

# OSHIFY Website Privacy Policy

*Last updated: June 1, 2022*

We don't sell your personal information, but we still have to tell you what we collect from you when you access or use our websites and how we use it. We may update this policy from time to time. Your continued use of this site indicates your agreement to the updated terms.

If you are a resident of **California**, our **CCPA Privacy Policy**, found below, also applies to you.

If you are under 13 years of age, please do not access or use our website. We do not knowingly collect or maintain personal information from people under 13, and if we find out that personal information of people under 13 has been collected on or through our website, we will delete it.

## 1. What Personal Information Do We Collect?

Depending on how you interact with our website, we may collect the following personal information about you, which we have grouped together as follows:

- **Identity Data**, which may include your first name, last name, and title.
- **Contact Data**, which may include your postal address, email address, and telephone numbers.
- **Financial Data**, which may include your payment card details and billing address.
- **Profile Data**, which may include username and password, purchases made by you, and customer service requests.
- **Technical Data**, which includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, and operating system and platform.
- **Usage Data**, which includes information about how you use our website.
- **Marketing and Communications Data**, which includes your preferences in receiving marketing and non-marketing communications from us.
- **Employment Data** – if you apply for employment with OSHIFY, we will collect your employment and work history, as well as personal information related to your potential employment. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.

## 2. How Do We Collect Personal Information?

We may collect personal information about you from the following sources:

- **From you**, such as when you subscribe to our publications, purchase an item, request marketing to be sent to you, enter a promotion, complete a survey, or correspond with us by any means. As you interact with our website, we will also automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- **Publicly available sources**, such as information that you or your organization make publicly available online.

### 3. How We Use Personal Information

We have set out below a description of the purposes for which we may use personal information. For each purpose, we identify the groups of personal information we use for that purpose (please refer to Section 1 above).

Purposes of Use	Group of Personal Information Concerned
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>(a) Communicating with you about our services, including notifying you about changes to our terms or privacy policy</li> <li>(b) Asking you to take a survey</li> <li>(c) To process and deliver customer orders;</li> <li>(d) to manage payments, fees and charges</li> <li>(e) To communicate about our goods and services and provide customer service</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and Communications</li> <li>• Financial</li> <li>• Profile</li> </ul>
<ul style="list-style-type: none"> <li>• To enable you to participate in a recognition program, competition or complete a survey</li> <li>• To understand what may be of interest to you, deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you, in accordance with applicable law</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Profile</li> </ul>
<ul style="list-style-type: none"> <li>• To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</li> <li>• To detect, prevent, or otherwise address fraud or security issues</li> <li>• To comply with legal obligations that apply to us, monitor and ensure compliance with our terms, and defend our legal interests in the event of a potential dispute</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Financial</li> <li>• Profile</li> </ul>
<input type="checkbox"/> To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> <li>• Profile</li> </ul>
<input type="checkbox"/> To defend our interests in the event of a dispute and comply in good faith with applicable laws, legal processes, and lawful government requests	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> </ul>
<input type="checkbox"/> To intake and assess your employment application and to contact you regarding the hiring process	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Employment</li> </ul>

#### 4. With Whom Do We Share Personal Information?

We may share your personal information with the following categories of third parties:

- **Our Service Providers:** We may transfer your personal information to our service providers, some of which may include our affiliates, as necessary for them to provide services to us in connection with our fulfillment of the purpose set out above. For example, we may rely on service providers to host and maintain our website, perform backup and storage services, process payments, collect debts, provide customer service, transmit communications, deliver products and prizes, and perform analytics services. Our service providers are located and process personal information in the following countries: United States and United Kingdom.
- **Government Agencies, Regulators and Professional Advisors:** Where permitted or required by applicable law, we may also need to transfer your personal data to government agencies and regulators (e.g., tax authorities, courts, and government authorities) to comply with our legal obligations, and to external professional advisors as necessary to defend our legal interests.
- **Organizations Involved in Business Transfers:** In the event of a merger, reorganization, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, will be transferred to the surviving entity in a merger or the acquiring entity. Such information will be transferred in accordance with applicable law.

#### 5. How Do We Protect Personal Information?

We maintain physical, administrative and technological safeguards intended to prevent personal information from accidental or unauthorized loss, alteration access or use. We have put in place procedures to deal with any suspected breach of personal information and will notify individuals and any applicable regulator of a breach where we are legally required to do so.

#### 6. Your Privacy Rights

Under applicable laws, you may have rights to access, update, rectify, port or erase certain personal information that we have about you or restrict or object to certain activities in which we engage with respect to your personal information. If you have such rights and your request complies with the requirements under applicable laws, we will give effect to your rights as required by law.

To exercise any rights you may have under applicable privacy laws, please contact us using the details in the “Contact Us” section below. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### 7. Links to Other Websites

Our website may contain links to other websites, which may have privacy policies or notices that differ from ours. We are not responsible for the collection, processing or disclosure of personal information collected through other websites. We are also not responsible for any information or content contained on such websites. Links to other websites are provided solely for convenience. Your usage and browsing on any such website is subject to that website’s own policies. Please review the privacy notices posted on other websites that you may access through our website. We may provide you with additional or different privacy notices in specific instances which describe how your personal information is collected and used for a specific service.

## **8. Contact Us**

You may contact us using the following details:

Email address: [legal@oshify.com](mailto:legal@oshify.com)

## **SUPPLEMENTAL CCPA PRIVACY POLICY**

*Last updated June 1, 2022*

As mentioned in our other privacy disclosures, we don't sell your personal information, but the privacy laws of California, including the California Consumer Protection Act of 2018 ("**CCPA**"), require us to provide some information about our data processing practices to California residents.

If you are a resident of California and not part of our workforce, this Supplemental CCPA Privacy Policy applies to you. However, this Privacy Policy does not reflect our collection, use or disclosure of California residents' personal information where an exception under the CCPA applies.

### **1. Your Personal Information: Right to Know, Request Deletion, and Opt-Out**

As a California resident, you have the right to request that we disclose what PI we collect, use, and disclose about you specifically ("**right to know**"), and the right to ask that it be deleted. To submit a request to exercise the right to know or to delete, please submit a request, with the details you would like to know or delete, by email to [legal@oshify.com](mailto:legal@oshify.com).

We may need to verify your identity, and/or ask you to confirm your request. If we deny your request, we will explain why.

You also have the right to opt-out of the sale of your personal information by a business. We do not sell personal information, so there is no need to opt-out. We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

### **2. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights**

You have a right not to receive discriminatory treatment by us for the exercise of your privacy rights under the CCPA.

### **3. Right to Be Informed of Financial Incentives**

We do not currently offer any financial incentives in exchange for the retention or sale of California residents' personal information.

### **4. Authorized Agent**

You can designate an authorized agent to make a request under the CCPA on your behalf if your authorized agent is a natural person or a business entity registered with the Secretary of State of California, and you sign a written declaration that you authorize the authorized agent to act on your behalf. If you use an authorized agent to submit a request under the CCPA, please have the authorized agent take the following steps in addition to the steps described in Section 1 above: (1) Mail a notarized copy of your written declaration authorizing the agent to act on your behalf to the address listed below (we will reimburse you for the costs of notarizing the declaration and mailing it to us if you provide a receipt showing the costs paid and they are reasonable); and (2) Provide any information we request from you to verify your identity and that you provided the authorized agent permission to submit a request under the CCPA on your behalf.

## 5. What we Collect

### *Collection of Personal Information*

We have set out below the categories of personal information we have collected about California residents in the past 12 months as well as the sources, business or commercial purposes, and categories of third parties with whom we shared the personal information. We collect this information directly from California residents who use our website or subscribe for our services. If a California resident uses their organization's OSHIFY subscription, we may collect some of this information from their organization. We may also collect some information about a California resident's interests and preferences from a third-party source where they or their organization make such information publicly available, such as on their organization's public website.

Category of personal information	Corresponding reference to category of personal information under CCPA definition of personal information (Cal. Civ. Code § 1798.140(o)(1))	Business or commercial purposes for which information was collected	Category of third parties with whom we shared the personal information
Name Title Username or similar identifier  Account Password Delivery/service address  Email address Telephone number  Details of products and services customers have purchased from us  Customer service requests, interests, preferences, feedback and survey responses	(A) Name (A) Name (A) Unique personal identifier (B) Signature (A) Postal Address   (A) Email address (B) Telephone number (D) Records of products or services purchased (D) Commercial information (D) Tendencies (H) Electronic information	<ul style="list-style-type: none"> <li>To process and deliver customer orders</li> <li>To manage payments, fees and charges</li> <li>To manage our relationship with customers, such as communicating with them about our goods and services, providing customer service, and notifying them of changes to our terms or privacy policy</li> <li>To administer and protect our business and services, including troubleshooting, and performing data analysis, testing, system maintenance, support, reporting and hosting of data</li> <li>To detect, prevent, or otherwise address fraud, security or technical issues, including by monitoring and enforcing compliance with our terms of use,</li> </ul>	Service providers that process personal information solely on our behalf and which are subject to data security measures

		<p>appropriate use policies, and privacy policies</p> <ul style="list-style-type: none"> <li>• To defend our interests in the event of a dispute</li> <li>• To comply in good faith with applicable laws, legal processes, and lawful government requests</li> <li>• To understand what may be of interest to a customer</li> <li>• To deliver relevant news, offers and other content to a customer and measure and understand the effectiveness of the content</li> <li>• To ask and enable a customer to take a survey</li> </ul>	
<p>Billing address</p> <p>Payment card details</p>	<p>(B) Financial information</p> <p>(B) Credit card number, debit card number</p>	<ul style="list-style-type: none"> <li>• To process and deliver customer orders;</li> <li>• To manage payments, fees and charges</li> <li>• To manage our relationship with customers</li> <li>• To administer and protect our business and services</li> <li>• To detect, prevent, or otherwise address fraud or security issues</li> <li>• To defend our interests in the event of a dispute and comply in good faith with applicable laws, legal processes, and lawful government requests</li> </ul>	Same as above
<p>Website technical data, which includes the following information about users of our online portal and services: Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and the ways in which the user uses or interacts with our online portal and services.</p> <p>Customer technical data, which includes data about throughput delivered to a customer over time, service connectivity, latency, quality metrics, sky obstruction</p>	<p>(A) Internet Protocol address</p> <p>(F) Internet or other electronic network activity information</p>	<p>Same as above, and:</p> <p><input type="checkbox"/> To use data analytics to debug, optimize, and improve our products and services, marketing, customer relationships and experiences</p>	Same as above

<p>data, device orientation and location, WiFi quality metrics, WiFi device information, and the public IP address information assigned to a customer over time.</p> <p>Hardware and network technical data, which includes data about the performance of user terminals and other hardware and software that we provide to customers, including data about the usage of such hardware and software, and their temperatures, power usage, signal strength, throughput, orientation, location, and software version information.</p>			
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## 6. Contact for More Information

If you have questions or concerns regarding our privacy policy or practices, you may contact us:

Email address: [legal@oshify.com](mailto:legal@oshify.com)