

OrangeQC Privacy Policy

Last Updated: July 22, 2020

OrangeQC LLC, an Illinois limited liability company (together with its affiliates, “**OrangeQC**,” “**we**,” or “**our**”) recognizes that privacy and security are concerns for itself and individuals accessing OrangeQC’s websites and/or applications. This privacy policy (the “**Privacy Policy**”) describes the types of information we may collect from individuals (“**you**” or “**your**”) that visit, download, install, or use our publicly available websites (the “**Websites**”), our online applications (the “**Web Applications**”), or our mobile applications for the iOS and Android operating systems (the “**Mobile Applications**”). It also describes the security measures we take to protect Personal Information we collect.

This Privacy Policy operates in conjunction with our Terms of Use, End User License Agreements, Master Services Agreements, and other agreements or service plans (each an “**OrangeQC Application Agreement**”) with individuals or businesses (e.g., your employer) that use or interact with OrangeQC products or services (each such business, together with its employees and other authorized users, a “**Client**”). By using any Websites, Web Applications, or Mobile Applications (collectively, the “**Platform**”) on which OrangeQC has posted this Privacy Policy, you authorize OrangeQC to collect and use your information as set forth in this Privacy Policy and any applicable OrangeQC Application Agreement. Such OrangeQC Application Agreements may further restrict and limit the way in which OrangeQC collects, uses, and shares personal information provided by OrangeQC Clients through or in connection with their use of OrangeQC products and services to which they subscribe.

Any revisions to this Privacy Policy will be posted at www.orangeqc.com/privacy. Your continued use of the Platform after we post such changes will constitute your acceptance of the revised Privacy Policy to the extent permitted by law.

1. What information is collected?

OrangeQC collects “**Personal Information**” for its own business purposes and to fulfill its contractual obligations to its Clients. Personal Information includes information that may be used to identify, locate, or contact you, such as your name, title, company, address, e-mail address, and phone numbers, as well as information that reasonably can be related or linked to a particular individual or a household, including through an IP address, such as relationship information regarding services we provide or may provide to you, information about how you use the Platform, and information about the device(s) and networks that you use in conjunction with the Platform. If you use one of our products or services that offers or depends upon location awareness, we will collect geolocation information about you. You should discontinue use of these products or services if you do not wish to share this information with OrangeQC. Unless otherwise required by law, Personal Information does not include publicly available information or aggregated or deidentified information that cannot be used to identify you individually or reasonably be re-associated with you.

2. Who is collecting the information?

When you are on the OrangeQC Platform and are asked for Personal Information, you are sharing that information with OrangeQC. The OrangeQC Platform may contain various links to third-party websites. These sites may provide information, goods, services and promotions that are separate from and in addition to OrangeQC information, goods, services and promotions. These sites are owned and operated by third parties and not by OrangeQC. As such, any information you provide to these third-party websites will be subject to their data collection practices and governed under the terms of their privacy

policy. All questions, comments, and concerns regarding third party websites should be directed to the third party directly.

3. How is my information collected and used?

OrangeQC may collect Personal Information directly from you when you interact with us, such as when you register for an OrangeQC product or service or make an inquiry about a product or service. OrangeQC's primary goal in collecting Personal Information is to facilitate business relationships, including providing products and services to our Clients, to enable us to contact you to fulfill requests and provide support, to bill and collect payments, and to improve our products and services. This information may also be used to provide you with a customized experience on our Platform, such as by providing interactive communications or other services.

OrangeQC may also collect Personal Information that you provide in your responses through optional surveys and questionnaires. Participating in OrangeQC surveys and questionnaires is optional and refusing to participate will have no effect on Website or Mobile Application functionality.

OrangeQC uses Personal Information that we collect to target valuable marketing and advertising offers as described below.

OrangeQC may perform research on our users' demographics, interests, and behavior based on the Personal Information provided to us when making a request, during a promotion, from surveys and from our server log files. We do this to better understand and serve our users. This research is compiled and analyzed on an aggregated, de-identified basis.

We may use automatic data collection technologies, such as cookies, to collect information about your computer and your use of our Platform and other websites. We treat this information as Personal Information when it is associated with or stored in a way that can be reasonably associated with identifiable Personal Information we collect in other ways. We use this data to improve our Platform and deliver a better, more personalized service. For example, this data allows us to:

- Measure our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Platform according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Platform and detect certain types of fraud.

This information allows us to measure the use of our Platform, to improve content and to take other actions in furtherance of our business relationships with our Clients and prospects. While our Platform currently does not recognize Do Not Track signals from your browser, we do provide information below about how to manage your choices and preferences related to online tracking. To learn more about browser tracking signals and Do Not Track please visit <http://www.allaboutdnt.org/>. Additionally, you may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, please note that some parts of the Platform may become inaccessible or not function as intended.

4. With whom does OrangeQC share my information?

OrangeQC may, without restriction, disclose aggregated information about our users and information that does not identify any individual. We may disclose Personal Information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of OrangeQC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by OrangeQC about our Platform users is among the assets transferred.
- To fulfill the purpose for which you provide it, including, without limitation, the provision of services by OrangeQC to you.
- For any other purpose disclosed by OrangeQC when you provide the information; and
- With your consent.

OrangeQC may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of OrangeQC, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. Privacy Information for OrangeQC Client Personnel

In order to provide our products and services to our business Clients using the Platform, OrangeQC may collect Personal Information about such Client's current, prospective, and former employees, representatives and other personnel (collectively, "**Client Personnel**"). We may receive this Personal Information from our business Clients or directly from Client Personnel. OrangeQC will disclose Personal Information about Client Personnel as directed by the relevant Client including through any applicable OrangeQC Application Agreement with the Client and other entities that may be required for us to deliver our products and services to the Client. Any such entities are contractually bound to limit use of Personal Information as needed to perform the services requested. We may also disclose Personal Information of Client Personnel when required to do so by law, such as in response to a subpoena or court order. OrangeQC will at all times maintain reasonable and appropriate security controls to protect personal information of Client Personnel, as described under Data Security below.

If you have questions about your privacy rights as an employee of an OrangeQC Client, please contact your employer's human resources department.

6. Choices about how we use and disclose your information

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

(a) Tracking Technologies and Advertising. In many cases, you can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. Each browser is different,

so visit the “help” section of your browser to learn about cookie preferences and other privacy settings that may be available. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website: <https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>. If you disable or refuse cookies, please note that some parts of our Platform may then be inaccessible or not function as intended.

(b) Promotional Offers from the Company. If you do not wish to have your contact information used by OrangeQC to promote our own products or services, you can opt-out by sending an email stating your request to privacy@orangeqc.com. If we have sent you a promotional email, you may request to be omitted from future emails by sending us a return email or pressing the button provided. This opt out will not apply to our use of information provided to OrangeQC as a result of a product or service purchase, warranty registration or other transactions.

(c) Targeted Advertising. Third party advertising companies may place cookies on your computer when you visit our website or other websites so they can display targeted interest-based advertisements to you. This Privacy Policy does not cover the collection methods or use of the information collected by these third parties. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI’s website at www.networkadvertising.org.

(d) Google Analytics. We use Google Analytics to monitor and improve our user experience. You can opt out of Google Analytics without affecting how you visit our site. For more information on opting out of being tracked by Google Analytics across all websites you use, visit <https://tools.google.com/dlpage/gaoptout>.

7. Accessing and correcting your information

If allowed by the applicable OrangeQC Application Agreement or required by law, you may review and change your Personal Information by logging into your account on the Platform and visiting your profile page.

8. California Privacy Rights

California Civil Code Section § 1798.83 permits users of the Platform that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@orangeqc.com or write us at: 19630 Governors Hwy, Suite 2, Flossmoor IL 60422.

Below is additional information related to OrangeQC’s information practices and your rights related to your Personal Information under the California Consumer Privacy Act of 2018 (CCPA) depending on the context in which OrangeQC collects and uses such Personal Information.

(a) California Client Personnel. In many cases in which we collect or receive your Personal Information, we are acting as a “service provider” to your employer (our Client), as such term is defined in the CCPA. OrangeQC is contractually prohibited in such cases from collecting, accessing, maintaining, using, processing and transferring your Personal Information except as is necessary to perform our contractual obligations to our Client or as otherwise required or permitted by law. If you are a California resident and you have questions about our collection and use of your Personal Information in this context, please contact your employer, who acts as the “business” under the CCPA in such cases.

(b) California B2B Client Representatives. If you are a representative of one of our business Clients, we may have Personal Information about you, such as your contact information, title, and other information reflecting our communications and transactions with our business Clients. We do not, and do not intend in the future, to sell this Personal Information. If you have questions regarding this policy or OrangeQC's privacy practices while acting in this capacity, please contact us at privacy@orangeqc.com.

(c) Other California Business Prospects and Visitors. Outside of the two contexts described above, OrangeQC may collect and maintain Personal Information about California business prospects and visitors in OrangeQC's capacity as a "business" under the CCPA. In these cases, the CCPA gives California residents the right to request access to or deletion of (subject to certain exceptions) such information from OrangeQC. In general, the categories of Personal Information that OrangeQC may have about California business prospects and visitors include identifiers and commercial information, as well as network and geolocation information depending on whether and how a visitor or prospect has interacted with our Websites. Some of this Personal Information may be covered by California's Customer Records statute (Cal. Civ. Code § 1798.80(e)). This Personal Information is used and shared as described in this policy.

(d) Disclosure and Deletion Requests. OrangeQC does not (and does not intend in the future) to sell your personal information. To request more information about the Personal Information collected about you in this context in the last 12 months, or to request deletion of your Personal Information, you may call toll-free +1-844-968-2776 or complete the online fillable form available at [California Privacy Request Form](https://www.orangeqc.com/california-privacy-request-form/) (<https://www.orangeqc.com/california-privacy-request-form/>). The CCPA also provides California consumers the right to opt out of the sale of their personal information. As explained in this Privacy Policy, we do not sell the personal information of our users. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information, and access requests may only be made twice within a 12-month period. OrangeQC must be able to verify your identity in order to comply with your requests under the CCPA. To do so, OrangeQC will seek to associate the information provided by you when making your request with personal information we have collected about you previously. OrangeQC will endeavor to respond to valid verifiable consumer requests within 45 days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. OrangeQC may not and will not discriminate against any California consumer for exercising any of the rights described in this section – including by charging differential pricing.

9. European Users and Visitors

If you are located outside of the United States, you acknowledge and agree that your Personal Information may be processed outside of the country in which you are a resident and in countries that are not subject to an adequacy decision by the European Commission and which may not provide for the same level of data protection as the European Economic Area (EEA). In such cases, OrangeQC will ensure that we or the recipient of your Personal Information offer an adequate level of protection and that such transfers are made consistent with applicable law, for instance by entering into binding corporate rules or standard contractual clauses for the transfer of data as approved by the European Commission.

If you are located in the EEA, you have certain statutory rights in relation to your Personal Information. Subject to any exemptions provided by law, you may have the right to request access to, as well as to seek to update, delete, correct, or restrict or object to the processing of your Personal Information. As explained above, we process Personal Information in various ways depending upon your use of our Platform. OrangeQC relies on the following bases to process Personal Information: (1) as

necessary to perform a contract when you request services; (2) as necessary for our legitimate interests in providing, enhancing, and protecting our Platform and providing you with marketing materials; and (3) with your lawful consent. You have a right to object to OrangeQC's use of your Personal Information for direct marketing purposes at any time.

You may write to our Privacy Office at privacy@orangeqc.com with any questions or complaints. You also have the right to complaint to the data protection authority in the country where you reside, work, or where an alleged infringement of data protection laws has taken place.

10. Data Security

OrangeQC has implemented reasonable, risk-based technical and organizational measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where you have chosen a password for access to certain parts of the Platform, you are responsible for keeping this password confidential.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to the Platform. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Application by any third party unless the circumvention was the result of our gross negligence or willful misconduct.

11. Mobile Applications

All Personal Information collected by OrangeQC's Mobile Applications which enable users to interact with the Websites, the Web Application, and other resources are subject to the terms of this Privacy Policy.

12. Children

The Platform is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Platform. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on the Platform or through any of its features, register on the Platform, make any purchases through the Platform, use any of the interactive or public comment features of this Platform, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at privacy@orangeqc.com.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see "California Privacy Rights" above for more information.

13. Additional Information

If you have any questions or concerns about your privacy on the Site, or wish to opt-out of any email list, please contact us at:

OrangeQC

Attn: Privacy Office

19630 Governors Hwy, Suite 2

Flossmoor, IL 60422

Email: privacy@orangeqc.com

Any questions regarding this policy should be directed to privacy@orangeqc.com.