

PRIVACY POLICY

This privacy policy (“Privacy Policy”) governs how Software Information Systems, LLC and its affiliates, SIS Holding Company, LLC and VBS, LLC (“SIS”, “we”, “our”), use customer information provided by our customers and prospective customers (“Customers”, “you”) who access the company website or consume SIS services. This policy explains what information SIS receives and collects from our Customers and how it is used. By providing Customer information to SIS, the Customer accepts the terms of this privacy policy and any supplementary terms, in addition to, being authorized to provide Customer information to SIS.

DEFINITIONS

Customer – customer or prospective customer that has engaged or potentially will engage in SIS business, and their representatives, consumers of SIS business systems, visitors to SIS facilities and business websites, vendors and business partners.

End Customer – where SIS resells its services through a business partner, the customer that consumes the product or service. **Personal Information** – any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a phone number, an email address and other contact information.

Data – information that could be considered Personal Information or other data the Customer chooses to store with SIS on behalf of Customer through its cloud or hosted services, or Customer data that SIS may be made aware of in support of its reseller or professional services that could include:

- Customer information (both for customer companies and for people as individuals)
- Financial information, including credit cards, salaries, banking, transactions and more
- Medical information of all types
- Company patents, business plans, and other intellectual property
- Company business records and planning materials, including our customer list, marketing and sales efforts, product line plans, and more.
- Copyrighted materials, both which our company creates and those which we obtain under license from others

COLLECTION AND RECEIPT OF CUSTOMER INFORMATION

SIS receives and/or collects customer-related information for all its business segments, to include, vendor approved reseller services, professional services, staff augmentation, managed services and cloud services. SIS will collect information solely for legitimate business purposes in accordance with this policy, agreements with SIS or governing laws. SIS may receive and/or collect Customer information in the following ways:

Customer Account Setup and Account Use. As part of setting up and maintaining Customer accounts, SIS may collect information the Customer may consider Personal Information. Such Personal Information may include user ID, name, email address, business or mobile phone, company address, and company financial information pertaining to credit applications. SIS may use this information to provide contract agreements, recruitment, purchases and fulfillments, billing information, and other material and communication that is related to SIS business. In order to use cloud services, a separate user ID and password will be created for individual Customer personnel.

End Customers. As part of providing SIS cloud services to a Customer, SIS may collect certain Personal Information that a Customer chooses to provide about its End Customers for resell or white-label purposes. Such information may include an End Customer's name, email address, phone number, fax number, and other Personal Information that the Customer chooses to make available in connection with its use of cloud services.

Technical Information. In providing SIS services to its Customers, SIS may require specific Customer technical information to be collected that may be considered sensitive or proprietary, and may include, but not limited to, site names, IP addresses, DNS or host names, physical architecture, logical architecture, hardware models and related configurations, software versions and related configurations, statistical information related to systems such as CPU, memory, and storage size, and/or software licenses.

Log Files. SIS may collect log files provided by Customer to assist in SIS services to resolve point in time issues for your systems. In addition, SIS collects infrastructure-related log files ongoing for its cloud services that may include event information typically collected in infrastructure logs, such as, but not limited to, date/time stamp, IP addresses, host names, event ID, and event content.

Websites. The Thinksis.com site is a registered website of SIS, LLC, and is used to promote the company and its services through product and service information, external links to partner company websites and cloud services, blogs and forums, and event registration. Personal Information collected from thinksis.com includes name, company, title and email address.

Cookies. SIS may utilize cookies for authentication validation purposes for its company website and certain cloud services. A “cookie” is a small text file that may be used, for example, to authenticate access to the cloud service. Typically, you can choose how cookies are handled by devices via web browser settings, including whether to accept or block cookies via the browser. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. By blocking cookies, login attempts to these sites may be unsuccessful.

Customer Data. Customers use SIS services to host, transmit or process data on our hosted systems which the Customer may choose to include its own Personal Information. As the Customer, you, are the sole owner of such data, and SIS will not access, review, share, distribute, or reference any such Customer Data except as provided in SIS’ Master Services Agreement and other subsequent agreements, or as may be required by law. In this case, it is the responsibility of you to decide, not us, how that Customer Data is collected and processed. The Customer is accountable for the security and privacy of its Customer Data that exists with SIS cloud services and has sole responsibility for the security of such data where SIS does not have access to the systems and/or applications that house the data.

HOW SIS USERS CUSTOMER INFORMATION

Customer and Personnel Information. SIS only uses Personal Information of a Customer and its Personnel to: (i) contact the Customer, (2) provide SIS services to the Customer, and (iii) identify and authenticate the Customer and its personnel’s access to cloud services. End Customer Information. SIS only uses End Customer Personal Information to provide services to the Customer that are related to that End Customer. In connection, thereto, SIS may disclose an End Customer’s Personal Information to the Customer (and its personnel) that is related to the End Customer.

Third Parties and Affiliates. SIS may transfer Personal Information to its third party service providers and business partners for the purposes of referral partnerships, to provide sales quotes and orders, to provide services performed by another entity on behalf of SIS, and job recruitment.

Business Transfers. If SIS is acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.

Marketing. Personal information may be utilized to provide marketing related functions, such as, event notifications, business surveys, marketing collateral, and marketing campaigns. SIS only shares minimal contact information with its business partners for event attendance to

business partner-sponsored events and does not permit such information to be sold to third party entities. SIS does collect web analytic statistics for traffic that connects to our company website and may collect your IP address. In addition, SIS may use aggregated, de-identified information about users with third parties for marketing, advertising, research or similar purposes.

THIRD PARTY LINKS

SIS may provide you with links to third-party websites that we believe may be of interest to our visitors or convenience or are used by SIS to provide certain business services on behalf of SIS. By clicking on a third-party link, you will leave thinksis.com. SIS is not responsible for the content of third-party websites.

SOCIAL MEDIA

SIS may receive certain information stored or processed on third-party social media sites, blogs and forums such as Facebook[®], Twitter[®], LinkedIn[®], and WordPress[®] among others. Any Personal Information you choose to submit via such a forum may be read, collected, or used by others who visit these forums. These sites also may have their own privacy policies that specifically govern its use of social media features. SIS will ask your permission before posting case studies or quotes by our Customers on our associated websites.

HOW DATA IS SECURED

Protecting Customer data that SIS is trusted with every day is very important to us. SIS sets expectations with its employees, contractors and business partners to protect data and comply with laws to protect Customer Data, including Personal Information. We have written policies and contract agreements to help assure that SIS employees, contractors and business partners comply with information security, customer, legal, regulatory and industry requirements regarding Customer Data. In addition, SIS has put in place technical, administrative and physical safeguards as deemed commercially reasonable and appropriate for the protection of Customer Data from unauthorized use, disclosure and access.

RETENTION

SIS reserves the right to retain any Personal Information and other service-related information to fulfill the purposes identified in this policy. SIS retains personal information for only as long as necessary to fulfill the stated purposes or as required by law or regulations.

CHILDREN UNDER 13

SIS services are not designed for children under 13. If we discover that a child under 13 has provided us with personal information, we will delete such information from our systems.

CCPA PRIVACY

Your Rights under the CCPA

Under this Privacy Policy, and by law if You are a resident of California, You have the following rights:

- **The right to notice.** You must be properly notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to access / the right to request.** The CCPA permits You to request and obtain from the Company information regarding the disclosure of Your Personal Data that has been collected in the past 12 months by the Company or its subsidiaries to a third-party for the third party's direct marketing purposes.
- **The right to say no to the sale of Personal Data.** You also have the right to ask the Company not to sell Your Personal Data to third parties. You can submit such a request by visiting our "Do Not Sell My Personal Information" section or web page.
- **The right to know about Your Personal Data.** You have the right to request and obtain from the Company information regarding the disclosure of the following:
 - The categories of Personal Data collected
 - The sources from which the Personal Data was collected
 - The business or commercial purpose for collecting or selling the Personal Data
 - Categories of third parties with whom We share Personal Data
 - The specific pieces of Personal Data we collected about You
- **The right to delete Personal Data.** You also have the right to request the deletion of Your Personal Data that have been collected in the past 12 months.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your Consumer's rights, including by:
 - Denying goods or services to You

- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
- Providing a different level or quality of goods or services to You
- Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services.

EXERCISING YOUR CCPA DATA PROTECTION RIGHTS

In order to exercise any of Your rights under the CCPA, and if you are a California resident, You can email or call us or visit our "Do Not Sell My Personal Information" section or web page.

The Company will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonable necessary and with prior notice.

DO NOT SELL MY PERSONAL INFORMATION

We do not sell personal information. However, the Service Providers we partner with (for example, our advertising partners) may use technology on the Service that "sells" personal information as defined by the CCPA law.

If you wish to opt out of the use of your personal information for interest-based advertising purposes and these potential sales as defined under CCPA law, you may do so by following the instructions below.

Please note that any opt out is specific to the browser You use. You may need to opt out on every browser that you use.

WEBSITE

You can opt out of receiving ads that are personalized as served by our Service Providers by following our instructions presented on the Service:

- From Our "Cookie Consent" notice banner

The opt out will place a cookie on Your computer that is unique to the browser You use to opt out. If you change browsers or delete the cookies saved by your browser, you will need to opt out again.

Mobile Devices

Your mobile device may give you the ability to opt out of the use of information about the apps you use in order to serve you ads that are targeted to your interests:

- "Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from Your mobile device by changing the preferences on your mobile device

"DO NOT TRACK" POLICY AS REQUIRED BY CALIFORNIA ONLINE PRIVACY PROTECTION ACT (CALOPPA)

Our Service does not respond to Do Not Track signals.

However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

YOUR CALIFORNIA PRIVACY RIGHTS (CALIFORNIA'S SHINE THE LIGHT LAW)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if you are a California resident, You can contact Us using the contact information provided below.

CALIFORNIA PRIVACY RIGHTS FOR MINOR USERS (CALIFORNIA BUSINESS AND PROFESSIONS CODE SECTION 22581)

California Business and Professions Code section 22581 allow California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if you are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

MODIFICATION OF POLICY

SIS reserves the right, at our discretion, to change the terms of this Privacy Policy at any time which will be posted on our website www.thinksis.com. Changes to this Privacy Policy are effective when they are posted on this page. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

CONTACTING US

Any comments, concerns, complaints, or questions regarding our Privacy Policy may be addressed to the Contracts and Compliance department at contractscompliance@thinksis.com.

To make a CCPA request, please contact us by email at ctccpa@convergetp.com by phone: 416.360.1495

Questions related to our company website, thinksis.com, or opting out of marketing communications should be addressed to info@thinksis.com