



## SitePREP, LLC Privacy Policy

**Date of last revision (the "Effective Date"): February 1, 2021**

Maintaining your privacy is of paramount concern to SitePREP, LLC and its parents, subsidiaries, representatives, affiliates, officers and directors (collectively, "SitePREP"). As a user of our website(s), apps, developer application program interface and services (collectively, the "Site"), we want you to have a positive experience and know that we respect the privacy and security of our users. Our goal is to provide you with an experience that delivers the information, resources and services that are helpful to you. In order to achieve this goal, we may collect information from you. We discuss our information collection practices below.

This Privacy Policy sets forth the privacy principles that SitePREP follows, in accordance with our operations. This policy does not apply to the practices of companies that we do not own and/or control or to people that we do not employ or manage. If you do not agree to the terms in this Privacy Policy, please do not access the Site.

For any questions on this Privacy Policy or our data practices, you can contact us via email at [support@siteprep.io](mailto:support@siteprep.io) or by mail at the following address:

SitePREP, LLC  
Attn: Legal Department  
2124 Moores Mill Road, Suite 120  
Auburn, Alabama 36830 USA

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described above.

### **TYPES OF INFORMATION COLLECTED**

Upon registration with the Site, we will collect both personal and non-personal information and/or data. "Personal Data" includes any information or data that identifies you as an individual or relates to an identifiable individual, including: your name, postal address, telephone number, email address, credit card information, geolocation, certain device information, and IP address. This data will be stored in an internal database that is proprietary to SitePREP. If you submit any Personal Data relating to other people to us or to our service providers in connection with our Site, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

"Non-Personal Data" includes any information or data that does not directly reveal your identity or does not directly relate to an identifiable individual. This data might include a unique identifier (unconnected to your account login information or IP address) and related analytics and usage information that we use to track usage of our Site, track trends in our data and our Site, administer the Site, and improve our users' experience.

We will only collect and use Personal Data when you voluntarily provide it to us, with the exception of your IP address which may be automatically captured when you access our Site. In order to use some portions of our Site, a user must first complete a registration form or provide an email address that will require

disclosure of Personal Data. Such disclosure is strictly voluntary. In addition, and in order to contact us by email, you must provide an email address.

We automatically collect Non-Personal Data, generated from your use of our Site. We use this Non-Personal Data in the aggregate and do not combine these types of Non-Personal Data with Personal Data. We may also share aggregated demographic information with our business partners, sponsors, advertisers, and companies that control, are controlled by, or are under common control with SitePREP.

## **USE OF INFORMATION**

SitePREP will use the Personal Data collected for limited internal purposes that may include, but are not limited to, processing your transactions, establishing the identity of account holders, customer service, and providing you with information concerning our services and Site. We will retain this information and may also use that Personal Data to improve and customize our content and Site. We do not sell Personal Data to third parties.

We may use or share your usage data related to our Site with our affiliates for purposes of providing and improving our services. This use may include your pictures contained within the Site, which we may use to continue to refine and enhance our services and intelligence engine. We will not disclose any information about your pictures or usage data related to our Site to unaffiliated third-parties, except as necessary to enhance the product experience, service the legal agreement under which you are provided access to our Site, to enforce the Terms of Use, to meet our contractual obligations to report aggregated usage data to content providers, or as required by law.

We also reserve the right to disclose your Personal Data if we are required to do so by law, or in the good faith belief that disclosure of the information and/or data is reasonably necessary to comply with legal process, to respond to our claims, or to protect or advance the rights, property, safety, or well-being of our company, our employees or contractors, our customers, or the public.

If you have questions about or need further information concerning the basis on which we collect and use your Personal Data, please contact us using the contact information provided above.

## **SECURITY OF PERSONAL DATA**

SitePREP has taken appropriate technical and organizational measures to ensure that Personal Data we have collected or will collect in the future is secure. For example, we have limited the number of people who have access to the Personal Data, by electronic security systems and password protections that guard against unauthorized access. As a reminder, if SitePREP provides links to third-party websites, these websites may not have the same privacy policies as SitePREP. We take reasonable care in recommending these websites, but we are not responsible for their content or privacy policies. We urge users to read the privacy statement of a third-party website when leaving our Site and linking to a third-party website.

We always use industry-standard technologies when transferring and receiving consumer data exchanged with our Site. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of data that we have collected from you under this Privacy Policy.

It is important to us that the Personal Data we collect is appropriate and relevant to the purposes for which we intend to use it. SitePREP will take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete and current. We understand that you may not want to let us use your

Personal Data for purposes that you believe may be incompatible with the purpose for which it originally was collected.

Therefore, we will use Personal Data only in ways that are compatible with the purposes for which it was collected.

Should SitePREP subsequently desire to use Personal Data for purposes other than the purpose for which it originally was collected, SitePREP will contact the person providing the information and/or data for active opt-in authorization prior to such use.

## **PAYMENT INFORMATION**

If you are purchasing a product or service, or using a paid account, we collect your payment information so that we can automatically charge your credit card when you purchase the product or service. This information is only shared with the company that is processing the credit card payments for us and we do not store this information.

## **ACCESS, CORRECTION, AMENDMENT or REMOVAL of DATA**

SitePREP wants to assure you that you have access to your Personal Data that we collect and store. Upon request, we will provide you with information about whether we hold any of your Personal Data. You may contact us either in writing or by email at the contact information stated above to exercise the following rights:

Access your data to check and review it;

Have a copy of your Personal Data;

Demand that we supplement, correct or delete your Personal Data; or cease or restrict the collection, processing, use or disclosure of your Personal Data; the right of rectification will comprise the right to have incomplete Personal Data completed, including by means of providing a supplementary statement;

Object to the processing of your Personal Data;

Receive your Personal Data in a structured, commonly used and machine-readable format and have it transmitted to another controller; provided that the processing is based on your respective consent or to execute a contractual relationship or a relationship prior to entering into contract with you; and

Withdraw your consent where the Personal Data we collect from you is based on your consent.

SitePREP will respond to your request within thirty (30) days of receipt.

If you have granted consent, you can withdraw your consent at any time with future effect. Please address your withdrawal by contacting us in writing or by email at the contact information stated above.

## **EUROPEAN UNION GLOBAL DATA PROTECTION REGULATION**

SitePREP understands that Account Registration Information and Payment Information may be considered "Personal Data" under European Union Global Data Protection Regulations (GDPR). SitePREP endeavors to comply with GDPR including, but not limited to, (a) protecting your right to have Personal Data collected only after you have specifically taken action to approve the collection of your Personal Data, (b) the right to easily access a mechanism to withdrawal that approval and have your Personal Data

promptly removed from our proprietary internal database, (c) using industry standard best practices to maintain care, custody, and control over the Personal Data we collect, and (d) reporting as prescribed by GDPR any breach of Personal Data within 72 hours of our discovery of such breach. SitePREP believes the nature and scope of the Personal Data it collects does not require the designation of a GDPR Data Protection Officer.

## **COLLECTION AND USE OF DATA FROM CHILDREN**

Our Site is not intended for children under 16 years of age. No one under age 16 may use the content or Site, register as an account holder on the Site, or provide any Personal Data to or on the Site. We do not knowingly collect Personal Data from children under 16 years of age. If you are under 16, please do not use or provide any information or data on this Site or on or through any of its features. If we learn we have inadvertently collected or received Personal Data from a child under 16 years of age, it will be promptly removed from our care, custody, and control. If you believe we might have any information from or about a child under 16 years of age, please contact us using the information listed above.

## **PROMOTIONAL CAMPAIGNS**

From time to time, either SitePREP or a third-party might host a promotional campaign in the Site environment. These campaigns have a variety of objectives such as ensuring that we are satisfying account holder needs, assessing the performance of areas of the Site, and introducing new products or offers. In these cases, a specialty promotional privacy statement will be implemented in the framework of the promotion, which will give specific direction as to the treatment of collected information. Often, the information will be necessary for fulfillment obligation of a prize or sample. SitePREP conducts all promotional campaigns within the guidelines of this privacy policy.

## **YOUR PHOTOGRAPHS AND CONTENT**

SitePREP does not claim ownership rights to your photographs, content and data. However, we do retain the right to use your photographs and content to refine and improve our Services and Platform and to provide services required by the system to you and other system users that you have linked your account to. We may also use your photographs and content in a non-identifiable manner for purposes such as marketing, system development and improvement, and testing. Account holders may export their photographs and content at any time as long as their account is still open. If an account holder cancels an account, the data will be retained in our system for three (3) months before deletion and may not be recoverable after that time period. SitePREP is not liable for data that is altered, lost or damaged at the hands of the account holder or third parties (third parties include, but are not limited to, hosting, backup, and data storage companies). We will make a good faith effort to try to restore or recover missing or damaged data, but we cannot guarantee recovery.

## **INFORMATION DISCLOSURE**

Except as set forth in this policy, SitePREP will not disclose your information it gathers to any unaffiliated companies. Disclosure of information to any other third parties will not be used in a manner that can be linked to you or that identifies you. Any information provided to third parties from SitePREP about you will be treated in accordance with this Privacy Policy, unless you are otherwise notified and expressly consent to such information being given. In the following limited circumstances, we will consider, and may release, Personal Data to third parties: (1) to comply with valid legal requirements such as a law,

regulation, search warrant, subpoena, or court order; or (2) in special cases such as a physical threat to yourself or others.

## **AGGREGATE INFORMATION**

In most cases, SitePREP will provide aggregate information about you, which does not allow you to be personally identified or contacted ("Aggregate Information") to third parties. For example, we might inform third parties regarding the number of account holders registered on the SitePREP Site who live in a certain geographic region. Or we might also inform a specific manufacturer (that may or may not be an advertiser on our Site) that 45% of the users on our Site visit more than 3 times a week. Depending on the circumstances, we may or may not charge them for this information.

## **INTERNAL PRIVACY**

SitePREP utilizes databases to produce results of our Site performance and give us the activity measurement of our Site. This enables us to continually refine and improve the Site environment and provide the best service to you. Only authorized SitePREP employees or contractors are permitted access to your personally identifiable information and all SitePREP employees and contractors are required to abide by our Privacy Policy. Those who violate the terms of this policy are subject to disciplinary action, up to and including termination.

## **YOUR RIGHTS TO DATA**

Upon request, SitePREP will tell you if we process any of your Personal Data. Depending on your country of residency, you may have legal rights with respect to your Personal Data. As such, if you would like to manage, change, limit or delete your Personal Data, you can do so via the account settings or by contacting us using the information provided above. We will respond to your request within a reasonable timeframe.

If we process your Personal Data based on our legitimate interests, you can object to this processing in certain circumstances. In such cases, we will cease processing your Personal Data unless we have compelling legitimate grounds to continue processing or where it is needed for compliance and/or legal reasons. Where we use your Personal Data for direct marketing purposes, you can always object or opt out by using the unsubscribe link in such communications or by contacting SitePREP using the above contact information.

## **YOUR CHOICE**

When you complete the registration form and your profile, you will be given the opportunity to receive recurring information/promotional emails and offers from SitePREP and/or third parties. To access these preferences, login to your account, click on "Settings" and edit your Send Email Update preferences.

## **NOTICE TO UTAH RESIDENTS**

Except as expressly identified below, we do not disclose a user's Personal Data to any third party for such third party's direct marketing purposes.

## **NOTICE TO NEVADA RESIDENTS**

Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to a number of exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to a person for the person to license or sell the information to additional persons. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to support@siteprep.io.

## **NOTICE TO RESIDENTS OF THE U.S. (OTHER THAN CALIFORNIA) AND CANADA**

You may access Personal Data held by us about you, as well as information about how we are using your data, and you can request that we rectify any inaccurate Personal Data held by us about you.

## **NOTICE TO CALIFORNIA RESIDENTS**

The California Consumer Privacy Act (CCPA) requires that SitePREP provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of California residents regarding their personal information.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include information that is publicly available, de-identified or aggregate information. For purposes of this “Notice to California Residents” section we will refer to this information as “Personal Information.”

## **RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, DISCLOSED OR SOLD**

### **Your Right**

If you are a California resident, you have the right to request that we disclose what Personal Information we have collected about you in the 12-month period preceding your request. There is no charge to you for exercising your rights under the CCPA. This right includes the right to request any or all of the following:

- Specific pieces of Personal Information that we have collected about you;
- Categories of Personal Information that we have collected about you;
- Categories of sources from which the Personal Information was collected;
- Categories of Personal Information that we sold (if applicable) or disclosed for a business purpose about you;
- Categories of third parties to whom the Personal Information was sold (if applicable) or disclosed for a business purpose; and
- The business or commercial purpose for collecting or, if applicable, selling Personal Information.

The CCPA defines “sell” to mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a California resident’s Personal Information to another business or a third party for monetary or other valuable consideration.

## How to Submit a Request to Know

You may submit a request to know at [support@siteprep.io](mailto:support@siteprep.io).

## Our Process for Verifying a Request to Know

If we determine that your request is subject to an exemption, we will notify you of our determination. If we determine that your request is not subject to an exemption, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request. Our verification process may differ depending on whether you maintain a password-protected account with us. If you maintain a password-protected account, we may verify your identity through existing authentication practices available through your account. If you do not maintain a password-protected account, or if you are an account-holder but we suspect fraudulent or malicious activity with your account, we will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” using methods we have determined are reliable for the purpose of verifying identities depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized access. In addition, you may be required to submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.

## Collection of Personal Information

The following table presents the categories of Personal Information that we have collected, the categories of sources from which that information was collected, and the categories of third parties (if applicable) with whom we shared that Personal Information for the 12 months preceding the Effective Date of this Privacy Policy.

| Categories of Personal Information Collected | Categories of Sources from which Personal Information was Collected                             | Business or Commercial Purpose for the Collection   | Categories of Third Parties with whom We Share Personal Information |
|--|---|---|---|
| Name   | Information provided by you when making a transaction or registering with the Site.             | To deliver products and services to you. To identify you as a user of the Services.                 | None  |
| Postal Address                               | Information provided by you when making a transaction or registering with the Site.             | To deliver products and Services to you.  | None  |
| Email Address                                | Information provided by you when making a transaction or registering with the Site.             | To communicate with you regarding a transaction and products and Services you may be interested in. | None  |
| Telephone Number                             | Information provided by you when making a transaction or registering with the Site.             | To communicate with you regarding the Services.   | None  |
| IP Address                                   | We collect your IP address when you log into the Site and use the Services.                     | To deliver products and Services to you.  | None  |
| Geolocation                                  | We receive this information from your input, or by a third-party device linked to your account. | To provide you with the desired feedback and functionalities when using the Services.               | None  |

## **RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION**

### **Your Right**

If you are a California resident, you have the right to request that we delete the Personal Information about you that we have collected or maintain. However, a business is not required to comply with a request to delete if it is necessary for the business to maintain the Personal Information in order to, for example, complete a transaction, detect security incidents, comply with a legal obligation, or otherwise use the Personal Information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

### **How to Submit a Request to Delete**

You may submit a request to delete by sending an email to [support@siteprep.io](mailto:support@siteprep.io).

If you submit a request to delete online, you will be asked to confirm separately that you want your Personal Information deleted.

### **Our Process for Verifying a Request to Delete**

If we determine that your request is subject to an exemption, we will notify you of our determination. If we determine that your request is not subject to an exemption, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request. Our verification process may differ depending on whether you maintain a password-protected account with us. If you maintain a password-protected account, we may verify your identity through existing authentication practices available through your account. Prior to deleting the Personal Information, we will ask you to re-authenticate yourself with respect to that account. If you do not maintain a password-protected account, or if you are an account-holder but we suspect fraudulent or malicious activity with your account, we will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized deletion.

If we are unable to verify your identity to the applicable standard, we will treat your request to delete as a request to opt-out of the sale, if applicable, of the personal information that you provided as part of processing the request to delete. Please see the following section for a description of the right to opt-out of the sale of personal information.

## **NOTICE OF RIGHT TO OPT-OUT OF SALE OF PERSONAL INFORMATION**

### **Your Right**

If you are a California resident, you have the right to direct a business that sells (or may in the future sell) your Personal Information to stop selling your Personal Information or to refrain from doing so in the future.

The CCPA defines “sell” to mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a California resident’s Personal Information to another business or a third party for monetary or other valuable consideration.

### **How to Submit a Request to Opt-Out**

You may submit a request to opt-out by sending an email to [support@siteprep.io](mailto:support@siteprep.io).

### **How We Process a Request to Opt-Out**

We will act upon your request to opt-out within 15 days from the date that you submit the request. The CCPA does not require that we verify the identity of individuals who submit requests to opt-out of sales. However, we may deny the request if we have a good faith, reasonable, and documented belief that the request is fraudulent. If we deny the request on this basis, we will notify the requesting party and provide an explanation as to why we believe the request to be fraudulent.

## **RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF A CALIFORNIA RESIDENT'S PRIVACY RIGHTS**

We will not discriminate against California residents if they exercise any of the rights provided in the CCPA as described in this section "Notice to California Residents." As such, we will not deny goods or services to that California resident; charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; provide a different level or quality of goods or services to the California resident; or suggest that the California resident will receive a different price or rate for goods or services or a different level or quality of goods or services. However, we are permitted to charge a California resident a different price or rate, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by that resident's scope of use of our services.

## **AUTHORIZED AGENTS**

California residents may use an authorized agent to submit a request to know, delete or opt-out of sales on your behalf. If you use an authorized agent to submit a request to know or request to delete, we may require that (1) the authorized agent provide proof of your written permission and (2) you verify your identity directly with us. The requirements do not apply if you have provided the authorized agent with a power of attorney pursuant to California Probate Code sections 4000 to 4465.

If you use an authorized agent to submit a request to opt-out of sales, you will need to provide that authorized agent with written permission to do so and submit written proof to us that the agent has been authorized to act on your behalf.

## **SHINE THE LIGHT LAW**

We do not disclose Personal Information obtained through our Site or Services to third-parties for their direct marketing purposes. As such, we have no obligations under California Civil Code 1798.83.

## **NOTICE TO RESIDENTS OF EUROPE AND THE UNITED KINGDOM**

SitePREP recognizes the importance of protecting the privacy of our customers and the users of the Site. Accordingly, we will always ensure that we have a lawful basis for processing your Personal Data.

## **THIS POLICY MAY CHANGE**

As we grow and offer new service features, we will continually evaluate this policy to ensure that your privacy is maintained and to protect your personally identifiable data. We reserve the right to update this policy at any time without prior notice. Revised policies will be posted on the Site. You agree that continued use of the Site is an acknowledgement and consent to any terms contained in this Privacy Policy, current at the time of use. If you do not agree to the terms of this Privacy Policy or any revised

policy, please discontinue using the Site immediately and contact us to have your account deleted. We encourage you to periodically review this page for the latest information on our privacy practices.