy applies to the data collected through the Safe 1031 website (the “**Safe 1031 Platform**”) that Safe 1031 LLC (“**Safe 1031**” “**we**” or “**us**”) owns and operates. This Privacy Policy does not apply to data collected offline or by any third-party websites or services that do not link to this Privacy Policy or that are not owned or operated by Safe 1031.

WHAT KINDS OF INFORMATION DO WE COLLECT?

Depending on which parts of the Safe 1031 Platform you use, we may collect different kinds of Personal Information from or about you. “**Personal Information**” is any information that can be used to identify you. For example, Personal Information can include your:

- **Account and profile information:** Personal Information you provide when you register for an account and complete a profile on the SAFE 1031 Platform. This information may include your contact information, date of birth, and gender. It also may include information about your activity on the SAFE 1031 Platform, such as statistics about your yoga workouts.
- **Device information:** Information from or about the computers, phones, smart watches, or other devices where you install, access, or push information to the SAFE 1031 Platform. Some of this information may be considered Personal Information, such as your IP address, device identification number, and your device location (including specific geographic locations, such as through Bluetooth, WiFi signals or GPS).

We also may collect information that does not identify you, such as information about how many users navigate to our page, what types of browsers our users have, and where they click. We typically collect this information in the aggregate through the use of Data Collection Technology (defined below). If any of this information becomes identifiable, we will treat such information as Personal Information.

HOW DO WE USE THIS INFORMATION?

We will ask for your consent to use your Personal Information for purposes other than as disclosed in this Privacy Policy, which include:

- **Operating and delivering the SAFE 1031 Platform:** We use your Personal Information to deliver the SAFE 1031 Platform. We also use your Personal Information to analyze, develop and improve our offerings and services. We also use your Personal Information to process payments, provide support, conduct research and test features in development, which help us evaluate and improve SAFE 1031 Platform.
- **Communicating with you:** We use your information to send you marketing communications, surveys and important administrative announcements about the SAFE 1031 Platform. We also use your information to respond to you when you contact us.
- **Marketing and promoting the SAFE 1031 Platform:** We use the information we collect to market and promote our service, activities on the SAFE 1031 Platform, and other commercial products and services that may be relevant to you. We may also show you advertisements on and off the SAFE 1031 Platform and measure the effectiveness and reach of such advertisements.
- **Ensuring safety and security:** We use the information we collect to help verify your identity, your account, and your activity on the SAFE 1031 Platform. We might use this information, for instance, to investigate suspicious activity or violations of our Terms of Use or policies.

We use cookies and other data collection technologies to provide and support the SAFE 1031 Platform and some of the uses described in this section of the Privacy Policy. See the **COOKIES AND OTHER DATA COLLECTION TECHNOLOGY** section below to learn more about how we use Data Collection Technology and how to control cookies on your devices.

HOW IS THIS INFORMATION SHARED?

Your Personal Information may be shared, at your direction or your consent, or in the following ways:

- **With our vendors:** We work with vendors that help us provide you the SAFE 1031 Platform and related services. Unless prohibited by applicable law, we may share Personal Information with our vendors for purposes such as website hosting, professional services, human resources management, customer service, e-mail delivery and auditing. When we share Personal Information with vendors, we require those vendors to process your Personal Information only on our behalf and for the same purposes for which the Personal Information was collected.
- **With third party partners:** We work with third party partners that provide advertising, measurement and analytics services. We want our advertising to be relevant and interesting, so we may share information (including Personal Information) with these third party partners to help us tailor these advertisements to your interests. We do not sell or lease your Personal Information to any third party non-affiliated partners for their own marketing purposes.
- **With affiliates:** We share your Personal Information within our corporate family for the purposes described in this Privacy Policy, including for their direct marketing purposes, and as required or authorized by law. Affiliates are those companies that are under common control of SAFE 1031 LLC.
- **As part of a corporate transaction:** Unless prohibited by applicable law, we may share, transfer or delete your Personal Information if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control by Safe 1031 LLC or any affiliated company (in each case, whether in whole or in part). If required by applicable law, any such sharing of Information will be reported to regulators in accordance with the applicable law.
- **In other lawful ways:** We may also share your Personal Information: (i) if we determine that disclosure is necessary to comply with the request of a law enforcement, regulatory agency or other legal process; (ii) to protect the rights, privacy, property, interests or safety of our company or our affiliates, customers, business partners, suppliers, employees or the general public; (iii) to pursue available remedies or limit damages; (iv) to enforce our Terms of Use; (v) to respond to an emergency; and (vi) as otherwise permitted by applicable law.

We may also aggregate the information you and other users make available in connection with the SAFE 1031 Platform and post it publicly or share it with third parties. To do this, we remove your Personal Information and combine it with information from other users of the SAFE 1031 Platform.

COOKIES AND OTHER DATA COLLECTION TECHNOLOGY.

We use cookies and other data collection technologies to help us provide, protect and improve the SAFE 1031 Platform.

Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers on computers, phones and other devices and they may contain information such as user settings, browsing history and other Internet activities. While the cookies that we use may change from time to time as we improve and update the SAFE 1031 Platform, the types of cookies we use generally fall into the below categories:

- **Session Cookies** are used to operate the SAFE 1031 Platform. Some cookies are essential for the operation of the SAFE 1031 Platform. If a user chooses to disable cookies, certain content and features may not be available.
- **Preference Cookies** are used to remember your preferences. For example, when you input the location of your farm, we use cookies to remember this location so you do not have to select it every time you visit the SAFE 1031 Platform.
- **Advertising Cookies** are used to serve you with advertisements that we believe are relevant to you and your interests. These cookies also help us evaluate our marketing program performance and analytics. For more information about advertising cookies, see [Opting out of interest-based advertising below](#).
- **Security Cookies** are used for general security purposes, such as user authentication and preventing fraudulent use or unauthorized access of data.

We also use **web beacons** (also called a pixel tag or clear GIF) that enable us to monitor user activity and website traffic. In this Privacy Policy, we refer to cookies, web beacons, and other similar technology as “**Data Collection Technology.**”

Why SAFE 1031 uses Data Collection Technology: Data Collection Technology helps us to save your password for future log-ins, detect and prevent fraud, and helps us (and our ad partners) manage our online marketing program and deliver ads that are relevant or may be of interest to you. Data Collection Technology also helps us personalize and improve the performance of our services.

Controlling cookies on your computer: We will notify you when you are on part of the SAFE 1031 Platform that uses cookies. By continuing to use that part of the SAFE 1031 Platform after such notice, you accept the use of cookies. If you do not wish to receive cookies, you may set your browser to reject cookies or alert you when a cookie is dropped on your computer. Usually, these settings are available through the security features of your web browser. Please be aware that if you disable cookies, some features on the SAFE 1031 Platform may not be available.

Our policy on “Do Not Track” signals: California’s Online Privacy Protection Act requires website operators to disclose how they respond to web browser’s “Do Not Track” (“DNT”) signals. Some web browsers incorporate a DNT or similar feature that signals to websites that a user does not want to have his or her online activity tracked. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including SAFE 1031, do not respond to DNT signals.

Opting out of Interest-Based Advertising. Interest-based advertising is a way that helps companies provide you with more relevant advertising on the websites you visit or the applications you use. If you want to “opt out” of receiving online interest-based ads, please follow the instructions at www.aboutads.info/choices, or <http://www.networkadvertising.org/choices/>. Please note that when you “opt-out” of receiving interest-based ads, this does not mean you will no longer see ads from us or on the SAFE 1031 Platform. It means that the online ads that you do see will not be based on your particular interests. If you delete cookies on your device, generally you will need to opt-out again. More information about online behavioral advertising can be found at www.aboutads.info.

LINKS TO THIRD PARTY WEBSITES.

The SAFE 1031 Platform may include links to third party websites and services that we do not own or operate. When you click these links, you will be directed away from the SAFE 1031 Platform to that third party’s website. Any information you submit on that third party’s website will be subject to that third party’s practices and privacy policy. We encourage you to read these third party privacy policies carefully before submitting your information.

NOTE TO INTERNATIONAL USERS.

The SAFE 1031 Platform is directed to and intended for individuals located in the United States. If you are located outside of the United States and choose to use the SAFE 1031 Platform, your Personal Information will be stored and processed on servers in the United States or in other countries where we have affiliates or service providers. The laws governing Personal Information in the United States may differ from, and may be less protective than, the laws of other countries. By using the SAFE 1031 Platform, you understand and consent to the transfer, storage and use of your Personal Information in accordance with laws in the United States and with this Privacy Policy.

YOUR CALIFORNIA PRIVACY RIGHTS.

Under California law, California residents have the right to request a list of all third parties to whom a company has disclosed their Personal Information for those third parties’ direct marketing purposes in the prior calendar year. We currently share Personal Information with third parties, including our affiliates, so that those third parties can market themselves to you. If you are a California resident and you would like to request this information, please send us an email at info@safe1031.com with the subject line “California Privacy Rights” or write us at the address listed below. Please note that, under this law, we are not required to respond to your request more than once in a calendar year, nor are we required to respond to any requests that are not sent to the above-designated email address.

CHILDREN’S PRIVACY.

The SAFE 1031 Platform is not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children’s Online Privacy Protection Act, if we learn that we have received any Personal Information directly from a child under age 13 without his or her parent’s verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the SAFE 1031 Platform. Subsequently, we will delete that information.

HOW WILL WE NOTIFY YOU OF CHANGES TO THIS PRIVACY POLICY?

The Effective Date of this Privacy Policy is set forth at the top of this page. If we make a material change to the way we treat your Personal Information, we will notify you in advance via email, the SAFE 1031 Platform, or through other reasonable means. Your continued use of the SAFE 1031 Platform after the Effective Date of any changes constitutes your acceptance of the amended Privacy Policy. Any amended Privacy Policy supersedes all previous versions.

HOW TO CONTACT US.

To learn more about how we collect and use your information, please contact us using the information below:

Safe 1031 LLC
Address: 5001 LBJ Freeway, Suite 850,
Dallas, Texas 75244
Tel: 800.229.4874
Email: info@safe1031.com