

Last updated: April 14, 2023

BLUEPALLET
PRIVACY POLICY

1. In General

SimpleTrade, Inc., a Delaware corporation dba BluePallet (“*BluePallet*,” “*we*,” “*our*,” or “*us*”) values our customers and respects their privacy. This privacy policy (this “*Privacy Policy*” or “*Policy*”) governs our collection and use of data in connection with our website or applications (the “*Site*”), and the services we offer, including providing our MarketPlace, WantedBoard, TradeHub, TradePass and TradeCart platforms (the “*Services*”). By accessing the Site or using our Services, you agree to our collection and use of personal information as described in this Policy and in our [Terms of Use](#).

For purposes of this policy, “*Personal Information*” means information that identifies or can reasonably be used to identify an individual.

2. Changes in Privacy Policy

We may update this Privacy Policy from time to time, and our changes will be reflected in this Policy. If the changes are material, we will post those changes on the Site and notify you via the Site or email.

3. Sources of Personal Information We Collect

We collect Personal Information from and about you when you use the Site or Services to create an account with us, register to buy or sell products through our Services, purchase products through our Services, register for mailing lists, email or call us, submit a review or evaluation of our services, or when you voluntarily provide information to us through an email or phone call.

We may also collect your Personal Information from companies that determined you or your business may be interested in our Services, from other companies that assist us with identity verification processes, and from others that have information that allows us to provide you with a consistent and relevant online experience.

4. Categories of Personal Information We Collect

The Personal Information we collect can include your name, date of birth, governmental identification, number, mailing address, business address, email addresses, telephone number, professional affiliation or employer name, job title, payment card or bank information. It can also include information obtained about your use of the Site or the Services, such as device, browser type, referring or exit webpages, click patterns, Site usage patterns, Session ID, and your computer’s IP address. We also collect information about your purchasing and sales histories, and location data.

5. How We May Use Personal Information

We may use your information in the following ways:

- To provide you with access to our platform and Services, and to respond to requests for information from us;

- To conduct routine business operations such as billing, identification, customer support, authentication, contact purposes, and general research;
- To employ personalized marketing techniques to provide a customized Site experience and for advertising and marketing generally, including to communicate with you about Services and special offers;
- To enhance the Services;
- To create anonymized market reports which we may use internally, or which we may sell to others; and
- To prevent fraud, activities that violate our Terms of Service or that are illegal; and to protect our rights and the rights and safety of our users or others.

6. How We May Share Your Personal Information

We may share your Personal Information with certain third parties that assist us in the operation of our business, such as for customer relationship management, web hosting, marketing, providing customer support, email, IT support, legal services, accounting services, analytics and payment processing. We also use third parties to assist in onboarding customers through customer screening activities required by applicable law, verify credit and insurance requirements, and to provide financing options.

We may also share information about your purchasing patterns with third parties that may provide you with additional services that you may be interested in and with other third parties that provide our platform with their services.

We may also share your Personal Information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also share your personal information with third parties to help detect and protect against fraud or data security vulnerabilities. And we may transfer your personal information to a third party in the event of an actual or proposed sale, merger, reorganization of our entity or other restructuring.

7. Tracking, Use of Cookies, Web Beacons and Similar Devices

A cookie is a small amount of data that is transferred to your browser by a web server and can only be read by the server that gave it to you. It functions as your identification card and enables us to record your passwords and preferences. In order to improve our Services and provide more convenient, relevant experiences to our customers, we may use cookies and other online tracking tools that recognize you when you visit the Site. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org.

Most browsers are initially set to accept cookies, and most services that include similar devices are typically initially activated to collect data. You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. If you block cookies you may not be able to access certain parts of this website. You can disable cookies from your computer system by following the instructions on your browser or at www.youradchoices.com.

We use cookies and information gathered through their use to make your experience with us richer and

more personalized based on the products, services, or other interactions you have with us and other sites. We also use cookies to collect information about your online activities over time and across different websites when you visit our Site so that we can provide you with products and services in which we think you would be interested; we allow third parties to do the same by placing cookies on our Site.

We use Google Analytics to evaluate the use of our website. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit the website, what pages they visit when they do so, and what other websites they visited prior to visiting our website. To learn more about how Google Analytics collects personal information, review [Google's Privacy Policy](#).

8. How We Protect Your Personal Information

We implement and maintain reasonable security measures appropriate to the nature of the Personal Information that we collect, use, retain, transfer or otherwise process. Those measures include administrative, physical and technical safeguards to protect the security, confidentiality and integrity of Personal Information. However, data security incidents and breaches can occur due to a variety of factors that cannot reasonably be prevented; therefore, our safeguards may not always be adequate to prevent all breaches of security.

9. Do Not Track

We do not respond to Do Not Track (DNT) header signals at this time.

10. California Shine the Light

California Civil Code Section 1798.83, also known as the "Shine the Light" law, permits California residents that have an established business relationship with a business to annually request, free of charge, information about certain categories of Personal Information a business has disclosed to third parties for those parties' direct marketing purposes in the preceding calendar year. For information and to make a request, please contact us at 312-380-2440 or compliance@bluepallet.io.

11. Minors' Personal Information

The Site and our Services are not intended for children, including children under age 13, and we do not knowingly collect any Personal Information from anyone under 13 years of age. If you are under age 13, please do not provide any Personal Information about yourself to us.

12. International Residents

Laws in the region or country in which you are located may provide you with rights with respect to the Personal Information we collect, use or disclose about you. If you are located in regions or countries where applicable law provides you with rights with respect to the Personal Information we collect, use or disclose about you, please contact us at compliance@bluepallet.io to exercise those rights. We will respond to your request in accordance with applicable law.

Additionally, Personal Information we collect from you, including through the Site, may be transferred to, and stored at, a destination outside of your region or home country (e.g., the United States) which may not provide a similar or adequate level of protection as compared to that provided by the region or country in which you are located. It may also be processed by staff operating outside your region or home country who work for our affiliates or for one of our third-party contractors or suppliers. Please do not use the Site if you do not agree to the transfer and processing of your Personal Information in the United States or

if it is illegal to do so in your region or home country.

13. Third Party Websites and Social Media Buttons

Our Site may contain links to third-party websites or social media buttons. We are not responsible for the content or privacy practices of any of these third-party websites or social media platforms. This Privacy Policy applies only to our business and the Personal Information we collect through our Site.

14. Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at 312-380-2440

15. Contact Us

To contact us with questions or to request a copy of this Privacy Policy in another format, you may contact us at: SimpleTrade, Inc. dba BluePallet, 5501 Balcones Drive #162A, Austin, Texas 78731; compliance@bluepallet.io.