

Effective Date: 08 NOV 2018

CINC Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY.

CINC Systems, LLC (“CINC” or “We”) respects your privacy and is committed to protecting it through our compliance with this policy.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it (“Privacy Policy”). By accessing our website or mobile application, including any products and services offered on or through our website or any subsite, subdomain, or successor site, or any mobile application which links to this policy (collectively, our “Website”), you agree to this Privacy Policy. If you do not agree with all of the terms, conditions, and practices set forth below, do not access the Website. By submitting personal information to us, you give us permission to receive it, review it, edit it, store it, and use it for the purposes described in this Privacy Policy.

This Privacy Policy may change from time to time. Your continued use of this Website after we make changes is deemed to be an acceptance of those changes, so please check the Privacy Policy periodically for updates. If we make a material change about how we treat our members’ personal information we will notify you via the website.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the Website and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies to the information we collect on the Website, in email, text, or other electronic messages between you and the Website. This Privacy Policy does not apply to any services that do not display or link to this Privacy Policy or that have their own privacy policy statements. Additionally, this Privacy Policy does not apply to any external websites that may be linked to the Website.

Information We Collect About You and How We Collect It

We may collect several types of information from or about users of our Website, including information:

- By which you may be personally identified, such as your name, address, email, telephone number, and Banking Information;
- About you individually but does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

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

Information We Collect

As you navigate through the Website, we may collect two types of information from you: (1) “personally identifiable information” (as described below); and (2) “non-personally identifiable information” (as described below).

“Personally identifiable information” is information that can be used to uniquely identify or contact a single person, directly or indirectly in conjunction with other public information.

There are a number of ways in which you may provide us with and consent to our collection of certain personal information. Here are some examples of the ways in which we may collect and store your personally identifiable information through the Website:

- We may collect your first and last name, email address, mobile phone number or other information when you register for our services and create an account;
- We may collect certain information about your family members if you add your family or household to your account;
- We may collect personal information you submit to us, such as your name, phone number, and email address when you contact us; and
- We may collect your first and last name, mailing address, and payment information (such as credit card number and expiration date) if you make a payment on the Website.

“Non-personally identifiable information” can be technical information or it can be demographic information, such as your age, name, gender, or interests. Non-personally identifiable information may also mean aggregated, non-identifiable, or anonymized information. Non-personally identifiable information does not identify you personally. If you do provide us with non-personally identifiable information, we may use it for the purposes described in this Privacy Policy, or any other legal purpose.

Here are some examples of ways through which we may collect and store your non-personally identifiable information through the Website, and how we use such information:

- **Log Information:** When you use the Website or view content provided by CINC, we automatically collect and store certain information in our server logs. This type of information includes details of how you use our service, IP address information described below, web pages which have been viewed by you, date and time, domain type, device event information such as crashes, system activity, hardware, settings, browser type, browser language, the date and time of your requests, and referral.
- **Internet Protocol (IP) Address:** Your “IP address” is a number that lets computers attached to the internet know where to send you data, such as screens and pages of our Website that you view. We use this information to deliver our screens and pages to you upon request, to tailor our services to the interests of you and our other visitors, and to measure traffic to and within our Website.
- **Demographic Information:** “Demographic Information” may be gender, age, zip code, and interests. We may collect such information about you through our services and use it to provide you with personalized services and to analyze trends to ensure that our Website and the information on them is targeted to meet your needs. Please note that we also consider aggregated information, which is not personally identifiable, to be non-personally identifiable information.
- **Location Information:** When you use the Website, we may collect and process information about your actual location. We use various technologies to determine location, including IP address, global positioning systems, and other sensors that may provide CINC with information about nearby devices and WiFi access points.
- **Usage Information:** When you use the Website, we may collect and process information about how you use the Website, including how you move through the Website.
- **Feedback Information:** From time to time, we may request that you provide us with feedback regarding the Website, as well as the products and services we offer. We may do this in the form of a survey or other feedback mechanism. We may collect and analyze this information.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies):** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse our cookies, our system will use cookies when you direct your browser to our Website.

- **Flash Cookies:** Certain features of our Website may use local stored objects (or flash cookies) to collect and store information about your preferences and navigation to, from, or on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies.
- **Web Beacons:** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

If you encounter a screen or page that requests information you do not want to share with us, do not enter the information and do not proceed with that screen or page.

How We Use Your Information

Personally Identifiable Information

If you provide us with personally identifiable information, we will use it only for the purposes described in this Privacy Policy or where it was collected (including in a financial privacy statement). Primarily, we use it to:

- Offer you the products and services you request;
- Process and complete transactions and send notices about your transactions;
- Create or offer content which is relevant to you;
- Register you as a member and develop your profile to enable you to take advantage of the personalized features of the Website;
- Alert you to updated information, and other new services offered by us or by third parties;
- Improve your user experience and the experience of other users of our Website;
- Understand how you use the Website;
- Identify you as a poster or provider of communications or content; or
- Contact you in response to an email or other communication.

Non-Personally Identifiable Information

We may use non-personally identifiable information for the purposes described in this Privacy Policy or where it is collected, or any other legal purpose, including, when and where applicable, combining non-personally identifiable information with personally identifiable information. Without limiting the above, we may collect information to understand how you use the Website and how we can improve the Website's functionality.

Reports

We may periodically prepare analyses and reports reflecting our visitor and member use of the Website and services. In preparing these reports, we may combine and analyze the personal information you provide to us with information from other sources. However, these reports will include only aggregate information about visitors and members. The information in these reports will not identify you individually and any business partner with whom such reports may be shared will not be able to contact you based on the information contained in the reports.

Disclosures of Your Information

We may disclose information we obtain about you in compliance with this Privacy Policy.

Personally Identifiable Information

We may share or disclose your personally identifiable information in the following instances:

- To activate and maintain your account;
- To carry out the transaction(s) you have requested or authorized;
- To respond to your questions, inquiries, comments, and instructions;
- To send you information; including updates, notices and other information about us or our Website;
- To unaffiliated third-party service providers, agents, or independent contractors who help us maintain our products and services;
- To comply with law, or if in good faith we believe that such action is necessary to conform to the requirements of law, or comply with legal process served on us, and to protect and defend our rights or property, or act in urgent circumstances to protect the personal safety of you and our other visitors;
- To third parties as part of a corporate reorganization process including, but not limited to, a merger, acquisition, or sale of all or substantially all of our assets;
- To our subsidiaries and affiliates;
- With your consent or direction;
- To track and analyze non-identifying, aggregate usage and volume information from our visitors or members and provide such information to third parties;
- To maintain the security of the Website and CINC's systems;
- To protect against fraud or potential fraud; and
- For any lawful purpose, which may include selling your data to third parties.

Non-Personally Identifiable Information

We may share or disclose your non-personally identifiable information for the purposes disclosed in this Privacy Policy or where it is collected (including in our financial privacy policy), or for any other legal purpose, including when and where applicable, sharing and disclosing non-personally identifiable information combined with personally identifiable information.

Legal Disclosure

We may disclose and share information about you and your use of the Website if we believe such disclosure is necessary to:

- Comply with the law and/or legal process where a formal request has been made;
- Protect or defend our rights and/or property and property of others;
- Enforce our Website terms of use and/or this Privacy Policy;
- Conduct investigations of possible breaches of law.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies: You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of the Website may then be inaccessible or not function properly.
- Promotional Offers from CINC: If you do not wish to have your contact information used by CINC to promote our products or services, you can opt-out by sending us an email stating your request to support@cincsystems.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.
- Marketing Emails from CINC: You may choose not to receive marketing email communications from us by clicking on the “unsubscribe” link in our marketing emails. You also may ask us not to send you other marketing communications by contacting us at support@cincsystems.com, and we will honor your request.

Accessing and Correcting Your Information

We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

Subject to applicable law, you may obtain a summary of your personal information or the type of personal information we maintain about you by contacting your management company or at support@cincsystems.com. To help protect your privacy and maintain security, we, or your management company, will take steps to verify your identity before granting you access to the

information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting your management company or at support@cincsystems.com.

Data Security

We have implemented measures to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Once we receive your information, we make reasonable efforts to ensure the security of our systems. We use firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction. However, this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of such firewalls or secure server software.

The safety and security of your information also depends on you. Where you have chosen a password to access our Website, you are responsible for keeping this password confidential. We ask that you do not share this password with anyone.

Unfortunately, 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 via our Website. Any transmission of personal information is done at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Retention and Deletion

We will retain your personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and your consent to such purpose(s) remains valid after termination of CINC's relationship with you.

Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete the information. If you believe we might have any information from or about a child under 13, please contact us at support@cincsystems.com.

Third Party Sites

The Website may contain links to webpages operated by parties other than CINC. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the user to take precautions to ensure that whatever links the user selects or software the user downloads (whether from this Website or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the user will be subject to upon linking to the third party's website. CINC strongly recommends that each user review the third party's terms and policies.

Do Not Track (DNT) Signals

CINC does not respond to Do Not Track (DNT) signals. Some third-party sites keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

You can, however, make decisions about your privacy and the advertisements you receive. You can control whether companies serve you behaviorally-based advertising by visiting the Digital Advertising Alliance (“DAA”) Web page and using the DAA's opt-out selection (located at <http://www.aboutads.info/choices/>).

Information for California Residents

This section is required under California law. California residents are entitled to information about our practices regarding the sale of personal information. We do not sell your personal information. If at any time we begin selling personal information, we will update this Privacy Policy.

California residents are entitled to contact us to request information about whether we have disclosed personal information to third parties for the third parties' direct marketing purposes. We do not disclose personal information to third parties for the third parties' direct marketing purposes. California customers may request further information about our compliance with this law by e-mailing us at support@cincsystems.com. [C4]

International Users

The Website is intended solely for CINC customers residing in the United States. If you are a non-US resident, please be advised that we may transfer information that we collect about you, including your personal information, to subsidiary and affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring information about you, including personal information, to a country and jurisdiction that does not have the same data protection laws as the European Union. Accordingly, you consent to the transfer of information about you, including your personal information, to the U.S., and the use and disclosure of information about you, including your personal information, as described in this Privacy Policy.

Compliance and Cooperation with Regulatory Authorities

We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, if the person complaining provides contact information, we may contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our customers directly.

Changes to this Policy

From time to time, we may make changes to this Privacy Policy in order to accommodate new technologies, platforms, industry practices, regulatory requirements, or for other purposes. We encourage you to review this Privacy Policy periodically to ensure that you understand how we collect, use, and share information through the Website. If we make changes to this Privacy Policy, we will update the “Effective Date” posted at the top of this Privacy Policy.

Any changes to this Privacy Policy will become effective when the revised Privacy Policy is posted on the Website. By continuing to use the Website following such changes, you are agreeing to accept the terms of the revised Privacy Policy.

Contact Us

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at: support@cincsystems.com