Shady Grove Group/Gashe Publishing/How this Happened Privacy Policy

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We at Gashe Publishing, a Shady Grove Group LLC company (collectively Gashe Publishing/Shady Grove Group or 'GP/SG') strive to protect your privacy by preparing this privacy policy with regards to the collection and processing of information through our processes and procedures. One of the products for Gashe Publishing is the book 'How this Happened'.

#### 1. Scope of this policy

This privacy policy (the "Policy" or the "Privacy Policy") describes how Gashe Publishing collects, uses, consults, or otherwise processes an individual's Personal Data. For the purposes of this policy, "the Shady Grove Group LLC., a company incorporated under the law of the state of Maryland, has its registered seat and its offices at 215 Spring Avenue, Rockville, MD, 20850, and email address <a href="info@shdygrovellc.com">info@shdygrovellc.com</a>. We are committed to protecting the privacy of our users and customers. This Privacy Policy is especially directed at subscribers of our publishing company and the produce offered through How this Happened site. This Privacy Policy is intended to inform you how we gather, define, and use information that could identify you, such as your First Name, Last Name and email address. Please take a moment to read this Privacy Policy carefully. This policy is to be read as consistent with the Cookie Policy. This policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out.

### 2. Contacting us

If you have general questions about your account or how to contact Customer Service for assistance, please send us an email on <u>info@shaygrovellc.com</u>.

#### 3. Collection of Information

The purpose of the Gashe Publishing and its product How this Happened Application provides a platform for customers to read published materials, book excerpts, and blogs. As part of these processes, we receive and store information about you such as:

#### a) Personal Data

The majority of our sites may require registration. Users may register ("sign-up") on the application. Upon signing-up, an account is created for the user ("Account"). Upon registration, users are required to provide part or all of the following information below,

- First Name
- Last Name
- Email address.

#### 4. Use Information

### a) Information Collected while Using the Application

We use your information to provide, analyze, administer, enhance and personalize our services and marketing efforts, to process your registration, your orders and your payments and to communicate with you on these and other topics.

### b) Information from Third-Party Social Media Services

The Company allows you to create an account and log in to use the Service through the following Third-party Social Media Services:

- Google
- Facebook
- Twitter

If you decide to register through or otherwise grant us access to a Third-Party Social Media Service, we may collect Personal data that is already associated with Your Third-Party Social Media Service's account, such as your name, your email address list associated with that account.

#### 5. Protection of Information

We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information. Indicatively:

a) Shady Grove Group/Gashe Publishing does its utmost to secure communications and data storage in order to protect confidentiality of your Information against loss and interception by third parties. However, it is important to know that there is no zero risk against loss or interception by others of your Information. You are responsible for maintaining the security and confidentiality of your Account's username and password.

### 6. Storage Information

We save your information in our secured firebase database. Firebase is an analytics service provided by Google Inc. You may opt out of certain Firebase features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy. We also encourage you to review Google's policy for safeguarding your data. For more information on what type of information Firebase collects, please visit the Google Privacy & Terms web page.

# 7. Information and Rights

Once you have provided your Personal Data, you have several rights, which you can in principle exercise free of charge, subject to statutory exceptions. These rights may be

limited, for example if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. To exercise any of your rights, you can file a request here <a href="mailto:privacy@shadygrovellc.com">privacy@shadygrovellc.com</a> Should you have unresolved concerns, you have the right to lodge a complaint with a Supervisory Authority where you live or where you believe a breach may have occurred. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant Supervisory Authority.

### a) Right to withdraw consent

Wherever we rely on your consent, you will be able to withdraw that consent at any time you choose and at your own initiative by logging into your account on our website (if you have one) or by contacting us at <a href="mailto:privacy@shadygrovellc.com">privacy@shadygrovellc.com</a>. The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment when you withdraw your consent.

### b) Right to access and rectify your data

You have the right to access, review, and rectify your Personal Data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to rectify any information like your name, email address, passwords and/or any other preferences, you can easily do so by logging into your account on our website (if you have one) or by contacting us here <a href="mailto:privacy@shadygrovellc.com">privacy@shadygrovellc.com</a>. You may also request a copy of the Personal Data processed as described in this Privacy Policy.

#### c) Right to erasure

You have the right to erasure of your Personal Data processed by us as described in this Privacy Policy in case it is no longer needed for the purposes for which the Personal Data was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other legal ground for processing applies. Should you wish to have your Personal Data erased, please file a request here <a href="mailto:privacy@shadygrovellc.com">privacy@shadygrovellc.com</a>.

### d) Right to restriction of processing

Under certain circumstances, you may ask us to restrict the processing of your Personal Data. This is for example the case when you contest the accuracy of your Personal Data. In such an event, we will restrict the processing until we can verify the accuracy of your data. Should you wish to have your Personal Data restricted, please file a request here <a href="mailto:privacy@shadygrovellc.com">privacy@shadygrovellc.com</a>

## e) Right to object to processing

Under certain circumstances you may object to the processing of your Personal Data, including where your Personal Data is processed for direct marketing purposes. If you no longer want to receive certain communications from us via email, simply click the subscription link in any of our emails.

### f) Right to data portability

Where you have provided your data directly to us and where the processing is carried out by automated means and based on your consent or the performance of a contract between you and us, you have the right to receive the Personal Data processed about you in a structured, commonly used and machine-readable format, and request portability of your Personal Data.

#### 8. Other websites

Shady Grove Group/Gashe Publishing and affiliated organizations websites may contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully.

# 9. Changes to this Privacy Policy

We reserve the right to modify and update this Privacy Policy from time to time. We will bring these changes to your attention should they be indicative of a fundamental change to the processing or be relevant to the nature of the processing or be relevant to you and impact your data protection rights.

#### 10. Data Retention

We retain your Personal Data for as long as is required to fulfil the activities set out in this Privacy Policy, for as long as otherwise communicated to you or for as long as is permitted by applicable law.

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy 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.

The Company 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.

# 11. Applicable Law

The validity and interpretation of this Privacy Policy shall be governed by the laws of the state of Maryland without regard to Maryland's choice of law principles. For the purposes described in this policy, your personal data will be transferred to the United States of America. When such a transfer happens, we ensure that it takes place in accordance with this policy.