

## Passageways Privacy Policy

Passageways, Inc., (“Passageways,” “we” or “our”), the provider of OnBoard and other services (collectively, the “Services”), is committed to protecting the privacy of all individuals who visit the Passageways Website located at [www.passageways.com](http://www.passageways.com), or the Passageways Help Center Website ([help.passageways.com](http://help.passageways.com)) or utilize the web application located at [onboard.passageways.com](http://onboard.passageways.com), or any successor URL of any of the Passageways-owned websites and applications (herein collectively referred to as “Passageways Websites”). Please read the following Data Security Privacy Policy (“Privacy Policy”) to understand how we collect, use and safeguard the personal data you (or the entity with which you are associated, herein referred to as the “Associated Entity”) may provide to us via Passageways Websites. This Privacy Policy may be revised from time to time, so please revisit this page often to remain fully informed of our policies.

By accepting this notice of terms, you consent to the collection and use of all information as set forth in this Privacy Policy. You have the right to revoke consent at any time by notifying Passageways. If you do not agree to the terms of this Privacy Policy, please do not provide us with any personal data and do not use Passageways Websites. If you (or the Associated Entity) have an account with Passageways for the Services, this Privacy Policy is incorporated into and subject to the Master Subscription Agreement governing your use of such Services.

### APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy applies solely to personal data you may provide to us or we otherwise collect from you (or the Associated Entity) via Passageways Websites, whether you are a casual visitor to Passageways Websites or have an account with Passageways for use of the Services (whether directly or through an Associated Entity). This Privacy Policy does not apply to (i) data that may be collected by Passageways through any other means, including offline or (ii) data about you collected by third-party services, applications, or website or advertisements associated with, linked to or otherwise accessible from Passageways Websites.

### HOW DO WE COLLECT DATA FROM YOU?

We collect personal data we receive through your use of Passageways Websites in several ways: (i) when you register for Passageways’ Services through Passageways Websites, (ii) when you (or the Associated Entity) use the Services, and (iii) when you elect to contact us electronically to request a trial, ask a question or for other reasons.

We also receive automatic and passive data (both personally identifiable and otherwise) from the computer used to access Passageways Websites and when you interact with Passageways Websites. In this regard, Passageways Websites use common automated data gathering tools such as logs files that record page activity, “one-pixel gifs,” “clear gifs,” or “web beacons” which are small bits of code embedded in Passageways Websites to gather certain data, and/or “cookies.” When you visit Passageways Websites, whether or not you are a registered user of the Services (a

“Registered User”), Passageways’ servers send a “cookie” to your computer. Cookies are small strings of text that are sent by Passageways Websites to your browser or device and then stored by your browser on your computer’s hard drive or device. Passageways uses cookies that are session-based (“Session Cookies”) and persistent-based (“Persistent Cookies”). Session Cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent Cookies remain on your computer after you close your browser or turn off your computer. To the extent Passageways Websites contains any third party-provided features or functions, such features or functions may also send cookies from such companies or their advertising partners to your browser (known as “third party cookies”). Most web browsers automatically accept cookies, but it is possible to change your browser setup so that it warns you each time a cookie is being sent, blocks third-party cookies or blocks or rejects all cookies. However, rejecting cookies may prevent you from taking advantage of certain portions of Passageways Websites.

#### WHAT DATA DOES THE COMPANY COLLECT FROM YOU?

Via Passageways Websites, Passageways collects from you: (i) certain non-personal technical and other data and (ii) certain personal data.

All Visitors to Passageways Websites—Whether or not you are a Registered User, when you visit Passageways Websites various types of data are collected automatically and passively through cookies, log files and other tools as noted above under the caption “How Do We Collect Data From You,” including, but not limited to the following:

- the domain name and browser you use to access the Internet
- the date and time of your visit
- the pages you visited, and how many "hits" a particular item is receiving and links “clicked”
- the address of the web site you visited immediately prior to visiting Passageways Websites
- your IP address (a number assigned to your computer when you use the Internet)
- your operating system
- the name of your internet service provider
- certain broad types of demographic data
- data relating to malfunctions or problems occurring when you use your computer with Passageways Websites and other customer service data
- data about your use of the Services, and particular features thereof, and how frequently you use them

For a list of trusted third parties that we use to process your personal data please see our FAQ.

Discretionary Contact With Us: Passageways Websites allow you to contact us electronically through e-mail to request a demo or other data. Whenever you make such

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contact, you will be providing us with some or all of the following data: your name, email address, phone number and any data you choose to include in the text of your message. If you send an e-mail message to Passageways, initiate a chat session, or complete a questionnaire, form, or other online survey found on Passageways Websites, Passageways will maintain the data in its databases.

**Registered Users**—If you are a Registered User of the Services, you (or someone on your behalf) will be providing us with some or all of the following registration-related data: full name, address, phone numbers, e-mail address, website address, and certain financial qualification and billing data, such as billing name and address, payment data, and the number of employees and others within or associated with the Associated Entity.

Registered Users or authorized persons within the Associated Entity will also provide to us data, documents, materials, and data to be posted, distributed, or received by Users of Passageways Websites Site(s) (collectively, “Posted Content”).

**Tracking:** We do not engage in the collection of personal data about your online activities outside of the Passageways Websites, and we do not allow third parties to collect personal data from Passageways Websites as part of their tracking of such online activities. Accordingly, we do not currently process or comply with any web browser’s “do not track” signal or other mechanisms that provide consumers with the ability to exercise choice regarding the collection of personal data about online activities over time and across third-party websites.

### HOW IS YOUR DATA USED?

**Our Use of Data.** We collect, retain, and use the data we collect via Passageways Websites for legitimate business purposes only. This not only allows us to provide the Services as they exist today, but it also allows us to provide you with innovative features and services we develop in the future. For example, we may use the data we receive about you:

- to provide you with our Services;
- to help keep Passageways Websites safe and secure, and protect users’ rights or property;
- to monitor your use of Passageways Websites, including to enforce our Terms of Use; and
- to correspond with you regarding our Services or matters relating to your use or potential use of Passageways Websites, or to inform you of developments in our company or with our Services that we believe may be of interest to you. For example, if you fill out a “Contact Me” Web form, Passageways will use the data

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provided to contact you about your interest in the Services. Passageways may also use data we collect for products and event data dissemination purposes.

We use cookies and other automated and passive tools (such as log files) to gather broad demographic data for internal marketing and demographic studies; to help identify you as a Registered User and to track and personalize your use of Passageways Websites so as to improve your user experience; to assess overall activity on Passageways Websites, including tracking interest in particular features of Passageways Websites and our Services; and for internal operations, including troubleshooting, diagnosing problems with servers, data analysis, testing, research and service improvement. We use such data for statistical/analytical purposes and for evaluating our Services to make them more useful to customers and to track and aggregate non-personal data. For example, Passageways uses IP addresses to monitor the regions from which Registered Users and visitors navigate Passageways Websites. Passageways also collects IP addresses from Registered Users when they log into the Services as part of Passageways' "Identity Confirmation" and "IP Range Restrictions" security features.

**Sharing of Data.** Your trust is important to us, which is why we don't share data we receive about you. Moreover, we do not sell or rent your personal data to third parties for marketing purposes.

However, notwithstanding the foregoing, we may employ your personal data in limited situations as follows:

- to protect and defend our rights, property, or safety or those of our Registered Users, or others; and in connection with the enforcement of terms which may govern Passageways Websites or provision of the Services;
- with our affiliates or business firms contracted to provide specific services to us or on our behalf, in a manner consistent with this Privacy Policy. In situations such as this, the affiliate or third-party servicing firm will be contractually obligated to use your personal data only for the purpose for which our relationship with the firm exists, and the firm will not have the right to share your data with other organizations or contact you outside the bounds of their contract with us. However, we cannot guarantee compliance by any such third-party firm;
- when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities (such as for potential fraud or infringement);
- when required to do so by law or regulation, or in response to legal process (for example, a court order, search warrant or subpoena) or a request from a law enforcement or governmental agency or authority, and in other circumstances in which we have a good faith belief that a crime has been or is being committed by you or another User or that an emergency exists that poses a threat to the safety of you or another person; and

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- aggregate statistical data with respect to “traffic” patterns and usage of Passageways Websites may be provided to our partners or affiliates; provided that such data has been rendered non-personally identifiable.

Certain features of the Websites let you make personal data available to others.

### MODIFICATIONS TO DATA

We strive to maintain the accuracy of any personal data that may be collected from you, and will use our commercially reasonable efforts to respond promptly to update our database when you tell us the data in our database is not accurate. It is your responsibility to ensure that such data is accurate, complete and up-to-date. You may obtain from us, by e-mail the registration data in our records and/or files. Data will be updated as soon as reasonably practicable.

### OPT-OUT

All emails will contain links allowing you to opt-out of receiving such data. In addition, you may opt out of receiving materials or other communications from us and our affiliates by contacting us via email at [support@passageways.com]. For recipients in the EU, your consent to receive email from us will be obtained.

### CHILDREN

In compliance with the Children’s Online Privacy Protection Act, 15 U.S.C. §§ 6501-06 and 16 C.F.R. §§ 312.1-312.12, Passageways will not knowingly collect or solicit personal data from anyone under the age of 13 or knowingly allow such persons to use the services of Passageways Websites. If you are under 13, please do not use Passageways Websites or send any data about yourself to us, including your name, address, phone number, or email address. By using Passageways Websites, you represent that you are not under 13 years of age.

### PROTECTING YOUR PERSONAL DATA

Security is of the utmost importance to Passageways, and, while no data transmission can be absolutely guaranteed as secure in every instance, we will always use our best commercial efforts to ensure the security of our systems and to prevent any disclosure of data inconsistent with this Privacy Policy (for example, as a result of unauthorized acts by third parties). Passageways employs robust physical, electronic and administrative safeguards to protect the data we receive from you, as well as the Posted Content, from unauthorized disclosure. As part of our efforts to promote greater security, Passageways currently uses the Microsoft Azure service to identify unauthorized attempts to upload or change data, or otherwise cause damage. If you suspect unauthorized access to your data, please contact Passageways immediately.

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- Control of Personal Data. You have control over your personal data and how we collect, use and share personal data that you have provided to us. You can download a copy of your personal data or request a copy of the personal data you provided to Passageways.
- Retention. Passageways will retain personal data you provide us as long as we need it to provide Services or the Associated Entity related to you. If you ask to delete a personal account with Passageways, Passageways will initiate deletion of this data after 30 days. Please note: there may be some latency in deleting this data from our servers and storage and we may retain this data if necessary to comply with legal obligations, resolve disputes or enforce Passageways' agreements.
- To provide you with the Services, we may store, process, and transmit data in the United States and locations around the world. Data may also be stored locally on the devices you use to access the Services.

## BUSINESS TRANSFER

Passageways may, in the future, sell or otherwise transfer some or all of its assets to a third party. Data we have received from you, including personal data and technical and usage data we obtain from you directly or automatically via Passageways Websites, may be disclosed to any potential or actual third-party purchasers of such assets and/or may be among those assets transferred. In such instance, we will use reasonable commercial efforts to provide you with written notice of such transfer.

## USERS OUTSIDE THE UNITED STATES

Certain features of the Services allow Registered Users to upload and store data including personal data of third parties ("Third-Party Personal Data"). In these instances, the Registered User will determine the purposes and means of the processing of the Third-Party Personal Data and Passageways processes the Third-Party Personal Data on behalf of the Registered User and under the Registered User's instructions. In these instances, because the Registered User controls the Third-Party Personal Data, the Registered User is responsible for ensuring conformity with local data protection laws.

## EFFECTIVENESS AND POLICY MODIFICATIONS

We reserve the right, at any time, to modify, alter, or update this policy, and any such modifications, alterations, or updates will be effective upon posting. In the event we modify this Privacy Policy, your continued use of Passageways Websites will signify your acceptance of the modified Privacy Practices. If modifications are deemed by Passageways to be material, Passageways will use its reasonable commercial efforts to provide you with confirmed notice of the changes. In any event, please revisit this page often to remain fully informed of our policies.

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### QUESTIONS

Passageways will happily address any concerns about our Privacy Policy. If you have questions about this Privacy Policy, please contact us at [support@passageways.com](mailto:support@passageways.com)