Privacy Notice

When we refer to "us," "we," "our," or "InfoReady" in this Privacy Notice, we mean InfoReady Corporation.

This Privacy Notice ("Privacy Notice") discloses the privacy practices for this website. This Privacy Notice applies solely to information collected by this website where this Privacy Notice appears. By visiting or using this website, you agree to the practices described in this Privacy Notice. We reserve the right to modify the Privacy Notice from time to time without prior notice to you, effective upon the posting of such modified terms on this website. Your continued use of this website constitutes acceptance of any such changes. To ensure that you are aware of current privacy practices, we recommend that you review the Privacy Notice periodically. If you do not agree to the changed or modified Privacy Notice, do not use this website.

We provide most of our products and services to end-users of an institution (for example, schools and universities). Your institution determines what information we collect through our products and services and how it is used, and we process your information according to your institution's instructions and the terms of our contracts with your institution. Therefore how your information is used depends on your institution, so you should read your institution's privacy statement.

The following describes how your information is generally collected and used when we provide products and services to you on behalf of an institution. This Privacy Notice does not supersede the terms of any agreements between us and your institution (or any other client or third party), nor does it affect the terms of any agreement between you and your institution.

For your convenience we have organized our Privacy Notice into the following topics:

- Information Collection, Use, and Sharing
- Use of Email Addresses
- Registration
- Your Access to and Control Over Information
- Security
- Children's Privacy
- California Resident Privacy Rights
- Tracking Technologies
- Links
- Visiting this Website from Outside the United States
- Contact Information

Information Collection, Use, and Sharing

Your institution is the sole owner of the information collected on this website. In addition, your institution determines what information we collect through this

website, including during registration (see Registration section below for more information). We only have access to/collect information that you voluntarily provide. We will not sell or rent this information to anyone, and will only share and disclose this information as discussed below.

We use your information on behalf of and under the instruction of your institution. We use the information in accordance with our agreement with your institution to operate, maintain, and provide the features and functionality of this website. Your institution determines how your information is used. We will also use your information to respond to you, regarding the reason you contacted us.

We share your information in accordance with our agreement with your institution. Generally, this includes the sharing of data within and outside of InfoReady.

<u>Within InfoReady</u>. Your information will be accessed only by those who have a need to know to provide and maintain this website for your institution. For instance, our technical and customer support teams may have access to your information when we set up the product for your institution or when software or database changes are required for support and maintenance purposes.

<u>With your institution</u>. Much of the personal information we collect and use about you is shared with your institution. What information is shared depends on this website's functionality and settings, and the instructions of your institution. Please read your institution's privacy statement to learn more.

<u>Outside InfoReady</u>. We use vendors to help us provide this website to you on behalf of your institution and to perform other business, professional, or technical support functions for us. For example, RackSpace helps us host our websites. In addition, your institution may ask us to share information with additional outside parties or it may share your information further. Please read your institution's privacy statement.

<u>Other types of disclosures</u>. We will also share your information where required in the following circumstances.

• <u>Changes to our business structure</u>. Where permitted by applicable law and by the contracts with our clients, we may disclose your information in the following cases: (1) Corporate transactions such as a merger, acquisition, sale of assets, and financing; (2) Bankruptcy, dissolution or reorganization, or in similar transactions or proceedings; or (3) Steps related to (1) and (2) (for example, due diligence).

• <u>Comply with law</u>. We may need to disclose your information to comply with legal or regulatory requirements and to respond to lawful requests, court orders, and legal processes. We will always aim to limit the information we provide as much as possible. Where such disclosures relate to personal information we hold on behalf of our clients, we will defer such requests to our clients where permissible.

• <u>Enforce our rights, prevent fraud, and for safety</u>. We may need to disclose your information to protect and defend the rights, property, or safety of us, our clients, or third parties, including enforcing contracts or policies or in connection with investigating and preventing fraud.

• <u>De-identified information</u>. We may disclose aggregate or deidentified information that is no longer associated with an identifiable individual for research or to enhance and promote our products and services. For example, we may share aggregated or de-identified information with our partners or others for business or research purposes like partnering with a research firm or academics to explore how our products are being used and how such data can be used to enhance our functionalities and further help our clients and other educational institutions. We will implement appropriate safeguards before sharing information, which may include removing or hashing direct identifiers (e.g., your name, email address, and device ID).

Use of Email Addresses

Unless you ask us not to, we may contact you via email in the future to tell you about pertinent information or changes to this Privacy Notice. If you wish to stop receiving promotional emails, you may request discontinuation of email messages by clicking the "Unsubscribe" link on the e-mail you received. Please note that even if you opt out of receiving promotional communications, we may continue to send you non-promotional emails, such as those about your account.

Registration

In order to use this website, your institution may allow or require you to complete a registration form. During registration you are required to give certain information (such as name and email address). Your institution determines what information you are required to provide during the registration process. This information is used by your institution according to its privacy statement. It is also use by InfoReady to contact you as needed. At your option, you may also provide demographic information (such as gender or age) about yourself, but it is not required.

Your Access to and Control Over Information

You can do the following at any time by contacting us via the email address or phone number below:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

Security

We take precautions to protect your information. We employ a variety of physical, administrative, and technological safeguards designed to protect sensitive information against loss, misuse, and unauthorized access or disclosure. When

you submit sensitive information via this website, your information is protected both online and offline. Our security measures include data encryption, firewalls, data use, and access limitations for our personnel and vendors and physical access controls to our facilities. Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of this website.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment. However, no method of electronic transmission or storing of data is guaranteed to be 100% secure, and therefore, we do not guarantee that the information collected will never be accessed, used, or disclosed in a manner that is inconsistent with this Privacy Notice.

Children's Privacy

This website is not directed toward children under the age of 13. We do not knowingly collect information from children under the age of 13 without parental or guardian consent, or unless and until the relevant institution has provided consent and authorization for a child under 13 to use this website and for us to collect information from such child. Please contact us via the contact information provided below if you believe we may have collected such information without consent or other than in a manner authorized by law, and we will delete it.

California Resident Privacy Rights

If you are a California resident, California Civil Code Section 1798.83 allows you to request information on how we disclose personal information to third parties for their direct marketing purposes. To make such a request, please contact us by sending us an email to <u>Maurice@inforeadycorp.com</u>. Requests must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and zip code.

Tracking Technologies

Like most websites, this website gathers traffic patterns, web usage information (e.g., IP address, browser type and version) and information about a visit, including page response times, length of visits to certain pages, and page interaction information (such as searches, scrolling, clicks and mouse-overs).

We use "cookies" and "web beacons" on this website. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site. Usage of a cookie is in no way linked to any personally identifiable information on our site. Web beacons are small graphic images embedded in web pages and email messages. Web beacons may be used to count the number of visitors to the website, to monitor how users navigate the website, and to count content views.

We may use cookies for various purposes, including to recognize visitors to the website, determine the number of visitors to the website and ascertain which pages they visit, personalize user experiences and to generally serve you better. Cookies are also useful in allowing more efficient log-in for users and preserving information between sessions. The information collected from cookies may also be used to improve the functionality of the website.

You can adjust the settings in your browser in order to restrict or block cookies that are set by the website (or any other website on the Internet). Your browser may include information on how to adjust your settings. Alternatively, you may visit <u>www.allaboutcookies.org</u> to obtain comprehensive general information about cookies and how to adjust the cookie settings on various browsers. That website also explains how to delete cookies from your computer.

Links

This website contains links to other sites that are not maintained or related to InfoReady. These links are not sponsored by or affiliated with this website or InfoReady. Please be aware that we are not responsible for the content or privacy practices of such other sites. The links are accessed and used at your own risk, and we make no representations or warranties about the content, completeness or accuracy of these links, or the sites hyperlinked to this website. Third party websites that are accessible by hyperlinks from this website may use cookies and other tracking technologies. We encourage you to be aware when you leave this website and to read the privacy statements, terms and conditions, and their other policies of any other site that collects personally identifiable information before providing personally identifiable information to them.

Visiting this Website from Outside the United States

If you are visiting this website from outside of the United States, please be aware that your personal information may be transferred to, stored or processed in the United States, where our servers are located. The data protection and other laws of the United States and other countries might not be as comprehensive as those in the country from which you are visiting this website. By providing your information, you understand that it may be transferred to our facilities and to those third parties with whom we share it as described in this Privacy Notice.

Contact Information

If you have any questions, or feel that we are not abiding by this Privacy Notice, you should contact us immediately via telephone at (734) 929-0010 or via email at <u>Maurice@inforeadycorp.com</u>.

This Privacy Notice was last updated on June 13, 2018.