

**I. Policy**

1. This policy is effective from 7/02/2015 and is updated and revised on the date in the Date Revised Section of this Policy. It is based on the requirements for:
    - a) **GDPR** - The General Data Protection Regulation (GDPR) will apply in the UK from 25 May 2018. It will replace the 1998 Data Protection Act and introduce new rules on privacy notices, as well as processing and safeguarding personal data.
    - b) **EU US Privacy Shield** \*Previously the Safe Harbor
    - c) **Vroozi's Standard Privacy & Confidentiality Practice** for the US
    - d) **They are related to** Requirements for Employees, Vendors, Customers and 3<sup>rd</sup> Parties Privacy and Confidentiality, Data and Data Security & Data Integrity
  2. This privacy policy sets out how Vroozi uses and protects any information that you give Vroozi when you use the Vroozi website and or Vroozi Platforms.
  3. Vroozi is committed to ensuring that your privacy is protected.
    - a) Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.
  4. Vroozi may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.
- A.** The Vroozi, Inc. Privacy Policy provides established procedures and practices governing the privacy of the following:
- a) Customers,
  - b) 3<sup>rd</sup> Party Vendors,
  - c) Contractors,
  - d) Employees
- B.** VROOZI Privacy Policy requires that Vroozi provides Customers, Vendors, Contractors, 3<sup>rd</sup> Parties and Employees –
- a) Notice (Notice) to help the Customers, Vendors Contractors, 3<sup>rd</sup> Parties and Employees learn about how we handle customer and supplier Personal Information collected throughout the world.
  - b) When we use the term “Personal Information” or “PI” in this Notice, we are referring to any information that
    - (1) is recorded in any form;
    - (2) is about or is related to a specific individual;
    - (3) can be linked to that individual; and
      - (a) When the term “Sensitive Personal Identifiable Information” in this Notice, it is referring to a particular

subset of an individual's Personal Information Personal Information that provides details of his or her

- (i) Race,
- (ii) Ethnic Origin,
- (iii) Sexual Orientation,
- (iv) Political Opinions,
- (v) Religious,
- (vi) Philosophical Beliefs,
- (vii) Trade Union Membership,
- (viii) Concerns his or her Health

- c) Vrooz systems and software do not capture any "PI" information.
- d) Vrooz general practices for implementing the Principles with respect to the "PI" we receive are described below:

### **C. Notice**

1. A Notice is submitted to

- a) all of our Customer Master Administrators (for our Platform),
- b) our Customers who have registered with us on our website or contacted us via our website.

2. This notice is also posted on our website and in our platform as a link that can be found at:

- a) This Notice can be found on our Website at : xxxxxx
- b) This Notice can be found on our Platform.
  - (1) Vrooz only provides this link to customers and we do not share the link unless you are paid customer of Vrooz

3. The Notice indicates below items we advise our customers, vendors, employees and contractors:

#### **4. What we collect**

- a) We may collect the following information for our Website and our Platforms:

##### **(1) Website – Schedule a Demo**

- (a) First Name
- (b) Last Name
- (c) Job Title
- (d) Company Name
- (e) Phone Number
- (f) Email Address

**(ii) Website – Contact Us**

- (a) First Name
- (b) Last Name
- (c) Company Name
- (d) Phone Number
- (e) Area of Interest for the contact
- (f) Message – Text Fields Open for the person entering the data to input
- (g) Confirmation Captcha “I am not a Robot”

**(iii) Vroozi Log In**

- (a) Username | Email
- (b) Password

**(iv) Vroozi Platform Data & Sign In | Log In Information**

(a) This can be controlled by your Master Administrator at your organization. This information is able to be turned on and off by your Master Administrator.

(b) If Vroozi is ACTING as a Master Administrator for your organization, then we will need to be notified by your own resource at the company utilizing the Vroozi Platform to ensure that the users Log In Information is displaying of:

- (i) Username | Email
- (ii) Password
- (iii) Address name,
- (iv) Admin,
- (v) Attention
- (vi) Building Code
- (vii) City
- (viii) Company Address
- (ix) Company name
- (x) Country
- (xi) Created date
- (xii) Email
- (xiii) Floor
- (xiv) Phone
- (xv) Postal Code
- (xvi) Room
- (xvii) State
- (xviii) Street
- (xix) Street 2
- (xx) TaxID
- (xxi) UserID

(c) To disable | remove the information, you will need to contact your

- (i) Vroozi Master Administrator at your organization or
- (ii) If Vroozi is ACTING as the Master Administrator, you must contact [Support@Vroozi.com](mailto:Support@Vroozi.com)

(v) demographic information such as postcode, preferences and interests

(vi) other information relevant to customer surveys and/or offers

**b) What we do with the information we gather**

(i) We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- (a) Internal record keeping only
- (b) We may use the information to improve our products and services.
- (c) We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- (d) From time to time, we may also use your information to contact you for market research purposes.
- (e) We may contact you by email, phone, fax or mail.
- (f) We may use the information to customize the website and Platform Demo or your Platform according to your interests and your needs.

**5. Customer Information:**

**(1)** We may receive information from entities including:

- (a) Name,
- (b) Contact Information
- (c) Communication Preferences,
- (d) Member Number
- (e) Account Information,

- (f) Payment-Related Information and
- (g) Other Types of Information individuals choose to provide (collectively, "Personal Information").

(2) Any Personal Information sent to us may be used by us and our agents for the following purposes:

- (a) To Provide the Services or Transactions you have requested;
- (b) For Internal Quality Assurance purposes;
- (c) To Improve our Products, Services or Infrastructure;
- (d) To distribute Administrative Communications, Notifications, Marketing or Promotions;
- (e) To Communicate or Conduct Surveys, Questionnaires, Contests or Promotions.

#### **6. Supplier, Vendors, and 3rd Party Information:**

(1) We may receive supplier Personal Information from entities including:

- (a) Name,
- (b) Business Title,
- (c) Business Address
- (d) and Other Business Contact Information,
- (e) Financial Account or
- (f) Tax Identification Information,
- (g) Payment-Related Information,
- (h) Service or Relationship Status Information and
- (i) Other Types of Information Individuals choose to Provide (Collectively, "Personal Information").

(2) Any Supplier Personal Information sent to us may be used by us and our agents for the following purposes:

- (a) To Manage Supplier Relationships;
- (b) Process Payments to Suppliers or
- (c) Perform Related Accounting or
- (d) Recordkeeping Functions; or
- (e) for Internal Quality Assurance Purposes.

(3) Access to Customer or Supplier Personal Information is limited to those persons who must use the information in order to carry out the above purposes.

#### **7. Contractor, Employee Information:**

(1) We may receive information from entities including:

- (a) Name,
- (b) Contact Information
- (c) Communication Preferences,

- (d) Contract or Employee Number or ID
- (e) Personal Address and or Personal Information,
- (f) Payment-Related Information and
- (g) Other Types of Information individuals choose to provide (collectively, "Personal Information").

(2) Any Personal Information sent to us may be used by us and our agents for the following purposes:

- (a) To Provide the Services or Transactions you have requested;
- (b) For Internal Quality Assurance purposes;
- (c) To Improve our Products, Services or Infrastructure;
- (d) To distribute Administrative Communications, Notifications, Marketing or Promotions;
- (e) To Communicate or Conduct Surveys, Questionnaires, Contests or Promotions.

## **8. Security**

a) We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable safeguard measures in order to secure the information we collect online:

- (1) physical,
- (2) electronic
- (3) managerial procedures

## **9. How we use cookies**

a) A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

b) Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

c) We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

d) Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

e) You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

#### **10. Links to other websites**

a) Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### **11. Controlling your personal information**

a) You may choose to restrict the collection or use of your personal information in the following ways:

(1) whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes

(2) if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [email address]

#### **12. Information that's shared with trusted third-party services**

a) We may share your information with certain trusted third-party services to help us provide, improve, promote, or protect VROOZI's Services (like when we partner with payment processors, or use services that help us manage our ads on other sites). When we share data with third-party services that support our delivery of the VROOZI Services, we require that they use your information only for the purposes we've authorized, and that they protect your personal information at least to the same standards we do. We may also share information that's aggregated and anonymized in a way that it doesn't directly identify you.

#### **D. Choice**

a) If we intend to use your information for a purpose that is incompatible with these purposes or

b) if we intend to disclose it to a type of third party (other than an agent or service provider) not previously identified, we will notify you and offer you the opportunity to opt out of such uses and/or disclosures where it involves non-sensitive information or opt-in where sensitive information is involved.

**E. Onward Transfers (Transfer to Third Parties)**

- a) We will provide you with notice and choice if we intend to transfer your Personal Information to a type of third party that is not acting as our agent or service provider and that we have not previously identified.
- b) We sometimes contract with other companies and individuals to perform functions or services on our behalf.
- c) They may have access to Personal Information needed to perform their functions but are restricted from using the Personal Information for purposes other than providing services for us or to us.
- d) We enter into written agreements with agents and service providers that may be provided access to Personal Information received that require them to provide the same level of privacy protection as Vroozi promotes.

**F. Security and Data Security Measures**

- a) We take security seriously, and the security of your personal data is important to us. We follow industry-standard practices to protect the data we collect and maintain, including using Transport Layer Security (TLS) to encrypt information as it travels over the internet.
- b) We will take reasonable steps to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.
- c) No method of transmission over the internet or electronic storage is completely secure, so Vroozi cannot guarantee its absolute security.
- d) Your account information is protected by a password, which you should choose carefully and keep secure.
- e) We encourage all users to enable two-factor authentication in account settings to further protect their account and this is a request conducted from your organization to use two factor authentication process. If your organization did not opt to use this, we can not enable two factor authentication. Please contact your Master Administrator or Securities team at your organization.
- f) We have implemented appropriate physical, electronic and managerial procedures to help safeguard and secure Personal Information from loss, misuse, unauthorized access or disclosure, alteration or destruction.
- g) We have a Security Incident Response Team (SIRT) and protocol in place in the event of a data breach. We encourage the responsible disclosure of vulnerabilities of our Services by emailing



[Support@Vrooz.com](mailto:Support@Vrooz.com), and we will invite valid disclosures to our bug bounty program.

**G. Data Integrity**

- a) We will process Personal Information in a manner that is compatible with and relevant to the purpose for which it was collected or authorized by you.
- b) To the extent necessary for those purposes, we will take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

**H. Retention**

- a) We will retain your information as long as your account is active, as necessary to provide you with the Services or as otherwise set forth in this Policy. We will also retain and use this information as necessary for the purposes set out in this Policy and to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements and protect Vrooz's legal rights.
- b) We also collect and maintain aggregated, anonymized or pseudonymized information which we may retain indefinitely to protect the safety and security of our Site, improve our Services or comply with legal obligations.

**I. Data Transfers**

- a) Vrooz is a US-based company, your information will be collected and processed in the United States.
- b) The United States has its own laws governing data protection and government access to information.
- c) The rules that protect your personal information under United States law may be different than in your home country.
- d) If you choose to use the Services, you need to agree to our Terms of Use, which set out the contract between Vrooz and its users.

**J. Access. Upon request**

- a) Vrooz will provide you with reasonable access to the Personal Information about you that we hold.

b) Vroozi will also take reasonable steps to correct, update, amend or delete any information that is demonstrated to be inaccurate, except where the burden or expense of doing so would be disproportionate to the risks to your privacy in the case in question or where the rights of third parties would be violated.

**K. Data Protection Officer (DPO)**

c) **Vroozi's Data Protection Officer can be reached at:**

- (1) **Email:** [Support@Vroozi.com](mailto:Support@Vroozi.com)
- (2) **You can also send mail to:**  
15000 Ventura Blvd, Suite 200,  
Sherman Oaks, CA 91403

**L. Data Protection Authority**

d) Subject to applicable law, if you are a citizen or resident of the European Economic Area, you also have the right to

- (1) Object to Vroozi's use of your personal information and
- (2) Lodge a complaint with your local data protection authority or the United Kingdom Information Commissioner's Office, which is Vroozi's lead supervisory authority in the European Union.

United Kingdom Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire  
SK9 5AF, United Kingdom  
Telephone: +0303 123 1113  
Fax: 01625 524510  
Web: <https://ico.org.uk/global/contact-us/>

**M. Children & Minors Under the Age of 18 and then Under the Age of 13 years of age**

e) People under 18 (or the legal age in your jurisdiction) are not permitted to use Vroozi on their own. Vroozi does not knowingly collect any personal information from children under the age of 13 and children under 13 are not permitted to register for an account or use our Services.

f) If you believe that a child has provided us with personal information, please contact us at [Support@Vroozi.com](mailto:Support@Vroozi.com). If we become aware that a child under age 13 has provided us with personally identifiable information, we'll delete it.

**N. User Rights**

g) Users residing in certain countries, including the EU, are afforded certain rights regarding their personal information. Except where an exception or exemption applies, these rights include the ability to access, correct, and request deletion of your personal information. While these rights are not applicable globally, all Vroozi's users can manage their personal information, as further described below, in their account settings or contact their Vroozi Master Administrator accordingly. If Vroozi is managing the Master Administration Account a formal email to [Support@Vroozi.com](mailto:Support@Vroozi.com) will need to be send for change in the settings for your user account.

h) You can request a downloadable copy of your personal data from Vroozi from your account settings page.

(1) To modify or delete the personal information you've provided to us, please log in and update your profile by contacting your Vroozi Administrator or the Vroozi Master Administrator at Vroozi (if your master administration is conducted by Vroozi resources) Please send a message to [Support@Vroozi.com](mailto:Support@Vroozi.com)

(2) You may also delete your account from your account settings page. We may retain certain information as required by law or as necessary for our legitimate business purposes.

#### **O. Email and Mobile Notifications**

i) We want to communicate with you only if you want to hear from us. We try to keep emails to a minimum and give you the ability to opt in to any marketing communications we send.

j) We will send you email relating to your transactions on Vroozi

k) You may also elect to receive certain marketing email communications, in accordance with your preferences, and from which you may opt out at any time by adjusting your account settings, notification settings under profile settings. Please contact your Master Administrator or the Vroozi Master Administration if Vroozi is managing your accounts.

l) We'll also send you service-related announcements when it's necessary to do so.

#### **P. Employee & Contractor Training**

m) All of the Employees and Contractors at Vroozi go through a thorough training process and a re-training process for the compliance requirements on Privacy & Confidentiality. They are provided with the Policy and they

acknowledge in writing as an acknowledgement letter for Privacy & Confidentiality at Vroozi for:

- (1) Safeguarding the Data of Vroozi's Website and Platforms
- (2) Not to Sell the Data
- (3) Not to distribute the information to others without the consent of the actual customer, 3<sup>rd</sup> party vendor, other employees and contractors.

n) The Board of Directors review and approve the policies, procedures

Q. **Deviations from this policy** require written approval from the appropriate level of management for Internet data file download operations and maintenance.

## II. Purpose

A. To establish formal process of Privacy for the Customers, Contractors, Employees and 3<sup>rd</sup> parties. and to establish maintenance and monitoring of this privacy policy to ensure the integrity and security of Personal information that Vroozi may obtain.

## III. Scope

### A. In Scope

- i. Privacy for Customers, Contractors, Employees, and 3<sup>rd</sup> Party Vendors
- ii. Personal Information obtained by Customers, Contractors, Employees and 3<sup>rd</sup> Parties in writing

## IV. Confidentiality of User Information

- A. The use of Confidential Data or Personal Information if visible by Employees of Vroozi is considered privileged for the contractor, employee that is involved in the use of the confidential and personal information for a customer, a 3<sup>rd</sup> party.
- B. Similarly, the Organization understand that the use of Confidential Data or Personal Information of an employee if visible by the leadership of Vroozi is considered privileged for the leadership team.
- C. Before confidential information may be transferred across the Internet, the person making the transfer must make sure that access controls on the destination computer are commensurate with access controls on the originating computer.

- D. If comparable security cannot be provided with the destination system's access controls, then the information must not be transferred.
  
- E. We will not sell, distribute or lease your personal information to third parties unless
  - a. we have your permission or
  - b. are required by law to do so.
  - c. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.
  
- F. You may request details of personal information which we hold about you under the Data Protection Act 1998.

A small fee will be payable. If you would like a copy of the information held on you, please write to

15000 Ventura Blvd Suite 200, Sherman Oaks, CA 91403  
Or  
You can call: 1-866-509-5045

- G. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

## **VI. Change Management, Notice Postings & Updates to the Privacy Policy**

- A. The most recent version of the Notice will always be posted to this website.
- B. Anytime that we do make such changes, we will also update the Effective Date listed at the beginning of the Notice.
- C. Customers, Vendors, Employees and Contractors and 3rd Parties are encouraged to review the most recent version of the Notice each time that you visit this website so that you are aware of how we collect, use and retain personal information.
- D. Any changes to our Policy will become effective upon our posting of the revised Policy on the Site.

## **VII. Enforcement**

- A. We will regularly review our compliance with the statements set forth in this Notice, and we will provide an independent way to resolve complaints about our privacy practices.

We encourage interested persons to Contact Us at  
15000 Ventura Blvd Suite 200, Sherman Oaks, CA 91403  
Or

You can call: 1-866-509-5045

Or

Email: [Support@Vroozi.com](mailto:Support@Vroozi.com)

- B.** for Vroozi and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.
  
- C.** Failure to comply to the rules and regulations of this policy may cause termination of employment with Vroozi, Inc.