

# PRIVACY STATEMENT

Probacted Privacy Statement Last Updated: August 1st 2020

At Probacted, we pride ourselves on our commitment to protecting your privacy. Our data Stewardship Principles reflect our company's values and how we strive to maintain your privacy. This Privacy Statement describes in greater detail the privacy practices of Probacted, and its affiliates and subsidiaries, meaning companies related by common ownership or control ("us," "we," "our") responsible for collecting and maintaining certain information collected about you. If you have questions or complaints regarding our Privacy Statement or practices, please contact us as detailed under the How to Contact us heading below.

## **1. WHEN THIS PRIVACY STATEMENT APPLIES**

If a Service you're using links to this Privacy Statement, this Statement applies to you. This Privacy Statement ("Statement") applies to our sites, products, and services (collectively, "Services") that link to this Statement. Probacted is the responsible entity for all Personal Information subject to this Privacy Statement for our Services targeted to US customers.

## **2. WHAT WE DO WITH YOUR INFORMATION**

We want to be clear about what information we collect and how we use it to deliver our Services to you, improve your financial life, operate our business, and help make our Services useful, more intelligent, and work better for you. We do not sell or share your Personal Information with third parties for their own commercial uses without your consent.

### **a) Types of Information We Collect**

In connection with accessing our Services, we may collect information from you which can be used to identify you ("Personal Information"), such as your name, shipping/billing address, email address, phone, username and password.

We collect information when you register or open an account, sign in, pay a bill, purchase a Service, use a Service, call us for support, or give us feedback. We may also get information from other companies or third parties, such as when you sync a third party account or service with your Probacted Service, or when we may use service providers to supplement the Personal Information you give us (e.g., validate your mailing address) to help us maintain the accuracy of your data and provide you with better service. Finally, we also collect content or other information that you may provide or create when you interact with our Services.

We may also automatically collect certain usage information when you access our Services ("Usage Data"), such as Internet Protocol ("IP") addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP

addresses from users when they log into the Services as part of our log-in and security features. We may also, when you enable location-based Services, collect Global Positioning System (GPS) location data and/or motion data.

Our Services may change over time and we may introduce new features that may collect new or different types of information.

## **b) How We Use Your Information**

Unless prohibited by law, regulation, or a contractual obligation, we may use your information, including your Personal Information, for the following purposes:

### *Account Registration*

We may use your name, address, phone number, and email address to register your Probacked Account for certain Services we provide and to communicate important information to you. We may obtain additional Personal Information about you, such as address change information, from commercially available sources, to keep our records current. If you set up an administrator account that may be accessed by people other than you, please note that they may see and have the ability to change or delete your Personal Information.

### *Communicate With You and Tell You About Other Services*

We may use your information to communicate with you about our services and to give you offers for third party products and services that we think may be of use to you. Please see below under "What You Can Do to Manage Your Privacy" for the choices you have regarding these communications.

### *To Improve Services and Develop New Services*

We will use your information to personalize or customize your experience and the service, develop new features or services, and to improve the overall quality of Probacked's Services.

### *To Provide Our Services And Operate Our Business.*

We may use your information to operate our business, including providing services you requested, provide you with support related to our services, and to help us protect our Services, including to combat fraud and protect your information.

### *Customer Service and Technical Support*

We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration to resolve questions you may have about our services and to follow up with you about your experience. We also offer various internet chat services, for example, to speak with a Probacked support representative or legal advisor. Internet Chat transmissions are encrypted but you should not supply more personal information, including legal data, than is required to address your specific issue. A transcript of the session is retained to resolve questions or issues related to our Services.

### *Feedback*

We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional.

### *Research, Including Publishing or Sharing Anonymized Combined Information from Many Users, But Only in a Way that Would Not Allow You or*

### Any Other Person to be Identified

Only in a way that would not allow you or any other person to be identified, we may prepare and share information about our customers with third parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our customers who use mobile services or who use a particular operating system. We or our third party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you or any other person to be Identified.

### **c) Probacked Single Sign-On (Probacked Account)**

Probacked Single Sign-On is a Service that allows you to sign-in to a variety of Probacked Services with a single Probacked Account. We will collect certain information for security purposes in order to verify your authorized access to an account or to reset your password if you cannot access your Probacked account. Some Services may require added security and you may be asked to provide additional information. The email address and password that you use to sign up for a Probacked account are your "credentials" that you will use to authenticate with our network. We assign a unique ID number to your credentials to track you and your associated information. Probacked Services do not allow sharing of accounts between users or individuals.

### **d) How We Share Your Personal Information**

From time to time, we may need to share your Personal Information with others.

#### Third Party Service Providers

We may share your information, including Personal Information and Usage Data, with third party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics. Our contracts with these third parties require them to maintain the confidentiality of the Personal Information we provide to them, only act on our behalf and under our instructions, and not use Personal Information for purposes other than the product or service they're providing to us or on our behalf.

#### Protection of Probacked and Others

We may share account information, Personal Information and Usage Data when we believe it is appropriate to enforce or apply our products' Terms of Service and other agreements; or protect the rights, property, or safety of Probacked, our Services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and legal risk reduction. This does not include selling, renting, sharing, or otherwise disclosing Personal Information of our customers for commercial purposes in violation of the commitments set forth in this Privacy Statement.

#### Reporting Legal Information

We may need to share information about you with other companies, lawyers, firms, agents and government agencies in connection with legal requirements or to properly help you and your case.

#### Information Sharing Between Probacked Entities

We share your information, including your Personal Information, with and among our affiliates and subsidiaries, except where prohibited by law, regulation, or a contractual obligation. The protections provided in this Privacy Statement apply across all Probacked entities. Affiliates and subsidiaries means companies related by common ownership or control. We will also share your information in order for us to be able to offer our products and services to you. If we sell, merge, or transfer any part of our business, we may be required to share your information. If so, you will be asked if you'd like to stop receiving promotional information following any change of control.

#### *With your Consent*

Other than as set out above, we will provide you with notice and the opportunity to choose when your Personal Information may be shared with other third parties.

### **3. WHAT YOU CAN DO TO MANAGE YOUR PRIVACY**

You can view and edit information that identifies you online through your Probacked Service. How you can access and control information that identifies you will depend on which Services you use. You have a choice about the use of information that identifies you, marketing communications you receive from us, and our use of cookies and other tracking technologies.

#### **a) Managing Marketing Communications From Us**

We will honor your choices when it comes to receiving marketing communications from us. You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive: Click the "unsubscribe" link in the email or newsletter you received or visit the Marketing Preferences Center. For SMS messages, reply "STOP" or follow the instructions in the message or settings to discontinue the Service. Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

#### **b) Updating Your Personal Information**

In connection with your right to manage your Personal Information you provide to us, you may access, update, change, correct or request deletion of your information either through the Service or through our customer support. You can reach our customer support by using the contact information provided in the "How to Contact Us" section of this statement.

#### **c) Cookies and Similar Tracking Technologies**

The following is a high level summary of our practices and your controls for cookies and other tracking technologies. For more information, please see our Cookies Policy. In accordance with applicable law, Probacked and our service providers may use commonly-used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Service you requested. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers' experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings. Please note that even if you opt-out of such Cookies or

otherwise opt-out of interest based advertising, you may still receive advertisements, they just won't be tailored to your interests. Also, if you opt-out and later delete your Cookies, use a different browser, or buy a new computer, you may need to renew your opt-out choices.

#### **d) Do Not Track**

Like most other companies, our Services are not currently configured to respond to browsers' "Do Not Track" signals because at this time no formal "Do Not Track" standard has been adopted. Click here for more information on "Do Not Track."

#### **e) Social Media Features**

Many of our Services may use social media features, such as Facebook sharing ("Social Media Features"). These features may collect your IP address and which page you are visiting within our Service, and may set a cookie to enable the feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy statement of the company providing the relevant Social Media Features.

### **4. DATA RETENTION AND YOUR ACCESS RIGHTS.**

#### **a) Data Retention**

In accordance with and as permitted by applicable law and regulations, we will retain your information as long as necessary to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and Probacked's records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements and complete any outstanding legal requirements.

#### **b) Your Access Rights**

If you have created an online account with us and would like to update the Personal Information you have provided to us, you can access your account to view and make changes or corrections to your Personal Information. EU individuals and Swiss individuals have certain rights to access Personal Information about them, and to limit use and disclosure of their Personal Information. Probacked has committed to respect those rights. If you wish to request access, to limit use, or to limit disclosure, please contact us at [privacy@probacked.com](mailto:privacy@probacked.com) or the mailing address provided under "How to Contact Us" and please provide the name of the Probacked customer who submitted your Personal Information to our services. We will refer your request to that customer, and will support them as needed in responding to your request.

### **5. SECURITY OF YOUR INFORMATION**

Keeping your information safe is important to us. We provide reasonable and appropriate security measures in connection with securing Personal Information we collect. For example, we: Constantly work to update our security practices to implement accepted best methods to protect your Personal Information, and review our security procedures carefully. Comply with applicable laws and security standards. Securely transmit your sensitive Personal Information. Train our staff and require them to safeguard your data. Transmit, store, protect, and access all client information in compliance with Government Security Standards.

## **6. CHANGES TO OUR PRIVACY STATEMENTS**

From time to time we may change or update our Privacy Statements. We reserve the right to make changes or updates at any time. More information about how we will notify you is below. If we make material changes to the way we process your Personal Information, we will provide you notice via our Service or by other communication channels, such as by email or community post. Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may close your account(s). All changes are effective immediately upon posting and your use of our Service after a notice of material change or posting of an updated Privacy Statement shall constitute your consent to all changes.

## **7. YOUR GEORGIA PRIVACY RIGHTS**

We do not share your Personal Information with third parties for their marketing purposes without your consent.

# Probacked Cookie Policy

Last Updated, August 1st 2020

Please check back from time to time for updates to this Cookie Policy.

As described in the “Cookies and Other Tracking Technologies” Section of our Privacy Statement, Probacked and Probacked’s affiliates and subsidiaries (collectively, “Probacked”), along with Probacked’s third-party partners and service providers use cookies and similar technologies (collectively “Cookies,” see the “What Cookies Are” Section below) on our websites, products, mobile apps, co-branded offerings and applications (collectively, “Services”).

This Cookie Policy addresses how we use Cookies and other similar tracking technologies in relation to Services that link to this Cookie Policy. For information on how we protect your privacy in our use of Cookies and other information, please see our [Privacy Statement](#).

## What Cookies Are

A ‘cookie’ is a small file which is created by a website and stored on your device. Often Cookies contain a string of numbers and letters that uniquely identifies your device, but can contain other information. Cookies serve many different purposes, including to help remember your preferences or allow the Service to function.

There are different types of Cookies:

- Cookies are “**persistent**”, “**permanent**” or “**session**”:
  - Persistent and permanent Cookies remain on your device even after you have gone offline. These cookies will remain on your device until you manually delete them or until your browser deletes them based on the duration specified in the Cookie file itself.
  - Session Cookies are deleted as soon as you close your web browser.
- Cookies can also be “**first-party**” or “**third-party**”:
  - First-party Cookies are Cookies that are placed by Probacked.
  - Third-party Cookies are placed by our partners, vendors and other third parties. We do not control the collection or further use of data by third parties using Third party Cookies.

- We also classify Cookies according to whether they are “**Essential**”, “**Functional**”, “**Improved Performance**”, or “**Advertising**”:
  - **Essential Cookies** are necessary to allow the technical operation of our Services (e.g., they enable you to move around on a website and to use its features).
  - **Functional Cookies** increase the usability of an online service by remembering your choices (e.g. language, region, login information, and so on).
  - **Improved Performance Cookies** collect data on the performance of an online service, such as the number of visitors, the time spent on a website and error messages and allow us to conduct analytics and provide you with more personalized services.
  - **Advertising Cookies** enable us and our ad network partners to display advertising personalized to you.

Other types of tracking technologies, which we are also calling “Cookies” for the purposes of this Cookie Policy, are: HTML5 Local Storage, web beacons (electronic images also called single-pixel gifs), pixels, Flash cookies (also known as “local shared objects” or “LSOs”), and similar technologies. Flash cookies, specifically, are another technology from Adobe that can provide cookie-equivalent functionality. Flash cookies are capable of storing information on your device (in a file outside of your browser). We may employ Flash Cookies in certain situations where we use Flash to provide some content such as video clips or animation.

### **How Probacted Uses Cookies**

We use Cookies for many purposes. We use them, for example, to:

- protect your information and improve the security of our Services;
- help you sign up for our Services;
- understand your interests and needs;
- understand which features are helpful to you and improve our Services;



- recognize your device, network, or browser over time or correlate IP addresses, mobile devices, and other technologies to determine if multiple devices may relate to the same user or account; and
- assess the effectiveness of our promotional campaigns.

Probacked also uses Cookies on our Services in conjunction with advertising networks and other third-party partners, including social media companies, and may deliver co-branded Services. Our third-party partners may place Cookies on both our Services and on unaffiliated websites in order to serve advertisements that may be relevant to you based on your activity in our Services, and your interests.

We also include Cookies in our promotional email messages or newsletters to determine whether you open and act on them, which helps us deliver content which we hope you will find useful and informative.

### Types of Cookies Used

An overview of the cookies used on our Services is set out in the following table.

#	Purpose	Category	Example / Description
1	Necessary (Essential)	Critical	Contain information critical to your online experience (like the specific services you've ordered), or that assist with certain kinds of personalization that are essential to your use of our services (like language preferences)
		Security	Authenticate users, prevent fraudulent use of login credentials, and protect user information from unauthorized parties.

2	Functional	Preference	<p>Help make our Services work and deliver the services that you expect.</p> <p>Contain information important to your experience, but not critical (like fonts, personalization of the services with your name).</p>
3	Improved Performance	Surveys	Enable surveying activities, such as allowing us to keep you from being given the same survey more than once.
		Social Sharing	Allow you to utilize sharing features for third party social media services from within our services.
		Analytics	Collect information and report statistics about usage of the Services
4	Advertising		<p>Serve purposes such as introducing products or services that may be of interest to you or measuring interactions with the ads on our sites or on third party sites and preventing the same ads from being shown to you too many times.</p>

**Controlling Cookies**

**Please note** that even if you opt-out of Cookies or interest-based advertising, you will still receive advertisements, they just won't be tailored to your interests. Also, if you opt-out and later delete your Cookies, use a different browser, or use a new or different device, you may need to renew your Cookie preferences.

### *Controlling Cookies on our Services*

Many devices and internet browsers are set to automatically accept Cookies. Information on changing your browser settings to opt-out of Cookies can be found in your browser settings. If you use different devices to access our Services, you will need to ensure that each browser of each device is set to your Cookie preferences.

Most mobile operating systems provide you an option in the device settings to limit ad tracking associated with the device ID they may share with us. Please reference your mobile operating system's help center to learn more.

To find out more about Cookies, including how to see what Cookies have been set and how to manage and delete them, visit [en.wikipedia.org/wiki/HTTP\\_cookie](http://en.wikipedia.org/wiki/HTTP_cookie), [www.allaboutcookies.org](http://www.allaboutcookies.org), or [www.aboutcookies.org](http://www.aboutcookies.org). Please note that Probacked has no affiliation with, and is not responsible for, these third party websites.

Please note that not all browsers provide the ability to remove Flash Cookies. You can restrict or block Flash Cookies through the Adobe website and links for doing so are included below. As with any Cookie, if you do restrict Flash Cookies, there may be some features of our Services that you won't be able to use.