

## **Your Privacy Rights**

### **Introduction**

Alltana, Inc. (“Alltana” or “we” or “us”) has created this Privacy Policy in order to disclose its use of consumer data collected about you. This Privacy Policy is effective as of January 1, 2019. Any questions regarding this policy should be directed by email to [info@alltana.io](mailto:info@alltana.io). You may also contact Alltana at 2301 S 5<sup>th</sup> St, Suite 34, Austin, TX 78704. The following discloses Alltana’s information gathering and dissemination practices for the Alltana Software as a Service and associated applications (“Alltana Platform”)

Alltana may be the controller or processor of your personal data provided to us by you or collected by us from you during your use of the Alltana Platform, as outlined below. If you use the Alltana Platform, you consent to this policy and the use/sharing of your personal data as described herein. You have the choice to opt-out of sharing your data, as described below, and control how we use and share your data.

### **Information Collected and Received**

Alltana may collect or receive personal information about you, including, but not limited to, user name, password, first and last name, email address, street address. You can choose what information you want to share with Alltana, however if you choose to withhold any personal data requested by us, it may not be possible for you to gain access to certain parts of the Alltana Platform. We collect personal information from you at several different points, including but not limited to the following:

- when we correspond with you as a customer or prospective customer;
- when you visit the website and/or Alltana Platform;
- when you register as an end-user of the Alltana Platform and an account is created for you;
- when you provide information, such as survey information;
- when you contact us for help; and
- when the website and/or Alltana Platform sends us error reports or application analytics data.

Alltana does not require you to include sensitive information.

### **Lawful Basis for Processing**

We will only collect and process your personal data where we have lawful basis. Our lawful basis include consent (where you have given it), where processing is necessary for the performance of a contract with you, and for the purposes of our legitimate interests or the legitimate interests of our third parties, provided that such interest does not outweigh your rights and freedoms. Examples of legitimate interest include but are not limited to: (i) complying with

applicable law, (ii) protecting against security or other threats, (iii) administration of our business interests, including improvements and enhancements of our business, and (iv) customer relationship issues.

### **Your Rights: Access, Correction, Deletion**

We retain the personal data that you provide to us when you registered with the Alltana website and/or Alltana Platform or any other information that you volunteered while using the website and/or Alltana Platform for (i) as long as your account is active or (ii) otherwise for a limited period of time as long as we need to fulfill the purposes for which we have initially collected it, unless otherwise required by law. We retain any information provided as described in the Uses of Information below.

You have the right to request access to the information that Alltana has on you. You can do this by contacting us at [info@alltana.io](mailto:info@alltana.io). In order to comply with your request, we may have to verify your identity. If you believe that the information that we have about you is incorrect, you are able to contact us at [info@alltana.io](mailto:info@alltana.io) with the change request. Any data that is no longer needed for the purposes specific below will be deleted. You have the right to request the deletion of any personal data that we have on you. If you wish to do so, please contact us at [info@alltana.io](mailto:info@alltana.io). Note that Alltana may not be able to delete any depersonalized data on you.

### **How We Use Your Information**

Alltana may use personal information that we collect about you to:

- deliver the Alltana Platform that you have requested;
- manage your customer relationship and provide you with customer support;
- perform analysis about your use of the website and/or Alltana Platform;
- communicate with you by e-mail, postal mail, telephone and/or mobile devices about products or services that may be of interest to you;
- enforce our terms and conditions and other agreements between Alltana and you;
- manage our business;
- respond to investigation, court orders, legal process, or to investigate, prevent or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person, or as otherwise required by law; and
- perform functions as otherwise described to you at the time of collection.

Alltana occasionally uses other companies to perform services necessary to our operations. In the course of providing these services, those companies may have access to your personal information. By contractual agreement, those companies must treat your information in accordance with this Privacy Policy. However, we will not be liable for any damages that may result from the misuse of your personal information by these companies.

## How We Share Your Information

**(a) Personally Identifiable Information.** Alltana will never sell your email address or any other personally identifiable information, to any third party without your permission. We may store personally identifiable information in locations outside the direct control of Alltana (for example, on servers or databases co-located with hosting providers). Any personally identifiable information you elect to make publicly available on our websites and/or applications (such as posting comments, reviewing items, etc.) will be available to others. Except as described in this Section, we will not disclose your personally identifiable information to any third party except consultants working on our behalf, without notifying you of our intent to share the information and giving you an opportunity to prevent your information from being shared. From time to time, we may partner with companies based on the interests of our users. These partner companies will never see your email address or any other information that could identify you or be used to contact you directly.

**(b) Non-Personally Identifiable Information.** The Alltana site registration form may require users to give Alltana contact information (such as your name and email address) and demographic information (such as your zip code, age, or income level). Alltana uses your contact information from the registration form to send you information about Alltana and promotional material from some of Alltana's partners. Your contact information may also be used to contact you when necessary. Alltana may use demographic and/or profile data to tailor your experience on the Alltana website and/or applications, show you content that Alltana thinks you may be interested in, and display content according to your preferences. The demographic and profile data will be shared with third parties ONLY on an aggregate basis. Furthermore, Alltana shall have the right to retain records of all data pertaining to use of the website and Alltana Platform including, but not limited to, usage, activity logs, and click-throughs. Alltana may disclose such data to third parties provided it is grouped with other Alltana users' data and is presented in an aggregate form.

**(c) We May Be Required to Share Your Information.** Alltana reserves the right to disclose information when required by law, such as by a subpoena or other legal proceedings. Alltana may also disclose your information if we reasonably believe it necessary to (i) comply with requests of law enforcement or other applicable law; (ii) to enforce any agreement between you and us; (iii) to protect the security and integrity of our website and the Alltana Platform; and/or (iv) to protect us, our users or others.

**(d) What Happens in the Event of a Change of Control:** We may be involved with an acquisition or divestiture of our business, products or services. Information we maintain including names and email addresses, and other information related to the Alltana Platform may be sold or transferred in connection with such transaction. We may also sell, assign or otherwise transfer such information in connection with a sale of all or substantially all of our business or assets. You will be notified via email and/or a notice on our site of any applicable change in ownership or uses of your information.

**(e) Behavioral Targeting / Re-Targeting.** We allow advertisers to display advertising on our sites and applications. Our advertisers may use technology such as cookies to gather information

about your activities on multiple sites in order to provide you advertising based upon your activities and interests. The only way to opt out of the collection of any information through cookies or other tracking technology is through the settings in your browser or mobile device. Please review your browser or mobile device information for instructions on how to delete and disable cookies, and other tracking/recording tools (to learn more about cookies, clear gifs/web beacons and related technologies, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org>). If you access the Alltana Platform, websites and/or applications on your mobile device, you may not be able to control tracking technologies through the settings. For more information, see the Cookies Section below.

## **How We Store and Process Your Information**

The information collected by Alltana may be processed and/or stored in the United States, European Union Member Nations, Canada, or any other country in which Alltana or its affiliates or service providers maintain operations. Alltana may transfer information that we collect, including personally identifiable information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction of domicile to other countries or jurisdictions. If you are located in the European Union or other regions with laws restricting transferring of data, please note that we will comply with laws applicable to us.

## **How We Protect Your Information**

Alltana is concerned with protecting your privacy and data, and therefore we use industry-standard technologies when transferring and receiving consumer data exchanged between Alltana and other companies to help ensure its security. This site has security measures in place designed to protect the loss, misuse and alteration of the information under Alltana's control. Alltana's servers and the Alltana Platform are backed up regularly and protected by security systems. However, we cannot ensure or guarantee the security of any information you transmit to us or guarantee that your information on the Alltana Platform may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards. If you have any questions about security on our website and/or the Alltana Platform, you can contact us at [info@alltana.io](mailto:info@alltana.io).

## **Cookies**

“Cookies” are small pieces of information that are stored by your browser on your computer's hard drive. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at our website and/or Alltana Platform. However, once you choose to furnish the website and/or Alltana Platform with personal information, this information may be linked to the data stored in the cookie. We use cookies to understand website and/or Alltana Platform usage and to improve the content. You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage cookies, please consult the privacy features in your browser.

## **Global Positioning System**

Global Positioning System (GPS) tracking technology may need to be enabled in the Alltana Platform in order to determine the location (latitude and longitude) of users of the Alltana Platform. Your location can be determined with varying degrees of accuracy by using Global Positioning System (GPS) data, IP address, and information about things near your device, such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices. You acknowledge and consent to the use of this technology. You have the right to reject the use of this technology by turning off location services on your computer; however, note that this technology and its applicable information is used in conjunction with the Alltana Platform and therefore some elements of Alltana Platform may not be accessible to you. The GPS information may be transmitted to the Alltana Platform, the Alltana users, and temporarily stored by Alltana for its customers. Alltana does not provide this information to any other third party.

## **Links**

Alltana may create links to other web sites. Alltana will make a reasonable effort to link only to sites that meet similar standards for maintaining each individual's right to privacy. However, many other sites that are not associated or authorized by Alltana may have links leading to our site. Alltana cannot control these links and Alltana is not responsible for any content appearing on these sites.

## **Children's Privacy**

We do not knowingly collect any information from anyone who we know to be under the age of 13. If you are under the age of 18, you should use this website only with the involvement of a parent or guardian and should not submit any personal information to us. If we discover that a person under the age of 13 has provided us with any personal information, we will use commercially reasonable efforts to delete such person's personal information from all Alltana systems.

## **Your California Privacy Rights**

Alltana does not currently respond to browser "Do Not Track" (DNT) signals or other mechanisms. Third parties may collect personal information about your online activities over time and across sites when you visit the website.

If you are a California resident, California Civil Code Section 1798.83 permits you to request certain information regarding our disclosure of personal information to third parties for the third parties' direct marketing purposes. To make such a request, please contact us by sending an e-mail to [info@alltana.io](mailto:info@alltana.io).

Our website and/or Alltana Platform are not intended to appeal to minors. However, if you are a California resident under the age of 18, and a registered user of our website and/or application, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an e-mail with a detailed description of the specific content or information to [info@alltana.io](mailto:info@alltana.io).

Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Under California law, California residents who have an established business relationship with us may opt-out of our disclosing personal information about them to third parties for their marketing purposes

### **International Transfer of your Personal Information**

The website is hosted and operated entirely in the United States and is subject to United States law. Any personal information that we collect from you is currently stored and processed in the United States. If you are accessing the website and/or Alltana Platform outside of the U.S., you need to understand that by accessing our website and/or Alltana Platform, you consent to the transfer of your personal information to the United States. Please be advised that United States law may not offer the same privacy protections as the law in your jurisdiction.

### **Amendments**

Alltana may amend this policy at any time. If Alltana is going to use personally identifiable information collected through the Alltana site in a manner materially different from that stated at the time of collection, Alltana will notify users via email and/or by posting a notice on the Alltana site for thirty (30) days prior to such use. This Privacy Policy may not be otherwise amended except in a writing that specifically refers to this Privacy Policy and is physically signed by both parties.

### **Successors and Assigns**

This Privacy Policy inures to the benefit of successors and assigns of Alltana.

### **Contacts**

If you have any questions about this Privacy Policy, the practices with this website, or request access, changes or deletion to information we have about you, you can contact [info@alltana.io](mailto:info@alltana.io). Upon request, Alltana will provide you with access to information (e.g., name, address, phone number) that Alltana collects and maintains about you. We give you the following options for changing, modifying or removing information previously provided: (i) email: [info@alltana.io](mailto:info@alltana.io); or (ii) visit [www.alltana.io](http://www.alltana.io).

### **Opt-Out**

The Alltana site provides users the opportunity to opt-out of receiving communications from Alltana, except transactional correspondence. To opt-out of receiving our communications, you can (i) send email to [info@alltana.io](mailto:info@alltana.io); or (ii) send postal mail to: Alltana, Inc., 2301 S 5<sup>th</sup> St., Suite 34, Austin, TX 78704.