

Privacy Notice

Last updated: September 15, 2023

This Privacy Notice applies to our website (“**Website**”) and iPro Retailer and Wholesaler Portal online application (“**App**”) (collectively, the “**Services**”). This Privacy Notice describes how iPro Systems, LLC and its Affiliates (hereinafter: “**iPro**”, “**we**”, “**us**”, or “**our**”) process your Personal Data, including our policies and procedures on the collection, uses, and disclosure of your Personal Data when you use the Services. It also explains how your Personal Data is protected and what choices you have relating to your Personal Data.

If you do not agree with any portion of this Privacy Notice, you should not use the Services. We may update or modify this Privacy Notice at any time by posting the updated version including the effective date of the updated version. Please review this Privacy Notice periodically for any updates or changes. Your continued use of our Services is considered your acceptance of these terms, and you agree to the terms of this Privacy Notice and the collection and use of information in accordance with this Privacy Notice.

If you have any questions about this Privacy Notice, the processing of your Personal Data by iPro, please contact us at info@iprosystems.com.

Scope of Services

This Privacy Notice applies only to information collected through the Services and not to information collected offline or through any other means. iPro’s business partners, ad networks, and other third parties have their own websites and privacy practices. We encourage you to read the privacy notices of all websites you visit to understand their privacy practices and your options.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using our Services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. “Personal Data” is information that identifies, relates to, describes, can reasonably be associated with, or can reasonably be linked to a particular individual or household. We may collect Personal Data that you provide to us when you interact with our Services. Personal Data may include, but is not limited to:

Category	Data Types
Identifiers	Your name, email address, current job title/position and company name, and telephone number.
Interactions	Records of information you post or otherwise submit to the Services, including emails or other correspondence with you including information about your questions, complaints, or disputes
Internet / Electronic Network Activity	Data about your device’s location, which is inferred from your internet connection data, your IP address, and your postal

Category	Data Types
	address, or which you may choose to allow us to access by granting the Services access to your location when prompted.
Third-Party Social Networking Service(s)	If you choose to access, visit, and/or use any third-party social networking service(s) that may be integrated with the Services, we may receive your Personal Data and other information about you and your computer, mobile, or other device that you have made available to those social networking services, including information about your contacts through those services. Some social networking services will facilitate registration or enhance or personalize your experience on the Services. This includes if you “follow,” “like,” or link your social networking account to the Services. Your decision to use a social networking service in connection with the Services is voluntary. However, you should make sure you are comfortable with the information your third-party social networking services may make available by reviewing privacy policies of those providers and/or modifying your privacy settings directly with those networking services.

Use of Your Personal Data

iPro may use Personal Data for the following purposes:

<u>Categories of Information</u>	<u>Description of Category</u>	<u>How We Use Your Information</u>
Account Registration Information	<p>You do not have to register for an account to browse the Website. You must register for an account to access the App. This includes your name and email address and may include your business address and phone number.</p> <p>Some of the Personal Data we will ask you to provide is required in order to create your account.</p>	<ul style="list-style-type: none"> • To enable you to login and access your account and the App. • To provide you with information or services that you request from us. • To notify you about changes to the Services or any products or services we offer or provide through the Services. • To create, maintain and personalize you experience with the Services. • To communicate with you for Services-related purposes. • To check on your account status and maintain records of activities in connection with your use of the Services.

		<ul style="list-style-type: none"> • To contact you with newsletters, marketing, or promotional materials and other information that may be of interest to you. • To enforce our agreements, terms, conditions and policies.
Customer Service Information	This includes any information that you choose to provide, whether by phone, email, mail, or chat, to our customer service representatives or other iPro employees.	<ul style="list-style-type: none"> • To provide, maintain, operate, personalize and improve the Services. • To evaluate and improve the content of the Services. • To respond to your questions and requests. • To provide customer support. • To allow you to participate in interactive features of the Services when you choose to do so.
Social Media Platform Data	If you choose to access, visit, and/or use any of our pages on social media platforms such as Facebook, Twitter, or LinkedIn (" <u>Social Media Platforms</u> "), we may receive aggregate information and analysis about visitors' usage of our pages on such Social Media Platforms. You may choose to provide Personal Data through Social Media Platforms, including without limitation your name, phone number, or address when you communicate with us on the Social Media Platforms, post suggestions or comments for us, or through other such interactions on the Social Media Platforms.	<ul style="list-style-type: none"> • To respond to your questions and requests. • To provide customer support. • To gather analysis and assess trends and interests.
Third Party Data	This includes both Personal Data and non-personally identifiable data from our affiliates, customers, partners	<ul style="list-style-type: none"> • To provide, maintain, operate, personalize, and improve the Services.

	<p>or vendors, data brokers or public sources.</p>	<ul style="list-style-type: none"> • To monitor the usage of the Services. • To gather analysis and assess trends and interests. • To work with our service providers who perform certain business functions or services on our behalf.
<p>Usage Information</p>	<p>This can be Personal Data and non-Personal Data that is collected about you when you are using the Services, and this may include:</p> <ul style="list-style-type: none"> • Information about your interactions with the Services, which includes the date and time of any information you enter into the Services and your interactions with other users of the Services and what content or features you interacted with. • Technical data which may include URL information, cookie data, web beacons, web pixels, clickstream information collection, and other tracking technology information, your IP address, the types of devices you are using to access or connect to the Services, unique device IDs, device attributes, network connection type (e.g., WiFi, 3G, LTE, Bluetooth) and provider, network and device performance, browser type, language, and operating system. Further details about the technical data that is processed by us can be found below. 	<ul style="list-style-type: none"> • To improve our content and the products, services, materials, and other content we make available through the Services. • To optimize the display of the Services on your device. To create, maintain and personalize your account with us. • To provide, maintain, personalize, and improve the Services. • To provide customer support. • To monitor the usage of the Services. • To allow you to participate in interactive features of the Services when you choose to do so. • To gather analysis and assess trends and interests. • To enforce our agreements, terms, conditions, and policies. • To detect, prevent, and address technical issues. • To prevent or investigate fraud. • To provide you with advertising content in which we think you will be interested. As part of this customization, we may

		<p>observe your behaviors on the Services or on other websites.</p> <ul style="list-style-type: none">• To help maintain the safety, security, and integrity of the Services and technology assets.• To investigate complaints and potential violations of our policies.
Anonymized Information	<p>We use anonymized and aggregated information that may be created or derived from your Personal Data or usage of the Services for purposes that include data analysis, improving the Services, advertising, and developing new features and functionality within the Services.</p>	<ul style="list-style-type: none">• To provide, maintain, personalize, and improve the Services.• To monitor the usage of the Services.• To prevent or investigate fraud.• To gather analysis and assess trends and interests.• To conduct aggregate or research analysis to enhance, protect, and make informed decisions on the Services.• To detect, prevent, and address technical issues.• To enforce our agreements, terms, conditions, and policies.• To help maintain the safety, security, and integrity of the Services and technology assets.• To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about our Service users is among the assets transferred.

We may share your Personal Data in the following situations to be processed by persons working for or on behalf of iPro on a need-to-know basis for the purposes described in this Privacy Notice:

- **With Service Providers:** We may share your personal information with Service Providers to monitor and analyze the use of our Services, to contact you. "Service Provider" means any natural or legal person who processes the data on behalf of iPro. It refers to third-party companies or individuals employed by iPro to facilitate the Services, to provide the service on behalf of iPro, to perform services related to the Services or to assist iPro in analyzing how the Services are used.
- **For business transfers:** We may share or transfer your Personal Data in connection with, or during negotiations of, any merger, sale of iPro assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** We may share your information with our Affiliates, in which case we will require those affiliates to honor this Privacy Notice. "Affiliate" means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority. Affiliate(s) include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with iPro.
- **With business partners:** We may share your information with our business partners to offer you certain products, services or promotions.
- **With other users:** When you share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With your consent:** We may disclose your Personal Data for any other purpose with your consent.

Retention of Your Personal Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Notice. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Information for internal analysis purposes. Usage Information is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer time periods.

Security of Your Personal Data

The security of your Personal Data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. The Services incorporate reasonable safeguards to protect the security, integrity, and privacy of the Personal Data we have collected. We have put in place reasonable precautions to protect information from loss, misuse, and alteration, including logically and physically securing our equipment and encrypting our connections and certain equipment. While we strive to use

commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Children's Privacy

The Children's Online Privacy and Protection Act of 1998 ("**COPPA**") defines a "Child" (or "Children" as used herein) as anyone under the age of 13. iPro strictly adheres to COPPA. For that reason, we do not collect or maintain information obtained through the Services from those we actually know are under 13, and no part of the Services are structured to attract anyone under 13. By using the Services, you represent that you are at least 13 years old. If you do not meet this age requirement, then you must not access or use the Services.

If you are a parent or guardian and you are aware that your Child has provided us with Personally Identifiable Information or Personal Data, please contact us through one of the methods listed under "Contact Us", below. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take reasonable steps to remove that information from our servers.

For more information about COPPA, which applies to websites that direct their services to children under the age of thirteen (13), please visit the Federal Trade Commission's website <https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions>.

Links to Other Websites

Our Services may contain links to other websites that are not operated by us and that we do not control. If you click on a third party link, you will be directed to that third party's site. Each of these linked sites maintains its own independent privacy and data-collection policies and procedures. We strongly advise you to review the Privacy Notice of every site you visit, as iPro cannot be responsible for the actions of third parties.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Notice

We may update this Privacy Notice from time to time. We will notify you of any changes by posting the new Privacy Notice on this page. We will let you know via a notice on our Website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Notice. You are advised to review this Privacy Notice periodically for any changes. Changes to this Privacy Notice are effective when they are posted on this page.

This Privacy Notice and the use of the Services are governed by Tennessee law. Any claim related to the Services or this Privacy Notice shall be brought in a federal or state court in Sumner County, Tennessee, within one year after the claim arises. You consent to the sole and exclusive jurisdiction and venue of such courts as the most convenient and appropriate for the resolution of disputes concerning this Privacy Notice. This Privacy Notice are not intended to and do not create any contractual or other legal rights in or on behalf of any third party.

Acknowledgement

To the extent that you provide or transmit any information, including, but not limited to, any Personal Data and any information that identifies any other individual (including without limitation name, email address and/or telephone number), to iPro or our third-party service or data providers, licensors, or distributors (“**Representatives**”) through the Services, you warrant that (a) you are providing or obtaining only your own information or the information of others which you are authorized to provide to third parties and/or obtain from third parties on their behalf; and (b) the use of such information by iPro will not infringe upon or misappropriate the intellectual property rights or otherwise violate the rights of any third parties.

Contact Us

If you have any questions about this Privacy Notice, you can contact us:

By email: info@iprosystems.com

By visiting this page on our website: <https://www.iprosystems.com>

By phone number: 888.859.8937