

## **Privacy Policy Notice**

Effective June 1, 2022

SimpliSecure, Inc. (“SimpliSecure” “We”, or “Us”) recognizes and values the importance of privacy. We want you as a visitor to our website (“Site”) to feel confident using our products and services, and this privacy policy notice (“Notice”) is to help you better understand how we collect, use, and disclose your information.

This Policy describes the following:

What information we collect and how it is collected;

How we use your information;

With whom we may share your information;

Your rights and choices;

Security and storage of the information;

Third party websites;

Transfer of your information;

Do Not Track

Children and privacy

Contact information and changes to this notice

### **INFORMATION WE COLLECT**

We collect information about you directly from you and automatically through your use of our Site. We may combine information automatically collected with other information that we have collected about you including from publicly available sources. How we collect and process this information is as follows:

## **A. Information that you (and others) Give Us**

We collect information you (and others) give us when using this Site. As examples:

When you register an account with us, you provide us with personally identifiable information like name, email address, phone number, username and password, etc. Moreover, you have the ability to add information to your profile after registration.

If you buy something through our Site, we may collect information on this transaction, such as payment information, purchase activity, and shipping/contact details.

Occasionally, you may voluntarily provide information to us to complete surveys and questionnaires or to participate in user polls. We use this information to improve our products and services and to ensure that we're providing accurate disclosures. We may also use your information to provide you newsletters and other marketing information that coincide with your preferences. You may customize your marketing preferences, or let us know if you do not wish to receive any promotional materials, by adjusting your Subscriptions & Email options on the Site.

From time to time, we may collect personal information about you from third party sources which we will use for our business purposes (for example, in order to better serve you with content or promotions). However, we will only use this information where these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

## **B. Information Collected Automatically**

When you visit our Site, we may collect certain user information automatically from your device. In some territories, including California and countries in the European Economic Area, this information may be considered personal data or personally identifiable information under applicable data protection laws.

More broadly speaking, the user information we collect automatically may include information like your Internet Protocol (“IP”) address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., country or city-level location) and other technical information. We may also collect user information about how your device has interacted with our Site, including the pages accessed and links clicked.

Like many websites, we use Cookies, web beacons and other technologies to receive and store certain types of information when you interact with us through your device. Using these technologies helps us customize your experience with our Site, improve your experience, and tailor marketing messages. A specific type of information we may automatically collect includes:

**Log & Device data.** Information about your interactions with our Site, which may include log data like your web address you came from or are going to, your device model, operating system, browser type, unique device identifier, IP address, mobile network carrier, and time zone or location. Whether we collect some or all of this information often depends on what type of device you’re using and its settings.

**Cookie data.** Depending on how you’re accessing our Site, we may use “Cookies” (a small text file sent by your computer each time you visit our Site, or similar technologies to record log data. When we use Cookies, we may use ‘session’ Cookies (that last until you close your browser) or ‘persistent’ Cookies (that last until you or your browser deletes them). For example, we may use Cookies to keep you logged into the Site. Some of the Cookies we use are associated with your registered account (including personal information about you, such as the email address you gave us), and other Cookies are not.

**Other Web Site Analytics Services.** We also may use third party service providers to provide certain analytics and Viewer interactions services in connection with our operation of our Site, including the collection and tracking of certain data and information regarding the characteristics and activities of visitors to the Site.

Collecting this information automatically enables us to better understand the visitors who come to our Site, where they come from, and what content on our Site is of interest to them. We use this information for our business purposes, including internal analytics purposes and to improve the quality and relevance of our Site to our visitors.

Please note that nothing in this Notice addresses, or should be read to limit or restrict, how we collect, use or process anonymous, de-identified, or aggregate information.

## **HOW WE USE YOUR INFORMATION**

We may use information that we collect about you, including personal information, to:

**Provide the Features of the Site Products & Services You Request.** We will use your information to provide our Site to you; including managing your account; responding to your inquiries; and for other customer service and support purposes. We use the payment information you provide to us in order to alert you of past, current, and upcoming charges, to allow us to present the billing history to you on your billing page on the Site, and to perform internal financial processes, such as looking at the status of a credit card charge. In the event of a credit card dispute, we also share account information with your bank to verify the legitimacy of a charge.

**To Communicate Our Products, Services, Events and for Other Promotional Purposes.** If you have an account with us (or have placed an order with us), we may use the contact details you provided to send you marketing communications, where permitted by applicable law. We may use the information that you provide to us to personalize communications and advertisements regarding our products and services that may be of interest to you.

**To Operate, Improve and Maintain our Business, Products and Services.** We use the personal data you provide to us to operate our business. For example, when you make a purchase, we use that information for accounting, audits and other internal functions. We may use personal data about how you use our products and services to enhance your user experience and to help us diagnose technical and service problems and administer our Site.

**Legal Compliance.** We may use your information to comply with applicable legal or regulatory obligations, including complying with requests from law enforcement or other governmental authorities, or in legal proceedings involving us.

**Other.** We also may use your information to manage our business or perform functions as otherwise described to you at the time of collection subject to your consent.

## **WITH WHOM WE MAY SHARE YOUR INFORMATION**

We do not sell your information to any third parties, or disclose it in exchange for money or other valuable consideration. We do not share your personal information with others except as indicated within this Notice, or when we inform you and give you an opportunity to opt-out of having your personal information shared.

We may share information we collect about you, including personal information, in the following ways:

**With third party service providers, agents, contractors, or government entities.**

We use other companies, agents or contractors (“Service Providers”) to perform services on our behalf or to assist us with providing services to you.

We may engage Service Providers to process credit card transactions or other payment methods. We may also engage Service Providers to provide services such as monitoring and developing this Site and our products and services; aiding in communications, infrastructure and IT services; customer service; and analyzing and enhancing data. These Service Providers may have access to your personal or other information in order to provide these functions. In addition, some of the above-listed types of information that we request may be collected by third party providers on our behalf.

We may share information with Service Providers and government entities for legal, security, and safety purposes. This includes sharing information in order to enforce policies or contracts, address security breaches, and assist in the investigation of fraud, security issues, or other concerns.

We require Service Providers to agree to take reasonable steps to keep the personal information that we provide to them secure. We do not authorize them to use or disclose your personal information except in connection with providing their services.

## **YOUR RIGHTS AND CHOICES**

In certain circumstances, local data protection laws (such as the Global Data Protection Regulation or California Consumer Privacy Act) may give you rights with respect to personal information if you are located in or are a resident of that country, state, or territory (including if you are located in the EU/EEA).

**IMPORTANT: WE ARE ONLY REQUIRED TO HONOR RIGHTS TO THE EXTENT THAT THESE RIGHTS HAVE BEEN GRANTED TO YOU AND APPLY TO YOU UNDER APPLICABLE DATA PROTECTION LAWS. PLEASE CONSULT YOUR LOCAL DATA PROTECTION LAWS TO DETERMINE WHAT RIGHTS MAY BE AVAILABLE TO YOU AND WHEN ACCESS TO THESE RIGHTS ARE LIMITED**

### **A. What Rights May Be Available to You**

These rights differ based upon local data protection laws in your country, state, or territory, but these rights *may* include one or more of the following:

**Access to Personal Information.** You may have the right to obtain confirmation from us that we process your personal information and, if so, you may have the right to request access to your personal information.

**Rectification.** You may have the right to request that we rectify inaccurate personal information concerning you and, depending on the purposes of the processing, you may have the right to have incomplete personal information completed.

**Erasure/Deletion.** You may have the right to require us to erase some or all of the personal information concerning you.

**Restriction of Processing.** You may have the right to require us to restrict the further processing your personal information. In such cases, the respective information will be marked as restricted, and may only be processed by us for certain purposes.

**Object.** You may have the right to object, on grounds relating to your particular situation, to the processing of your personal information by us, and we may be required to no longer process some or all of your personal information.

**Data Portability.** You may have the right to receive a copy of your personal information which you have provided to us, in a structured, commonly used, and machine-readable format, and you may have the right to transmit that personal information to another entity without hindrance from us.

**Withdraw Consent.** You may have the right to withdraw consent you have provided to us where we rely solely on your consent to process your personal information. You can always provide your consent to us again at a later time.

**Right to Complain.** You may have the right to lodge a complaint to an applicable supervisory authority or other regulator if you are not satisfied with our responses to your requests or how we manage your personal information. For example, if you are located in the EU/EEA, a list of and more information about the EU/EEA Data Protection Authorities can be found here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). We encourage you to first or also reach out to us at [Privacy@SimpliSecure.org](mailto:Privacy@SimpliSecure.org), so we have an opportunity to address your concerns directly.

**California Resident.** If you are a California resident, California Civil Code Section 1798.83 may permit you the right to request information regarding the disclosure of personal information about you by us to third parties for the third parties' direct marketing purposes. Moreover, California residents are also directed to the section titled "Do Not Track" herein.

**Nevada Resident.** If you are a Nevada resident, Nevada residents may also have certain rights regarding the sale of personal information. Nevada residents may opt out of the future sale of their information to a third party so that they may license or sell information by emailing us at: [Privacy@SimpliSecure.org](mailto:Privacy@SimpliSecure.org).

## **SECURITY AND STORAGE OF INFORMATION**

We take the security of your personal data very seriously. We work hard to protect the personal data that you provide from loss, misuse, and unauthorized access, or disclosure. Given the nature of communications and information processing technology, there is no guarantee that personal data will be absolutely safe from access, alteration, or destruction by a breach of any of our physical, technical, and managerial safeguards.

You should take steps to protect against unauthorized access to your device and account by, among other things, choosing a unique and complex password that nobody else knows or can easily guess and keeping your username and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

We retain the personal data we collect for so long as is reasonably necessary to fulfill the purposes for which the data was collected, to perform our contractual and legal obligations, and for any applicable statute of limitations periods for the purposes of bringing and defending claims.

## **THIRD-PARTY WEBSITES**

Our Site may contain links to third-party websites and applications. Any access to and use of such linked websites and applications is not governed by this Notice but instead is governed by the privacy policies of those third parties. We do not endorse these parties, their content, or any products and services they offer, and we do not endorse these parties, their content, or any products and services they offer, and we are not responsible for the information practices of such third-party websites or applications.

## **TRANSFER OF YOUR INFORMATION**

This Site is based in the United States. Your information may be processed, transferred to, and maintained on, servers and databases located within the United States and elsewhere where the privacy laws may not be as protective as your jurisdiction. We reserve the right to transfer your information to and from any state, province, country or other governmental jurisdiction. Your consent to this Notice followed by your submission or our collection of such information represents your agreement to any such transfer.

## **DO NOT TRACK**

Web browsers can transmit “Do Not Track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information about an individual’s online activities over time and across third party websites or online services. Currently, no universally accepted standard exists for how to interpret such signals, although work to create consensus is ongoing. Therefore, we do not currently respond to, or take any action with respect to web browser Do Not Track.

## **CHILDREN AND PRIVACY**

The Site is not directed to children under eighteen (18) years of age, and we do not knowingly collect personal information from children under 18. If we discover that a child under 18 has provided us with personal information, we will promptly delete such personal information from our systems. You may learn more about protecting children’s privacy online by visiting: <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children%27s-privacy>

## **CONTACT INFORMATION & CHANGES TO THIS NOTICE**

If you have any questions or comments about this Notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at: [Privacy@SimpliSecure.org](mailto:Privacy@SimpliSecure.org).

This Notice is current as of the Effective Date set forth above and as modified as noted below. We reserve the right to amend this Notice at our discretion and at any time and will notify you of such amendment(s) on our homepage. Please note that if you continue to visit and use this Site after those changes are in effect, you agree to the revised Notice through use.

**Last Revised May 12, 2022**