

## SECUREDOCS PRIVACY POLICY

(Last Updated: July 27<sup>th</sup>, 2018)

### Information Collection & Use

SecureDocs, Inc. ("**SecureDocs**," "**us**," "**we**") of 6144 Calle Real, Suite 200A, Goleta, CA 93117, USA is committed to respecting your privacy. This policy discloses the privacy practices for SecureDocs and the ways we collect store, use, and protect information about or relating to you (which we refer to as personal data or personally identifiable information in this policy). If you wish to contact us about anything in this policy, please use the contact details found below.

### Children

Our website and services are not directed at children, and we do not knowingly collect any personal data from or about children.

If you are a child and we learn that we have inadvertently obtained personal data from you from our websites, or from any other source, then we will delete that information as soon as possible.

Please contact us at [info@SecureDocs.com](mailto:info@SecureDocs.com) if you are aware that we may have inadvertently collected personal data from or about a child.

### Whom this privacy policy applies to

SecureDocs collects information from, and therefore this policy applies to:

- individuals who visit our websites ("**Visitors**"); and
- customers or users ("**Users**") who register to use the SecureDocs web-based business and content management solutions ("**Services**").

You do not need to register in order to review the content on our website as a Visitor.

### Personally Identifiable Information Collected By Us

Users use our products for the storage and management of contracts, files, and documents (collectively, "**Content**") related to their business. That Content is considered confidential to our Users. SecureDocs will not review, share, distribute, or reference any such Content except for the purpose of resolving a problem, providing customer support, or to investigate a suspected violation of our Terms of Service.

Any personally identifiable information you submit to us is used solely for the purpose for which it is collected or for communicating with you regarding the Services.

As a part of signing up to become a User, we ask for the following contact information:

- your name;
- your email address;
- your company;
- your state (where applicable),
- your country (where applicable); and
- your contact phone number,

so that we may communicate with you.

Secondly, we collect billing contact information and/or credit card information for the purposes of collecting payment from Users for the use of the Services.

We also collect technical information from both our Users and Visitors. This information includes your device's Internet Protocol (IP) address, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, and other fields. We use this aggregated and anonymized information to analyze trends, to administer our website, and to track Users' movements around the website. This information will not be shared with third parties unless required by applicable law.

Finally, personally identifiable information about individuals who interact with our sales & marketing software platform, in the form of the contact details set out above, will also be collected.

### **Retention of Your Personally Identifiable Information**

We will retain your information, but for no longer than is necessary for the purposes for which the personally identifiable information is processed, which will be calculated by reference to the following criteria:

- for Users:
  - as long as your account is active;
  - as needed to provide you Services;
  - to comply with our legal obligations;
  - to resolve disputes; and
  - to enforce our agreements, including our Terms of Service.
- for Visitors:
  - for a period of time after you have provided us with your personally identifiable information for which we consider it necessary to retain that data either for archiving purposes or to market to you when you have requested such marketing messages.

### **Sharing Your Personally Identifiable Information**

We share personally identifiable information with the following third parties or categories of third parties in order to maintain your customer account with us and provide the Services to you:

- Third party credit card processors, whom we use in order to check the creditworthiness of our prospective Users and to assist us in processing User payments. This processing partner is not permitted (by law and by contract) to store, retain, or use the personally identifiable information provided, except for the sole purpose of credit card processing.
- Our third party service providers and subcontractors, including those who are providing marketing support, analysis, and public relations services. When we employ such companies, they are not permitted (by law and by contract) to retain, share, store, or use personally identifiable information for any other purpose than to complete the contracted assignment. In some cases, we may provide services, or sell product lines jointly with selected business partners.

Save as expressly detailed above, we DO NOT share, sell, trade, or rent your personally identifiable information with any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personally identifiable information in a particular way, but later change your mind, you should contact us by email at [info@SecureDocs.com](mailto:info@SecureDocs.com), and we will stop doing so.

### **Legal Basis for the Use of Your Personally Identifiable Information**

If you are accessing the Services or our website from the European Union, we are required to explain the legal basis for which we collect and use your personal data. We consider that the legal basis for using your personally identifiable information as set out in this privacy policy are as follows:

- (a) our use of your personally identifiable information is necessary to perform our obligations under any contract with you; or
- (b) our use of your personally identifiable information is necessary for complying with our legal obligations; or
- (c) Where neither (a) nor (b) apply, use of your personally identifiable information is necessary for our legitimate interests or the legitimate interests of others (for example to ensure the security of our website). Our legitimate interests are to:
  - (i) run, grow, and develop our business;
  - (ii) operate our website;

- (iii) carry out marketing, market research, and business development; and
- (iv) for internal group administrative purposes.

If we rely on our (or another person's) legitimate interests to use your personally identifiable information, we will undertake an assessment to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection. You can ask us for information on this assessment by contacting us at [gdpr@SecureDocs.com](mailto:gdpr@SecureDocs.com).

### **Services-related Announcements for Users**

We will send you services-related announcements as needed. For instance, when we add software enhancements, we will send you an email notification. These emails are necessary for the maintenance of your account with us.

### **Special Offers and Updates**

We will occasionally send Users, or individuals who have filled out our website form to receive a free trial, demonstration, or other downloadable content, information on our products, educational offers, and our newsletter. We will use your name and email address to send these communications to you.

If you wish to stop receiving our newsletter and promotional communications, you can email us at [info@SecureDocs.com](mailto:info@SecureDocs.com), call us on (866) 700 7975 or write to us at 6144 Calle Real, Goleta, CA 93117, USA. However, you will still receive communications such as confirmation emails and customer support updates that are necessary to continue to provide the service to you.

### **Privacy Shield Statement**

SecureDocs complies with the EU-US and Swiss-US Privacy Shield Frameworks as set forth by the US Department of Commerce regarding the collection, use, and retention of personal data transferred from the European Union and Switzerland. SecureDocs has certified to the Department of Commerce that it adheres to the Privacy Shield Principles (the "Principles") and commits to subject all personal data received from the EU or Switzerland to the Principles. If there is any conflict between the terms in this privacy policy and the Principles, the Principles will govern. To learn more about the Privacy Shield program, and to view our certification, please visit [www.privacyshield.gov/](http://www.privacyshield.gov/).

SecureDocs remains responsible for any of your personal data that is shared under the onward transfer principle with third parties for external processing on our behalf, as described in the "Sharing Your Personally Identifiable Information" and "Cookies" sections of our privacy policy.

In compliance with the Privacy Shield Principles, SecureDocs commits to resolve complaints about our collection or use of your personal data. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield Statement should first contact SecureDocs at [gdpr@SecureDocs.com](mailto:gdpr@SecureDocs.com).

SecureDocs has further committed to refer unresolved Privacy Shield complaints to International Center for Dispute Resolution, the international division of the American Arbitration Association (ICDR/AAA), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit [here](#) for more information or to file a complaint. The services of ICDR/AAA are provided at no cost to you.

SecureDocs' Privacy Shield compliance is subject to the investigatory and enforcement powers of the Federal Trade Commission. We may be required to disclose personal data that we handle under the Privacy Shield in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Finally, under certain conditions, more fully described on the [Privacy Shield website](#), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

### **Legal Disclaimer**

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on us.

### **Access to Personally Identifiable Information**

SecureDocs collects a variety of information via the use of our Services and at the direction of customers. As an individual, you have certain rights in relation to your personally identifiable information. If you would like further information in relation to these or would like to exercise any of them, please contact us at [info@securedocs.com](mailto:info@securedocs.com), and we will work with you and the organization responsible for processing your personal data to respond to your request within a reasonable timeframe (an in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please

note, however, that certain personally identifiable information may be exempt from such requests in certain circumstances.

If you are an individual who is based in the European Union, you have the following rights:

- the right of access to any personally identifiable information we hold about you including confirmation as to whether your personally identifiable information is being used by us; details about how and why it is being used; and details of the safeguards which are in place if we transfer your information outside of the European Economic Area (“**EEA**”);
- the right to request an update to any of your personally identifiable information which is out of date or incorrect;
- the right to ask us to delete any personally identifiable information which we are holding about you in certain specific circumstances;
- the right to ask us to restrict the way that we process your personally identifiable information in certain specific circumstances;
- the right to ask us to stop using your personally identifiable information for direct marketing purposes;
- the right to ask us to consider any valid objections to our use of your personally identifiable information where we process your personally identifiable information on the basis of our legitimate interest; and
- in accordance with Article 77 of the EU General Data Protection Regulation (GDPR), you may also make a complaint to the data protection regulator in the country where you usually live or work (for example, the Information Commissioner’s Office (in the UK), or where an alleged infringement of the GDPR has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

## **Cookies**

Some of the pages on our website use cookies, which are small files that are placed on your internet browser when you visit our website.

Cookies make web surfing easier for you by saving your preferences while you are at the website, and allow us to offer you a more tailored experience in the future by understanding and remembering your browsing preferences.

Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of some or all cookies. However, if you use your browser to block all cookies (including essential cookies), you may not be able to access all or parts of our website or use all the functionality provided through our website. For more information on the management and prevention of cookies, please follow the link to the DAA Consumer Choice page by clicking [here](#), or the European Interactive Advertising Digital Alliance Your Online Choices site by clicking [here](#). The Help menu on the menu bar of most browsers will also tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether.

The use of cookies is an industry standard, and as such, you will find them at most major websites. Our website uses cookies and related technologies dropped by us or third parties for a variety of purposes, including to operate and personalize our website.

We use cookies to store IP address, as well as unique, randomly assigned user IDs that enable you to enter our website without having to login each time, as well as your clickstream behavior (for example, the pages you view and the links you click). We may also use cookies to track how you use this site to target ads to you on other websites. We do not store any passwords or personally identifiable information about you in the cookies. By showing how and when Visitors use the website, cookies help us see which areas are popular and which are not. Many improvements and updates to the website are based on data such as total number of Visitors and pages viewed. This information is most easily tracked with cookies.

## **Anonymous Usage Data**

We may anonymize the information we collect about you by removing or "hashing" any data fields (such as name, address and telephone number), that identify you or that can be used to identify you personally. We use industry best practices and state-of-the-art techniques to anonymize and aggregate data.

We compile aggregate information by combining anonymous data that meet a certain criteria into groups. We will never sell your usage data to third parties. None of these anonymized, aggregated reports or statistics will enable our Visitors or Users to be personally identified or identifiable.

### **Public Forums, Referrals, and Testimonials**

We may provide public forums like bulletin boards, blogs, or chat rooms on our websites. These forums are provided as a service to our Users to help them exchange ideas, tips, information, and techniques related to our services. Any personally identifiable information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these forums.

We also post a list of Users and testimonials on our websites that may contain information such as the Users' names and titles. We obtain the consent of each user prior to posting any information on such a list or posting testimonials.

### **Security**

The main risk of our processing of your personally identifiable information is if it is lost, stolen, or misused. This could lead to your personally identifiable information being in the hands of someone else who may use it fraudulently or make public, information that you would prefer to keep private.

The security of your personally identifiable information is important to us. We utilize robust security measures to protect customer data from unauthorized access. Sensitive data is encrypted, and website connections are protected using SSL with a minimum of 256-bit symmetric encryption and a 2048-bit authenticated key agreement. Our websites are hosted in a secure server environment that uses multi-layer perimeter security, including firewalls and other advanced technology to prevent interference or access from outside intruders. Nevertheless, we remind you that no security measure is perfect and you should take steps to protect your passwords and personally identifiable information. SecureDocs is not liable for loss of passwords by customers. If you believe your password has been compromised, we recommend that you immediately change your password.

We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information.

### **Business Transitions**

In the event SecureDocs goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, your personally identifiable information will likely be among the assets transferred.

### **Changes in this Privacy Statement**

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here on the website and also, as necessary via email.

### **External Links**

Our websites may contain links to third-party websites. These links are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personally identifiable information that we collect or which we receive from third party sources. These third party websites maintain their own policies regarding cookies and the collection and use of personally identifiable information. We assume no responsibility or liability for the actions of such third parties with respect to their collection or use of your information. We encourage you to read the privacy policies of every website that you visit through a link on our websites.

**Contact Us** If you have any questions, concerns, or suggestions regarding our privacy policy or our collection, use, or storage of your personally identifiable information, please contact us by emailing us at [info@SecureDocs.com](mailto:info@SecureDocs.com), by calling (866) 700 7975, or by writing to us at 7127 Hollister Ave., Suite 25A - 320, Goleta, CA 93117.