

Privacy Policy

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This privacy policy (“Privacy Policy”) details the use and collection of your information by the websites (the “Sites”) operated and owned by OurSeniors.net Magazine, LLC and related entities such as Ourseniordiscounts.net OurSeniors.org and Axiom Administrative Services, LLC a/k/a axiomisbetter.com OurSeniors Team (“OS.net”, “us” or “we”) and governs your access to the content and services hosted on our platform (the “Services”). These Sites include Ourseniors.net, ourseniordiscounts.net, axiomisbetter.com.

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. To access our terms of use, please click [here](#).

Information We Collect and Use

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.

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.

OS.NET 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:

- ***Your Submissions to Us***– OS.NET will collect your Personal Data when you sign up for an online newsletter 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, 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. We process this Personal Data as long as we have a legitimate interest or based on your consent.

- ***Your Content Submissions***– OS.NET allows users to submit content, such as comments and images, 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 username 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.
- ***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 Wi-Fi 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.
- ***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.
- ***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.
- ***Contests, Sweepstakes, and Promotions*** – From time to time you may be able to participate in contests, giveaways, sweepstakes or other similar promotions that we or third parties may sponsor. Participation may require sharing your Personal Data with us or third parties sponsoring the contest, giveaway, sweepstakes or promotion, and you should check the rules to determine how your information will be used and shared with others. As a condition to receiving any awards or prizes, you may be required to provide additional information, to sign a release, or to authorize the use of certain information about you in marketing materials. If a third party administers the contest or if we

administer the contest via a third-party platform (like Facebook or Twitter), your participation may be subject to additional terms and conditions and that third-party's privacy policy. We are not responsible for such third parties. You should carefully review the contest guidelines and these third parties' terms and conditions before deciding whether to participate in a contest publicized or offered through the Service.

- ***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 e-mails, 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, 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 website 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.
- We may link this data with other information we have collected from and about you. Our vendors may also collect and combine information collected on our Services and emails with other information about your online activities over time, on other devices, and on other websites or apps, if those websites and apps also use the same vendors. Our vendors use the information they collect according to their privacy policies. For example, we currently use Google Analytics to collect and process certain website Usage Data for the above purposes and to facilitate our use of other Google tools (e.g. Google Display Network Impression Reporting and Google Analytics Demographics and Interest Reporting). To learn more about Google Analytics and how to opt out, please visit www.google.com/policies/privacy/partners/. You may be able to change browser settings to block and delete cookies when you access the Services through a web browser. However, if you do that, the Services may not work properly. Our Sites are not set up to respond or process web browser “Do Not Track” (“DNT”) signals but they do respond to browser cookie settings. You can learn to decline or opt-out of cookies by reading the section on Cookies below.

How We Share Information

We share Personal Data within OS.NET 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:

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.

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.

Legal and Other Similar Uses – Though we make every effort to preserve user privacy, OS.NET 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 OS.NET 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.

Online Advertising

We use industry standard website tracking and delivery technology 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.

- ***Ad Serving*** – The ads appearing on our Sites are delivered to you by advertising vendors and/or by OS.NET’s own proprietary advertising delivery software. 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.
- ***Advertising and Cookies*** – Some of our third-party advertising partners may distribute cookies to users in advertisements that are provided to us. OS.NET 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).

- **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.

Cookies – OS.NET 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. OS.NET uses the following cookies on our Sites:

- **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.
- **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.
- **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.
- **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.
- The cookies used by OS.NET are either first party or third-party cookies. First party cookies like the ones used when you log in to your OS.net account, are set by OS.NET and share the same domain. Third party cookies, on the other hand, are stored by third party providers and organizations with different domains.

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).

- **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:
- **First Party Opt-out** – Please visit this link to opt-out of cookies from our first party ad serving vendor, Google: <http://www.google.com/privacy/ads/>

- **Third Party and Interest-Based/Online Behavioral Advertising Opt-out** – Please visit this link to opt-out of cookies from over 50+ major third party behavioral advertising providers: <http://www.aboutads.info/choices/>

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. OS.NET 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 OS.NET 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. Our journalists are not involved – our reviews are driven entirely by our editorial staff based on what we think. We don’t let any monetary incentives influence our editorial choices, and the journalists who select the links in their articles aren’t aware of which sites might generate incremental revenue for OS.NET.

Merger, Sale or Other Asset Transfers -In the event OS.NET 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.

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.

How We Protect Personal Data

OS.NET 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.

If you become aware of a security issue, please email us at info@ourseniors.net. We will work with you to address any problems.

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.

For information about deleting your Personal Data, including, your OS.net account, see below.

Notice to Residents of the European Economic Area (EEA) and Switzerland

If you are a resident of the EEA or Switzerland, you are entitled to certain rights under Regulation (EU) 2016/679 of the European Parliament and of the Council of the European Union 27 April 2016 (the “General Data Protection Regulation” or “GDPR”). These include, without limitation, the right: (i) to access your personal data, (as that term is defined under the GDPR), (ii) to request deletion of your personal data in our possession, (iii) to restrict processing of your personal data, and (iv) to receive your personal data in a portable manner. We will only process your personal data as described in this Privacy Policy and only for the duration necessary. To exercise any of these rights, please contact us directly at info@ourseniors.net. As a security measure, we may ask you to verify your identity. We may contact you to ask you for further information to help you exercise your legal rights or to speed up our response. We will try to respond to requests within one month and we will let you know if we need longer, for example, because your request is complicated. We may have an overriding lawful basis for processing your Personal Data, or certain exemptions may apply. You have the right to complain about data privacy matters to the relevant data protection regulator in your country of residence, a list of whom is located here:

Members – European Data Protection Board

[Read on edpb.europa.eu](http://edpb.europa.eu)

We invite you to raise your concerns with us first, so that we can try to resolve them.

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. More information on SCCs is located here:

Standard Contractual Clauses (SCC)

Standard contractual clauses for data transfers between EU and non-EU countries. [Read on ec.europa.eu](#)

Changes to this Privacy Policy

OS.NET 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.

How to Contact Us

If you have any questions about this Privacy Policy, please contact us at info@ourseniors.net, or by mail to Attn. Legal Department, OS.NET, PO Box 730956, Ormond Beach, Florida 32173.