



SpotOnResponse Privacy Policy

Personal data collected or received by SpotOnResponse LLC (hereinafter “SpotOnResponse” or “we”) may be transferred to its affiliated entities, where it is necessary to meet the purpose for which the visitor has submitted the information. By submitting information and data via SpotOnResponse’s website or use of its products, software or services, you are providing explicit consent to collection and transmission of such data and information.

Data Collection

SpotOnResponse is committed to protecting the privacy of the users of its products, software or services and persons visiting our website. This policy addresses: what data may be collected; how data is held; how data will be used; under what conditions this data may be shared or released to another party; cookies; other sites; how material revisions to the policy will be conveyed; and contact information.

Data is retained or transmitted in either the jurisdiction(s) of the user operation(s), other jurisdictions authorized by the user, or jurisdiction(s) that SpotOnResponse determines is best to meet this policy and the obligations in the agreement for such use of the products and/or services.

Information Collection and Use

Personal information regarding your name, company, address, etc., may be requested. This data is usually gathered to fulfill requests from you, deliver products and services, and enable you to participate in our online services.

SpotOnResponse does not collect personal information about you when you visit our website unless you choose to provide that information to us. SpotOnResponse collects limited non-personally identifying information your browser makes available automatically whenever you visit a website. This information may include the internet address of your computer or network, the date, time, and page you visited on our website, your browser and operating system, and the referring page. We may use the aggregated information from all our visitors to measure server performance, analyze user traffic patterns and improve the content of our website.



Some of our online services require you to register for an account. We ask you for some personal information to create an account (typically your name, email address and a password for your account) and we will use that information to provide the service.

Information Sharing and Disclosure

SpotOnResponse gathers and tracks this information for our internal use and does not sell or disclose personal information, including email addresses, to third parties, partners, or affiliates. SpotOnResponse will only utilize the information provided to us in the manner described herein.

Cookies

To ensure we are publishing relevant content for our visitors, SpotOnResponse collects site-visitation statistics using cookies. SpotOnResponse will only use this information in aggregated form and only use site-visitation statistics for improving our site. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set.

Other Sites

This Privacy Policy applies solely to the information collection practice on SpotOnResponse’s and its affiliates’ websites and any products, services or software agreements or use acceptance that reference this Privacy Policy. From time to time, we may include links to other sites. Please be aware that SpotOnResponse has no control or influence over the privacy practices of such other sites. When you link to another website, you are subject to the privacy policy of that new site. We encourage our users to be aware when they leave the SpotOnResponse site and to read the privacy statements of each and every web site that they visit.

Some SpotOnResponse software applications and services incorporate Google Maps as part of their Application Programming Interface (API). By agreeing to the terms and conditions of these Services, you also agree to the [Google Maps/Google Earth Additional Terms of Service](#).



Policy Changes

Please note this Privacy Policy can change from time to time. It is your responsibility to be aware and to check this Privacy Policy for each use. The effective date of the changes will be represented by the Effective Date posted on the bottom of this page.

GDPR Rights

If you are a resident of the European Union, you may exercise your rights under the GDPR by contacting us at info@SpotOnResponse.com, and we will respond to you within 15 days. GDPR rights you may exercise include, but are not limited to, your right to request access to the personal information you may have provided to us, transfer of your personal data to a third party, deletion of personal data you may have provided to us, amendment or correction of your personal data, or place restrictions on use of your personal information.

CCPA Rights

Do Not Sell My Personal Information – CCPA Opt Out Link

This CCPA Rights supplements the information contained in the SpotOnResponse LLC's Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this CCPA Rights to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice. Consumers with rights under CCPA are available to exercise your rights under the CCPA by contacting us at info@SpotOnResponse.com or toll-free via 866-200-0165, and we will endeavor to respond to you within 45 days of our receipt of your request as set forth below. Consumers with rights under CCPA have the right to request, as set forth in the CCPA, access to personal information; such consumers can make this request for free, twice per year. Consumers with rights under CCPA have a right to request the deletion of personal information that the business holds on the consumer, subject to the terms of the CCPA. Consumers with rights under CCPA have the right not to be discriminated against for having exercised their rights under the CCPA. Personal information falls into the following "categories" pursuant to the CCPA:



1.
 1. Identifiers
 2. Customer records information
 3. Characteristics of protected classifications under California or federal law
 4. Commercial information
 5. Biometric information
 6. Internet or other electronic network activity information
 7. Geolocation data
 8. Audio, electronic, visual, thermal, olfactory, or similar information
 9. Professional or employment-related information
 10. Education information
 11. Inferences

Personal information does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Information excluded from the CCPA's scope:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; or
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

SpotOnResponse LLC obtains the categories of personal information listed above from the following categories of sources:

- Directly from you – for example, from forms you complete or products and services you purchase; and/or
- Indirectly from you – for example, from observing your actions on our Website or if you had disclosed it to a client or user of SpotOnResponse LLC's software, products or



services, and such personal information was provided or disclosed to SpotOnResponse LLC.

Use of Personal Information

SpotOnResponse LLC will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice. We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns;
- To provide, support, personalize, and develop our Website, products, and services;
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law);
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;



- As described to you when collecting your personal information or as otherwise set forth in the CCPA; and/or
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SpotOnResponse LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by SpotOnResponse LLC about our Website users is among the assets transferred.

Sharing Personal Information

SpotOnResponse LLC may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Service providers; and
- Data aggregators.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

- [Category A: Identifiers.]
- [Category B: California Customer Records personal information categories.]
- [Category D: Commercial information.]
- [Category F: Internet or other similar network activity.]
- [Category G: Geolocation data.]

We disclose your personal information for a business purpose to the following categories of third parties:



- Service providers; and
- Data aggregators

Sales of Personal Information

In the preceding twelve (12) months, Company has not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that SpotOnResponse LLC disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request);and/or
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.



Deletion Request Rights

You have the right to request that SpotOnResponse LLC delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
8. Comply with a legal obligation; And/or
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.



Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by:

- Emailing us at info@SpotOnResponse.com

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see *Personal Information Sales Opt-Out and Opt-In Rights*.



Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your two-free per 12-month period verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Questions/Requests

SpotOnResponse welcomes any questions regarding this Privacy Policy or requests for changes to any personally identifiable information. Please contact us at info@SpotOnResponse.com.

Effective Date: January 11, 2020