

# COLLABWORKX PRIVACY POLICY

www.collabworkx.com

Effective date: 1<sup>st</sup> July 2023

## 1. Introduction

### 1.1 Overview of Privacy Policy

Welcome to CollabWorkx. This Privacy Policy outlines the types of information we gather when you use CollabWorkx's services, as well as our practices for collecting, using, maintaining, protecting, and disclosing that information. We respect your privacy and are committed to protecting it through our compliance with this policy. This policy applies to information we collect through our services, or in email, text, and other electronic messages between you and our services.

### 1.2 Scope and Application of Policy

This policy applies to information we collect on our website or via our products, services, or applications, both for local and global users. It covers both Free Subscribers' and Customer Paid Subscribers,' laying the groundwork for how we handle data and privacy under our unique "Scaling model" which places the customer and privacy first. We urge you to read this policy carefully to understand our policies and practices regarding your information and how we will treat it.

## 2. Information We Collect

### 2.1 Information Users Provide to Us

We collect several types of information from and about users of our services, namely information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or offline ('personal information');
- That is about you but individually does not identify you, for example, usage details, IP addresses, and information collected through cookies;
- About your internet connection, the equipment you use to access our Services, and usage details.

We collect this information directly from you when you provide it to us and automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

## 3. Information We Automatically Collect

As you navigate through and interact with our website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the website.

- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and may include personal information. It helps us to improve our website and to deliver a better and more personalized service, including by enabling us to estimate our audience size and usage patterns, store information about your preferences, speed up your searches, and recognize you when you return to our website.

Note that the specifics of what we collect can vary based on whether you are a 'Type A - Free Subscriber' or a 'Type B - Paid Subscriber'.

## **4. How We Use Your Information**

### **4.1 Purpose for Collecting Information**

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

- To present our website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- 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 our website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our website.

The information we collect helps us better understand our users' needs, communicate effectively, and improve the overall user experience. The specific usage of the data may vary depending on whether you are a 'Type A - Free Subscriber' or a 'Type B - Paid Subscriber'.

## **5. How We Use Your Information**

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

## **6. Sharing of Your Information**

### **6.1 With Whom We Share Your Information**

We may disclose aggregated information about our users and information that does not identify any individual, without restriction. We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal

information confidential and use it only for the purposes for which we disclose it to them.

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.

## **7. Third-Party Service Providers**

We may use third parties to manage one or more aspects of our business operations, including the processing or handling of personal information. We may share personal information with such third parties to perform services on our behalf such as fulfilling online orders, processing payments, sending marketing communications, and providing web analytics. When we do use an outside company, we use contractual and other appropriate means to ensure your personal information is used in a manner that is consistent with this Privacy Policy.

## **8. Account Settings and Access Rights**

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 [email protected] We may retain certain information as required by law or for necessary business purposes. On request, we will give you a copy of all the personal information about you that we hold. This information is subject to a fee, except in the instance where the law mandates that we provide this information for free.

## **9. Data Subject Requests**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of these rights, please contact us.

## **10. Children's Privacy**

### **10.1 Compliance with COPPA**

Our services are not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Services. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Services or on or through any of its features. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us.

## **11. California Consumer Privacy Act (CCPA) Compliance**

### **11.1 Personal Information We Collect and How We Use It**

In accordance with California law, we collect a range of personal information about you. This information includes the following:

1. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers.
2. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
3. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.
4. Geolocation data.

We use the personal information we collect for one or more of the following business purposes:

5. To fulfill or meet the reason for which the information is provided.
6. To provide you with information, products, or services that you request from us.
7. To improve our website and present its contents to you.
8. For testing, research, analysis, and product development.
9. As necessary or appropriate to protect the rights, property or safety of us, our clients, or others.

## **12. Your CCPA Rights and Choices**

As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law:

- The right to know what personal information we have collected and how we have used and disclosed that personal information.
- The right to request deletion of your personal information.
- The right to be free from discrimination relating to the exercise of any of your privacy rights.

**Exercising Your Rights:** To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

Email: [privacy@collabworkx.com](mailto:privacy@collabworkx.com)

**Verification:** In order to protect your personal information from unauthorized access or deletion, we may require you to verify your credentials before you can submit a request to know or delete personal information. If you do not have an account with us, or if we suspect fraudulent or malicious activity, we may ask you to provide additional personal information

for verification. If we cannot verify your identity, we will not provide or delete your personal information.

### **13. Other U.S. Privacy Laws Compliance**

#### **13.1 Family Educational Rights and Privacy Act (FERPA)**

Similarly, for users who may use our services in an educational context, we are mindful of the requirements of the Family Educational Rights and Privacy Act (FERPA). We will ensure that any educational records or personally identifiable information from education records are handled in compliance with FERPA.

### **14. General Data Protection Regulation (GDPR) Compliance**

#### **14.1 Personal Data We Collect and Process**

For individuals in the European Economic Area (EEA), we collect and process personal data as a Controller as defined in the GDPR. The personal data we collect and process may include:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.
- Geolocation data.

#### **14.2 Your GDPR Rights and Choices**

If you are a resident of the EEA, you have the following data protection rights:

- The right to access, correct, update, or request deletion of your personal information.
- The right to object to the processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- The right to opt-out of marketing communications we send you at any time.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time.
- 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 using the contact details provided under the "How to Contact Us" heading below.

### **15 Data Transfers outside the EU**

CollabWorkx is based in the USA. Information we collect from you will be processed in the United States, which has data protection laws that are different than those in your country and may not be as protective. Our legal basis for collecting and using your personal information is to do so with your consent; where we need the personal information for performance of a contract, or where the collection and use is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal information in

question. If we collected your personal information with your consent, you may withdraw your consent at any time.

## **Other International Privacy Laws Compliance**

### **16 Other Jurisdiction-Specific Laws**

CollabWorkx services are used globally. As such, we strive to comply with all applicable privacy laws and regulations in the regions we operate. This includes, but is not limited to, data protection and privacy laws in Canada, Australia, India, and Japan. Specific rights under these laws will be afforded to you based on your place of residence.

### **17 Cross-Border Data Transfers**

Information that CollabWorkx collects may be stored and processed in and transferred between any of the countries in which we operate to enable the use of the information in accordance with this privacy policy. Information which you provide may be transferred to countries that do not have data protection laws equivalent to those in force in your home jurisdiction. By using our services, you agree to such cross-border transfers of your personal information.

### **18 Data Security**

#### **18.1 How We Protect Your Information**

CollabWorkx has implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our services, you are responsible for keeping this password confidential.

#### **18.2 Two-factor authentication (2FA)**

2FA is used to better safeguard the user's credentials and the resources that the user has access to. Two-factor authentication provides a better level of protection than single-factor authentication techniques.

#### **Limitations of Our Security Measures**

The transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our services. 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 services.

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

#### **19.1 Changes and Updates**

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 website home page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the website home page.

#### **19.2 Your Responsibility**

You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this privacy policy to check for any changes. Your continued use of the services after such modifications will constitute your acknowledgment of the modified Privacy Policy and agreement to abide and be bound by the modified policy.

## **20 Contact Information**

If you have any questions or comments about this Privacy Policy, the practices of our services, or your dealings with our services, please contact us at [privacy@collabworkx.com](mailto:privacy@collabworkx.com) and we will make an effort to reasonably respond to your inquiry or to address your concerns.