

PHRED Privacy Policy

Last Updated: January 23, 2024

This Online and Mobile Privacy Policy ("Privacy Policy") explains how information is collected, used and disclosed by PHRED Solutions, Inc. ("PHRED"), and applies to information we collect when you use or access our online or mobile websites, products, services or applications, or when you otherwise interact with us. We respect the privacy rights of users and recognize the importance of protecting information collected about you. If you use PHRED as part of an entity or organization that has an agreement with PHRED (like your employer), the terms of that organization's contract for PHRED may restrict our collection or use of your information more than what is described in this Policy.

Changes to This Policy

We may change this Privacy Policy from time to time. If we make any changes, we will notify you by revising the "Last Updated" date at the top of this Privacy Policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). We encourage you to review our Privacy Policy whenever you access PHRED to stay informed about our information practices and the ways you can help protect your privacy.

Information Collected

Information You Provide To Us.

- For example, we collect information when you register for an account, create or modify your profile and online account, access and use PHRED (including but not limited to when you upload, download, collaborate on or share files or other information), participate in any interactive features of PHRED, participate in a survey, contest, promotion, sweepstakes, activity or event, make a purchase, apply for a job, request customer support, communicate with us via third-party social media sites or otherwise communicate with us.
- The types of information we may collect directly from you include your name, email address, postal address, phone number, information about your data storage preferences, employer's name, job title, transactional information as well as any contact or other information you choose to provide. Please be aware that the information you choose to provide may reveal or identify information that is not expressly stated.
- Unless you have purchased a PHRED Enterprise account or higher, you agree not to upload and/or collaborate Protected Health Information ("PHI") as defined under the Health Insurance Portability and Accountability of 1996 Act as amended ("HIPAA"); PHRED disclaims all liability for such PHI.

Processing

By accessing or using PHRED or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries and territories, which may have different privacy laws from your country of residence.

Sharing and Disclosure of Information.

We will not share personal information about you or any content with any third parties except as described in this Privacy Policy or in connection with PHRED. For example, we may share personal information about you including as follows:

- **Vendors, Consultants and Other Service Providers:** We may share your information with third-party vendors, consultants and other service providers who are working on our behalf and require access to your information to carry out that work, such as to process billing, provide customer support, etc.
- **Corporate Account:** If you are an individual PHRED registered user and the domain of the primary email address associated with your PHRED account is owned by your employer and was assigned to you as an employee of that organization, and such organization wishes to establish a PHRED corporate account, then certain information concerning past use of your individual account may become accessible to that organization's administrator including your email address.
- **For Collaboration:** We may share your information, including when you choose to use collaboration features in PHRED that by their nature support sharing with third parties who you choose. Your name, email address, information from your profile and online account, and any content you choose to share will be shared with such third parties, and such third parties may communicate with you (such as by posting comments or emailing you) in connection with your use of the collaboration features of PHRED.
- **Third Party Applications:** PHRED provides you with opportunities to connect with third-party applications or services, such as through our PHRED Cloud or PHRED application partner ecosystem. If you choose to use any such third-party applications or services, we may share information about you including your username and any Content you choose to use in connection with those applications and services, and such third parties may contact you directly as necessary. This Privacy Policy does not apply to your use of such third-party applications and services, and we are not responsible for how those third parties collect, use and disclose your information and Content. We encourage you to review the privacy policies of those third parties before connecting to or using their applications or services to learn more about their information and privacy practices.
- **Compliance with Laws:** We may disclose your information to a third party if (a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request, (b) to enforce our agreements, policies and Terms of Service, (c) to protect the security or integrity of PHRED, (d) to protect PHRED, our customers or the public from harm or illegal activities, or (e) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.
- **Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Aggregated or Anonymized Data:** We may also share aggregated or anonymized information with third parties that does not directly identify you.

Collaboration and Sharing Features

PHRED offers collaboration features or other integrated tools, which allow you to share your Content through PHRED. As a function of the collaborative nature of PHRED and based on the permissions and settings you choose, the use of such features enables the sharing of Content with people you want to collaborate with or with the public. You can choose to change your settings at any time for a file or folder through your account.

We self-certify compliance with:

To help our customers continue to validate transfers of personal data under the EU data protection laws PHRED adheres to alternative methods for meeting the 'adequate protection' requirements of Article 25 of the EU Data Protection Directive (95/46/EC), such as standard contract clauses or Binding Corporate Rules ("BCRs"). To the extent that Safe Harbor is in effect, PHRED complies with the U.S.–E.U. Safe Harbor Framework and the U.S.–Swiss Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the from European Union member countries and Switzerland. PHRED has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, please visit <http://www.export.gov/safeharbor/>.

Security

While no service is completely secure, PHRED takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. For example, we encrypt your Content when it is stored in our data centers. In addition, sensitive information such as password that we request from you on PHRED is protected with encryption, such as Secured Socket Layer (SSL) protocol, during transmission over the Internet.

The servers on which personal information is stored are kept in a controlled environment with limited access. While we take reasonable efforts to guard personal information we knowingly collect directly from you, no security system is impenetrable. In addition, we cannot guarantee that any passively-collected personal information you choose to include in documents you store on our systems are maintained at levels of protection to meet specific needs or obligations you may have relating to that information.

You may access your account information and our service only through the use of an individual user ID and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been misused. In addition, always logout and close your browser when you finish your session. Please

note that we will never ask you to disclose your password in an unsolicited phone call or email.

Unless you have purchased a PHRED Enterprise subscription account or higher, you agree not to upload to or collaborate through PHRED any Personal Health Information as defined by the Health Insurance Portability and Accountability Act of 1996 as amended (HIPAA).

Your Choices

Account Information & Retention. You may update, correct or delete information about you at any time by logging into your online account and modifying your information or by emailing us at laurie@phredsolutions.com. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy. If you wish to deactivate your account, please email us at laurie@phredsolutions.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time. We will respond to your access request within 30 days. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information to comply with our legal obligations, resolve disputes and enforce our agreements.

Cookies. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies or to prompt you before accepting such a cookie. Please note that, if you choose to remove or reject browser cookies, this could affect the availability or functionality of PHRED.

California Residents. Under California law, California Residents who have an established business relationship with PHRED may choose to opt out of PHRED's disclosure of personal information about them to third parties for direct marketing purposes. If you choose to opt-out at any time after granting approval email laurie@phredsolutions.com.

Our Policy Toward Children

PHRED is not directed to individuals under 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information, please contact us at laurie@phredsolutions.com. If we become aware that a child under 13 has provided us with personal information, we will take steps to delete such information.

Contacting Us

Any questions about this Privacy Policy should be addressed to laurie@phredsolutions.com or to PO Box 4960, Breckenridge, Colorado, 80424.