

## Grayhill, Inc. Privacy Policy

Effective Date: 8-9-2019

Grayhill, Inc., a Delaware corporation having its principal place of business at 561 Hillgrove Ave, La Grange, Illinois 60525 (“we”, “us”, “our”) is committed to protecting the privacy of visitors users of its mobile application and related services (each a “Service” and collectively the “Services”). When you access, browse, or use the Services, information will be collected, transferred, processed, stored, and disclosed in accordance with this privacy policy (“Policy”). This Policy governs the information collection and disclosure practices for the Services. By accessing, browsing, or using the Services, including registering an account with our Services, you expressly consent to the collection, transfer, use, processing and storage of your information (including personal information), as described in this Policy. IF YOU DO NOT AGREE WITH THIS POLICY OR THE INFORMATION COLLECTION, USE, AND DISCLOSURE PRACTICES DESCRIBED IN THIS POLICY, DO NOT USE THE SERVICES OR REGISTER AN ACCOUNT.

### 1. INFORMATION COLLECTION PRACTICES

**1.1. General.** If you register for an account within or to access a Service, we will collect some personally identifiable information from you, including your full name, email address, phone number, geographic location, occupation, employer, and a password that you select. When you interact with the Services, we also receive and store certain additional types of information which, in general, do not directly identify you. For example, we automatically receive and record information on our server logs from your browser or device including your IP address, browser type and language, referring/exit pages and URLs, other browser history, device type, wi-fi network information, crash reports, platform type, number of clicks, landing pages, cookie information, the pages you requested and viewed, the amount of time spent on particular pages, and the date and time. This Section of the Policy outlines the various ways that information is collected from the Services. Please fully review this Policy before you use the Services or submit information to us.

#### 1.2. Information that You Provide.

- (a) **Registration and Login.** Certain Services require you to register for an account (“Account”). When you register for an Account you will be asked to provide some personally identifiable information, including your full name, email address, phone number, occupation, employer, and a password that you select. When you register an Account and log in to a Service you must provide your current, complete, and accurate information. It is your responsibility to keep your information up to date. We are not responsible for any problems, interruptions in access, or liability that may arise if you do not give us complete and accurate information or if you fail to update your information so that it is current.
- (b) **Uploads.** If you upload, submit, or otherwise provide materials to the Services (including within your Account profile), we may collect personally identifiable information about you and we may save the information in a profile specific to you.
- (c) **Correspondence.** If you send us personal correspondence, such as emails or letters, or if other users or third parties send us information about your use of the Services, we may save the information in a profile specific to you.
- (d) **Support.** If you speak or correspond with our sales associates or support associates, we may collect information from you and may save that information in a profile specific to you.

**1.3. Automatically Collected Information.** We will collect some information about you and any product or device you use to access or use the Services automatically using a variety of technologies. In general, automatically collected information about use of the Services does not directly identify you and the information may include your diagnostic log information, device serial number, metadata associated with content stored on the Services, IP address, browser and device type and language, the components of the Services you requested and viewed, the amount of time spent on particular parts of the Services, Service navigation, usage history, and the date and time. We collect this information for the purposes described in this Policy, including to better understand our customer base and to improve the quality of our Services.

## **2. USE OF INFORMATION**

**2.1. General.** We may use your personally identifiable information (including tracking information) to manage your Account. We may also use it to operate, maintain, and improve the Services (including providing you a more personal experience); communicate with you; provide you information about products and services (including products and services of third parties); market; research purposes; resolve disputes; collect fees owed; detect and protect against errors, fraud, and criminal activity; assist law enforcement; enforce this Policy and any the terms related to our Services; and any other purpose described in this Policy or that we describe to you at the time of collection.

**2.2. Email Communications.** We may use your personally identifiable information to send you emails, notifications, or other communications related to your Account or the Services, or in response to your inquiries or requests. You may not opt-out of receiving service-related messages that are not promotional in nature. We may also send you marketing emails, surveys, or newsletters to notify you about products or services that may be of interest to you. If you would like to stop receiving marketing emails from us, please click on the unsubscribe link at the bottom of any marketing email you receive. If you opt-out, you will continue to receive service-related emails.

**2.3. Non-identifying Information.** We may use non-identifying information for any lawful purpose, including analyzing trends, research, Services administration, tracking users' movements around the Services, and to improve our business and the Services.

**2.4. Retaining Your Information.** In general, we will retain your information indefinitely, or as long as legally required or allowed. If you cancel your Account or your Account is otherwise terminated, we may, but are not obligated to, delete information we have collected or obtained from third parties and we may continue to use and disclose it in accordance with this Policy.

## **3. INFORMATION SHARING**

**3.1. Generally.** We will not sell or rent any of your personal information to third parties for their marketing purposes. However, we may disclose your information to any affiliated entity or organization and to agents, service providers (including internal and external app developers). We may share non-identifying information with third parties for any lawful purpose, including analyzing trends, research, Services administration, tracking users' movements around the Services, and to improve our business, products, services, and the Services. Use of information by affiliated entities and organizations will be subject to this Policy or an agreement that is at least as

restrictive as this Policy. For information on use of information by agents and service providers see Section 4 (Third Party Providers).

**3.2. Legal Requirements.** In some cases, we may disclose your personally identifiable information as required by law; if we believe that disclosure is needed to protect our rights; to government regulators; to law enforcement authorities; in connection with any judicial proceeding, court order, subpoena, or legal process served on us or the Services; and to respond to a physical threat to you or another person.

**3.3. Insolvency and Business Transitions.** If we ever file for bankruptcy or engage in a business transition such as a merger with another company or if purchase, sell, or reorganize all or a part of the Services or our business or assets, we may disclose your personal information, including to prospective or actual purchasers in connection with one of these transactions.

**3.4. Disclaimer.** We cannot ensure that all of your personal information will never be disclosed in ways not otherwise described in this Policy. For example, we may be required to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your personal information that they collect from the Services. No transmission of data over the internet can be 100% secure.

#### **4. THIRD-PARTY PROVIDERS.**

**4.1. General.** We use third parties to help us operate and improve the Services. We may provide these third parties information we collect and they may collect information from you and about your use of the Services. We may provide information we collect to third parties and it will, unless specifically noted otherwise in this Policy, be governed by this Policy and may only be used by those third parties to help us operate or improve our business or the Services and provide services to us. We do not control information collected by third parties and are not responsible for their use of that information. Please review their privacy policies for more information on their information collection, use, and sharing practices.

#### **5. INFORMATION SECURITY MEASURES**

Keeping secure personal information that we collect is of great concern to us. While we have mechanisms in place to safeguard your personal information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. When you provide information to the Services, you do so at your own risk.

#### **6. CHILDREN**

**6.1. The Services are not for or Directed Toward Children.** Our primary audience is adults. We do not intend to and will not knowingly collect any personal information from children under the age of 13; children under the age of 13 are prohibited from using the Services without parent/guardian supervision. If we learn that we have collected information from a child under the age of 13, we will remove that information immediately and delete it from our servers (subject to applicable law and this Policy). If you believe Content from a child under the age of

13 has been posted to the Services, please contact us using the contact information in the Privacy Questions section at the bottom of this Policy. We also recommend that children over the age of 13 ask their parents for permission before sending any information about themselves to anyone over the internet.

**6.2. California Minors.** If you are a California resident who is under age 18 and you are unable to remove publicly-available Content that you have submitted to us, you may request removal by contacting us using the contact information in the Privacy Questions section at the bottom of this Policy. When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information is located, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the Content or information. **REMOVAL OF YOUR CONTENT OR INFORMATION FROM THE SERVICES DOES NOT ENSURE COMPLETE OR COMPREHENSIVE REMOVAL OF THAT CONTENT OR INFORMATION FROM OUR SYSTEMS OR THE SYSTEMS OF OUR SERVICE PROVIDERS.** We are not required to delete the Content or information posted by you; our obligations under California law are satisfied so long as we anonymize the Content or information or render it invisible to other users and the public.

## **7. CALIFORNIA SHINE THE LIGHT LAW**

California Civil Code Section 1798.83 permits California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed personal information (as defined under that statute) of that California resident, for direct marketing purposes in the preceding calendar year and the categories of that kind of personal information that was disclosed to them. If you are a California resident and you wish to make such a request you may contact us by using the contact information in the Privacy Questions section at the bottom of this Policy.

## **8. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION**

If you would like to cancel your Account or update your personally identifiable information associated with your Account, you may make such changes within the user profile. If you do not want your information accessed or stored as described in this Policy, you should not access, use, or register an Account with the Services.

## **9. MODIFICATION OF THIS POLICY**

The Effective Date of this Policy is set forth at the top of this webpage. We reserve the right to change this Policy as business needs require. If we make material changes to the way we use Personal Information, we will provide advance notice to you by email or by posting a message on the Services. Your continued use of the App after the Effective Date constitutes your acceptance of the amended Policy. The amended Policy supersedes all previous versions.

## **10. PRIVACY QUESTIONS**

If you have any concerns or questions about these policies, please contact us at: [info@grayhill.com](mailto:info@grayhill.com)