

## MEJOR PRIVACY POLICY

**Effective Date: March 3, 2020**

### Introduction and Scope

Our Turtle Creek, LLC, d/b/a MeJOR (“**MeJOR**”, “**we**”, “**us**” or “**our**”) respects the privacy of our visitors, users, and customers (also occasionally referred to as “**you**” or “**your**” or “**subscriber**”). This privacy policy (and as amended from time to time as posted on our website at [www.getmejor.com/privacy](http://www.getmejor.com/privacy)) (“**Privacy Policy**”) describes the types of information we may collect from you or that you may provide when you visit or use our [getmejor.com](http://www.getmejor.com) website (“**Website**”) or use our MeJOR hosted software platform (“**Services**”), and our practices for collecting, using, maintaining, protecting, disclosing, retaining, and transferring that information. By “visitors” we mean visitors to our Website who are not yet customers, those who become customers, as well as those who do not become customers; whether you upload information to our Website, download it, or are merely visiting our Website. By “customers” we mean the person or company which purchases our Services. By “users” we mean persons who are authorized by a customer to access the Services. This Privacy Policy applies to the data collected by us, or those working on our behalf, through information you enter or from the data imported from authorized and approved sources. It does not apply to data collected through other websites, products, or services not approved by us.

### Contacting Us

You may contact us using the Contact Information provided at the end of this Privacy Policy.

### Acknowledgement and Consent

By using or accessing our Website or the Services in any manner, you acknowledge that you accept the practices and policies described in this Privacy Policy (and as updated from time to time), and you hereby consent that we may collect, use, and share your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website or our Services. Your use of the Website and our Services is at all times subject to our Terms of Service (available at [www.getmejor.com/terms](http://www.getmejor.com/terms) (the “**Terms**”), which incorporates this Privacy Policy. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms.

### What Information Does This Privacy Policy Cover?

This Privacy Policy covers our treatment of personally identifiable information. Such information may include name, mailing address, email address, telephone number, and other information which identifies you as a specific individual (“**Personal Information**”). For this Privacy Policy the definition of “Personal Information” is the definition under the state law applicable to the person whose data is collected.

Personal Information does not include your Personal Information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable

means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (collectively, all of the foregoing in this sentence being referred to as “**De-Identified Personal Information**”).

We may also collect Personal Information from you through means other than our Website. This may include offline collection, such as if you submit a paper application, make a payment by check, or call or visit our office. It may also include emails, text messages, or other electronic communications that you send to us separate from our Website or by way of our third party service providers. However, if we combine the Personal Information we collect from you outside of our Website with Personal Information that is collected through our Website or by another means as described above, the Privacy Policy will apply to the combined information, unless specifically disclosed otherwise.

Other than as stated herein, this Privacy Policy does not apply to information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our Website. We are not responsible for the practices of sites linked to from the Services, and before interacting with any of these sites you are advised to review their rules and policies before providing them with any private information.

### **Individuals under the Age of 18**

As noted in the Terms, we do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 18 or knowingly allow such persons to register for our Services. If you are under 18, please do not send any Personal Information about yourself (such as your name, address, telephone number, or email address) to us. No one under age 18 should provide any Personal Information to or on the Services. In the event that we learn that we have collected Personal Information from a child under age 18 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database. Please contact us if you have any concerns.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see the section below entitled “Privacy Notice for California Residents” for more information.

### **Changes to Our Privacy Policy**

We are constantly working to improve our Website and Services, and we may need to change this Privacy Policy from time to time as well. Our current Privacy Policy will always be on our Website and any updates will be effective upon posting. You are responsible for periodically checking our Website for updates. Certain areas of our Website may require you to acknowledge your consent via a pop-up message and/or click-through box requiring your agreement to the amended Privacy Policy before you can proceed to that Website area.

Please note that if you have opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Website, purchase products, or use our Services after any changes to the Privacy Policy have

been posted, that means you agree to the new Privacy Policy, including all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

### Personal Information We Collect

We collect several categories of Personal Information from and about you as summarized in the following table:

Category	Specific Items of Personal Information
Identifiers	<p>For subscriber's employees and contractors we collect:</p> <ul style="list-style-type: none"> <li>● first and last name</li> <li>● cell phone number</li> <li>● email address</li> <li>● postal address</li> <li>● for customers' employees: <ul style="list-style-type: none"> <li>● pay rate</li> <li>● hours worked</li> </ul> </li> </ul> <p>For subscriber's customers we collect:</p> <ul style="list-style-type: none"> <li>● first and last name</li> <li>● phone number (home/work/cell)</li> <li>● email address and property service address</li> <li>● billing address</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>● products/services purchased</li> <li>● purchasing/consuming history or tendencies</li> </ul>
Internet or other electronic network activity	<ul style="list-style-type: none"> <li>● browsing history</li> <li>● search history</li> <li>● your interaction with a website</li> </ul>
Location	<ul style="list-style-type: none"> <li>● geolocation</li> </ul>
Professional or employment information	<ul style="list-style-type: none"> <li>● email address</li> </ul>
Inferences drawn from any of the above to create a profile of a consumer	<ul style="list-style-type: none"> <li>● a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</li> </ul>

## How We Collect Personal Information and from What Sources

**Information You Provide to Us.** The Personal Information we collect on or through our Website may include, but is not limited to:

- Information that you provide by filling in webforms on our Website. This includes information provided when creating an online account, purchasing our products or Services, subscribing to our e-newsletters or other communications, requesting information from us, submitting or posting material (where permitted), or interacting customer support or service, report a problem with our Website, products, or Services, or otherwise communicating with us.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Your search queries on the Website.

**Information We Collect Through Automatic Data Collection Technologies.** As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including, but not limited to, traffic data, geolocation data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, browser type, clickstream patterns, the URL of the most recent website you visited before coming to our Website, the amount of time you spent on our Website, and the pages you viewed while on our Website.
- Behavioral Tracking. We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services, or associate Personal Information with other information collected in this manner.

The information we collect automatically is statistical data and may include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including, but not limited to, by enabling us to: (a) estimate our audience/visitor size and usage patterns; (b) store information about your preferences, allowing us to customize and improve our Website; (c) speed up your searches; and/or, (d) recognize you when you return to our Website.

### **Cookie Notice/Policy**

The technologies we use for this automatic data collection may include cookies, local storage cookies, web beacons, pixel tracking, GIF and/or IP address. Each of these is discussed below.

### *Cookies (or browser cookies)*

A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the web browser on your computer (Internet Explorer, Firefox, Safari or Google Chrome).

Different types of cookies which have different purposes are used on our Website.

#### *Essential Cookies*

These cookies are essential to allow you to browse our Website and use its functions. Without them, services such as shopping baskets and electronic invoicing would not be able to work.

#### *Performance Cookies*

These cookies collect information on the use of our Website, such as which pages are consulted most often. This information enables us to optimize our Website and simplify browsing. Performance cookies also enable our affiliates and partners to find out whether you have accessed one of our Websites from their site and whether your visit has led to the use or purchase of a product or Service from our Website, including the references for the product or Service purchased. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

#### *Functionality Cookies*

These cookies enable our Website to remember the choices you have made when browsing. For example, we can store your geographical location in a cookie so that the Website corresponding to your area is shown. We can also remember your preferences, such as the text size, font and other customizable aspects of the Website. Functionality cookies may also be able to keep track of the products or videos consulted to avoid repetition. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

It is possible that you will come across third-party cookies on some pages of sites that are not under our control.

We also use cookies to implement tracking technology on our Website. This allows us to display advertising that is tailored to you on our Website which parts of our content interest you the most and which Service categories you request. This tracking uses De-Identified Personal Information data). We will not combine this data with your other Personal Information without your express permission. Some of our contracted vendors and affinity partners are allowed to place cookies on our Website. Those companies may also provide you with the option of preventing the use of cookies in the future. For more information, contact the relevant third-party provider.

At any time, you can prevent the use of cookies in the future. You may activate the appropriate setting in your browser to refuse to accept browser cookies. However, if you do, your experience on our Website may be affected; e.g., you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

**Local Storage Cookies.** Certain features of our Website may use local stored objects (or Adobe Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Local storage cookies are not managed by the same browser settings as are used for browser cookies.

**Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

**Pixel Tracking.** In addition to using Cookies, the Website may employ “pixel tracking”, a common process which may be used in connection with advertisements on other sites. Pixel tracking involves the use of pixel tags that are not visible to the user and consist of a few lines of computer code. Pixel tracking measures the effectiveness of advertisements and compiles aggregate and specific usage statistics. A “pixel tag” is an invisible tag placed on certain pages of websites that is used to track an individual user’s activity. We may access these pixel tags to identify activity and interests that may allow us to better match our products, services, and offers with your interests and needs. For example, if you visit our Website from an advertisement on another website, the pixel tag will allow the advertiser to track that its advertisement brought you to the Website. If you visit our Website, and we link you to another website, we may also be able to determine that you were sent to and/or transacted with a third-party website. This data is collected for use in our marketing and research.

**GIF.** We may use tiny images known as clear GIFs to track behavior of users, including statistics on who opens our emails.

**IP Address.** Our servers automatically record certain log file information reported from your browser when you access the Services. These server logs may include information such as which pages of the Service you visited, your internet protocol (“IP”) address, browser type, and other information on how you interact with the Services. These log files are generally deleted periodically.

### **Information We Collect from Third Parties**

We may collect information that others provide about you when you use the Website, or obtain information from other sources and combine that with information we collect through the Website.

- **Third Party Services.** If you link, connect, or login to your account with a third party social media service (e.g., Facebook, Yelp, etc.), the third party service may send us information such as your registration and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from service providers like identity verification services for our fraud prevention and risk

assessment efforts. We may receive information about you and your activities on and off the Website through partnerships, or about your experiences and interactions from our partner ad networks.

### Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers and application providers. First-party or third-party cookies may be used alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. A first-party cookie is a cookie set by the domain name that appears in the browser address bar. A third-party cookie is a cookie set by (and on) a domain name that is not the domain name that appears in the browser address bar. It might be set as part of a side resource load (image, JS, iframe, etc., from a different hostname) or an AJAX HTTP request to a third-party server. The information that first-party and third-party cookies collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services (i.e., tracking such activities). They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For more information on how to opt-out of third-party advertiser tracking mechanisms, please click [here](#).

Google Analytics. We use, and some of our third-party service providers may use, Google Analytics (click here for link to Google's website) or other analytics service to help us understand use of our Services. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

### Posting Content

Where we enable it, you may submit information, such as comments, reviews, testimonials, etc., to be published or displayed ("**posted**") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**Content**"). Your Content is posted and transmitted to others at your own risk. We cannot control the actions of other users of the Website with whom you may choose to share your Content. Therefore, we cannot and do not guarantee that your Content will not be viewed by unauthorized persons. By posting any User Content you agree to and do hereby grant us and our licensors, affiliates, partners, successors and assigns, a nonexclusive, perpetual, irrevocable, worldwide, sublicensable, transferrable, royalty-free right and license to use, store, display, publish, transmit, transfer, distribute, reproduce, rearrange, edit, modify, aggregate, summarize, create derivative works of and publicly perform the User Content that you post or otherwise submit to us for any purpose, in any form, medium, or technology now known or later developed. The term "**Use**" includes, but is

not limited to, use, reproduce, modify, publish, list information regarding, edit, delete, translate, distribute, publicly display, publicly perform, and make derivative works of the content.

If we permit you to post Content, by posting any Content you agree to comply with the following “User Content Posting Guidelines”:

To the extent our Website contains areas where you can post or submit to be posted such as comments, product reviews, testimonials, etc., you agree to post Content that is proper and related to the general theme of the Website. Content also includes that which you send to us by email, text, mail, or other means. You agree not to post any Content that:

- Is off-topic, false, inaccurate, misleading, defamatory, libelous, stalking, threatening, obscene, pornographic, indecent, vulgar, offensive, which contains unlawful material or information, or which otherwise violate the legal rights (such as rights of privacy and publicity) of others;
- Harasses, degrades, intimidates, or is hateful toward an individual or group of individuals on the basis of religion, gender, sexual orientation or identity, race, ethnicity, age, or disability;
- Is not your own original creation or that you do not have permission to use or that infringes the copyright, trademark, patent, or other proprietary right of any person or that is used without the permission of the owner;
- Is intended to provide professional advice, including but not limited to, the provision of medical treatment, or legal, financial or investment advice;
- Promotes or provides instructional information about illegal or illicit activities;
- Purports to be from any person or entity, including but not limited to one of our employees, or falsely states or otherwise misrepresents your affiliation with a person or entity;
- Includes personal or identifying information about another person without that person's explicit consent, or is doxxing;
- Contains software code of any kind, including, but not limited to, code that contain viruses, corrupted files, or any other similar software or programs designed to or that may interrupt, lock up, destroy, damage or limit the operation of another person's computer or network or telecommunications equipment;
- Disrupts the normal flow of dialogue with an excessive number of messages (flooding attack) to the Website, or that otherwise negatively affects the ability of others to use the Website; or,
- Advertises or offers to sell any goods or services, or engage in surveys, contests, chain letters, or for any commercial purpose.

You may not attempt to gain unauthorized access to our computer systems or those of any our service providers or third parties, or engage in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of, the Website or our services. We reserve the right, but do not undertake the obligation, to refuse to post or remove

any posted Content from our Website for violation of these rules or for any other reason, and to refuse to accept any future postings by you.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any Personal Information, for one or more of the following purposes:

- To present our Website and its contents to you.
- To provide you with information on products or services that you request from us.
- To provide you with the services that you have requested.
- To process transaction payments, including, but not limited to, service fees, subscription fees, professional fees, and refunds and reimbursements
- To provide you with notices about your account, including expiration and renewal notices.
- To send you emails and newsletters with product, service, company, and other information.
- To provide you with information on new products and services, discounts, special promotions or upcoming events, and features or offers that we believe will be of interest to you.
- To respond to your questions or other requests.
- To process your application.
- To process changes to your account information.
- To process Personal Information or other information that you submit through to us.
- To contact you with regard to the Website and to send important notices, such as communications about our Services, your account or changes to our terms, conditions, and policies.
- To notify you about changes to our Website, our policies, terms or any products or Services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- To ask for ratings and reviews of our Website, Services, and/or products.
- To provide access to restricted parts of our Website, e.g., areas accessible if you have a user account.
- To request your participation in surveys, focus groups, or other initiatives which help us to gather information used to develop and enhance our products and Services.
- To serve relevant information to you when you visit our Website or other third-party sites (including social media platforms).
- To contact you about our own and third-parties' products and services that may be of interest to you.
- To enhance and improve our products and Services, for example, by performing internal research, analyzing user trends and measuring demographics and interests.
- For internal purposes, such as Website and system administration or internal audits and reviews.
- For analyzing how the Services are used, diagnosing Service or technical problems, maintaining security, and personalizing content.
- To operate, maintain, and provide to you the features and functionality of the Services.

- To provide statistics about the usage levels of the Website and other related information to reputable third parties, but these statistics will not include information which will allow you to be identified.
- To notify you of data privacy incidents or provide you with legally required information.
- To fulfill any other purpose for which you provide it.
- In any other way we may describe and for which we obtain your consent when you provide the information.

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Website; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and, (f) help you efficiently access your information after you sign in.

We may use your Personal Information you provide us and which we obtain from other sources to better understand your interests so we can try to predict what other products, services and information you might be most interested in. This practice is called “profiling”, which involves making automated decisions about you based on this information in order to better enable us to tailor our interactions with you to make them more relevant and interesting. You may object to such profiling at any time by contacting us (see Contact Information/User Rights below).

## How We Share Your Personal Information

### *Personal Information:*

We may disclose your Personal Information, in whole or in part, with third-party service providers for the purpose of providing or improving our Services to you, or to those who perform services on our behalf. We may or do disclose Personal Information to the following types of service providers, and for one or more the following purposes:

- Hosting providers for the secure storage and transmission of your data
- Identity management providers for authentication purposes
- Database software providers for the management and tracking of your data
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants
- Payment solution providers for the secure processing of payments you provide to us
- Technology providers who assist in the development and management of our Website
- Outbound call center providers, who may perform outreach on our behalf regarding our products and Services
- Fulfillment and shipping vendors for the fulfillment of our products and Services
- Survey and research providers who perform studies on our behalf
- Advertising partners, including social media providers, for the delivery of targeted advertisements

Disclosures to Service Providers: We may share your Personal Information with third parties for the purpose of providing or improving the Services to you. We may share your Personal Information with third party service providers which perform services on our behalf

("Service Providers"). This includes, without limitation, Service Providers which provide services relating to: outbound and/or inbound communications, analyze data, credit checks, screening checks, collection services, marketing assistance, managing customer information, creating, hosting, and/or providing customer or support services on our behalf, fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analyzing data, providing search results and links (including paid listings and links), and processing credit card payments. These Service Providers may have access to your Personal Information in order to provide these services to us or on our behalf. If we engage Service Providers for any of the foregoing, use of your Personal Information will be bound by obligations of confidentiality and their use of Personal Information will be restricted to providing their services to us. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting Service Providers).

Required Disclosures: Except as otherwise described in this Privacy Policy, we will not disclose your Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including to respond to any government or regulatory request, or if we believe that such action is necessary to: (a) comply with the law, comply with legal process served on us or our affiliates, subsidiaries, contracted vendors, or affinity partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) enforce our Terms (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations; (e) assist government enforcement agencies or to meet national security requirements; (f) to protect the security or integrity of our Website, our Services, or any software we provide related thereto; or, (g) exercise or protect the rights, property, or personal safety of us, our users or others.

We will attempt to notify you about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon us, our users, our Website, or our Services. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

It is likely that the identity and categories of such third parties will change during the life of your account. We require that our third-party service providers only use your Personal Information as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with the applicable portions of this Privacy Policy.

We do not disclose or share your Personal Information with any third parties for which we receive any monetary or other valuable consideration. **In other words, we do not sell your Personal Information, period.**

Disclosure of De-Identified Personal Information: We may share De-Identified Personal Information with third parties for any purpose. De-Identified Personal Information or non-Personal Information may be aggregated for system administration and to monitor usage of the Website. It may be utilized to measure the number of visits to our Website, average time spent, number of pages viewed and to monitor various other Website statistics. This monitoring

helps us evaluate how visitors use and navigate our Website so we can improve the content. We may share De-Identified Personal Information or anonymous information (including, but not limited to, anonymous usage data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain Services, and for any other purpose we deem appropriate. We may disclose, sell, rent, or transfer your De-Identified Personal Information to third parties and we may receive valuable consideration for doing so.

**Your Consent to Disclosure/Transfer/Sale of Your Personal Information:** You consent to our disclosure of your Personal Information and other information to a potential or actual buyer of our company or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, change in control, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or other court proceeding, in which Personal Information held by us is among the assets transferred. You agree to and do hereby consent to (and shall not object to) our assignment, conveyance, transfer, and/or license (whether by contract, merger or operation of law) of any or all of our rights to your Personal Information and your consents, in whole or in part, and other information, with or without notice to you and without your further consent.

### **Data Transfer/Access Outside of the United States**

We have our headquarters in the United States. The Personal Information we or our service providers collect may be stored and processed in servers within or outside of the United States and wherever we and our service providers have facilities around the globe, and certain information may be accessible by persons or companies outside of the United States who provide services for us. As such, we and our service providers may transfer your Personal Information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take reasonable steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it. If you are located in the European Economic Area (“EEA”), United Kingdom, or Switzerland, we provide adequate protection for the transfer of Personal Information to countries outside of the EEA, UK, or Switzerland through a series of intercompany agreements based on the Standard Contractual Clauses. We may also need to transfer your information to other group companies or service providers in countries outside the EEA. This may happen if our servers or suppliers and service providers are based outside the EEA, or if you use our services and products while visiting countries outside this area.

If you are a resident of a country other than the United States, you acknowledge and consent to our collecting, transmitting, and storing your Personal Information out of the country in which you reside.

### **Security**

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. Your Personal Information is contained behind secured networks and a firewall and is only accessible by our personnel and by a limited number of service providers who have special access rights to our systems, and who are required to keep the information confidential. Any payment transactions will be performed using

our third party payment processors or gateways, who will use appropriate security procedures designed to protect your information. We do not collect or store full credit card numbers. Our Website and software is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Website or use our Service safer.

Our agents, contractors, service providers, and partners who require access to your Personal Information in order to provide services to us or to you on our behalf are also required to keep the information confidential in a manner consistent with this Privacy Policy and are not permitted to disclose the information to third parties or use the information for any purpose other than to carry out the services they are performing for us, or as permitted pursuant to our agreement with them.

The safety and security of platform login information also depends on you. Subscriber is responsible for keeping confidential all login credentials to Company's platform or systems ("**Systems**") to which Subscriber is provided access. Subscriber agrees to not disclose any such login credentials with any third party. Subscriber shall have its users authorized to access such systems limit access to its computers, devices, and browsers by signing off after an authorized user has finished accessing your account. If Subscriber becomes aware of any potential compromise of a user's login credentials, Subscriber shall immediately change the relevant password. Subscriber shall promptly deauthorize any of Subscriber's users for whom access to the Systems is no longer authorized. Subscriber agrees to and does hereby release and forever discharge us and our affiliates, subsidiaries, parents, officers, directors, employees, successors and assigns and contractors (collectively, "**Company's Group**"), and further will indemnify, defend and hold Company's Group harmless, from any and all past, current, and future liability, claims, demands, damages, losses, fines, penalties, assessments, private rights of action, or other actions, of whatever kind of nature, either in law or equity, as well as costs (including, but not limited to, attorneys' fees and costs), which arise from any failure of Subscriber or its service providers to maintain the security of Subscriber's email or other accounts which results in unauthorized access by a third party to such account and the transfer of funds by us in reliance of instructions purporting to originate from Subscriber.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do use security measures designed to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to us or which we obtain. Any transmission of Personal Information is at your own risk. Unauthorized entry or use, or hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

### **Data Retention**

The time periods for which we retain your Personal Information depend on the purposes for which we use it. We will keep your Personal Information for as long as your account is active, or as long as you are a registered subscriber or user of our Services or for as long as we have another business purpose to do so (such as, but not limited to, for business, tax, or legal purposes) and, thereafter, for no longer than is required or permitted by law, or our records retention policy, reasonably necessary for internal reporting and reconciliation purposes, or to

provide you with feedback or information you might request. This period of retention is subject to our review and alteration.

Following termination or deactivation of your user account, we may retain your profile information and all information posted to public areas of the Website. Following termination or deactivation of your user account, we may retain your Personal Information and other data, but will maintain it as confidential according to the Terms, this Privacy Policy, and as required by applicable law. We have the right to delete all of your Personal Information and other data after termination of your user account without notice to you.

We may retain De-Identified Personal Information for as long as we deem appropriate.

You can delete your account or request that we delete your account by contacting us.

We retain your information after you request such deletion for longer periods for specific purposes to the extent that we are obliged to do so in accordance with applicable laws and regulations and/or as necessary to protect our legal rights or for certain business requirements. For example, when we process your payments, we will retain this data for longer periods of time as required for tax or accounting purposes. See below for examples of specific reasons we would retain some data for longer periods of time:

- Our contractual and business relationships with you.
- Security, fraud and abuse prevention – i.e., to protect you, other people, and us from fraud, abuse, and unauthorized access.
- Financial record-keeping – when you make a payment to us we are often required to retain this information for long period of time for purposes of accounting, dispute investigation and resolution, and compliance with tax, anti-money laundering, and other financial regulations.
- Complying with legal or regulatory requirements – to meet any applicable law, regulation, legal process, or enforceable governmental request, as required to enforce our terms of service, including investigation of potential violations.
- Direct communications with us – if you have directly communicated with us, through a customer support channel, feedback form, or a bug report, we may retain reasonable records of those communications.

Even if you delete your account, keep in mind that the deletion by our third party providers may not be immediate and that the deleted information may persist in backup copies for a reasonable period of time.

### **What Information You Can Access, Change, or Delete**

Through your user account settings page, you may access and, in some cases, edit, or delete certain information you've provided to us, such as name and password, email address, address, user profile information, etc. The information that you can view, update, and delete may change as the Services or our practices change. If you have any questions about viewing or updating information we have on file about you, please contact us.

## Privacy Notice for California Residents

The following in this section applies only to California residents.

Online Privacy Protection Act (“CalOPPA”; Calif. Bus. & Prof. Code § 22575-22578, available [here](#)): CalOPPA applies only to companies which collect Personal Information of California residents.

### How We Respond to Do Not Track Signals.

California law (CalOPPA) requires us to let you know how we respond to web browser Do Not Track (DNT) signals. Because there currently isn’t an industry or legal standard recognizing or honoring DNT signals, we don’t respond to them at this time. We await the result of work by the privacy community and industry to determine when such a response is appropriate and what form it should take.

Visitors can visit our Website anonymously by adjusting the settings in your browser.

Third-Party Behavioral Tracking. We allow third-party behavioral tracking of Personal Information, though we may use De-Identified Personal Information to track users’ click or browsing patterns.

## Notices; Opting Out

By providing us with your email address (including by “following,” “liking,” linking your account to our Service or other services, etc., on a third party website or network), you consent to our using the email address to send you Service-related notices by email, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send you notifications of activity regarding the Service, the Website, and/or the Mobile App to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your opt-out request. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You may not opt out of Service-related emails.

You can add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by emailing us. It is your responsibility to maintain your current email address with us.

## Contact Information

If you have any questions about this Privacy Policy or our privacy practices, please contact us [info@getmejor.com](mailto:info@getmejor.com).