# **Privacy Policy**

Effective: December 20, 2021

The Connection Point software ("CP") is provided by Connection Point LLC. We respect your privacy and are committed to protecting it through our compliance with this policy. This privacy policy provides comprehensive information regarding how we collect, use, and share your personal information and the rights you have concerning this data. It applies to your use of CP and the websites, customer relationship management tools (CRM) and other online and offline services related to CP ("Services") and describes our privacy practices relating to the Services. The Services collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular user or device ("personal information").

Before accessing, using, or interacting with the Services, you should carefully review the terms and conditions of this privacy policy. Your use of the Services is further governed by our Terms of Service, located at www.dsamsoftware.com/terms-of-service.html, which is also incorporated into your agreement with Connection Point LLC by this reference.

Please note CP and Services are not affiliated with Norwex®, Pampered Chef®, Thirty-One®, or any other company. If you disagree with this CP privacy policy, do not access or use our Services or interact with any other aspect of our business.

#### 1. Contact information

Connection Point LLC 12175 Visionary Way Fishers, IN 46038

Email: DSAM@ConnectionPointSoftware.com

Phone: 317-567-9181

# 2. Categories of personal information we collect

The data we process is determined by how you interact with the Services. For example, the way we process your information may vary depending on whether you have submitted an inquiry via our contact form, contacted us via texting or email, joined one of our online groups (such as Facebook), registered for our newsletter, or signed up for certain Services.

We obtain personal information from the following categories of sources:

**Information You Provide To Us:** We process information you provide to us on the legal basis of our legitimate interests in performing the function or service you requested. Where appropriate, we may rely on alternate legal bases, such as your consent to certain types of processing.

**Marketing and Event Communications**: When you sign-up for or subscribe to the Services, our alerts, marketing communications, publications, or events, we collect personal information about you which may

include your name, email address, and postal address. We may use this information to send you updates that may be relevant to you regarding development of CP, industry developments, company-related events, activities, and related news. We process this personal information on the basis of legitimate interests, or where we obtain your affirmative consent, on the basis of that consent.

If you do not want to receive communications from us in the future, please let us know by following the unsubscribe instructions found in any email we send, or by sending us an email to <code>DSAM@ConnectionPointSoftware.com</code> . Please note we may still contact you if necessary to provide important notifications regarding certain Services.

**Account Information**: Certain users may register for an account (an "Account"). We do not require you to register to use all Services. However if you do register an Account, you will gain access to those areas and features of the Services that require registration. CP will collect certain information about you in connection with your registration for an Account, which may include personal information and other information such as a username and password.

When you open an Account, we may collect and process the following data about you:

- name
- title
- organization/company name
- email
- birthday
- phone numbers
- street address
- postal code
- online URLs
- images you upload
- software & access keys
- other online software settings
- those you refer or who may have referred you to CP
- payment information via our third party payment processor
- transactions history

We may also work with third party companies to improve the data we hold about you by obtaining and processing additional information. We may only obtain certain information when you hold your own account with such third party services.

We also keep track of how you use and interact with our website through the use of cookies and other tracking technologies, as listed below.

**Customer Information**: Depending on the type of account you have, we may automatically collect information about your customers and/or collect information that you enter.

We may collect and process the following data about your customers:

name

- where or how you obtained the customer
- organization/company name
- email
- birthday
- phone numbers
- street address
- postal code
- online URLs
- order information
- information they fill in on forms
- how you interact with the customer
- their interest in other products & services you provide
- categorization of customers
- marketing & advertising you use with your customers
- communication between you and your customers

We may also work with third party companies, such as Been Verified or Instant Checkmate, to improve the data we hold about your customers by obtaining and processing additional information, such as updating our records to include their birthday.

**Payment Transaction Information**: We may collect and store information related to purchases and donations made through the Services. You may provide certain information to complete payments via the Services, including your credit or debit card number, card expiration date, CVV code ("Card Verification Value"), and billing address (collectively, "Payment Information"), along with your name and billing, delivery and shipping address, to complete payment transactions through certain Services.

We work with Service Providers (as defined below) to handle payment transactions. We do not process credit card transactions internally. If you choose to purchase any products or services online via the Services using a credit card or other payment methods, your payment method information (i.e., credit card number, CVC code, and expiration date) will be encrypted and securely transmitted to our third party payment transaction processor.

You are subject to the privacy policies and terms and conditions of our Service Providers when making purchases related to CP or Services, the terms of which may differ from those of the Services. Please review the Service Providers' privacy policies and terms and conditions before using their services.

Correspondence Information: If you sign up, email us, subscribe to any blog, newsletters, or mailing lists we may provide, we may keep your message, email address, phone/texting numbers, other messaging addresses, and contact information to respond to your requests, provide the requested products or Services, and to provide notifications or other correspondences to you. If you do not want to receive communications from us in the future, please let us know by sending us an email requesting the same to DSAM@ConnectionPointSoftware.com or by following the unsubscribe instructions found in email we send.

If you supply us with your postal address online, you may receive periodic mailings from us or our affiliates with information on new products and services or upcoming events. If you do not wish to receive such mailings, please let us know by contacting us at DSAM@ConnectionPointSoftware.com or by calling our

phone number provided above. Please note requests to remove your email address from our lists may take some time to fulfil. We may also still contact you as needed to provide important announcements or notifications regarding the Services.

**Support Information**: You may provide information to us via a support request submitted through the Services. We will use this information to assist you with your support request and may maintain this information to assist you or other users with support requests. Please do not submit any information to us via a support submission, including confidential or sensitive information that you do not wish for us or our Service Providers to have access to or use in the future.

**Form Information**: We may use forms to request certain information from you on the Services, such as your contact information to assist with contacts or service requests. This information may include personal information.

#### **Information We Collect Automatically:**

We use automatic data collection and analytics technologies to collect aggregate and user-specific information about your equipment, domain names, patterns of use, communication data and the resources that you access and use on the Services, which may include your IP address, browsing and navigation patterns. This information is used to improve our Services. We process information collected automatically on the legal basis of our legitimate interests in assessing the use of Services.

When you use our Services, we may collect and process the following data:

- name of your Internet service provider
- information on the website you have visited us from
- web browser and operating system used
- the IP address assigned by your Internet service provider
- requested files, amount of data transferred, downloads/file export
- information on the pages of our website(s) that you visit, including date and time

**Cookies**: Certain Services may uses cookies. These are used to make our offering more user-friendly, effective, and more secure. These cookies enable us to analyze how users use our website. We may use both session cookies and permanent cookies. The session cookies are automatically deleted after your visit. Permanent cookies are automatically deleted from your computer when their expiry date is reached or when you delete them yourself before the expiry date. Most web browsers accept cookies automatically. You can usually change your browser's settings if you would prefer not to send the information. Please note, however, that some of the websites' features may not function properly if you disable cookies.

**Social Media Widgets**: The Services may contain links to our company's accounts on social media platforms. Clicking on any such links means that the respective social network receives information on which website you came from as a user. It is also possible if you are currently logged in to the network in question that the social network links this information to your Account.

**Log File Information**: When you use the Services, we may receive log file information such as your IP address, browser type, access times, domain names operating system, the referring web page(s), pages

visited, location, your mobile carrier or internet service provider, device information (including device and application IDs), search terms, and cookie information. We receive log file data when you interact with the Services, for example, when you visit our websites, sign into our website or software, or interact with our email notifications. The Services use log file data to provide, understand, and improve our website and software, and to customize the content we show you. We may link this log file to other information we collect about you via the website.

**Google Analytics**: We may use Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google uses cookies. The information generated by the cookie on the use of our content by the users is usually transmitted to a Google server in the USA or other country and stored there.

Google will use this information on our behalf to evaluate the use of our website and content by users, to compile reports on the activities within the website, and to provide us with other services related to the use of our website content and Internet usage. Also, pseudonymous usage profiles of the users may be created from the processed data.

Users may prevent the collection by Google of the data generated by the cookies and related to their use of the content and the processing of such data by Google by downloading and installing the browser plugin available at the following link: https://tools.google.com/dlpage/gaoptout?hl=en

If your browser does not support the link to the Browser Add-On from Google (e.g. when using our website from your smartphone), you can also opt-out of data collection by Google Analytics by clicking the link below. An opt-out cookie is then stored that prevents the future collection of your data when visiting the website.

Click here to opt out of Google Analytics measurements.

### 3. How we use your personal information

We use the information we receive about you and your customers to provide the Services and for the purposes described in this privacy policy. We generally process personal information received about you and your customers through our Services on the legal basis of our legitimate interests in providing the Services and as necessary to provide you with our Services. Where appropriate, we may rely on alternate legal bases, such as your consent to certain types of processing. We use your data to:

- initiate a business relationship
- offering and improving our Services
- developing new Services and features
- to fulfill contractual and legal obligations
- to conduct the contractual relationship
- to offer our Services
- to strengthen the customer relationship, which may include marketing and direct mail
- detecting, preventing or otherwise addressing fraud, abuse, security or technical issues with our Services
- maintaining and improving the integrity of our computing systems, and protecting our users' data security
- enforcing legal claims, including investigation of potential violations of applicable Terms of Service

when we're complying with legal obligations

To stay in touch with you: We use information you have provided to us to stay in touch with you and keep you informed about CP and Services-related activities. We may use this information to communicate with you, for example, to inform you about special events, promotions, hours of operation, incentives, as well as new program, product, or services information. Communication can be via email, SMS text messaging, telephone calls, online posts, and postal mail. If you wish to stop receiving promotional email materials, follow the unsubscribe instructions at the bottom of an email or send an email to DSAM@ConnectionPointSoftware.com. There are certain service notification emails that you may not opt-out of, such as notifications of changes to our Services, Terms of Service, or policies or to your Account.

If you have subscribed to certain messaging systems, we may occasionally send you a message with a new product announcement or other marketing messages. You may unsubscribe from this service at any time by replying STOP to the message, if a SMS text message. Further, certain message systems may be integrated into the Services for your use. You alone are responsible for ensuring the legality of your use of such message systems.

### 4. How we share your personal information

We share your personal information with your consent, to complete a requested transaction initiated by you, or provide a service or product you requested or authorized. We may also share data with our affiliates and subsidiaries; with vendors working on our behalf; when required by law or to respond to legal process; to protect our customers; to maintain the security of our products and services; and to protect our rights or property.

We will only share your data with third parties as described in this privacy policy, within the scope of applicable law, or with the appropriate consent. Otherwise, it will not be shared with third parties unless we are obliged to do so due to mandatory legal regulations (disclosure to external bodies such as law enforcement authorities in the United States or other countries, especially if you are located outside the United States).

We do not sell, license, lease or otherwise disclose your personal information to any third-party for any reason other than the purposes described in this privacy policy.

**Internally**: We may share and process information internally and with our subsidiaries and affiliates. Our personnel may have access to your information as needed to provide and operate the Services in the normal course of business. This includes information regarding your use and interaction with the Services.

In many cases, our departments are supported by Service Providers (defined below) to fulfill their tasks.

With our Service Providers: We work with various organizations and individuals to help provide our Services to you ("Service Providers"), such as server & webpage hosting, data hosting, online shop providers, and payment processing companies such as Stripe that help us with payment activities. We engage such third-party Service Providers to help us operate, provide, and market our Services. These third parties have only limited access to your information and may use your information only to perform these tasks on our behalf. Information we share with our Service Providers may include both information

you provide to us and information we collect about you, including personal information and information from data collection tools like cookies.

We take reasonable steps to ensure our Service Providers are obligated to reasonably protect your information on our behalf. If we become aware that a Service Provider is using or disclosing information improperly, we will take commercially reasonable steps to end or correct such improper use or disclosure.

We share personal information with our Service Providers on the legal basis of our legitimate interests in providing you with our Services. Our engagement of Service Providers is often necessary for us to provide the Services to you, particularly where such companies play important roles like helping us keep our Services operating and secure. In some other cases, these Service Providers aren't strictly necessary for us to provide our Services, but help us make it better by helping us conduct research into how we could better serve our users. In these latter cases, we have a legitimate interest in working with Service Providers to improve our Services.

**To conduct business transactions**: We may purchase other organizations or businesses or their assets, sell our organization or business assets, or be involved in a bankruptcy, merger, acquisition, reorganization or sale of assets. Your information, including personal information, may be among assets sold or transferred as part of a business transaction. In some cases, we may choose to buy or sell assets. Such transactions may be necessary and in our legitimate interests, particularly our interest in making decisions that enable our organization to develop over the long term.

To respond to safety and lawful requests: We may be required to disclose your information pursuant to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. We generally do not disclose user information unless we have a good faith belief that an information request by law enforcement or private litigants meets applicable legal standards. We may share your information when we believe it is necessary to comply with applicable laws, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the Services or using our name, or to protect the safety of any person. This may include sharing information with other companies, lawyers, agents, or government agencies. Nothing in this privacy policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your information.

**Aggregated Non-Personal Data**: We may disclose aggregated, non-personal information received from providing the Services, including information that does not identify any individual, without restriction. We may share demographic information with business partners, but it will be aggregated and depersonalized, so that personal information is not revealed.

#### 5. Data retention

We store your data as long as it is necessary for the processing purpose in question and for providing you the Services. Please note that a number of legally imposed retention periods require data to be stored for extended periods. This relates in particular to commercial or fiscal retention obligations. Unless there are further retention requirements, the data will be routinely deleted after use.

In addition, we may retain the information if you have given us your permission to do so, or in the event of legal disputes and we use evidence within the statutory limitation periods.

### 6. Data security

The security of your personal information is important to us. We make commercially reasonable efforts to secure and protect the privacy, accuracy, and reliability of your information and to protect it from loss, misuse, unauthorized access, disclosure, alteration, and destruction. We have implemented security measures consistent with industry standards. As no data security protocol is impenetrable, we cannot guarantee the security of our systems or databases, nor can we guarantee that personal information we collect about you will not be breached, intercepted, destroyed, accessed, or otherwise disclosed without authorization. Accordingly, any information, including your personal information is provided by you at your own risk.

### 7. Other providers

The Services may also contain links to the websites of other companies. Where links to other providers are available, we have no influence as to their content. As a result, no guarantee and liability can be assumed for this content. The content of these pages is always the responsibility of the respective provider or operator of the pages.

We may display information from third party services within our Services, such as displaying Facebook Messenger or WhatsApp messages, however we do not control these services and your use of these services is subject to and controlled by the privacy policies and terms associated with those services.

### 8. Online offerings for children

We do not collect any information from children. Persons under the age of 16 are not permitted to submit any personal information to us without the consent of the legal guardian or a declaration of consent. We encourage parents and guardians to actively participate in the online activities and interests of their children.

# 9. Opting-out of communications

Users may opt-out of receiving certain communications from us by following the unsubscribe process described in an email communication, or by contacting us using the contact information provided above. However, please note you may not opt-out of Services-related communications, such as Account verification, changes or updates to features of the Services, or technical and security notices.

## 10. Changes to our privacy policy

We may modify this privacy policy from time to time. The most current version of this privacy policy will govern our use of your information. We will notify you of material changes to this policy by posting a notice on one of our websites or within the CP software itself, or by emailing you at an email address associated with you, if applicable, and provide an "at a glance" overview of any changes.