

## Office Ally, Inc. Privacy Policy

Effective Date: September 14, 2021

Please click [here](#) for a printable PDF version of this notice.

### **Scope of This Policy**

This privacy policy applies to:

- Office Ally, Inc. and our affiliates (“Office Ally,” “we,” “us,” “our”).
- Office Ally’s online properties, including our websites, and websites or mobile applications that link to it; our social media pages or handles; and products and services (“Services”).

Office Ally understands that you care about how we collect, use, and share information when you interact with our Services, and we value the trust you place in us. This Policy explains:

- the types of information we collect through our Services
- how we use and protect that information
- the types of information we may share with others and under what circumstances
- the choices you have regarding our collection, use, and sharing practices
- Specific disclosures for residents of different jurisdictions

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to non-Office Ally websites and mobile applications that may link to the Services or be linked to or from the Services; please review the privacy policies on those websites and applications directly to understand their privacy practices.

### **Information We Collect**

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

### **Information you give us**

- Contact and professional information, including name, email address, telephone number, and job title, as well as company name and size.
- Demographic information.
- Audiovisual information.
- Payment information and associated contact information when engaging in a transaction on our site.
- Any information or data you provide by interacting with us through our customer support.

- Information you provide when you complete a survey administered by us or a service provider acting on our behalf.
- Any information or data you provide by interacting in our online forums and chatrooms, or by commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.
- Information you submit to inquire about or apply for a job with us.
- Any information that you provide in the course of using the Services.
- If you contact us, we may keep a record of that correspondence and any contact information provided.

Some of this information may be collected by external parties on our behalf. For example, we use a payment processor when you engage in a transaction on our site.

### Information We Collect Automatically

When you interact with the Services, certain information about your use of our Services is collected automatically. This includes:

- Details of your visits to our site and information generated in the course of the use of our site (including the timing, frequency, and pattern of service use) including, but not limited to, traffic data, location data, weblogs and other communication data, the resources that you access, and how you reached our site.
- Diagnostic information such as web traffic logs.
- Details regarding the device you use to access our Services, including, but not limited to, your IP address, operating system, and browser type.
- Information about how you interact with our Services, including whether you open or click links in any correspondence.

Much of this information is collected through cookies, web beacons, and other tracking technologies, as well as through your web browser or device. Office Ally relies on partners to provide many features of our Services using data about your use of Office Ally and other sites.

Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of the Services may not be available, work, or work as designed. You may also be able to opt out of or block tracking by interacting directly with the other companies who conduct tracking through our Services.

Your browser or device may include “Do Not Track” functionality. At this time, Office Ally does not respond to browser “Do Not Track” signals.

### Information We Collect From Other Sources

We may collect the following information about you from third-party sources.

- Subscription registration information.
- Contact information, demographic information, and information about your interests and purchases, from consumer data providers.
- Information about your credit history from credit reporting agencies.

- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.
- If you decide to invite others to the Services, we will collect your and the other person's names, email addresses, and/or phone numbers to send an email or text message and follow up with the other person. You agree that you will obtain the other person's consent before giving us his or her contact information. You also agree that you will not send us the contact information of a minor. We will inform any other person you invite that you gave us his or her information in the invitation email.

### **How We Use and Protect Your Information**

We may use the information we collect from you for the following purposes:

- To provide you with our products and services, including to take steps to enter into a contract for sale or for services, process payments, fulfill orders, and send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits.
- To enable additional features on our Services and to provide you with a personalized service.
- To provide you with the best service and improve and grow our business, including by understanding our customer base and purchasing trends and understanding the effectiveness of our marketing.
- To understand how our Services are being used, track site performance, and make improvements.
- To deliver tailored advertising on our Services based on your preferences or interests across services and devices and measuring the effectiveness of ads. We may share your information with business partners, online advertising partners, and social media platforms for this purpose.
- To detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and to comply with legal requirements regarding the provision of products and services.

### **How We Secure the Information We Collect From or About You**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

### **How We Share Your Information**

- **Affiliates:** We share information with other members of our group of companies.
- **Service Providers:** We engage the following types of vendors to perform functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:

- *Supporting Service functionality*, such as vendors that support customer service and customer relationship management, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email, fax).
- *Auditing and accounting firms*, such as firms that assist us in the creation of our financial records.
- *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
- *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
- *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
- *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
- *Marketing vendors*, such as entities that support distribution of marketing emails.
- **Business Partners:** We partner with select companies that assist us in providing you with certain services or products we offer. If you purchase such products or services, then we may share your information with such companies in order to facilitate the services or provide you with the products.
- **Provider information.** We may sell, license, or otherwise disclose information that identifies specific health care providers and information related to their use of the Services, such as health care claims, treatment, prescribing trends, etc. This information is de-identified with respect to patients and health plan members.
- **Online advertising partners:** We partner with companies that assist us in advertising our Services, including partners that use online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.
- **Social media platforms:** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Government entities/Law enforcement:** We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.

### **Additional Information About our Data Collection and Sharing Practices**

#### **Sharing of Aggregated Data**

We may share aggregated or de-identified data at our discretion, including with marketing agencies, media agencies and analytics providers. These other companies will not be able to relate this data to identifiable individuals.

#### **Combination of Information**

We may combine information from the Services together and with other information we obtain from our business records.

#### Change of Ownership or Corporate Organization

We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.

#### Cross-border Transfer of Data

If you use our Services outside of the United States, you understand that we may collect, process, and store your information in the United States. The laws in the U.S. regarding information may be different from the laws of your state or country. Any such transfers will comply with safeguards as required by relevant law.

#### Data retention

We may store information about you for as long as we have a legitimate business need for it.

#### Information about children

The Services are intended for users age thirteen and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

#### Health Information

Some of our Services we offer include the collection or processing of health information. The health or medical information we receive on behalf of our customers is subject to protections under applicable federal or state law. If you are a patient viewing this Privacy Policy, please contact your provider for information regarding your medical records.

#### Genetic Information

We also collect or process genetic information through genetic testing that is limited to individuals who voluntarily participate in such testing. The genetic information of our customers is collected, stored, and processed in accordance with relevant federal and state law. If you have any questions related to our practices, please contact us at the address below.

#### **Your Options and Rights Regarding Your Information**

Please send email with contact information changes to [support@officeally.com](mailto:support@officeally.com). To update your payment method, follow the instructions on the Customer Authorization Recurring Auto Payment Form located on Office Ally's website under Resource Center/Office Ally Forms and Manuals/Account Management.

If at any time you would like to unsubscribe from receiving future emails, you can email us at [support@officeally.com](mailto:support@officeally.com) and we will promptly remove you from all correspondence.

#### Ad Choices

You have options to limit the information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties.
- You may contact us directly.

If you delete your cookies, you may also delete your opt-out preferences.

### **Special Information for Job Applicants**

When you apply for a job with us, we may collect information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

### **Privacy Disclosures for Specific Jurisdictions**

#### **Special Information for European Economic Area, United Kingdom, and Switzerland Residents**

We process “personal data,” as that term is defined in the European Union’s General Data Protection Regulation (“GDPR”).

**Your rights under the GDPR:** Users who are located in the European Economic Area (“EEA”), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available 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).

If you are located in the EEA, U.K., or Switzerland, you have the following rights.

- **Access and Portability:** Request access to personal data we hold about you or request transmission of your data to a third party.
- **Correction:** Request that we rectify inaccurate or incomplete personal data we store about you.
- **Erasure:** Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- **Restriction of processing:** Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no

longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.

- **Objection to processing:** Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- **Transfers:** Obtain information about and a copy of the safeguards we use to transfer personal data across borders.

Please contact us to exercise these rights.

Special Information for California Residents

*Your California Privacy Rights; “Shine the Light” Law*

Residents of the State of California have the right to request information regarding third parties to whom the company has disclosed certain categories of personal information during the preceding year for the third parties’ direct marketing purposes. If you are a California resident and would like to make such a request, please email [compliance@officeally.com](mailto:compliance@officeally.com) or write to us at Office Ally, Inc., Attn: Privacy and Security Officer, P.O. Box 872020, Vancouver, WA 98687.

California Consumer Privacy Act

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

*Notice at Collection Regarding the Categories of Personal Information Collected*

You have the right to receive notice of the categories of personal information we collect and the purposes for which we use personal information. The following table summarizes the categories of personal information we collect, the categories of sources of that information, and whether we disclose or sell that information to service providers or third parties, respectively. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described in “how we use information.”

Category	Information Type	Source	We disclose to:	We sell to:
Account Identifiers	<ul style="list-style-type: none"> <li>• Contact information or personal characteristics (name; email address; postal address; telephone number; signature)</li> <li>• Social media handles</li> </ul>	You; our social media pages; third party subscription service providers	Service Providers	Not sold

Health Information	<ul style="list-style-type: none"> <li>Protected health information</li> <li>Physical or mental status or ailments</li> </ul>	You	Service Providers	Not sold
Provider Information	<ul style="list-style-type: none"> <li>Provider identifiers</li> <li>Claims and payment information (de-identified with respect to patients) associated with the provider</li> </ul>	You; health plans	Business partners	Business partners
Financial Information	<ul style="list-style-type: none"> <li>Payment card data</li> <li>Bank account information</li> <li>Credit information</li> </ul>	You	Service Providers	Not sold
Protected Classifications and Other Sensitive Data	<ul style="list-style-type: none"> <li>Date of Birth</li> <li>Gender</li> </ul>	You	Service Providers	Not sold
Commercial Information	<ul style="list-style-type: none"> <li>Transaction information</li> <li>Billing and payment records</li> <li>Order history</li> </ul>	You	Service Providers	Not sold
Biometric Information	<ul style="list-style-type: none"> <li>Fingerprint</li> <li>Voiceprint</li> <li>Facial recognition</li> <li>Eye recognition</li> </ul>	You	Service Providers	Not sold
Geolocation Information	<ul style="list-style-type: none"> <li>Precise (information that describes location with more precision than ZIP code, e.g., GPS data)</li> <li>Coarse (information that describes location at ZIP code-level or less precision)</li> </ul>	You; our analytics and advertising partners	Service Providers	Advertising partners (coarse location only)
Internet or Electronic Network Activity Information	<ul style="list-style-type: none"> <li>IP address</li> <li>Device identifier (e.g., MAC)</li> <li>Advertising identifier (e.g., IDFA, AAID)</li> <li>Information provided in URL string (e.g., search keywords)</li> <li>Cookie or tracking pixel information</li> <li>Information about your interaction with our website, app, email correspondence, or products</li> <li>Browsing history</li> <li>Search history</li> <li>Diagnostic information (e.g., crash logs, performance data)</li> </ul>	You; our analytics and advertising partners	Service Providers	Advertising partners

Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	<ul style="list-style-type: none"> <li>• Call recordings</li> <li>• Photographs</li> <li>• Video</li> </ul>	You	Service Providers	Not sold
Professional or Employment-Related Information	<ul style="list-style-type: none"> <li>• Current employer</li> <li>• Job title</li> </ul>	You	Service Providers	Not sold
Education Information	<ul style="list-style-type: none"> <li>• Education history</li> <li>• Level of education</li> </ul>	You	Service Providers	Not sold
Inferences Drawn About You	<ul style="list-style-type: none"> <li>• User profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</li> </ul>	You; our analytics and advertising partners	Service Providers	Advertising partners
Content of Communications	<ul style="list-style-type: none"> <li>• Contents of phone calls, emails, or text messages</li> <li>• Photos</li> </ul>	You	Service Providers	Not sold
Contacts	<ul style="list-style-type: none"> <li>• List of contacts that you supply to us</li> <li>• List of contacts we collect from your device with your permission</li> </ul>	You	Service Providers	Not sold

Entities to whom we disclose information for business purposes are *service providers*, which are companies that we engage to conduct activities on our behalf. We restrict service providers from using personal information for any purpose that is not related to our engagement.

Entities to whom we “sell” information are *third parties*. Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for purposes unrelated to the service it provides to us.

*Your rights under the CCPA*

- *Opt out of sale of personal information:* You have the right to opt out of our sale of your personal information to third parties. To exercise this right, please visit our Do Not Sell My Personal Information webpage or contact us. Please be aware that your right to opt out does not apply to our disclosure of personal information to service providers.
- *Know and request access to and deletion of personal information:* You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with to whom we sell or disclose it. You also have the right to request in certain

circumstances that we delete personal information that we have collected directly from you. Please contact us to exercise these rights.

#### *Financial incentives*

**Financial Incentives.** We may offer you the opportunity to participate in special promotions and programs from time to time. Your participation is voluntary. If we provide this offer, we will obtain your consent to collect your Personal Information in connection with your participation. The categories of Personal Information we collect is first and last name, phone number, email address, postal address, which we use to facilitate your participation in the program and to market to you.

You may opt in to the program using the means we present to you, such as an online registration page, at the time we make the offer. You may opt out of the program at any time by contacting us at the address below.

The program we offer may qualify as a financial incentive program (FIP) under California law. We are required to explain how the value you receive from FIPs is reasonably related to the value that we receive from the Personal Information you provide to us. We use the Personal Information you provide to directly market to you and offer referral programs. These activities generate revenue for us that we believe is reasonably related to the benefit you receive from participating in the incentive programs. In disclosures to you regarding the incentive programs, we will explain our good faith estimate of the value of your Personal Information.

#### Special Information for Nevada Residents

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. At this time, Office Ally does not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please email [compliance@officeally.com](mailto:compliance@officeally.com).

#### Making a request to exercise your rights

**Submitting requests:** You may request to exercise your rights by submitting the form on this page or making a request using the contact information below.

If you are a California resident, you may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Verification:** We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity. We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

#### Changes to This Policy

We may make changes to this Policy from time to time. The “Effective Date” at the top of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Policy.

**Contact**

For questions about our privacy practices, contact us at:

Office Ally, Inc.

Attn: Privacy and Security Officer

P.O. Box 872020

Vancouver, WA 98687

360-975-7004

Email: [compliance@officeally.com](mailto:compliance@officeally.com)