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## Improvation Software Privacy Policy

### 1. Introduction

This Privacy Policy sets out how Improvation, dba Easysuite Software (“**Company**”) uses and protects your personal data that you provide to us, or that is otherwise obtained or generated by us, in connection with your use of our cloud-based services (the “Services”). For the purposes of this Privacy Policy, ‘we’, ‘us’ and ‘our’ refers to Company, and ‘you’ refers to you, the user of the Services.

#### 1.1 Privacy Principles

Company has three fundamental principles when it comes to collecting and processing private data:

- We only store the data that we need to function as a secure and feature-rich service.
- We only use data for operational purposes.
- We don't sell or trade your data.

#### 1.2. Table of Contents

This Privacy Policy explains the following:

- the legal basis for processing your personal data;
- what personal data we may collect from you;
- how we keep your personal data safe;
- what we may use your personal data for;
- who your personal data may be shared with; and
- your rights regarding your personal data.

### 2. Legal Grounds for Processing Your Personal Data

We process your personal data on the grounds that such processing is necessary for operational purposes (including: (1) providing effective and innovative Services to our users; and (2) detecting, preventing or otherwise addressing fraud or security issues in

respect of our provision of Services; and (3) identifying trends in usage and market characteristics for general improvement).

### 3. Personal Data We may Collect from You

#### 3.1. Data Storage.

We will only store personal data that is required to fulfill the operation of the Services.

#### 3.2. Cookies

The only cookies we use are those to operate and provide our Services on the web. We do not use cookies for profiling or advertising. The cookies we use are small text files that allow us to provide and customize our Services, and in doing so provide you with an enhanced user experience. Your browser should allow you to control these cookies, including whether or not to accept them and how to remove them. You may choose to block cookies with your web browser, however, if you do disable these cookies you will not be able to log in to the service.

### 4. Keeping Your Personal Data Safe

#### 4.1. Where is Data Stored

The Company servers and storage equipment on which your data is stored are locked inside U.S. based data centers and are owned by us. As such, we do not share your data with the data centers. All password data is stored heavily encrypted so that physical intruders cannot get access.

#### 4.2. SSL Encrypted Data

Your data is encrypted in-transit between your device and our servers via 256-bit, or better, Secure Socket Layer certified encryption.

#### 4.3. Retention

Unless stated otherwise in this Privacy Policy, the data that you provide us will only be stored for as long as it is necessary for us to fulfill our obligations in respect to the provision of Services.

### 5. Processing Your Personal Data

#### 5.1. Our Services

We provide many applications as a cloud service that you use voluntarily to provide the applications that you choose. We will process your data and deliver it to you to any devices of your choosing without a need for you to use third-party backups or cloud storage.

## 5.2. Safety and Security

To improve the security of your account, as well as to prevent spam, abuse, and other violations of our Terms of Service, we may collect metadata such as your IP address, Company apps you've used, history of username changes, etc.

## 5.3. Third Party Payment Services

### 5.3.1. Payment Information

Company processes payments from users via registered payment providers of US banks authorized by the Federal Deposit Insurance Corporation (FDIC), the Federal Reserve Board, or the Office of the Comptroller of the Currency. Your credit card details are handled and stored by the payment providers. Although we work with payment providers, they are completely independent from Company.

### 5.3.2. Credit Card Information

When making a purchase, you enter your credit card details into our online form and the information goes directly to the payment provider's server. We do not access and do not store your credit card information. When you save your credit card info, it is saved on the respective payment provider's servers and the payment provider gives Company a token that is reused for future payments. It is not possible to reconstruct your credit card info from the token.

### 5.3.3. Clearing Payment Information

You can clear all payment information associated with your account at any time by going to Admin > Billing > Credit Cards and deleting your credit cards.

## 6. Who Your Personal Data May Be Shared With

### 6.1. Third Party Services solely for operational use

We employ 3<sup>rd</sup> party services to send text messages and voice calls. There may be some important communications for which we will use text or voice and in that case your phone number will be necessary to utilize the 3<sup>rd</sup> party service.

We also employ 3<sup>rd</sup> party services to develop and build our software. These parties are contracted under the strictest HIPAA privacy laws. Although, they may have visual

access to your non-encrypted data, they are not authorized to use it in any way other than for the purpose of developing and maintaining our software.

No 3<sup>rd</sup> party service is authorized to use any of your data shared by us for any purpose other than the operational purpose set forth herein.

## 6.2. Our Group Companies

We may share your data with other companies owned by us, including, but not limited to: Lotterease, Foodease, Enrollease, Journease, Supervisease, Merchease, Liberty Applications and Dr. Dial. All companies owned by us utilize the same privacy policy contained herein.

## 7. Your Rights Regarding the Personal Data You Provide to Us

### 7.1. Your Rights

Under applicable data protection legislation, in certain circumstances, you have rights concerning your personal data. You have a right to: (1) have access to all your personal data that we store; (2) delete or amend your personal data; (3) restrict, or object to, the processing of your personal data; (4) correct any inaccurate or incomplete personal data we hold on you; and (5) lodge a complaint with national data protection authorities regarding our processing of your personal data.

## 8. Changes to this Privacy Policy

We will review and may update this Privacy Policy from time to time. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy in the relevant Section of your account.