

Privacy Policy

Effective January 1, 2020

This Privacy Policy describes how we collect and use the personal information you provide on the websites of Submittable Holdings, Inc. (“Web Pages”). It also describes the choices available to you regarding our use of your personal information and how you can access and update this information. Submittable Holdings, Inc. (“we” or “us”) complies with the EU-US Privacy Shield Agreement.

Submittable Holdings, Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Submittable Holdings, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program and to view our certification, please visit <https://www.privacyshield.gov/>.

Collection of Personal Information

We collect the following types of personal information from you (“Personal Information”):

- contact information, such as first and last name, email address, mailing address, and phone number;
- billing information, such as credit card number, security code, expiration date, and billing address;
- unique identifiers, such as a username and password chosen by you, account number, Facebook User ID (UID), and other identifiers assigned to you by us or a third-party that you have authorized by establishing an account or other relationship;
- preferences, such as action history, marketing preferences, information requested or rejected, and other selections made by you;
- demographic information, such as age, education, gender, interests, and zip code; and/or
- location information, such as GPS locations, IP address, street address, city, state, and/or phone number.

Use of Personal Information

We use your Personal Information to:

- communicate with you;
- collect fees for services and products approved for purchase by you;
- authenticate your access to our Web Pages and your information stored by us; and/or
- provide services and improve those services.

We do not sell your Personal Information to third parties.

As is true of most websites, we gather some of your Personal Information from your computer automatically, as described below in “Cookies and Other Tracking Technologies.” We use this information to:

- fulfill your account or order;
- send you an order confirmation;
- assess the needs of your business to determine suitable products;
- send you requested product or service information;
- send product updates or warranty information;
- respond to customer service requests;
- administer your account;
- send you a newsletter;
- send you marketing communications;
- respond to your questions and concerns;
- improve our Web Pages and marketing efforts;
- conduct research and analysis;
- display content based upon your interests and location; and/or
- facilitate your transactions with other users.

Limitations on Use: Choice/Opt-In

Your Personal Information will never be used for a purpose that is incompatible with the original purpose for which it was collected UNLESS you specifically opt in to such use through a clear and distinctive affirmation process fully explained to you by us electronically (for example, a dialog box, alert, or prompt).

Limitations on Use: Choice/Opt-Out

Your Personal Information may be used for a new purpose different from, but related to, the original purpose. Such use will occur only if you do not object. We will always notify you of such use and provide an opt out option for such use.

Limitations on Use: Information Sharing

We will share your Personal Information if the new purpose is different from the original purpose but would not be considered materially different. Within such use, we may use and disclose your Personal Information as follows:

- To promote the use of our services. For example, if you leave your Personal Information when you visit our Web Pages and don't sign up for any of our services, we may send you a promotional email asking if you want to sign up. If you use any of our services, and we think you might benefit from using another service, we may send you a promotional email about it. You can stop receiving our promotional emails by following the unsubscribe instructions included in every email we send.
- To send you informational and promotional content that you may choose (or 'opt in') to receive. You can stop receiving our promotional emails by following the unsubscribe instructions included in every email.
- To bill and collect money owed to us. This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use

third parties for secure credit card transaction processing, and we send billing information to those third parties to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see Section 12 below.

- To send you system alert messages. For example, we may let you know about temporary or permanent changes to our services, like planned outages, new features, version updates, releases, abuse warnings, and changes to our Privacy Policy.
- To communicate with you about your account and provide customer support.
- To enforce compliance with our Terms of Use and applicable law. This may include developing tools and algorithms that help us prevent violations.
- To protect the rights and safety of our customers, users, and third parties, as well as our own.
- To meet legal requirements, such as complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- To provide information to our representatives and advisors, such as attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- To prosecute and defend a court, arbitration, or similar legal proceeding.
- To provide, support, and improve the services we offer. This includes aggregating information from your use of our services and sharing such information with third parties.
- To provide suggestions to you. This includes adding features that compare customers' email campaigns, or using data to suggest other publishers that customers' subscribers may be interested in.
- To transfer your Personal Information in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this Privacy Policy, including your rights to access and choice. We'll notify you of the change either by sending you an email or posting a notice on our website.

Age Limitations

To the extent prohibited by applicable law, we do not allow the use of our Web Pages and services by anyone younger than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us, and we will take steps to delete such information.

Cookies and Other Tracking Technologies

We collect certain information by automated means when you visit our Web Pages. By collecting this information, we learn how to best tailor our Web Pages to our visitors. We collect this information through various means, such as cookies and web beacons, as explained below.

Like many companies with online services, we may use browser "cookies" on our Web Pages. A cookie is a small text file that is stored on your device when you visit certain websites. We may use cookies, for example, to keep track of your preferences and profile information, or to tell us whether you have visited us before. Cookies are also used to collect information on site performance, general usage and volume statistical data that does not include personal information.

We use a third party to place cookies on your computer to collect non-personally identifiable information to compile aggregated statistics for us about visitors to our site.

Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. For more information about how to manage browser cookies, please follow the instructions provided by your browser.

Our Web Pages may also contain electronic images known as “web beacons” (sometimes called “single-pixel gifs”). We use web beacons together with cookies to compile aggregated statistics to analyze how our Web Pages are used. We may also use web beacons in some of our emails to let us know which emails and links have been opened by recipients. This allows us to gauge the effectiveness of our customer communications and marketing campaigns.

We use a third party to gather information about how you and others use our Web Pages. For example, we will know how many users access a specific page and which links they clicked on. We use this information in the aggregate ONLY to understand and optimize how our site is used.

Links to Other Websites

Our Web Pages include links to other websites whose privacy practices may differ from ours. If you submit your personal information to any of those websites, such information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

Security

The security of your Personal Information is important to us. When you enter information into our forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We follow generally accepted industry standards to protect your Personal Information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

If you have any questions about security on our Web Pages, you can contact us by writing or email us at the address below.

Correcting and Updating Your Personal Information

To review or update your Personal Information, you may submit your request to do so by writing or emailing us at our contact information provided below.

Notification of Privacy Policy Changes

We may update this Privacy Policy to reflect changes to our privacy practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of a notice on our Web Pages or your account prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Right to Access Your Personal Information

You may at any time, and for any reason, request access to your Personal Information by contacting us at the address below. We will provide such access within a reasonable time using methods we choose to ensure your access does not compromise others' data or our ability to conduct business efficiently.

Right to Control Your Personal Information

You may at any time control access to and use of your Personal Information by contacting us at the address below. Such control will include the ability to opt out of any use of your Personal Information and to prevent disclosure to any third-party, except as required by law or the order of a court of proper jurisdiction.

Right to File a Complaint as to Your Personal Information

You have the right to contact us with a complaint about the use of your Personal Information at the address below with the subject line "ATTENTION PRIVACY SHIELD COMPLAINT OFFICER" and all such complaints shall be handled within 45 days. In the event the issue cannot be resolved, alternative dispute resolution in the state of MONTANA will be used to resolve the issue.

Submittable Holdings, Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and/or the Department of Commerce. Under certain conditions, it is possible for you to invoke binding arbitration. You should understand that Submittable Holdings, Inc. may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, or as required by a court of proper jurisdiction. Our liability in cases of onward transfers to third parties is limited to actual damages sustained by you.

In compliance with the Privacy Shield Principles, Submittable Holdings, Inc. commits to resolve complaints about our collection or use of your Personal Information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Submittable Holdings Inc. at:

Submittable Holdings, Inc.
111 N. Higgins Ave, #200
Missoula, Montana, United States 59802
Email: info@submittable.com

Complaints will be received by the PRIVACY SHIELD COMPLAINT OFFICER who will:

- Acknowledge the complaint through communication with the complainant.
- Open an active complaint file (hard copy or electronic).
- Investigate the complaint by communicating with the complainant and Submittable Holdings, Inc. staff.
- Identify a resolution plan and share the resolution plan with the complainant.
- Monitor execution of the resolution plan to completion.
- Inform the complainant of completion of the plan.
- If acceptable to the complainant, close the complaint file, otherwise revise and re-implement the resolution plan or enter mediation.

Submittable Holdings, Inc. has further committed to refer unresolved Privacy Shield complaints to the American Arbitration Association (AAA), an alternative dispute resolution association with an existing relationship with the Privacy Shield Program. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact Dr. Joel Henry, Esq., at jhenry@wordenthan.com.

AAA's Privacy Shield page can be found here: <http://go.adr.org/privacysield.html>.

Contact Information

You can contact us with inquiries or complaints by writing or emailing us at:

Submittable Holdings, Inc.
111 N. Higgins Ave, #200

Missoula, Montana, United States 59802
Email: info@submittable.com
210513-9000\21146226.1