**EFFECTIVE DATE OF CURRENT POLICY:**

Bright Bar Boston (“Bright Bar”,“we” or “us”) respects your privacy and is committed to protecting it. This Privacy Policy is to inform you about the information we collect about you when you use our website http://www.BrightBarBoston.com (the “Site”), whether as a guest or a registered Member. This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the Site, and our practices for collecting, using, maintaining, protecting, and disclosing that information.  This Privacy Policy is incorporated by reference into our Terms and Conditions.This Privacy Policy applies to information we collect through the Site, which may include information in e-mails, forms, or other electronic messages between you and our Site when you voluntarily submit the information through the Site. The Privacy Policy also applies to information we may collect through the Site using certain automated technologies (described below).

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

**Acceptance of This Privacy Policy**
PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT.  YOUR USE OF OUR SITE MEANS THAT YOU ACCEPT THE TERMS OF THIS PRIVACY POLICY.  YOUR CONTINUED USE OF OUR SITE AFTER WE MAKE CHANGES TO THIS PRIVACY POLICY SHALL BE DEEMED TO BE YOUR ACCEPTANCE OF THOSE CHANGES SO YOU SHOULD PERIODICALLY CHECK THIS PRIVACY POLICY FOR UPDATED VERSIONS.  IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY OR OUR TERMS OF USE, WHICH ARE INCORPORATED HEREIN BY REFERENCE, YOUR CHOICE IS TO NOT USE OR ACCESS OUR SITE. BY USING OUR SITE, YOU ALSO REPRESENT THAT YOU ARE AT LEAST THE AGE OF MAJORITY IN YOUR STATE OR COUNTRY.

**Information You Provide to Us**
We may collect, store and process personal or other information that you supply to us through your use of the Site.  For example, we collects personally identifying information from our users through the Site’s “Contact Us” page and from time to time there may be other pages where information may be sought which will seek similar information.  Generally, this information includes:

* Identity Data, which includes first name, last name, username or similar identifier or title.
* Contact Data, which includes email address and telephone numbers. Profile Data, which includes your username and password, your interests, preferences and feedback.
* Usage Data, which includes information about how you use our Site, products and services.
* Marketing and Communications Data, which includes your preferences in receiving marketing from us and third parties, and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose.  Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.  However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this Privacy Policy.

**Information Collected Through Automatic Data Collection Technologies**We also collect and store information that is generated automatically as you navigate online through the Site.  For example, we may collect Technical Data, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Site.  This information allows us, among other things, to improve the delivery of our web pages to you and to measure traffic on the Site.

**Information Collected Through Third parties or Publicly Available Sources**
We or our service providers also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).  If you would like to find out how you can opt-out of behavioral tracking on our Site, you can visit the [Digital Advertising Alliance](http://optout.aboutads.info/?c=2&lang=EN)(“DAA”) opt-out program or the [Network Advertising Initiative](http://www.networkadvertising.org/choices/)(“NAI”) opt-out program.The information we collect automatically is statistical data and is not intended to identify you personally.  It helps us to improve our Site and to deliver a better and more personalized experience, by enabling us to estimate our audience size and usage patterns, store information about your preferences and recognize you when you return to our Site.

**How We Use Information**
We use information that we collect about you or that you provide to us, including any personal information:

* To present our Site and its contents to you;
* To provide you with information, products, or services that you request from us;
* To market our products and services to visitors;
* To analyze data or metrics about our Site to send more targeted messages to visitors of our Site;
* To conduct research to improve our products and services and Site;To provide you with notices about your account;
* To carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
* To notify you about changes to our Site or any products or services we offer or provide through it;

To allow you to participate in interactive features on our Site;

To respond to your inquiries and to deliver email messages like special offers, updates, newsletters, and service announcements; andTo fulfill any other purpose for which you provide your information or for any other purpose with your consent.

**How We Disclose Information**
We may disclose aggregated information about Site users, and information that does not identify any individual, without restriction.  We do not sell your information to third parties for marketing or advertising purposes.  We may disclose personal information that we collect or you provide as described in this Privacy Policy:

* To our subsidiaries and affiliates;
* To contractors, service providers, and other third parties we use to support our business or who provide important services to us;
* To the extent that such disclosure is required by law or to such an extent as we reasonably believe such disclosure is necessary to protect our legal interests;
* To fulfill the purpose for which you provide it; and For any other purpose disclosed by us when you provide the information.

**Tracking Technologies**You can set your web browser to refuse all or some browser cookies or to alert you when cookies are being sent.  If you disable or refuse cookies, some parts or features of our Site may become inaccessible or may not function properly.

**Opt-Out from Promotional Offers**
We have created mechanisms to provide you with the following control over your information, in the event you do not wish your information to be used for any of the above described purposes:If you do not wish to have your email address or contact information used by us to promote our own or third parties’ products or services, you can use the “unsubscribe” feature found in any marketing emails we send to you or send us an email stating your request to the email address listed in the Contact Information section below.  If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt-out does not apply to information provided to us as a result of a product purchase, warranty registration, product service experience or other transactions.

**Links to Other Websites**The Site may also include links to other websites or provide access to products and services offered by third parties, whose privacy policies we do not control.  When you access another website or purchase third party products or services, use of any information you provide is governed by the privacy policy of the site you are visiting and which is providing such products or services or collecting your information.

**Cookie Policy & Web Beacons**We use a standard browser software feature called a “cookie” in order to enhance your experience with the Site.  Cookies are small files that your web browser places on your hard drive for record-keeping purposes. By showing how and when visitors use the Site, cookies help identify how many unique users visit us, track user trends and patterns, and may help deliver content of the Site in the best possible fashion, including customizing features and advertising that may appear on the Site.  They also may prevent you from having to re-enter your preferences on certain areas of the Site where you may have entered preference information before. The Site uses cookies in several ways, including to provide social media features, analyze traffic to the Site and customize user experiences.  If you do not accept cookies, you may have difficulty navigating the Site, or the performance may not be the same.  Information about the procedure to follow in order to enable or disable cookies can be found on your Internet browser provider’s website via your help screen, or visit<http://www.allaboutcookies.org/manage-cookies/index.html> for information on commonly used browsers.The Site also may use web beacons (single-pixel graphic files also known as “transparent GIFs”) to access cookies and to count users who visit the Site or open HTML-formatted email messages.

**Use of Google Analytics**We may also use Google Analytics Advertiser Features (or other similar services) to optimize our business.
Advertiser features include:

* Remarketing with Google Analytics;·
* Google Display Network Impression Reporting;·
* DoubleClick Platform Integrations; and·
* Google Analytics Demographics and Interest Reporting

By enabling these Google Analytics Display features, we are required to notify our visitors by disclosing the use of these features and that we and third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to gather data about your activities on our Site. You can opt out of Google’s use of cookies by visiting [Google’s ad settings](https://tools.google.com/dlpage/gaoptout)and/or you may opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page.

**Social Media Networks**

Our Site also includes certain social media features and widgets that run on the Site, including from social media sites such as Instagram, Facebook, Twitter, LinkedIn and YouTube.  These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly.  Social media features and widgets are either hosted by a third party or hosted directly on our Site.  Your interactions with these features are governed by the privacy policy of the third party social media website providing such features.Location of Your Information Your personal data will be processed by us in the United States in accordance with applicable law.  To the extent your data is transferred internationally, such transfers will be effected through use of appropriate safeguards under applicable law. BY AGREEING TO THE ANCHIN PRIVACY POLICY, YOU UNEQUIVOCALLY AND UNAMBIGUOUSLY CONSENT TO THE COLLECTION AND PROCESSING IN THE UNITED STATES OF ANY PERSONAL AND NON-PERSONAL INFORMATION COLLECTED OR OBTAINED BY ANCHIN, AND YOU AGREE THAT UNITED STATES LAW GOVERNS ANY SUCH COLLECTION AND PROCESSING.

**Data Security**We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed without proper authorization, altered or disclosed.  In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

**Children Privacy Protection**
This Site is not intentionally designed for or directed at children 13 years of age or younger.  It is Bright Bar’s policy to refrain from intentionally and knowingly collecting or maintaining personally identifiable information about children under the age of 13.

**Data Retention**We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, 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.Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting ALEX@BRIGHTBARBOSTON.COMEmail Marketing and Opt-OutTo the extent required by the United States’ Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 (CAN-SPAM Act), or other similar domestic and international regulation, all of the commercial emails sent to you by us will include an unsubscribe link in them.  You can remove yourself at any time from our mailing list by clicking on the unsubscribe link that can be found in every communication that we send you.  Please note that changes to your email marketing preferences may not be effective immediately. Your Privacy RightsYou have the right to access, transport, update, correct and erase your personal data, as well as the right to object to or restrict its processing, transform it into anonymous form, or withdraw from any consent-based uses. These rights may be exercised by emailing ALEX@BRIGHTBARBOSTON.COM. You also have a right to complain to your local data protection authorities if you believe your privacy rights related to your personal information have not been properly observed.  Updates to Privacy Policy Bright Bar reserves the right to update and revise this Privacy Policy at its discretion.  You can determine if this Privacy Policy has been revised since your last visit by referring to the “Effective Date of Current Policy” date at the top of this page.  Your use of our Site constitutes your acceptance of the terms of the Privacy Policy as amended or revised by us, and you should therefore review this Privacy Policy regularly to ensure that you are aware of its terms. If you have questions concerning this Privacy Policy, please email ALEX@BRIGHTBARBOSTON.COM.  © 2019 Bright Bar Boston