

Privacy Policy

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Link to Printable Copy [privacy-policy-8-04-2021.pdf](#)

This Privacy Policy (“Policy”) explains the information collection, use, and sharing practices of Tom Humbert LLC (“TomHumbert.com”, “TomHumbert.com's”, “we”, “us”, and “our”). This Policy is incorporated into and part of TomHumbert.com's Terms of Use located at <https://tomhumbert.com/terms-of-use.php>.

We do not sell, trade or rent your personal information that we may collect to any person or entity.

This Policy describes and governs the information collection, use, and sharing practices of TomHumbert.com with respect to your use of our website pages that link to this Privacy Policy, collectively, the “Website”), and the services we provide through our Website and/or host on servers.

Before you use or submit any information through or in connection with the Website, please carefully review this Privacy Policy. By using any part of the Website, you understand that your information will be collected, used, and disclosed as outlined in this Privacy Policy. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE THE WEBSITE.

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1. Our Principles

TomHumbert.com has designed this policy to be consistent with the following principles:

- Privacy policies should be human readable and easy to find.
- Data collection, storage, and processing should be simplified as much as possible to enhance security, ensure consistency, and make the practices easy for users to understand.
- Data practices should meet the reasonable expectations of users.

2. Information We Collect

We collect information in multiple ways, including when you provide information directly to us; when we passively collect information from you, such as from your browser or device; and from third parties.

Information You Provide Directly to Us

We will collect any information you provide to us. We may collect information from you in a variety of ways, such as when you: (a) make a donation or purchase, (b) contact us or provide feedback, This information may include but is not limited to your name, email address, phone number, mailing address, payment information, photo, geographic location, and your social media handles.

Information that Is Automatically Collected

Device/Usage Information

We may automatically collect certain information about the computer or devices (including mobile devices or tablets) you use to access the Website. As described further below, we may collect and analyze (a) device information such as IP addresses, location information (by country and city), unique device identifiers, IMEI and TCP/IP address, browser types, browser language, operating system, mobile device carrier information, and (b) information related to the ways in which you interact with the Website, such as referring and exit web pages and URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed and the order of those pages, statistical information about the use of the Website, the amount of time spent on particular pages, the date and time you used the Website, the frequency of your use of the Website, error logs, and other similar information. As described further below, we may use third-party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information.

Cookies and Other Tracking Technologies

We also collect data about your use of the Website through the use of Internet server logs and online tracking technologies, like cookies and/or tracking pixels. A web server log is a file where website activity is stored.

A cookie is a small text file that is placed on your computer when you visit a website, that enables us to: (a) recognize your computer; (b) store your preferences and settings; (c) understand the web pages of the Website you have visited and the referral sites that have led you to our Website; (d) enhance your user experience by delivering content specific to your inferred interests; (e) perform searches and analytics; and (f) assist with security administrative functions. Tracking pixels (sometimes referred to

as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email, and that are designed to provide usage information like ad impressions or clicks, measure popularity of the Website and associated advertising, and to access user cookies. If you receive email from us or other ongoing email communications from TomHumbert.com, we may use certain analytics tools, such as clear GIFs, to capture data such as whether you open our message, click on any links or banners our email contains, or otherwise interact with what we send. This data allows us to gauge the effectiveness of our communications and marketing campaigns. As we adopt additional technologies, we may also gather additional information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., [Internet Explorer](#); [Google Chrome](#); [Mozilla Firefox](#); or [Apple Safari](#)). Please note that by blocking any or all cookies, you may not have access to certain features or offerings of the Website.

For more information about how we use cookies, please see our [Cookie Policy Notice](#).

Information from Third Parties

We may also collect information about you or others through third parties. To the extent permitted by law, we may also collect information from third parties, including public sources, social media platforms, and marketing and market research firms. Depending on the source, this information collected from third parties could include name, contact information, demographic information, information about an individual’s employer, information to verify identity or trustworthiness, and information for other fraud or safety protection purposes.

3. How We Use Your Information

We may use the information we collect from and about you to:

- Fulfill the purposes for which you provided it;
- Provide and improve the Website, including to develop new features or services, take steps to secure the Website, and for technical and customer support;
- Fundraise, accept donations, or process purchases of TomHumbert.com’s merchandise;
- Send you information about your relationship or transactions with us or other communications.
- Process and respond to your inquiries or to request your feedback;
- Conduct analytics, research, and reporting, including to synthesize and derive insights from your use of our Website;
- Comply with the law and protect the safety, rights, property, or security of TomHumbert.com, the Website, our users, and the general public; and
- Enforce our [Terms of Use](#), including to investigate potential violations thereof.

Please note that we may combine information that we collect from you and about you (including automatically collected information) with information we obtain about you from our affiliates and/or non-affiliated third parties, and use such combined information in accordance with this Privacy Policy.

We may aggregate and/or de-identify information collected through the Website. We may use de-identified and/or aggregated data for any purpose, including without limitation for research and marketing purposes.

4. When We Disclose Your Information

We may disclose and/or share your information under the following circumstances:

- Service Providers.

We may disclose your information with third parties who perform services on our behalf, including without limitation marketing, customer support, data storage, data analysis and processing, and legal services.

- Legal Compliance and Protection of TomHumbert.com and Others.

We may disclose your information if required to do so by law or on a good faith belief that such disclosure is permitted by this Privacy Policy or reasonably necessary or appropriate for any of the following reasons: (a) to comply with legal process; (b) to enforce or apply our Terms of Use and this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) to respond to your requests for customer service; and/or (d) to protect the rights, property, or personal safety of TomHumbert.com, our agents and affiliates, our users, and the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.

- Affiliated Companies.

We may disclose your information with current or future affiliated companies.

- Consent.

We may disclose your information to any third parties based on your consent to do so.

- Aggregate/De-identified Information.

We may disclose de-identified and/or aggregated data for any purpose to third parties, including advertisers, promotional partners, and/or others.

- Disclosure or Sale of Personal Information

The categories of personal information that we have disclosed for a business purpose or sold to third parties in the preceding 12 months are as follows.

- None, No disclosures or Sales of Personal Information.

The categories of third parties to whom the information was disclosed or sold is as follows.

- None, No disclosures or Sales of Personal Information.

5. Legal Basis for Processing Personal Data

The laws in some jurisdictions require companies to tell you about the legal ground they rely on to use or disclose information that can be directly linked to or used to identify you. To the extent those laws apply, our legal grounds for processing such information are as follows:

- To Honor Our Contractual Commitments to You.

Much of our processing of information is to meet our contractual obligations to provide services to our users.

- Legitimate Interests.

In many cases, we handle information on the ground that it furthers our legitimate interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals, these include:

- Customer service
- Marketing, advertising, and fundraising
- Protecting our users, personnel, and property
- Analyzing and improving our business
- Managing legal issues

We may also process information for the same legitimate interests of our users and business partners.

- Legal Compliance. We may need to use and disclose information in certain ways to comply with our legal obligations.
- Consent. Where required by law, and in some other cases where legally permissible, we handle information on the basis of consent. Where we handle your information on the basis of consent, you have the right to withdraw your consent; in accordance with applicable law.

6. Online Analytics

We currently do not use online analytics. However links to third-party web sites and third-party embedded video providers may use online analytics.

7. Your Choices, Data Subject Rights and Consumer Privacy

You have various rights with respect to the collection and use of your information through the Website. Those choices are as follows:

- Email Unsubscribe – You may unsubscribe from our marketing emails at any time by clicking on the “unsubscribe” link at the bottom of each newsletter or by emailing legal@tomhumbert.com with your request.
- Fundraising Analytics – We currently are not using fundraising analytics
- EU Data Subject Rights – Individuals in the European Economic Area (“EEA”) and other jurisdictions have certain legal rights (subject to applicable exceptions and limitations) to obtain

confirmation of whether we hold certain information about them, to access such information, and to obtain its correction or deletion in appropriate circumstances. You may have the right to object to our handling of your information, restrict our processing of your information, and to withdraw any consent you have provided. To exercise these rights, please email us at legal@tomhumbert.com with the nature of your request. You also have the right to go directly to the relevant supervisory or legal authority, but we encourage you to contact us so that we may resolve your concerns directly as best and as promptly as we can.

- California Consumer Privacy Act ("CCPA") – If you are a California resident, you may ask us to disclose what personal information we have about you and what we do with that information, to delete your personal information and not to sell your personal information. You also have the right to be notified, before or at the point we collect your personal information, of the types of personal information we are collecting and what we may do with that information. Generally, we cannot discriminate against you for exercising your rights under the CCPA. We cannot make you waive these rights, and any contract provision that says you waive these rights is unenforceable. To exercise these rights, please email us at legal@tomhumbert.com with the nature of your request.

- California Residents Under the CCPA – If you are California resident under the CCPA, please email us at legal@tomhumbert.com with the nature of your request.

- Instructions for California Resident Requests – In order to verify your identity you must fill out the CCPA affidavit of identity and have it notarized by a licensed notary public. Next, you must fill out the CCPA request form. Then, a photo copy of the CCPA affidavit and the CCPA request form must be emailed to legal@tomhumbert.com with CCPA in the subject line. The CCPA affidavit of identity and the CCPA consumer request form, with instructions, are at the following links respectively.

- <https://www.tomhumbert.com/page-content-files/privacy-policy/ccpa-affidavit-of-identity.pdf>

- <https://www.tomhumbert.com/page-content-files/privacy-policy/ccpa-consumer-request-form.pdf>

- Authorized Agent Under CCPA – If you are an authorized agent of a consumer under the CCPA, please email us at legal@tomhumbert.com with the nature of your request.

- Instructions for Authorized Agent Requests – The consumer must fill out the CCPA consumer affidavit to authorize agent form and have it notarized by a licensed notary public. Next, in order to verify your identity, you must fill out the CCPA authorized agent affidavit of identity form and have it notarized by a licensed notary public. Then, you must fill out the CCPA authorized agent request form. Finally, a photo copy of the CCPA consumer affidavit to authorize agent, CCPA authorized agent affidavit of identity and the CCPA authorized agent request forms must be emailed to legal@tomhumbert.com with CCPA in the subject line. The CCPA consumer affidavit to authorize agent, CCPA authorized agent affidavit of identity and the CCPA authorized agent request forms, with instructions, are at the following links respectively.

- <https://www.tomhumbert.com/page-content-files/privacy-policy/ccpa-consumer-affidavit-to-authorize-agent-form.pdf>

- <https://www.tomhumbert.com/page-content-files/privacy-policy/ccpa-authorized-agent-affidavit-of->

[Identity-form.pdf](#)

<https://www.tomhumbert.com/page-content-files/privacy-policy/ccpa-authorized-agent-request-form.pdf>

8. Consumer Data Collected in the Preceding 12 Months

The categories of personal information that we have collected about consumers in the preceding 12 months are as follows.

- First and Last Names.

The categorie(s) of the source(s) of the first and last names collected are as follows.

- Website Contact Form

The business purpose for collection was Website testing.

- Email Addresses.

The categorie(s) of the source(s) of the email addresses collected are as follows.

- Website Contact Form

The business purpose for collection was Website testing.

- Phone Numbers.

The categorie(s) of the source(s) of the phone numbers collected are as follows.

- Website Contact Form

The business purpose for collection was Website testing.

- Contact Form Subject Selection.

The categorie(s) of the source(s) of the contact form selections collected are as follows.

- Website Contact Form

The business purpose for collection was Website testing.

- Contact Form Subject Message.

The categorie(s) of the source(s) of the contact form messages collected are as follows.

- Website Contact Form

The business purpose for collection was Website testing.

- IP Addresses.

The categorie(s) of the source(s) of the IP addresses collected are as follows.

- Website Contact Form

The business purpose for collection was Website security testing.

- IP Servers.

The categorie(s) of the source(s) of the IP servers collected are as follows.

- Website Contact Form

The business purpose for collection was Website security testing.

- Time/Date Stamps.

The categorie(s) of the source(s) of the time/date stamps collected are as follows.

- Website Contact Form

The business purpose for collection was Website testing.

9. International Transfers

Our computer systems are currently based in the United States and the majority of our contractors are based in the United States. As described above in the “When We Disclose Your Information” section, we may share your information with trusted service providers or business partners in countries other than your country of residence, including the United States, in accordance with applicable law. This means that some of your information may be processed in the United States, which may not offer the same level of protection as the privacy laws of your jurisdiction. By providing us with your information, you acknowledge any such transfer, storage or use. If we provide any information about you to any third parties information processors located outside of the EEA, we will take appropriate measures to ensure such companies protect your information adequately in accordance with this Privacy Policy and other data protection laws to govern the transfers of such data.

10. Security Measures

We have implemented technical, physical, and organizational security measures to protect against the loss, misuse, and/or alteration of your information. These safeguards vary based on the sensitivity of the information that we collect and store. However, we cannot and do not guarantee that these measures will prevent every unauthorized attempt to access, use, or disclose your information since despite our efforts, no Internet and/or other electronic transmissions can be completely secure.

11. Children

The Website is intended for users over the age of 18 and are not directed at children under the age of 13. If we become aware that we have collected personal information (as defined by the Children’s Online Privacy Protection Act) from children under the age of 13, or personal data (as defined by the EU GDPR) from children under the age of 16, we will take reasonable steps to delete it as soon as practicable.

CCPA required statement: We have no actual knowledge that we sell the personal information of consumers under 16 years of age.

12. Data Retention

We retain the information we collect for as long as necessary to fulfill the purposes set forth in this Privacy Policy or as long as we are legally required or permitted to do so. Information may persist in copies made for backup and business continuity purposes for additional time.

13. Third-Party Links and Website

The Website may contain links to third-party websites (e.g., social media sites like Facebook and Twitter), third-party plug-ins (e.g., the Facebook “like” button and Twitter “follow” button), and other services. If you choose to use these sites or features, you may disclose your information not just to those third-parties, but also to their users and the public more generally depending on how their services function. TomHumbert.com is not responsible for the content or privacy practices of such third party websites or services. The collection, use and disclosure of your information will be subject to the privacy policies of the third party websites or services, and not this Privacy Policy. We encourage you to read the privacy statements of each and every site you visit.

14. Changes to this Privacy Policy

We will continue to evaluate this Privacy Policy as we update and expand our Website, and we may make changes to the Privacy Policy accordingly. We will post any changes here and revise the date last updated above. We encourage you to check this page periodically for updates to stay informed on how we collect, use and share your information. If we make material changes to this Privacy Policy, we will provide you with notice as required by law.

15. Questions About this Privacy Policy

If you have any questions about this Privacy Policy or our privacy practices, you can contact us at: legal@tomhumbert.com.

16. Citation

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