

## **Privacy Policy – June 13, 2022**

Realeflow, LLC (“Realeflow”) has created this Privacy Policy to demonstrate our commitment to privacy and security. This Privacy Policy describes our policies and procedures regarding the collection, use and disclosure of personally identifiable information received from our users through our Products and this website (collectively, the “Products” or the “Website”). By using or accessing the Products or the Website, you are accepting the terms of this Privacy Policy and are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us.

This Privacy Policy may be updated from time to time for any reason and at our sole discretion. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy on our Website. You are advised to consult this Privacy Policy regularly for any changes.

This Privacy Policy only applies to the Website and Products operated by Realeflow. This Privacy Policy does not apply to companies that Realeflow does not own or control, or to individuals that Realeflow does not employ or manage. The Products and the Website may contain links to other sites. Realeflow is not responsible for the privacy policies and/or practices on other sites. You should review the privacy policy as stated on that site.

### **What Type of Information Do We Collect?**

We may collect the following categories of personal identifiable information, although, not all categories may be collected for every individual because it may depend on whether you are a visitor to our websites or if you purchase a product or service or pay a monthly fee for our product:

- Personal identifiers, such as your name and mailing address;
- Device and online identifiers and related information, such as your telephone number and email address;
- Internet, application, and network activity, such as Cookie IDs and browser visits;
- Financial information, such as credit and debit card numbers;
- Purchase history information, such as products and services you have purchased and/or returned;
- Location information, such as geo-location information; or
- Behavioral information, such and when how often you access our product and how often you communicate with us

### **How Do We Collect Information?**

- We collect information from you when you share information with us; for example, when you register for and/or attend a webinar or training, fill out a survey, create an account, make a purchase, post user-generated content on our website, participate in a promotion, or request customer service or contact us with an inquiry or request;
- We collect information indirectly and passively from you through technology, such as through a cookie placed on your computer when you visit our websites or from the device or browser you use to access our services;

- We also collect information from third parties and other sources to help us correct or supplement our own records, improve the quality or personalization of our services and marketing, and to prevent or detect fraud. For example, we belong to ad networks that may use your browsing history across participating websites and mobile services to show you internet-based advertisements, and you may see our ads for Realeflow on participating websites and mobile services based on how you browse;
- We collect technical information when you visit our websites or use our mobile applications or services. This includes information such as Internet Protocol (IP) address, the type of mobile device you use, your device operating system and browser type, a unique device identifier, the address of referring websites, the path you take through our websites, pages visited, average time spent on our websites, and other information about your session on our websites;
- We use our own and third-party technologies such as cookies, web beacons, and mobile device identifiers to collect information about the use of our websites and mobile services. We use these tools to provide an integrated and more personalized customer experience for you. For example: a cookie, which is a small data file that can be placed on your hard drive when you visit certain websites, allows us to provide you relevant information as you use or return to our sites; web beacons allow us to know if a certain page was visited, an email was opened, or if ad banners on our websites and other sites were effective. We also use tracking pixels (i.e. Google Analytics) to aid in measuring and tracking where our website traffic is coming from and to track the performance of our site. Finally, we use remarking pixels from Facebook and Google to aid in customized, targeted follow up advertising.
- We do not respond to “Do Not Track” signals.

### **California Notice of Collection**

We may collect the below categories of information for the following business purposes:

- Providing the Products;
- Our operational purposes;
- Auditing consumer interactions on our site;
- Detecting, protecting against, and prosecuting security incidents and illegal activity;
- Bug detection and/or error reporting;
- Improving our existing Products and developing new products;
- Other uses that advance our economic interests, such as communicating with you about relevant products and services; or
- Other uses about which we notify you.

Examples of these types of uses are identified below and are outlined more generally above in the section titled “What Type of Information Do We Collect?”. We may also use the below categories of personal information for compliance with applicable laws and regulations, and we may combine the information we collect or remove pieces of information to limit or prevent identification of any particular user or device.

- **Identifiers.**
  - Information we may collect: name, billing addresses, email address, billing information, username, provided phone numbers, security questions and password.

- Categories of sources: You, if you choose to provide to us. Your use of our products automatically collected from you. Third parties who may refer you to the product. Consumer data resellers. Public records databases.
- Examples of uses: Providing the Products. Fixing and improving the Product. Facilitating payment. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Products. Security, fraud and legal compliance.
- Categories of third parties with which we may share that information: Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as advertisers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.
- **Commercial Information.**
  - Information we may collect: records of your purchases and transaction data.
  - Categories of sources: You, if you choose to provide to us. Your use of our products automatically collected from you. Third parties who may refer you to the product.
  - Examples of uses: Providing the Products. Fixing and improving the Product. Facilitating payment. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Products. Security, fraud and legal compliance.
  - Categories of third parties with which we may share that information: Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as advertisers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.
- **Financial Data.**
  - Information we may collect: credit or debit card number, verification number, expiration date – provided to us to process your payments for the Products.
  - Categories of sources: You, if you choose to provide to us.
  - Examples of uses: Providing the Products. Facilitating payment. Security, fraud and legal compliance.
  - Categories of third parties with which we may share that information: Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as advertisers.
- **Device Information and Identifiers:**
  - Information we may collect: your IP address, browser type and language, operating system, platform type, device type, software and hardware attributes, unique device, advertising and app identifiers.
  - Categories of sources: You, through your device. Advertising providers. Analytics providers. Cookies and tracking technologies.
  - Examples of uses: Providing the Products. Fixing and improving the Product. Facilitating payment. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Products. Security, fraud and legal compliance.
  - Categories of third parties with which we may share that information: Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as advertisers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.
- **Device Information and Identifiers:**

- Information we may collect: files you download, domain names, landing pages, browsing activity, content viewed and clicked, dates and times of access, pages viewed, forms you complete, the URL that referred you to our Products, other web usage activity and data logged by our web servers, whether you open an email and your interaction with email content, access times, error logs, and other similar information.
- Categories of sources: You, through your device. Advertising providers. Analytics providers. Cookies and tracking technologies. Marketers.
- Examples of uses: Providing the Products, including registration and customer service. Fixing and improving the Product. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Products. Security, fraud and legal compliance.
- Categories of third parties with which we may share that information: Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as advertisers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.
- **Location information:**
  - Information we may collect: general location and if you provide permission, precise GPS location.
  - Categories of sources: You, if you choose to provide to us. Your use of our Products automatically collected from you.
  - Examples of uses: Providing the Products, including registration and customer service. Fixing and improving the Product. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Products. Security, fraud and legal compliance.
  - Categories of third parties with which we may share that information: Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as advertisers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.
- **Other information:**
  - Information we may collect: any other information you choose to directly provide to us in connection with your use of the Products.
  - Categories of sources: You, if you choose to provide to us.
  - Examples of uses: Providing the Products, including registration and customer service. Fixing and improving the Product. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Products. Security, fraud and legal compliance.
  - Categories of third parties with which we may share that information: Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as advertisers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.

## **Do Not Sell My Personal Information**

California residents may opt out of the 'sale' of their personal information.

Under the CCPA, sale is defined such that it may include allowing third parties to receive certain information, such as cookies, IP addresses, and/or browsing behavior, to deliver targeted advertising on the Products or other Services.

If you would like to opt out of our use of your information for such purposes that are considered a “sale” under California law, you may do so by sending an email to [support@realeflow.com](mailto:support@realeflow.com) and include the subject line: CCPA Opt-Out. You may also call our customer service department at 855-545-2095.

### **Rights for California Consumers**

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.

We will take reasonable steps to verify your identity before responding to a request, which may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, verifying your name, email address, and physical address.

You are also permitted to designate an authorized agent to submit certain requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent’s request.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, please: (i) contact us at 855-545-2095; or (ii) email us at [support@realeflow.com](mailto:support@realeflow.com).

You may have the right to receive information about the financial incentives that we offer to you (if any). You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Certain information may be exempt from such requests under applicable law. We need certain types of information so that we can provide the Products to you. If you ask us to delete it, you may no longer be able to access or use the Products.

### **How We May Use Personal Information**

We may use your Personal Information to provide you products and services. We also use your Personal Information to support our business functions, such as fraud prevention, marketing, and legal functions.

Some examples include:

- To fulfill your purchase or requests for services and provide customer service
- To create and maintain your account
- To conduct auditing and monitoring of engagement
- To conduct marketing, personalization, and third-party advertising
- To protect the security and integrity of our websites, mobile services and our business, and help prevent fraud

- To update our operational and technical functionality
- To conduct business analysis, such as analytics, projections, identifying areas for operational improvement
- To conduct research and development
- To fulfill our legal function or obligations

To do the above, we combine Personal Information and non-personal information, collected online and offline, including information from third party sources. We also may transfer or share your personal information for these purposes within our corporate family of companies and affiliates, as permitted by law.

### **How Do We Share Your Personal Information Outside of Realeflow?**

All the categories of Personal Information that we collect may be shared for a business purpose with our family of companies and affiliates. We do not sell or rent your personal information for monetary consideration; however, we may receive an affiliate referral fee if you purchase a product or service from an affiliate company. We may share your Personal Information in other circumstances, such as in order to conduct our business, for other companies to offer you products and services, in the event all or a part of our business is merged, sold or reorganized, when legally required, as described below, or with your consent.

We will not share your personal information outside of our corporate family of companies and affiliates, except in the following circumstances:

#### Service Providers

We share personal information about you with service providers that help with our business activities, including direct mail vendors, payment card processors, marketing and advertising vendors, and companies that help us improve our products and services. Your personal information may be stored and processed by our service providers in the United States or other locations where the service providers maintain facilities.

#### Products and Services Offered by Other Businesses

We will sometimes enable other businesses and affiliates to make their products or services available to our customers. You may purchase these companies' products or services from within our products or directly from the other businesses. When you purchase these products or services, we identify the other business and share with this business personal information related to your purchase of their products and services.

Note that other companies' use cookies and other data collection technologies and have their own privacy policies, separate from this one. Like many companies, we may allow cookie matching with select partners and affiliates. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any site or service to which our website links to or is linked from. The inclusion of a link on the website does not imply endorsement of the linked site or service by us or our affiliates.

#### Co-Branded Products and Services

We may share your personal information with affiliate companies that offer complimentary and/or cobranded products or services, and we may receive compensation from these affiliate companies when you make a purchase. We instruct these companies to not use your personal information for purposes other than offering you their complimentary products and administering your use of their services.

#### Legal Requirements and Protection of Our Company and Others

We may share your Personal Information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of Realeflow, our customers, our team members, or other persons. Examples include:

- Protecting our intellectual property
- Identifying and addressing fraud or financial risk
- Providing personal information to law enforcement at their written request
- Responding to a subpoena or other valid legal inquiry
- Responding to an investigative body in the case of a breach of an agreement or violation of law
- Business Transfers

In the event that all or a part of our business is merged, sold or reorganized (including transfers made as a part of insolvency or bankruptcy proceedings), personal information about you could be shared with the successor business. We will use reasonable measures recommend that any successor treats your information in accordance with this Policy.

#### Advertising Related Activities

We may share aggregated or pseudonymous information (pseudonymous information includes things like: device identifier, type of device, IP addresses, cookies and other information associated with your browsing and app usage) with other companies, such as publishers, advertisers, measurement analytics providers, and others. We do not share information that directly identifies you (information such as name or email address) with these companies.

Advertisers and partners may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

#### With Your Consent

In circumstances other than those described above, we will ask for your affirmative consent before we share your personal information outside of our corporate family of companies and affiliates.

#### **How Can You Make Choices About Receiving Marketing, Promotional, and Other Information?**

Realeflow may send you marketing, promotional or other information. In certain cases, when interacting with us, you may be provided with a choice to opt-in or opt-out of receiving such information. In other cases, you will not be presented this choice. If you, at any time, choose to opt-out of receiving such information, we will abide by that marketing preference. Moreover, at any time (no matter what you have chosen or informed us of in the past), you may send us an email to [support@realeflow.com](mailto:support@realeflow.com) to

update your marketing preference or to request that we delete your personal information; we will abide by that preference and update your personal information accordingly. We will respond to your requests regarding your personal information within 30 days. You may of course also follow the unsubscribe instructions contained in the marketing communications you receive from us.

Some of our mobile services use your device's location information. You may be able to adjust the settings of your mobile device at any time to control whether your device communicates this location information. We may also offer additional controls on our use of your mobile location information.

Kindly note that no matter what your marketing preferences are, we may contact you to acknowledge, confirm or fulfill any order that you place, to respond to you or for other legitimate business reasons.

### **Marketing Preferences**

When we are sending marketing communications to you, we use the following standards:

- We use an opt-in standard for automated phone and text messages. Opt-in means we will only conduct the activity with your affirmative consent.
- We use an opt-out standard for email, app notifications, postal mail, and for sharing personal information with our affiliates and any companies outside our corporate family of companies for their use in direct marketing of their products and services. Opt-out means we or they may contact you but will stop upon your request (as described below).

If you contact us by email or mail, please be sure to include your full name, the types of communications you would like to receive or not receive, and your related contact information. For instance, if you would like to opt-out of mail, include your mailing address. Please allow sufficient time for your marketing preferences to be processed. It may take up to 30 days to process your requests. Please note that postal mailings are often prepared many weeks in advance, and you may continue to receive mail for six to ten weeks.

Since we do not accept opt-out requests from third parties, please communicate your request directly to us through one of the mechanisms mentioned in this Privacy Policy.

Please know that, even if you opted out of receiving marketing communications from us, we may still contact you for transactional or informational purposes. Some examples are contacts for customer service or payment reminder notices. We may also need to contact you with questions or information regarding your purchase.

### **How Do You Access and Update Your Personal Information?**

We provide you with various ways to access or update your personal information, including contact and account information. We also take reasonable steps to keep your personal information accurate and complete.

You can access or update your personal information, including contact or account information, in the following ways:

- If you have created an account on one of our websites or mobile services, log into your account. Once you do, you will be able to enter and update your own contact information and payment information, as well as contact information for recipients you have designated.
- Contact us through one of the ways listed in Privacy Policy. Please include your current contact information, the information you are interested in accessing, and your requested changes. We will provide you the personal information requested if it is reasonably available, unless it infringes on the privacy of other individuals, and subject to reasonable limitations provided by law and internal procedures. Otherwise we will describe the types of information we typically collect. We will provide access and make the changes you request or will provide an explanation of what actions we will be able to take about the request.
- If you need to access your personal information related to a specified service provided to you by a Realeflow service provider or business partner or affiliate, we will refer you to the service provider or business partner or affiliate.

If you are a California resident, please refer to the “Rights for California Consumers” section for additional information on your rights under the California Consumer Privacy Act.

### **How Do We Secure Your Personal Information?**

We recognize the importance of maintaining the security of our customers’ personal information. We use reasonable security measures, including physical, administrative, and technical safeguards to protect your personal information.

We have team members who are responsible for helping to protect the security of your information. We use reasonable security measures, including physical, administrative, and technical safeguards. These measures may include physical and technical security access controls or other safeguards, information security technologies and policies, procedures to help ensure the appropriate disposal of information, and training programs.

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 website or services, you are responsible for keeping this password confidential. Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal Information transmitted to our websites.

### **How Does Realeflow Protect the Privacy of Children Online?**

The Website is not designed to solicit information from individuals under the age of 18. We do not knowingly collect or store any personal information from anyone under the age of 18. If we become aware that we have collected or stored personal information from an individual under age 18, we will remove his or her personal information from our files. If you are a parent or legal guardian and believe we may have inadvertently collected personal information from your child, please contact us at: [support@realeflow.com](mailto:support@realeflow.com).

## **Shine the Light Disclosure**

Under the California “Shine the Light” Act, if you reside in California and have an established business relationship with us, you have the right to receive information about our sharing of your personal information with affiliated entities or non-affiliated third parties for direct marketing purposes. If you wish to exercise these rights, please send your written request, via email or postal mail to “Shine the Light Disclosure” in the subject line. Please include your full name, street address, city, state and zip code in the body of your request. Our contact information is:

Attn: Privacy and Legal Department  
Realeflow LLC  
6659 Pearl Road, Suite 301  
Parma Heights, OH 44130  
Email: [support@realeflow.com](mailto:support@realeflow.com)

We will not accept requests via the telephone or facsimile. We also may not be able to respond to requests that are not labeled or sent properly, or do not have complete information.