AbeTech Privacy Policy

We at AbeTech are committed to protecting your privacy. This Privacy Policy applies to the information and data collected by AbeTech as a controller, including the information collected on our websites (the "Websites") or through other channels as described below. This Privacy Notice describes how we collect, receive, use, store, share, transfer, and process your personal information. It also describes your choices regarding use, as well as your rights of access and correction of your personal information. If you do not agree with the data practices described in this Privacy Policy, you should not use the Websites.

We periodically update this Privacy Policy. We will post any privacy policy changes on this page and, if the changes are material, we will provide a notice by sending you an email notification.

While we may notify you of any material changes to this Privacy Policy prior to the changes becoming effective, we encourage you to review this Privacy Policy periodically. We will also keep prior versions of this Privacy Policy in an archive for your review upon request.

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please write to us by email at <u>privacy@AbeTech.com</u>.

1. What Information We Collect About You

When You Visit our Websites

When you visit the Websites, we collect Navigational Information. You are free to explore the Websites without providing any Personal Information about yourself. However, for certain functionality on the Websites, we may request that you provide Personal Information about yourself.

"Personal Information"

This refers to any information that you submit to us that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you enter into on the Websites, and information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or information that we acquire from service providers.

Personal Information includes Navigational Information or Payment Information where such information can directly or indirectly identify an individual.

• Navigational information refers to information about your computer and your visits to the Websites such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed. Please see the "Use of Navigation Information" section below.

• Payment information includes information we collect and process from you, including credit card numbers and billing information, using third party PCI-compliant service providers. Except for this, we do not collect other Sensitive Information from you.

"Sensitive Information"

This refers to credit or debit card numbers, personal financial account information, Social Security numbers, passport numbers, driver's license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other employment, financial or health information.

Log Files

When you view content provided by us, we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by AbeTech to provide general statistics regarding use of the Websites. For these purposes, we do link this automatically-collected data to other Personal Information such as name, email address, address, and phone number.

Information we collect from third parties

From time to time, we may receive Personal Information about you from third party sources including partners with which we offer co-branded services or engage in joint marketing activities, and sources such as social media websites.

Information About Children

The Websites are not intended for or targeted at children under the age of 16, and we do not knowingly or intentionally collect personal information about children under the age of 16. If you believe that we have collected personal information about a child under the age of 16, please contact us at privacy@AbeTech.com, so that we may delete the information promptly.

2. How We Use Information We Collect

Compliance with Our Privacy Policy

We use the information we collect only in compliance with this Privacy Policy and reasonably necessary and proportionate to achieve the purpose for which the information was collected or processed.

We Never Sell Personal Information

We will never sell your Personal Information to any third party.

Use of Personal Information

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to:

- Improve your browsing experience by personalizing the Websites;
- Send information or AbeTech content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business;
- Promote use of our services to you and share promotional and information content with you in accordance with your communication preferences;
- Provide other companies with statistical information about our users -- but this information will not be used to identify any individual user and will only be shared on an aggregate and de-identified basis;
- Contact you about billing, account management, and other administrative matters;
- Send information to you regarding changes to our Customer Terms of Service, Privacy Policy (including the Cookie Policy), or other legal agreements;
- Investigate and help prevent security issues and abuse; and
- Meet legal requirements.

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your Personal Information to the third party.

Use of Navigational Information

We use Navigational Information to operate and improve the Websites and to provide you with a better experience when you interact with AbeTech. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized information about AbeTech. Navigational Information, such as IP address, is used to approximate your location. For example, we may use your approximate location to provide content that has been translated or send emails at certain times using your local time zone.

You may disable the collection and use of your location data through browser-, operating systemor device-level settings. Consent concerning location data may be withdrawn at any time by emailing <u>privacy@AbeTech.com</u>.

Customer Testimonials and Comments

We post customer testimonials and comments on our Websites, which may contain Personal Information. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

Use of Payment Information

If you give us Payment information, we use it solely as authorized by you in accordance with this Privacy Policy, including to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use information you provide except for the sole purpose of credit card processing on our behalf.

Security of your Personal Information

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use, or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. All Personal Information is protected using appropriate physical, technical and organizational measures.

Social Media Features

Our Websites include Social Media Features, such as the Facebook Like button and Widgets, such as the Share Button or interactive mini-programs that run on our sites. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Websites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

External Websites

Our Websites provide links to other websites of third parties. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

Public Forums

We offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you directly disclose any information through our public message boards, blogs, or forums, this information may be collected and used by others. We will correct or delete any information you have posted on the Websites if you so request, as described in "To Unsubscribe From Our Communications" below.

Retention of Personal Information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so (for example, as needed to comply with our legal obligations, resolve disputes, and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Information, we securely delete the information or anonymize it or, if this is not possible, securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information at an earlier date if you so request, as described in the "How to Access & Control Your Personal Data" below.

If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as when you last opened an email from us or ceased using your AbeTech account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

3. How we Share Information we Collect

Service Providers

We employ other third-party service providers to provide services on our behalf to visitors to our Websites and our customers and may need to share your information with them to provide information, products or services to you. Examples may include removing repetitive information from prospect lists, analyzing data or performing statistical analysis, providing marketing assistance, processing credit card payments, supplementing the information you provide us in order to provide you with better service, and providing customer service or support. These service providers are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and customer data handling policies.

AbeTech Partners

In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information.

We partner with trusted third parties to provide you with co-marketing content that we think may be relevant to you. When you engage with these co-marketing partners, we will tell you who we are sharing data with, and provide a link to the co-marketing partner's privacy policy so you can learn more about how to opt-out of the partner's communications. These co-marketing partners are required to adhere to our privacy and data protection policies. If you do not want us to share your personal information with these companies, please contact us at <u>privacy@AbeTech.com</u>.

Corporate Events

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by AbeTech on the Websites. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.

Compelled Disclosure

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

4. How We Transfer Data We Collect Internationally

We may transfer your Personal Information outside of your country or province of residence in order to operate and utilize vendors located around the world. If we transfer your Personal Information outside of your country or province of residence, we do so in accordance with applicable law and take appropriate steps to ensure your information is protected. Please note that while outside of the jurisdiction in which you reside, some of your Personal Information will be subject to applicable local laws, which may permit government and national security authorities in those jurisdictions to access your Personal Information in certain circumstances.

5. Cookies and Similar Technologies

Cookies

AbeTech and our partners use cookies or similar technologies (such as web beacons and JavaScript) to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole.

Flash Cookies and Other Third Party Tracking Technologies

The Adobe Flash Player (and similar applications) use technology to remember settings, preferences and usage similar to browser cookies but these are managed through a different interface than the one provided by your Web browser. This technology creates locally stored objects that are often referred to as "Flash cookies." AbeTech does not use Flash cookies. However, our customers of our software platform may create pages on the AbeTech platform that employ Adobe Flash cookies. For more information on "Flash cookies" and how you can manage them please visit our Cookie Policy.

Advertising

We partner with a third party ad network to either display advertising on our Websites or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests.

Third Party Tracking Technologies

The use of cookies and web beacons by any tracking utility company is not covered by our Privacy Policy or Cookie Policy.

6. How to Access & Control Your Personal Data

Reviewing, Correcting and Removing Your Personal Information

You have the following data protection rights:

- You can request access, correction, updates, or deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information.

To exercise any of these rights, please contact us at **privacy@AbeTech.com**. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

Anti-Spam Policy

Our Acceptable Use Policy, among other things, prohibits sending unsolicited commercial email in violation of applicable laws, and requires the inclusion in every marketing email of an "opt-out" mechanism and other required information.

To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, updating your communication preferences, or by emailing us at <u>privacy@AbeTech.com</u>. Customers cannot opt out of receiving transactional emails related to their account with us.

7. California Privacy Rights

This section applies only to California consumers. It describes how we collect, use, and share California consumers' Personal Information in our role as a business, and the rights applicable to such residents. If you are unable to access this Privacy Policy due to a disability or any physical or mental impairment, please contact us and we will arrange to supply you with the information you need in an alternative format that you can access.

For purposes of this section "Personal Information" has the meaning given in the California Consumer Privacy Act ("CCPA").

How We Collect, Use, and Share your Personal Information

We have collected the following statutory categories of Personal Information in the past twelve (12) months:

- Identifiers, such as name, e-mail address, mailing address, and phone number. We collect this information directly from you or from third party sources.
- Commercial information, such as order records. We collect this information directly from you.
- Internet or network information, such as browsing and search history. We collect this information directly from your device.
- Geolocation data, such as IP address. We collect this information from your device.
- Financial information, such as Payment Information or financial account numbers in the process of providing you with goods or services. We collect this information from you.
- Inferences.
- Other personal information, in instances when you interact with us online, by phone or mail in the context of receiving help through our help desks or other support channels; participation in customer surveys or contests; or in providing goods or services.

The business and commercial purposes for which we collect this information are described in Section 2 of this Privacy Policy. The categories of third parties to whom we "disclose" this information for a business purpose within the past twelve (12) months are described in Section 3 of this Privacy Policy.

Your California Rights

You have certain rights regarding the Personal Information we collect or maintain about you. Please note these rights are not absolute, and there may be cases when we decline your request as permitted by law.

The right of access means that you have the right to request that we disclose what Personal Information we have collected about you including the categories of Personal Information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, and the specific pieces of Personal Information that we have collected about you.

The right of deletion means that you have the right to request that we delete Personal Information maintained by us, subject to certain exceptions.

The right to correct means that you have the right to request that we correct inaccurate Personal Information maintained by us.

The right to non-discrimination means that you will not receive any discriminatory treatment when you exercise one of your privacy rights under this section. This right includes an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of these rights.

AbeTech does not sell Personal Information to third parties (pursuant to California Civil Code §§ 1798.100–1798.199, also known as the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020).

How to Exercise your California Rights

You can exercise your rights yourself or you can alternatively designate an authorized agent to exercise these rights on your behalf. Please note that to protect your Personal Information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your authorized agent have written permission from you to make requests on your behalf, and we may also need to verify your authorized agent's identity to protect your Personal Information.

Please use the contact details below, if you would like to:

- Access this policy in an alternative format;
- Exercise your rights;
- Learn more about your rights or our privacy practices; or
- Designate an authorized agent to make a request on your behalf.

E-mail: privacy@AbeTech.com.

8. Other State Privacy Rights

Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state resident with rights to:

- Confirm whether we process their personal information;
- Access and delete certain personal information;
- Correct inaccuracies in their person information, taking into account the information's nature processing purpose (excluding Iowa and Utah);
- Data portability;
- Opt-out of personal data processing for:
 - Targeted advertising (excluding Iowa);

- Sales; or
- Profiling in further of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. To exercise any of these rights please submit a request by emailing us at <u>privacy@AbeTech.com</u>.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: <u>privacy@AbeTech.com</u>. However, please know we do not currently sell data triggering some state statute's opt-out requirements.

If you have any questions about this Privacy Policy or our privacy practices, or if you have a disability and need to access this notice in a different format, please contact us at privacy@AbeTech.com.

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