

Zone & Company Software Consulting LLC Privacy Statement
Revised: April 30 2021

Effective Date: May 01, 2021

In this Privacy Statement (“Statement”), Zone & Company Software Consulting LLC (“Zone”) explains how we collect, use, maintain, disclose, and transfer personal information, and the choices you have in relation to our processing of your personal information. We are committed to protecting your privacy in accordance with this Statement.

References in this Statement to “we,” “us”, or “our” are references to the Zone entity that is operating the relevant Website or providing the applicable Services. Statements referring to “you” or “your” are references to the company or individual we are collecting personal information about. Our use of the term “Services” in this privacy Statement has the same definition as in our End User License Agreement (“EULA”) (available at <https://www.zoneandco.com/end-user-license-agreement>) or other customer’s applicable Services agreement with us, or the applicable Zone service (collectively, the “Services”). This Statement is incorporated into and is part of the EULA and any other Services agreements. If you do not agree with the terms and conditions in this Statement, please refrain from using our Websites or Services.

If you have any questions regarding this Statement, please email us at support@zoneandco.com.

SCOPE

This Statement applies to the following:

- Personal information we collect through all websites operated by Zone (“Website(s)”), including zoneandco.com and any other Websites that post this Statement.
- Personal information we collect about you in the course of doing business with you, such as when you engage with us as a customer, potential customer, vendor, service provider, professional advisor, consultant or other third party in relation to the provision of our Services, and the operation of our business generally. This includes sales, marketing, business contact or registration activities conducted by Zone.

TYPES OF DATA AND COLLECTION METHODS

Information you provide to us directly: Through your use of the Websites, you may choose to provide us with certain personal information. For example, when you request information, a free product tour, schedule a consultation, use any Chat Now function, subscribe to a mailing list, subscribe to Services, respond to an online survey or otherwise contact us, we usually collect personal information such as your name, e-mail address(es), postal address(es), telephone numbers and any other information you choose to provide.

You may choose to provide personal information when engaging in or conducting business with us. The types of information we may collect include names, email addresses, postal addresses, contact details, job titles, transactional information, financial/billing information, account information, correspondence, and any other information you may choose to provide.

You may also choose to provide personal information, such as contact details and job titles, when you attend sales and marketing events, product demos, take part in surveys, or through other sales and marketing interactions we may have with you. Information we collect automatically: The Websites also collect certain information by automated means. For example, when you visit a Website, we track certain information about your computer and Internet connection, such as the IP address of your computer and/or Internet service provider, the date and time you access the site, the Internet address of websites from which you link to our Websites, the computer technology you are using and your movements and preferences on our site.

We use tracking technology that many other websites employ, including, without limitation, “cookies”, which are small data files stored on your computer’s hard drive, to collect such information. We use cookies to collect information in connection with future visits from that Website, to recognize you as a previous visitor, or to track your activity on our Websites. We also use cookies to provide statistical information on site usage and personalize and enhance the online experience. Some of these cookies may be active during the time you are viewing a website (“session cookies”). Other cookies may remain on your computer after you have closed your browser or turned off your computer (“persistent cookies”).

If you follow a link to the Website from an affiliate or promotion, we store information about your arrival from that affiliate or promotion in a session cookie. A persistent cookie consists of a text file sent by a web server to web

browser, which will be stored by the browser and will remain valid until its set expiry date.

The following cookies are deployed on the Websites:

- **Strictly Necessary Cookies:** These cookies are strictly necessary to provide the Website. For example, they are used to authenticate and identify returning users.
- **Performance and Functionality Cookies:** These cookies provide statistical information on site usage, such as web analytics. They also help us to personalize and enhance your online experience.
- **Advertising Cookies:** These cookies track activity across websites in order to understand a viewer's interests, and to direct marketing to them.

We do not deliver third party online advertisements on our Websites, but we may use third-party advertising companies to serve ads for our Services when you access and use other websites, based on the information relating to your access to and use of our Websites, as well as information received from third parties. To do so, these companies may place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice and to learn how to opt out in desktop and mobile browsers on the particular device on which you are accessing this Statement, please visit:

- http://www.networkadvertising.org/managing/opt_out.asp, or
- <http://www.aboutads.info/>

In general, you do not need to have cookies turned on to visit our Websites. You can refuse cookies by setting your browser to decline them automatically or to give you the choice of declining or accepting the placement of cookies from the Website. That said, some of our webpages, may require you to accept a mandatory session cookie, which you can delete after you leave the Website. For more information on how to manage cookies, please go to www.allaboutcookies.org. if you set your browser to disable all cookies or opt out, some features of the Websites may not function properly.

We also use web beacons and pixels on our Websites and in emails. For example, we may place a pixel in marketing emails that notify us when you

click on a link in the email. We use these technologies to operate and improve our Websites and marketing emails.

Please note that Statement does not cover the use of cookies used by third parties, and we are not responsible for their privacy policies and practices. Also, please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Websites.

We also may collect information related to your company, approximate geographic location, or other demographic information that does not personally identify you.

To the extent permitted by applicable law, we reserve the right to combine other information as defined above with personal information that you submit.

Other information we collect in the course of operating our business: We also collect information from our vendors, suppliers, service providers, agents, consultants, business partners, professional advisors and other third parties for the purposes of managing and operating our business. For example, we will collect business contact information, financial information and other information necessary to engage third parties and to evaluate their performance.

Information we collect automatically through the Services: Our systems may also collect certain information automatically when you use the Services, for example, usage information (such as user activity, configuration of the device, performance metrics data) and log information (such as IP addresses, ISP, browser type, clickstream data, security information, errors and crashes).

COLLECTION PURPOSES, USE OF PERSONAL INFORMATION

We will use your personal information for a range of different purposes, including:

- To respond to your specific inquiry or request and to provide you with information and access to resources that you have requested from us;
- To administer, protect, operate and maintain the Websites and our systems;
- To improve the navigation and content of our Websites, system administration and security;
- To compile aggregated statistics about the site usage and to better understand the preferences of our site visitors;

- To help personalize your experience on our Websites (for example, we may use IP addresses to approximate your general location such as city and state for purposes such as to provide information on local promotions and events);
- To help deliver our Services to our customers and to provide customer service and support;
- To process and complete business transactions and send related information, including transaction confirmations and invoices; To send information to our customers about their account, technical alerts or updates, and other administrative or service-related communications;
- To carry out research and development to improve our Services;
- To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify our users and customers.

We maintain reasonable procedures to help ensure that personal information we collect and use is reliable for its intended use, accurate, complete, and current.

Additionally, we may collect personal information for marketing purposes such as contacting you to further discuss your interest in our company, the Services we provide and ways we can improve them and to provide information on Services, promotions, and events. You can opt out of receiving marketing emails as explained in the “Your Choices” section below.

DATA TRANSFERS TO THIRD PARTIES

We do not sell your personal information to any third parties; however, we may share your personal information with third parties as follows:

- Within Zone companies consistent with this Statement.
- Trusted agents, consultants and service providers to perform business related functions such as service providers that help support the Services.
- Business partners, such as system integrators, distributors, and referral partners that are involved in providing Services. For example, if you indicate an interest in a Service, we may share personal information such as your contact information with our business partners.

OTHER DISCLOSURES

Under certain circumstances, we may be required to disclose your personal information in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

We may disclose your personal information if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency, or in the good faith belief that such action is necessary (a) to comply with a legal obligation, (b) to protect or defend our rights, interests or property or that of third parties, (c) to prevent or investigate possible wrongdoing in connection with the site or our Services, (d) to act in urgent circumstances to protect the personal safety of users of the site, our Services or the public; or (e) to protect against legal liability.

DISCLOSURE FOR PROSPECTIVE SALE, MERGER, ACQUISITION OR REORGANIZATION

We may share or transfer your information in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business. Also, we reserve the right to fully use and share any information that is not in personally identifiable form (such as statistics and survey results that do not identify you individually by name).

YOUR CHOICES

You can always opt out of providing your personal information by not providing it when asked. If personal information is required in order to allow us to respond to your inquiry, you will receive a notice advising you of this. If you do not provide us with some or all of the requested personal information, we may not be able to respond to your inquiry or provide the Services to you.

If we intend to use your information for a purpose that is materially different from the purposes identified above or if we intend to disclose it to a third party (a non-agent) not previously identified, we will notify you and offer you the opportunity to opt out of such uses and/or disclosures where it involves non-sensitive information or opt-in where sensitive information is involved.

You may choose to change your marketing choices at any time by contacting us at: support@zoneandco.com, or by contacting us as described in the “How to Contact Us” section below.

You can also unsubscribe from our marketing communications by following the instructions or unsubscribe mechanism in the e-mail message. To opt out

of receiving marketing related communications from us, please click on the “opt-out” link in the communication or please contact us at support@zoneandco.com, or by contacting us as described in the “How to Contact Us” section below. Please note that if you do opt-out of receiving marketing- related emails from us, we may still send you important administrative messages, and you cannot opt-out from receiving account-related or other administrative messages.

THIRD-PARTY SITES

This Statement does not apply to, nor are we responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the site links. The inclusion of a link on the site does not imply our endorsement of the linked site or service.

SECURITY

We maintain reasonable and appropriate security measures to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. While we follow generally accepted standards to protect personal information, no method of storage or transmission is 100% secure. There is always risk inherent to providing information online.

If you use a login ID and password to access the Services, be advised that you are solely responsible for protecting your password, limiting access to your devices and signing out of websites after your sessions. We cannot be responsible for a data breach or other incident if a password is used by unauthorized persons. If you have any questions about our implemented security measures, please contact us by using the information in the “Contacting us” section, below.

LOCATED IN THE UNITED STATES

Zone is located in the United States. Your personal information may be stored and processed in the United States or in any country where we have facilities or in which we engage service providers. You acknowledge that your personal information may be transferred to countries outside of your country of residence, including to the United States, which may have different data protection rules than those of your country. Please be aware that the United States and countries other than the one in which you are located may not provide the same level of data protection as country from which you are accessing the Website. Note also that your personal information may be

available to the US Government or its agencies under legal processes in the US.

EEA AND UK PRIVACY RIGHTS

For residents of the European Economic Area (EEA) and United Kingdom (UK), we advise that your personal information will be transferred to and processed in the United States, which has data protection laws that are different than those in your country and may not be as protective. The United States has not sought or received a finding of “adequacy” from the European Union under Article 45 of the General Data Protection Regulation (GDPR). Our legal basis for collecting and using your personal information is to do so with your consent; where we need the personal information for performance of a contract or requested service, or where the collection and use is in our or another’s legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal information in question. If we collected your personal information with your consent, you may withdraw your consent at any time.

Our retention of your personal information and any subsequent communications are based on our legitimate interest in providing you with new and potentially relevant materials based on your geography, role, or company. As always, you can elect to opt out from receiving such future communications.

To the extent that we transfer personal information from the EEA to a jurisdiction outside the EEA or UK that has not been adduced by the European Commission as providing adequate data protections (such as the United States), we will ensure that such personal information is safeguarded through appropriate contractual terms or other approved mechanisms.

Rights for EEA and UK Residents - If you are a resident of the EEA or UK, you have the right to:

- Find out if we use your personal information, to access your personal information and receive copies of your personal.
- Withdraw any express consent that you have provided to the processing of your personal information at any time without penalty.
- Access your personal information and have it corrected or amended if it is inaccurate or incomplete.

- Obtain a transferable copy of some of your personal information which can be transferred to another provider when the personal information was processed based on your consent.
- If you believe your personal information is inaccurate, no longer necessary for our business purposes, or if you object to our processing of your personal information, you also have the right to request that we restrict the processing of your data pending our investigation and/or verification of your claim.
- Request your personal information be deleted or restricted under certain circumstances. For example, if is using your personal information on the basis of your consent and has no other legal basis to use such, you may request your personal information be deleted when you withdraw your consent.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If we ask you to provide personal information to us to comply with a legal requirement or enter into a contract, we will inform you of this and let you know whether providing us with your personal information is required and if not, the consequences of not sharing your personal information with us.

Similarly, if we collect and use your personal information in reliance on our or a third party's legitimate interests and those interests are not already described above, we will let you know what those legitimate interests are.

We endeavor to apply suitable safeguards to protect the privacy and security of your personal information and to use it only consistent with your relationship with us and the practices described in this Statement.

To withdraw consent or exercise these rights, please contact us via email at support@zoneandco.com.

If you are not satisfied with our response, or believe we are processing your personally identifiable information in violation of the law, you have the right to lodge a complaint with the Supervisory Authority (also known as Data Protection Authority) or other appropriate governmental authority in your EEA Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

CANADA PRIVACY RIGHTS

Users of the Website from Canada are informed we take appropriate steps to comply with applicable Canadian data privacy requirements, including the Anti-Spam Legislation (CASL) and the Personally Identifiable Protection and Electronic Documents Act (PIPEDA). Note, however, that personal information stored or processed outside of Canada, including in the US or another foreign country, may not be subject to the PIPEDA. In addition, personal information stored or processed outside of Canada is subject to the laws of that other country and may be available to the foreign government of the country in which the personal information or the entity controlling it is located pursuant to a lawful order in that jurisdiction. This Statement is intended to provide the required notices regarding our collection and use of personal information, including transfer to the United States.

You may request to access, correct, or delete your personally identifiable information, or withdraw consent to our collection, use or disclosure of your personal information, by contacting us at support@zoneandco.com.

These rights are subject to applicable contractual and legal restrictions and reasonable notice. We may take reasonable steps to verify your identity before honoring any such requests.

AUSTRALIA PRIVACY RIGHTS

For visitors or users of the Website in Australia, the collection and processing of your personal information is governed by the Australian Privacy Act of 1988 and Spam Act 2003.

- Our service providers assume the same obligations, where relevant, under the Privacy Act as apply to us.
- We will not use or disclose personal information to third parties for the purpose of our direct marketing to you unless you have consented to receive direct marketing. You may opt out of any marketing materials we send to you through the unsubscribe mechanism or by contacting us directly. If you have requested not to receive further direct marketing messages, we may continue to provide you with messages that are not regarded as "direct marketing" under the Privacy Act or Spam Act, including changes to our terms, system alerts, and other administrative or technical information.
- Our servers are located in the United States. In addition, we or our service providers may use cloud technology to store or process

personal information, which may result in storage of data outside Australia.

- If you think the personal information, we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, we will take reasonable steps, consistent with our obligations under the Privacy Act, to correct that information upon your request. You can contact us at as provided below.

If you are unsatisfied with our response to a privacy matter, then you may file a complaint with the Office of the Australian Information Commissioner (at <https://www.oaic.gov.au/privacy/privacy-complaints/>). CALIFORNIA PRIVACY RIGHTS

“Shine The Light” Law -- California residents with whom Zone has an established relationship has the right to request certain information with respect to any personal information Zone may have shared with third parties for their direct marketing purposes. Alternatively, Zone may provide a cost-free means to opt out of such sharing. Zone has opted to provide you with a cost-free means to opt out of such sharing. If you do not want Zone to disclose your personal information to other companies for their marketing purposes, please email us at support@zoneandco.com.

For California residents under the age of 18 and registered users of our Website, California law (Business and Professions Code § 22581) provides that you can request the removal of content or information you posted on Websites. Any such request should be sent to us at support@zoneandco.com along with a description of the posted content or other information to be removed. Be advised, however, that applicable law may not permit us to completely or comprehensively remove your deleted content or for other reasons as set forth in this California law.

Zone does not share or transfer personal information that would constitute a “sale” under the California Consumer Privacy Act.

We do not currently respond to browser do-not-track signals.

NEVADA PRIVACY RIGHTS

Nevada law (SB 220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. Zone does not sell your personal information to third parties as defined in Nevada law, and will not do so in the future

without providing you with notice and an opportunity to opt-out of such sale as required by law. If you have any questions regarding our data privacy practices or our compliance with Nevada data privacy law, please contact us at support@zoneandco.com.

CHILDREN

The Websites and Services are not directed at children. We do not knowingly solicit information from or market to children under the age of 18. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users younger than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us using the contact information provided below.

RETENTION PERIOD

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Statement unless a longer retention period is required or permitted by law, for legal, tax or regulatory reasons, or other legitimate and lawful business purposes.

GENERAL DATA REQUESTS

If personal information you have submitted to us is no longer accurate, current, or complete, and you wish to update it, please send an e-mail to: support@zoneandco.com, or by contacting us as described in the "How to Contact Us" section below. Upon appropriate request we will update or amend your information, but we reserve the right to use information obtained previously to verify your identity or take other actions that we believe are appropriate.

HOW TO CONTACT US

If you have any questions regarding this Statement or if you need to request access to or update, change or remove personal information that we control, you can do so by contacting:

Zone & Company Software Consulting LLC
800 Boylston Street

16th Floor
Boston, Massachusetts 02199
United States of America
support@zoneandco.com

AMENDMENTS

We reserve the right to change, modify, add or remove portions of this Statement from time to time and in our sole discretion, but will alert you that changes have been made by indicating on this Statement the date it was last updated and when it becomes effective. When you visit the Website, you are accepting the current version of this Statement as posted on the site at that time. We recommend that users revisit this Statement periodically to learn of any changes.