

## XO DETROIT PRIVACY POLICY

*Last updated and effective May 17, 2018*

Welcome to xodetroit.com (the “**Website**”). You have landed at this page because you visited our Website and clicked the “Privacy Policy” link. The Website is owned, directly or indirectly, by Bedrock Management Services LLC, or one or more of its direct or indirect affiliates (collectively, the “**Company**,” “**we**,” or “**us**”). This Privacy Policy (the “**Privacy Policy**”) describes the types of information we may collect from you or that you may provide when you visit, use, register for, or purchase services, programs or products from, the Website, and our practices for collecting, using, maintaining, protecting, and disclosing such information.

This Website includes by definition, and this Privacy Policy applies to information collected on, the Website, any current or future mobile application associated with the Website, all interactive features, applications, widgets, social networks and social network “tabs”, and other online or wireless offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device, or other technology or any associated content, material, or functionality contained on the Website.

Please read this Privacy Policy carefully before using the Website. We will treat any information we collect from you through any part of the Website in accordance with this Privacy Policy. By accessing or using any part of the Website, you consent to all actions we may take with respect to your information in compliance with this Privacy Policy and agree to the terms herein. If you are unwilling to accept the terms of this Privacy Policy, please do not use any part of the Website.

### 1. APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy applies to information collected through the Website, including the services provided via the Website, and information exchanged by e-mail, text message, and other electronic messages between you and any part of the Website. This Privacy Policy also applies to any new internet properties we may acquire from time to time. This Privacy Policy will be updated accordingly and the “Last Updated” date indicated above revised.

**This Privacy Policy does not apply to information collected offline or through any other means, including any other website operated by any third party.**

NOTE TO USERS FROM OUTSIDE THE UNITED STATES: This Privacy Policy is governed by United States law, and we make no representation that any part of the Website is appropriate or available for use in locations outside of the United States. Translations of the Website into languages other than English are for your convenience only. In the event you visit the Website from outside the United States, please know that your information may be transferred to, stored, and processed in the United States, where our servers are located and our central database is operated. The laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to ensure that your privacy is protected. By using the Website, you understand that your information may be transferred to our facilities and to those third parties with whom we may share it as described in this Privacy Policy.

### 2. CHILDREN UNDER THE AGE OF 13

No part of the Website is intended or designed to attract children under the age of 13. We do not collect personally identifiable information (“**Personally Identifiable Information**”) from any person we actually know is a child under the age of 13. If you are under the age of 13, do not use or provide any information on the Website or on or through any of its features, use any of the interactive or contact features of any part of the Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use.

If we learn we have collected or received personal information from a child under the age of 13 without parental consent, we will delete that information. If you believe we might have any information from or about a child under the age of 13, please contact us by sending us an e-mail stating your request to [Marketing@BedrockDetroit.com](mailto:Marketing@BedrockDetroit.com) or contacting us in writing at the address provided below.

### 3. INFORMATION WE COLLECT

- The Website is intended to be informational only. If you elect to contact us through the Website by sending an email, we would then possess your email address, as well as whatever information you elect to provide in the body of your email. Such information would either be discarded or stored in our internal databases, and might be seen by us, our affiliates, or third-party service providers who are working on our behalf. If you send us an email, you should be sure not to provide us with sensitive personal information (and see additional information regarding security in Section 4 below). By providing your e-mail address, you are requesting that we communicate with you in that manner. To

withdraw your request, or to unsubscribe, please contact us by sending us an e-mail stating your request to [Marketing@BedrockDetroit.com](mailto:Marketing@BedrockDetroit.com) or by contacting us in writing at the address provided below.

- We may offer visitors to the Website the opportunity to sign up to receive newsletters or other e-mail communications from the Website, at your own request. In order to sign up for these communications, we ask for contact information, such as name and e-mail address. We also may offer the opportunity for you to receive mailings from our business partners or affiliates that we think may be of interest to you. We do not currently sell or license this information to unaffiliated third parties unless permitted by law or with express authorization from you. You can unsubscribe from these communications at any time through the unsubscribe link in each communication, contacting us via e-mail at [Marketing@BedrockDetroit.com](mailto:Marketing@BedrockDetroit.com) or contacting us in writing at the address provided below.
- To the extent you provide us with any Personally Identifiable Information, we would use and/or disclose such information in accordance with this Privacy Policy. Personally Identifiable Information provided to us through the Website may be disclosed and used by us and our subsidiaries and affiliates as follows:
  - to our subsidiaries and affiliates for our internal business purposes;
  - for purposes including administration of the Website;
  - to notify you about changes to the Website or any products or services we offer or provide through it;
  - to allow you to participate in communications with us;
  - to contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep such information confidential and to use it only for the purposes for which we disclose it to them;
  - to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of assets of ours or of our subsidiaries or affiliates, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which Personally Identifiable Information about users of the Website is among the assets transferred;
  - to fulfill the purpose for which you provide it;
  - for any other purpose we may disclose when you provide the information; or
  - otherwise with your consent.

We may also disclose Personally Identifiable Information if we are required to do so by law or if we believe that such action is necessary to (a) comply with any court order, law, or legal process, including to respond to any government or regulatory request; (b) protect and defend our rights and property; (c) protect against misuse or unauthorized use of the Website; or (d) protect the personal safety or property of our users or the public. Please note that we might not provide you with notice prior to disclosure in such cases.

- **Cookies.** By placing a small file known as a "cookie" on your computer (or other device), we, along with third parties we may work with, passively gather information about all visitors' use of the Website for several reasons, including, but not limited to, the following: statistics collection and analysis, system optimization, analytics, and market research. The information that we and our third party service providers track with cookies includes, but is not limited to, the type of browser (such as Google Chrome or Internet Explorer) and Internet-connected devices being used to access the Website, your Internet protocol ("IP") address, your home domain or Internet service provider, your referrer URL (which is the URL for the website that you were viewing prior to visiting the System), how you were directed to the Website, which specific pages you access on the Website, how long you view each page, the time and date you access our Website and the total number of visitors to the Website. We, and/or our third party service providers, may use the information collected from cookies or similar files on your computer for security purposes (such as authentication), to facilitate site navigation and to personalize your experience while visiting the Website. This data helps us and our third party service providers improve our respective product and services. Most popular Internet browser applications will allow you to configure the browser so as not to accept cookies. However, setting your browser to reject cookies may, in certain instances, prevent you from taking full advantage of the Website (or some portion thereof) and its capabilities, or cause some features of the Website to function improperly or more slowly.

- Google Analytics and Web Beacons. The Websites may use Google Analytics, a web analysis service provided by Google, in order to better understand your use of the Website and how we can improve it. Google Analytics collects information such as how often users visit a website, what pages you visit when you do so, and what other websites you used prior to coming to such website. Google Analytics collects only the IP address assigned to you on the date you visit a website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with your personal information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit a website, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to the Website is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). Google utilizes the data collected to track and examine the use of the Website, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Website to contextualize and personalize the ads of its own advertising network. To more fully understand how Google may use the data it collects on the Website, please review “How Google uses data when you use our partners' sites or apps,” (located [here](#) or any successor URL). Some of the areas of the Website may contain electronic images known as web beacons (sometimes known as clear gifs) that allow us, and our third party providers or affiliates, to count and track users who have visited certain portions of the Website. Web beacons collect only limited information and do not collect any of your personal information.

#### 4. SECURITY

We have put in place reasonable precautions to protect information from loss, misuse, and alteration. Unfortunately, the transmission of information via the Internet is not completely secure. Although we strive to protect your personal information, we cannot guarantee the security of your personal information transmitted through the Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

While we strive to protect your personal information, we cannot ensure or warrant the absolute security of any information you transmit to us or through the Website. Once we receive your transmission, we will use reasonable efforts to ensure its security on our internal systems. Depending on the nature of the inquiry, your communication may be discarded or archived. Please note that your e-mail, like most, if not all, non-encrypted Internet communications, may be accessed and viewed by other Internet users without your knowledge and permission, while in transit to us. For that reason, to protect your privacy, please do not use e-mail to communicate information to us that you consider sensitive or confidential. If you wish, you may contact us instead via telephone at the numbers provided throughout the Website or at the address below.

#### 5. LINKING TO THE WEBSITE; EXTERNAL LINKS

You may link to our Website, provided you do so in a way that is fair and legal and does not damage our reputation or take advantage of it, but you must not establish a link in such a way as to suggest any form of association, approval, or endorsement on our part without our express written consent.

The Website may provide links to various websites that we do not control. These links are provided for your convenience only. This includes links contained in advertisements, including banner advertisements and sponsored links. When you click on one of these links, you will be transferred out of the Websites and connected to the website of the organization that you selected. We have no control over the contents of those sites or resources, and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access any of the third party websites linked to the Website, you do so entirely at your own risk and subject to the terms and conditions of use for such websites.

We are not responsible for the nature, quality, or accuracy of the content or opinions expressed on such websites, and such websites are not investigated, monitored, or checked for quality, accuracy, or completeness by us.

Inclusion of any linked website on the Website does not imply or express our approval or endorsement of the linked website or any of the content, opinions, products, or services provided through the Website. We exercise no control over linked sites even if an affiliation exists between the Website and a third-party website. Each of these linked sites maintains its own independent privacy and data collection policies and procedures. While we expect our business partners and affiliates to respect the privacy of our users, we cannot be responsible for the actions of third parties. If you visit a website that is linked to or from the Website, we encourage you to consult that website’s privacy policy before providing any personal information and whenever interacting with any website.

#### 6. SPECIAL NOTICE TO CALIFORNIA RESIDENTS

Under California Civil Code § 1798.83, residents of the State of California that have provided any Personally Identifiable Information to us have the right to request a list of all third parties to which we have disclosed Personally Identifiable Information during the

preceding year for direct marketing purposes.

Alternatively, the law provides that if we have a privacy policy that gives either an opt out or opt-in choice for use of Personally Identifiable Information by third parties (such as advertisers or affiliated companies) for marketing purposes, we may instead provide you with information on how to exercise your disclosure choice options.

If you are a resident of the State of California and request information about how to exercise your third party disclosure choices, please send a request to [Marketing@BedrockDetroit.com](mailto:Marketing@BedrockDetroit.com) with a preference on how our response to your request should be sent.

Additionally, California law (CalOPPA) requires us to disclose how we respond to “do-not-track” requests from our customer-users. At this time, we do not currently respond to “do-not-track” requests from our customers.

## 7. REVOKING AND DELETING PERSONAL INFORMATION

We welcome your questions, comments and all feedback pertaining to your privacy or any other issue with regard to the Website.

At any time, you may ask us to cease any further use of your e-mail address and direct us to delete any Personally Identifiable Information you have supplied. Although it is not always possible to remove or modify such information, we will make reasonable efforts to do so. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. If you have given us information for one of those third parties we mentioned above and we have already passed it on, we may not be able to delete or change the information.

## 8. USER-PROVIDED CONTENT

Any information, communications, or material of any type or nature that you submit to the Website by e-mail, posting, messaging, uploading, downloading, or otherwise (collectively, a “Submission”) is done at your own risk and without any expectation of privacy. We cannot control the actions of other users of the Website and we are therefore not responsible for any Submissions contained on the Website. By visiting any of our pages that are contained on the Website, you are representing and warranting to us that you have reviewed this Privacy Policy and that you will abide by all such provisions contained therein. Additionally, in the event that we offer a message board or any other interactive or social-type feature on the Website, please be aware that these areas may allow you to post, and share with other users, certain messages, content, or other information. We encourage you to be wary of giving out any personal information, or any personal information of others to which you may have access, in such forums. The information you post can be collected and used by other people. We cannot guarantee the privacy and safety of these areas and are therefore not responsible for any information you choose to post. Your use of these features is fully at your own risk.

## 9. SOCIAL MEDIA PLATFORMS AND WEBSITES

Any Submission that you submit to any of our pages contained on a social media platform or website by e-mail, posting, messaging, uploading, downloading, or otherwise is done at your own risk and without any expectation of privacy. We cannot control the actions of other users of a social media platform and we are therefore not responsible for any Submissions contained on a social media platform or website. By visiting any of our pages that are contained on any social media platform or website, you are representing and warranting to us that you have reviewed the applicable privacy policy and terms of use of such website or social media platform and that you will abide by all such provisions contained therein.

## 10. SWEEPSTAKES, PROMOTIONS, CONTESTS, SURVEYS

On the Website, you may wish to participate in certain online polls, surveys, contests, sweepstakes and other promotions that may be offered from time to time by us, a partner, or other entity through which you are using the Website. Participation in these polls, surveys, contests, sweepstakes and promotions is completely voluntary; you have a choice about whether or not to disclose information required to enter. Information requested may include information such as your name, address, date of birth, phone number, mobile phone number, e-mail address, username, and/or similar information. Through these online polls, surveys and promotions, you may choose to participate in activities such as sharing information with others and sending email invitations. In connection with any online polls, surveys, contests, sweepstakes and other promotions that may be offered from time to time via the Website by us, we use the information you provide to administer the polls, surveys, contests, sweepstakes and other promotions. Subject to applicable contractual or legal restrictions, we also may use the information to communicate with you, or the other people you select, about our services or products. Any information that you submit to one of our partners or another entity through which you are using the Website in the course of any poll, survey, contest, sweepstakes, or promotion offered by any third party shall be fully at your own risk, and we disclaim all responsibility for any losses, liability, damages, or expenses that may arise from your submission of such information.

11. MODIFICATIONS TO THIS PRIVACY POLICY

This Privacy Policy may change from time to time at our discretion. Modifications are effective upon being posted on any part of the Website. Your continued use of any part of the Website after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

It is our policy to post any changes we make to our privacy policies on this page. The date on which this Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting the Website and this Privacy Policy to check for any changes.

If we make material changes to how we treat information supplied in connection with the Website, we will notify you through a notice on the Website's home page or by other reasonable means.

12. CONTACT INFORMATION

If you have any questions regarding this Privacy Policy or any part of the Website, you may contact us by sending us an e-mail stating your request to [Marketing@BedrockDetroit.com](mailto:Marketing@BedrockDetroit.com) or by contacting us in writing at the address provided below:

Bedrock Management Services LLC  
Attn: Webmaster  
630 Woodward Ave  
Detroit, Michigan 48226

Copyright © 2018, Bedrock Management Services LLC. All rights reserved.

Bedrock Detroit, Bedrock and Opportunity Detroit are trademarks of Bedrock Management Services LLC or its affiliated companies. You must not use such marks without the prior written permission of the Company. All other names, logos, product and service names, designs, and slogans on the Website are the trademarks of their respective owners.