

## **Confidential Draft**

### **Workbuk.com Website Privacy Policy**

#### **1. Purpose of the Privacy Policy**

Workbuk.com (hereinafter will be referred as “the website”) is brought to you by VDPMAG TECHNOLOGY SOLUTIONS, LLC whose registered address is 245 Park Avenue 39th Floor, New York City, 10167, NY, USA (hereinafter will be referred as VDPMAG TECHNOLOGY SOLUTIONS, LLC or “we,” “our,” or “us”). This Privacy Policy describes the types of personal and non-personal information we collect on the website, how we use such information and to whom and under what circumstances we may disclose it. By using the website, you agree to the collection, use and disclosure of your information as described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, you shall not use the website.

#### **2. Methods of Collecting Information**

##### **2.1. The Information Submitted by You**

The data such as your name, email addresses, mailing addresses, telephone numbers, and certain information related to the business you represent may be collected on the website when you request information, subscribe to or order a product or service, register as a user, respond to an online survey or otherwise actively send us data. If we charge for services or products, we will also collect payment information such as credit card number and related verification information, phone number, and billing and shipping addresses. By actively submitting the information, you will have a full knowledge in what data we collect through the website.

##### **2.2. The Information Collected Through Standard Operation of the Website**

As part of the standard operation of the website, we may collect information from your computer or device, including but not limited to your browser type, operating system, IP address and the domain name from which you accessed the website, and if you are accessing our website with your mobile device, type of mobile device. In addition, we may collect information about your browsing behavior, such as the date and time you visit the website, the areas or pages of the website that you visit, the amount of time you spend viewing the website, the number of times you return to the website and other click-stream data.

##### **2.3. Cookies and Other Technologies**

Cookies" are small text files sent from a Site to the hard drive of a user's computer to

store bits of information related to that user. Cookies can store information about users, including IP addresses, navigational data, server information, data transfer times, user preferences, and passwords needed to access the special areas on the Site. We may use cookies to collect the information described above. We may also use cookies to: (1) provide you with customized content; (2) monitor website usage; (3) remember you when you return to the website; and (4) conduct research to improve our content and services.

You may configure your Internet browser, using the "help" function, to be notified when a cookie is sent (giving you the option to decide whether to accept it or not), and to reject cookies or remove cookies. However, if you reject or remove cookies, you might not be able to access certain pages or use important functions on the Site, including downloading documents and establishing a user profile.

The website also uses Internet Protocol (IP) addresses and log files to identify server problems. We also use beacons to perform standard Site traffic analysis in a manner similar to how we use cookies. In particular, we utilize, to the extent allowed under applicable law, Google Analytics services to track Site usage for statistical purposes. VDPMAG TECHNOLOGY SOLUTIONS, LLC also reserves the right to introduce new passive tracking technologies and techniques related to the use of the website, although we will do so subject to and in accordance with applicable data protection laws and regulations.

### **3. Use of Information**

We may use the information we collect from and about you for any of the following purposes;

- (a) for account verification and to fulfill your requests for products and services;
- (b) to contact you with information and promotional materials and offers from our company as well as from our subsidiaries, affiliates, marketing partners, advertisers and other third parties;
- (c) to contact you when necessary;
- (d) to review website usage and operations;
- (e) to address problems with the website, our business or our products and services;
- (f) to protect the security or integrity of the website and our business; and
- (g) otherwise, as we disclose to you at the point of information collection.

#### **4. Where We Store and Process Data**

We store and process the data in the cloud across multiple data centers (ie. Ireland) globally.

#### **5. Disclosure of Information**

We use, disclose, transfer and otherwise process Personal Information in several ways. When you place an order online, we use the Personal Information you provide, including the credit/debit card or payment information, to provide the products or services requested. If you create a user profile, we will store your Personal Information as requested to manage your profile. If you later decide that you do not want us to store such information, you may ask us to delete the Personal Information in your profile by sending an e mail to [privacy@workbuk.com](mailto:privacy@workbuk.com). VDPMAG TECHNOLOGY SOLUTIONS, LLC also may disclose and transfer Personal Information to IT providers, fulfillment houses, and other subcontractors that assist with the operation of the website and/or the associated business transactions, which may be located within any country, including countries which may not offer a level of protection equivalent to the country in which you are located. All such parties will be required to keep Personal Information secure and only process it in accordance with our instructions.

Personal Information may also, subject to the requirements of applicable law, be used, disclosed and transferred to law enforcement personnel and other persons in situations where we believe that it is necessary to identify, contact, or bring legal proceedings against someone who may be misusing the website, using the website without proper authorization, interfering with the rights of VDPMAG TECHNOLOGY SOLUTIONS, LLC, or when VDPMAG TECHNOLOGY SOLUTIONS, LLC reasonably believes that the law requires such disclosure.

We may also disclose and transfer Personal Information, subject to the requirements of applicable law, where necessary or appropriate to protect the security of the website, to protect VDPMAG TECHNOLOGY SOLUTIONS, LLC and our affiliated companies against liability, and/or in connection with the sale or transfer of all or part of the business. In addition, the information may be used and disclosed to verify your compliance with the Workbuk Website Terms of Use. We may also share your personal information where you have granted us permission, and we reserve the right to fully use and disclose any information collected via the website that is not in personally identifiable form.

#### **6. Information Disclosed at Forums and Blogs**

In order to participate in interactive features on the website such as, forum, blog, or other interactive feature that allows you to disclose information directly to us and other users of

the website, we may require you to register with us and provide certain information such as your name, email address, location, phone number, and desired display name (which may be viewable by other users of the interactive features). You shall acknowledge that your participation in such interactive features is completely voluntary and we assume no obligations or responsibility with respect to the information you provide or share through such interactive features. If you personalize our interactive features by voluntarily providing additional information such as your location, instant message contact information, website address, occupation, age, and other information, or upload avatars or pictures of yourself, you hereby acknowledge that you voluntarily provide such additional information, and it may be viewable by other users of the interactive features. Hence, you shall not provide information you do not want other users to know.

## **7. Security**

We have taken reasonable physical, electronic, contractual, and managerial steps to safeguard and secure the information we collect from you. You hereby shall acknowledge that no method of transmission over the Internet, or method of electronic storage, is 100% secure although we take all reasonable steps. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. If you register on our website or for our services, you hereby agree that it is your responsibility to protect the security of your login information. If you supply financial information as part of completing a transaction, we will encrypt the transmission of that data.

## **8. Links to Other Internet Sites**

The privacy practices set forth in this Privacy Policy are for this website and other specified activities only. Other Sites hosted by third parties may have different practices. If you link to or otherwise visit any other Sites managed by third parties, please review the privacy policies posted at those sites. VDPMAG TECHNOLOGY SOLUTIONS, LLC has no control over those Sites and is not responsible or liable for the policies and practices followed by third parties.

## **9. Retention of Data**

VDPMAG TECHNOLOGY SOLUTIONS, LLC will keep your Personal Information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by applicable law.

## **10. Revisions to this Privacy Policy**

We reserve the right to change this Privacy Policy from time to time in our discretion. Please check this Privacy Policy frequently and particularly before you submit additional Personal Information via the website. All revisions to this Privacy Policy will be posted on the website via a link from the home page. In the event that we change a significant or material term in this Privacy Policy, we will notify affected visitors by revising the link on the home page to read "Revised Privacy Policy."

## **11. Children's Online Privacy Protection**

VDPMAG TECHNOLOGY SOLUTIONS, LLC complies with the Children's Online Privacy Protection Act and does not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register. If you are under 13, please do not send any information about yourself to us, including your name, or email address. No one under age 13 is allowed to provide any personal information to or on workbuk.com. If you are the parent or legal guardian of a child under 13 who has registered on workbuk.com, then please contact VDPMAG TECHNOLOGY SOLUTIONS, LLC at [privacy@workbuk.com](mailto:privacy@workbuk.com) to have that child's account terminated and information deleted.

## **12. Governing Law and Dispute Resolution Body**

This Privacy Policy shall be governed by, and construed in accordance with the laws of the State of New York and any related Federal Law. In case of any dispute, the Parties shall first pursue amicable settlement. If they cannot settle the dispute, they hereby agree to submit the dispute to the exclusive jurisdiction of state and federal courts of the State of New York.

## **13. Effective Date**

This Privacy Policy becomes effective when it is posted on the website for public access.