# ProjectReady LLC. Privacy Policy

#### Last Updated: May 18, 2023

ProjectReady Central LLC (**"ProjectReady," "we," "our" or "us"**) respects your privacy and is committed to protecting it through our compliance with this privacy policy. This privacy policy explains our policies and procedures regarding the collection, use, disclosure, and security of certain information that we receive, with a focus on information that would be considered "personal data" within the meaning of the EU General Data Protection Regulation ("GDPR"). As used in this privacy policy, "personal data" refers to information about an identifiable individual, such as their name or email address.

ProjectReady offers an end-to-end project management and document control solution platform (the "**ProjectReady Service**").

For the purposes of the GDPR, ProjectReady is considered the data controller. This means that we are responsible for deciding how we use the information that we hold. We are a Delaware limited liability company registered in the United States with an office at ProjectReady Central LLC, 50 Main St., Suite 1086, White Plains, NY 10606.

The GDPR applies to you if you are located in the European Economic Area, the United Kingdom or Switzerland (an "EEA Individual").

Please note that by accessing and using the ProjectReady Service, visiting or using <u>www.project-ready.com</u> (the "Site") and the various related services, features, functions, software, applications, websites and networks associated with the ProjectReady Service (the ProjectReady Service, together with the Site, collectively, the "ProjectReady Services"), you are accepting the practices described in this privacy policy, subject to any rights or restrictions that might apply under the GDPR if you are an EEA Individual, including the rights described in the European Privacy Rights for EEA Individuals provisions below. This privacy policy is incorporated by reference into the Subscription Agreement that governs your use of the ProjectReady Service and the other ProjectReady Services (the "**Subscription Agreement**").

This policy describes the types of information we may collect from you or that you may provide when you access or use the ProjectReady Service, the Site, the other ProjectReady Services or any of the other features, functions, services, and products, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect or may collect:

- In accessing and using the Site.
- In registering to use and to create an account for the ProjectReady Service.
- In accessing and using the ProjectReady Service and the other ProjectReady Services.
- In e-mail, text and other electronic messages sent through or use of the Site, the ProjectReady Service and the other ProjectReady Services.
- When you send any content through the Site, the ProjectReady Service or any of the other ProjectReady Services.
- Through services provided to us or to you by third-party companies, agents, or contractors.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by ProjectReady or any third party; or
- Any third party.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your only choice is not to use the ProjectReady Service or any of the other ProjectReady Services. By accessing or using any of the ProjectReady Services, you agree to this privacy policy. This policy may change from time to time. Your continued use of the ProjectReady Service, the Site, and/or any of the other ProjectReady Services, after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

# Minors under the Age of 18

None of the ProjectReady Services are intended for minors under 18 years of age. No one under age 13 may provide any information on or through the Site, the ProjectReady Service or the other ProjectReady Services. We do not knowingly collect personal data from children younger than 13. If you are younger than 13, do not use or provide any information on or through any of the ProjectReady Services or any of its features or register on the Site, use any of the interactive or public comment features of any of the ProjectReady Services or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name, username you may use or any pictures of you. If we learn we have collected or received personal data from a child younger than 13 without verification of parental consent, we will delete that information. If you believe that we might have any information from or about a child younger than 13, please contact us at <a href="mailto:support@projectready.com">support@projectready.com</a>.

# Information We Collect About You and How We Collect It

We collect or may collect several types of information from and about users of the ProjectReady Service, the Site and the other ProjectReady Services, including:

- Information by which you may be personally identified, including personal data such as name, telephone number, address and e-mail address;
- Your IP address, including when you create an account;
- Information that you provide by registering or creating an account or filling in forms or applications in connection with the ProjectReady Service and the other ProjectReady Services, including information provided in connection with registering to access and use the ProjectReady Service;
- Information that is about you but individually does not identify you, such as the date and time of visit and areas of the Site visited or features of the ProjectReady Service that are accessed;
- Device, internet, and mobile information such as the hardware model, operating system version, unique device identifiers, browser type and language. When you report a problem with any of the ProjectReady Services; and/or

Records and copies of your correspondence (including e-mail addresses) if you contact us.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through or use the ProjectReady Service, the Site or any of the other ProjectReady Services.
- From third parties, such as our customers, business partners and other third parties that provide us or you with certain services.

Certain transactions may also involve you calling us or our calling you. Please be aware that we may monitor, and in some cases, record such calls for staff training or quality assurance purposes.

#### **Data Minimization**

We take every reasonable step to limit the volume of your personal data that we process to what is reasonably necessary.

### We do not Engage in Automated Decision-making without Human Intervention

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

### **Consequences of not providing Personal Data**

You are not required to provide all personal data identified in this privacy policy to interact with us offline, but if you do not provide the personal data, we may not be able to respond to your requests, provide the ProjectReady Services or access to the ProjectReady Service, or provide you with marketing that we believe you would find valuable.

#### Use of Cookies and Other Tracking Technologies.

We use various technologies to manage the Site and track use of the content we provide. These technologies include: standard web analytics information; aggregated data about email click-through rates and video viewing; data collected through HTML cookies, flash cookies, web beacons and similar technologies; demographics and other details to help us customize our sites based on your preferences; and data on view counts and video search functionality. Cookies provide a mechanism for us to understand how you use the site over time so that we can provide you the best user experience according to your expressed preferences. We do not sell this information to any third party but may provide information to partners that assist us in updating, managing or maintaining our websites.

# **Use of Google Analytics**

# TYPES OF COOKIES AND OTHER TECHNOLOGIES USED BY GOOGLE

Some or all of the cookies or other technologies described below may be stored in your browser, app, or device. To manage how cookies are used, including rejecting the use of certain cookies, you can visit <u>g.co/privacytools</u>. You can also <u>manage cookies in your browser</u> (though browsers for mobile devices may not offer this visibility). Other technologies used to identify apps and devices may be managed in your device settings or in an app's settings.

#### Functionality

Cookies and other technologies used for functionality allow you to access features that are fundamental to a service. Things considered fundamental to a service include preferences, like your choice of language, information relating to your session, such as the content of a shopping cart, and product optimizations that help maintain and improve that service.

Some cookies and other technologies are used to maintain your preferences. For example, most people who use Google services have a cookie called 'NID' or 'ENID' in their browsers, depending on their cookies choices. These cookies are used to remember your preferences and other information, such as your preferred language, how many results you prefer to have shown on a search results page (for example, 10 or 20), and whether you want to have Google's SafeSearch filter turned on. Each 'NID' cookie expires 6 months from a user's last use, while the 'ENID' cookie lasts for 13 months. Cookies called 'VISITOR\_INFO1\_LIVE' and 'YEC' serve a similar purpose for YouTube and are also used to detect and resolve problems with the service. These cookies last for 6 months and for 13 months, respectively.

Other cookies and technologies are used to maintain and enhance your experience during a specific session. For example, YouTube uses the 'PREF' cookie to store information such as your preferred page configuration and playback preferences like explicit autoplay choices, shuffle content, and player size. For YouTube Music, these preferences include volume, repeat mode, and autoplay. This cookie expires 8 months from a user's last use. The cookie 'pm\_sess' also helps maintain your browser session and lasts for 30 minutes.

Cookies and other technologies may also be used to improve the performance of Google services. For example, the 'CGIC' cookie improves the delivery of search results by autocompleting search queries based on a user's initial input. This cookie lasts for 6 months.

Google uses the 'CONSENT' cookie, which lasts for 2 years, to store a user's state regarding their cookies choices. Another cookie, 'SOCS', lasts for 13 months and is also used to store a user's state regarding their cookies choices.

# Security

Cookies and other technologies used for security help to authenticate users, prevent fraud, and protect you as you interact with a service.

The cookies and other technologies used to authenticate users help ensure that only the actual owner of an account can access that account. For example, cookies called 'SID' and 'HSID' contain digitally signed and encrypted records of a user's Google Account ID and most recent sign-in time. The combination of these cookies allows Google to block many types of attack, such as attempts to steal the content of forms submitted in Google services.

Some cookies and other technologies are used to prevent spam, fraud, and abuse. For example, the 'pm\_sess', 'YSC', and 'AEC' cookies ensure that requests within a browsing session are made by the user, and not by other sites. These cookies prevent malicious sites from acting on behalf of a user without that user's knowledge. The 'pm\_sess' cookie lasts for 30 minutes, while the 'AEC' cookie lasts for 6 months. The 'YSC' cookie lasts for the duration of a user's browsing session.

# Analytics

Cookies and other technologies used for analytics help collect data that allows services to understand how you interact with a particular service. These insights allow services to both improve content and build better features that enhance your experience.

Some cookies and other technologies help sites and apps understand how their visitors engage with their services. For example, <u>Google Analytics</u> uses a set of cookies to collect information and report site usage statistics without personally identifying individual visitors to Google. '\_ga', the main cookie used by Google Analytics, enables a service to distinguish one visitor from another and lasts for 2 years. Any site that implements Google Analytics, including Google services, uses the '\_ga' cookie. Each '\_ga' cookie is unique to the specific property, so it cannot be used to track a given user or browser across unrelated websites.

Google services also use 'NID' and 'ENID' cookies on Google Search, and 'VISITOR\_INFO1\_LIVE' and 'YEC' cookies on YouTube, for analytics.

#### Advertising

Google uses cookies for advertising, including serving and rendering ads, personalizing ads (depending on your settings at <u>myadcenter.google.com</u> and <u>adssettings.google.com/partnerads</u>), limiting the number of times an ad is shown to a user, muting ads you have chosen to stop seeing, and measuring the effectiveness of ads.

The 'NID' cookie is used to show Google ads in Google services for signed-out users, while the 'ANID' and 'IDE' cookies are used to show Google ads on non-Google sites. If you have personalized ads enabled, the 'ANID' cookie is used to remember this setting and lasts for 13 months in the European Economic Area (EEA), Switzerland, and the United Kingdom (UK), and 24 months everywhere else. If you have turned off personalized ads, the 'ANID' cookie is used to store that setting until 2030. The 'NID' cookie expires 6 months after a user's last use. The 'IDE' cookie lasts for 13 months in the European Economic Area (EEA), Switzerland, and the United Kingdom (UK), and 24 months everywhere else.

Depending on your ad settings, other Google services like YouTube may also use these and other cookies and technologies, like the 'VISITOR\_INFO1\_LIVE' cookie, for advertising.

Some cookies and other technologies used for advertising are for users who sign in to use Google services. For example, the 'DSID' cookie is used to identify a signed-in user on non-Google sites and to remember whether the user has agreed to ad personalization. It lasts for 2 weeks.

Through Google's advertising platform, businesses can advertise in Google services as well as on non-Google sites. Some cookies support Google showing ads on third-party sites and are set in the domain of the website you visit. For example, the '\_gads' cookie enables sites to show Google ads. Cookies that start with '\_gac\_' come from Google Analytics and are used by advertisers to measure user activity and the performance of their ad campaigns. The '\_gads' cookies last for 13 months and the '\_gac\_' cookies last for 90 days.

Some cookies and other technologies are used to measure ad and campaign performance and conversion rates for Google ads on a site you visit. For example, cookies that start with '\_gcl\_' are primarily used to help advertisers determine how many times users who click on their ads end up taking

an action on their site, such as making a purchase. Cookies used for measuring conversion rates are not used to personalize ads. '\_gcl\_' cookies last for 90 days.

See more information about cookies used for advertising here.

### Personalization

Cookies and other technologies used for personalization enhance your experience by providing personalized content and features, depending on your settings at <u>g.co/privacytools</u> or your app and device settings.

Personalized content and features include things like more relevant results and recommendations, a customized YouTube homepage, and ads that are tailored to your interests. For example, the 'VISITOR\_INFO1\_LIVE' cookie may enable personalized recommendations on YouTube based on past views and searches. And the 'NID' cookie enables personalized autocomplete features in Search as you type search terms. These cookies expire 6 months after a user's last use. Another personalization cookie, 'UULE', sends precise location information from your browser to Google's servers so that Google can show you results that are relevant to your location. The use of this cookie depends on your browser settings and whether you have chosen to have location turned on for your browser. The 'UULE' cookie lasts up to 6 hours.

Non-personalized content and features are distinct from personalized content and features insofar as they are influenced by things like the content you're currently viewing, your current Google search, and your general location.

#### Here is the way to currently opt out of Google Analytics - <u>https://tools.google.com/dlpage/gaoptout/</u>

#### **Do Not Track Policy**

Your web browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. We do not honor any web browser "Do Not Track" signals or other mechanisms that provide you with the ability to exercise choice regarding the collection of personally identifiable information about your online activities over time and across third-party websites or online services. At present, no universally accepted standards exist on how companies should respond to do-not-track signals. In the event a final universally accepted standard is established, we will assess and provide an appropriate response to these signals.

#### How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal data:

- To provide you with the ProjectReady Service and the other ProjectReady Services and the content and the other products and services that you request from us.
- To provide the Site and the content that is on it to you.
- To process and complete transactions, including registration for the use of the ProjectReady Service and the other ProjectReady Services and send you related information.
- To provide technical and other support to you.

- To send you promotional communications, such as providing you with information about services, features, surveys, newsletters, offers and events; and providing other news or information about us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to the ProjectReady Service, the Site and the other ProjectReady Services.
- To enhance the safety and security of all of the ProjectReady Services.

To verify your identity and prevent fraud or other unauthorized or illegal activity.

- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Some of the information that we collect automatically is statistical data and does not include personal data, but we may maintain it or associate it with personal data we collect in other ways or receive from third parties or you provide to us. It helps us to improve the Site, the ProjectReady Service and the other ProjectReady Services, and to deliver a better and more personalized service, including enabling us to:

- Estimate our audience size and better understand usage patterns.
- Store information about your preferences, enabling us to customize the Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Site.

#### Storage and Transfer of Your Information

We may store any data or other information that we collect (personal or otherwise) ourselves or in databases and servers owned and maintained by us, our affiliates, agents or Service Providers. If you access or use the Site outside of the United States, information that we collect about you may be transferred to servers inside the United States and maintained indefinitely, which may involve the transfer of information out of countries located in the European Economic Area and other parts of the world unless otherwise prohibited by applicable law or agreed by ProjectReady and you. By allowing ProjectReady to collect information about you from the Site, you consent to such transfer and processing of such information without restriction. We may also store some information locally on your computer or other devices. For example, we may store information as local cache so that you can open the Site and view content faster.

Although users from all over the world may access the Site, keep in mind that no matter where you live or where you happen to use our services, you consent to us processing and transferring information collected on the Site in and to the United States and other countries whose data-protection and privacy laws may offer fewer protections than those in your home country.

#### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not include any personal data, without restriction.

We may disclose personal data that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To other users in your organization in connection with the ProjectReady Service or any of the other ProjectReady Services.
- To a potential or actual buyer, assignee or other successor (including its related advisors and agents) in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of ProjectReady' assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal data held by ProjectReady about users of the Site is among the assets that may be or are actually transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your data information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply the Subscription Agreement and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ProjectReady, our customers or others.

We may share information that is anonymized or in an aggregated form that does not include any personal data about you and we may use and share any such information for any purpose without restriction so long as it does not violate the terms of this privacy policy or any applicable law. We may use, disclose or sell that anonymized or aggregated information without restriction so long as we do not disclose any of your personal data or violate the terms of this privacy policy or any applicable law.

# Choices About How We Use and Disclose Your Personal Data

We strive to provide you with choices regarding the personal data you provide to us. We have created mechanisms to provide you with the following control over your personal data:

• **Promotional Offers from ProjectReady**. If you do not wish to have your e-mail address/contact information used by ProjectReady to market or otherwise promote our own or third parties' products or services, you can opt-out through the unsubscribe mechanism at the bottom of the applicable email. This opt out does not apply to information provided to ProjectReady as a result of a service or product purchase, product service experience or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. You may be able to opt out of receiving personalized advertisements from companies who are members of the Network Advertising Initiative or who subscribe to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising. For more information about this practice and to understand your options, please visit: <u>http://www.aboutads.info</u> and <u>http://www.networkadvertising.org/choices/</u>. You may also use TRUSTe's Preference Manager at <u>http://preferences-mgr.truste.com</u>.

### **Our Legal Bases for Handling Your Personal Data**

GDPR and the laws in some other jurisdictions require companies to tell you about the legal bases that they rely on to use or disclose your personal data. To the extent that those laws apply, we rely on the following legal grounds to process your personal data:

- Performance of a contract: In most cases, we collect and use your personal data and other information to meet our obligations under a contract to which you are a party or pursuant to which we are providing services to you. For example, when you use the ProjectReady Service or the other ProjectReady Services, we will use your personal data to respond to your requests and to provide you with these services.
- Legitimate interests: We may use your personal data information for our legitimate interests on the grounds that it furthers our legitimate interests in commercial activities (but only to the extent that such interests are overridden by the interests or fundamental rights and freedoms of the affected individuals) including:
  - Analyzing and improving the ProjectReady Service, the other ProjectReady Services and our business
  - Providing the services pursuant to our contracts with our clients
  - Marketing
- Legal compliance: We may use and disclose personal data in certain ways to comply with our legal obligations under European or Member State law or other applicable law.
- Consent: To the extent required by law, and in certain other cases, we handle personal data on the basis of implied or express consent.

#### Accessing and Correcting Your Personal Data

You may change, correct or delete any personal data that you have provided to us by emailing us at <a href="mailto:support@project-ready.com">support@project-ready.com</a>.

#### Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of the Site that are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please send an e-mail to support@project-ready.com or write to us at: ProjectReady Central LLC, 50 Main St., Suite 1086, White Plains, NY 10606, USA.

# European Privacy Rights for EEA Individuals.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your personal data) if we intend to use your personal data for such purposes or if we intend to disclose your personal data to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal data. You can also exercise the right by contacting us directly.

If you are an EEA Individual and GDPR applies and we hold your personal data in our capacity as a controller, you may request that we:

- Provide access to and/or a copy of certain personal data (including, in some cases, in portable form);
- Prevent the processing of your personal data for direct-marketing purposes (including any direct marketing processing based on profiling);
- Update personal data that is out of date or incorrect;
- Delete certain personal data which we are holding about you; provided that the personal data is not required by us for (i) compliance with a legal obligation under European or Member State law or other applicable law or (ii) the establishment, exercise or defense of a legal claim;
- Object to our processing of personal data;
- Restrict the way that we process and disclose certain of your information except to the extent that processing is required (i) to comply with a legal obligation under European Member State law or applicable law or (ii) for the establishment, exercise or defense of legal claims;
- Transfer your personal data to a third party to the extent that this is technically feasible; and
- Honor a revocation of your consent for the processing of your personal data (without retroactive effect).

We will consider all requests and provide our response within the time period required by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation. We may request you provide us with additional information to confirm your identity before responding to your request. You have the right to lodge a complaint with the authorities applicable to your situation, though we invite you to contact us with any concern, as we would be happy to try to resolve it directly. You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: https://edpb.europa.eu/aboutedpb/board/members\_en.

If you are an EEA Individual in France, you also have the right to set guidelines for the retention and communication of your personal data after your death.

If you reside in a jurisdiction other than the European Economic Area, you may also have similar rights to the above. Please contact us at <a href="mailto:support@projectready.com">support@projectready.com</a> if you would like to exercise one of these rights, and we will comply with any request to the extent required under applicable law.

In addition, where you believe that we have not complied with its obligation under this Privacy Policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office. <u>Here is a list of local data protection authorities in EEA countries</u>.

You can exercise any of these rights by contacting us at <u>support@projectready.com</u> or write to us at: ProjectReady Central LLC, 50 Main St., Suite 1086, White Plains, NY 10606.

# How Long We Store Your Personal Data

We will only retain your personal data, in a form which permits us to identify you, for as long as necessary to fulfill the purposes we collected it for. We will retain and use your personal data as necessary to satisfy any legal, accounting or reporting requirements, to resolve disputes or to enforce our agreements and rights. To dispose of personal data, we may anonymize it, delete it or take other

appropriate steps. Data may persist in copies made for backup and business continuity purposes for additional time.

# **Data Security**

We understand that the security of your personal data is important. We provide reasonable administrative, technical, and physical security controls to protect your personal data. However, despite our efforts, no security controls are 100% effective. ProjectReady cannot ensure or warrant the security of your personal data. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

The safety and security of your data also depends on you. Where you have chosen (or we have given you) a password for access to and use of certain parts of the Site, the ProjectReady Service and/or the other ProjectReady Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of any of the ProjectReady Services. The information you share in public areas may be viewed by any other user of the ProjectReady Services.

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the home pages of the Site for at least 30 days. If we make material changes to how we treat our users' personal data that are materially less protective than provided in this policy, we will use reasonable efforts to notify you by e-mail to the e-mail address specified in your account and/or through a notice on the home pages of the Site and to attempt to get your consent to the changes. The date the privacy policy was last updated is identified above. You are responsible for ensuring that we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting the Site and this privacy policy to check for any changes. Like our Subscription Agreement, of which this privacy policy is a part, your use, and/or continued use after our efforts to contact you, of the Site, the ProjectReady Service or any of the other ProjectReady Services, means that you agree to be bound by such changes.

#### Survival

The policies indicated in this privacy policy will remain effective, even if the Subscription Agreement and the other agreements between us are terminated and you are no longer using the Site, the ProjectReady Service or any of the other ProjectReady Services.

#### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices or need to reach us for any other reason, you may contact us by e-mail at <a href="mailto:support@projectready.com">support@projectready.com</a> or by mail at ProjectReady Central LLC, 50 Main St., Suite 1086, White Plains, NY 10606.

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