

PRIVACY POLICY

This Privacy Policy explains how [mPro5] (“mPro5,” “us,” “we” or “our”) collects, uses, and discloses Personal Information through our website [include link] (the “Website”), and any of our related websites or applications that link to this Privacy Policy (collectively, the “Site”) that are owned and controlled by mPro5. As used in this Privacy Policy, “Personal Information” means information that identifies or that could be used to identify you.

The [mPro5] platform allows our business customers who subscribe to the platform to [include description of platform function] (“Platform Subscribers”). mPro5 acts as a “data processor” for Personal Information that we collect or process on behalf of Platform Subscribers.

This Privacy Policy does not apply to information that Platform Subscribers collect, create, or provide to the mPro5 platform, which we refer to as “Customer Data.” Customer Data, which may include Personal Information contained in text, images, photos, chat logs, or audio or video recordings that are created or shared by Platform Subscribers, is owned and controlled by the Platform Subscriber. Our use and disclosure of Customer Data is governed by our agreements with Platform Subscribers. If you have questions about the information practices of the Platform Subscriber that uses the mPro5 platform for [_____], please review the Platform Subscriber’s privacy policy or contact them directly.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

The Personal Information we collect and how we use it depends on the context of your interactions with us. We also collect certain information automatically when you interact with the Site.

Information You Provide Us

We collect Personal Information that you choose to share with us when you use the Site, as described below.

Account Information

If you visit our Site, create an account, or sign up for services, we will collect Personal Information from you, including through forms presented on the Site.

This Personal Information may include:

- name,

- email address,
- password,
- company name and job title/position, and
- phone number.

Payment Information

If you make a payment through the Site, we will need to collect your payment card number, expiration date, CVV, credit card type, and billing name and address.

Additional Information

If you contact us or participate in a survey, contest, or promotion, we collect the information you submit such as your name, email address, contact information, and message. If you apply for a job through the “Careers” page on our Site, we (or our third party career services providers) will collect information necessary to evaluate and contact you about your application, which may include your contact details, your resume/CV, employment history, job preferences, educational background, achievements, immigration status and entitlement to work; as well as information for diversity monitoring, such as your gender, race, disability or veteran status.

Information We Collect Automatically

In addition to the information you share with us, we collect some information automatically when you use the Site. The types of information that we collect automatically may include:

- Technical information about your computer, device, hardware, or software you use to access the Internet or our Site, such as IP address or other transactional or identifier information for your device (such as device make and model, information about device operating systems and browsers, or other device or system related specifications);
- Usage information and statistics about your interaction with the Site which may include the URLs of the Site that you have visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, the applications and features you use, when and how long you use those applications and features, and other usage statistics;
- Information that facilitates a safer and more personalized experience with the Site, such as user identification information, saved preferences, and device identifiers or usage information for authentication and fraud prevention purposes; and
- Information about your approximate location, which we may derive from device information such as IP address.

We collect some of this information through tracking technologies such as cookies and web beacons. For more information, please see the How We Use Cookies and Other Tracking Technologies section below.

Information We Collect from Third Parties

In some cases, we receive Personal information from third parties. For instance, while using our Site, individuals may provide information about another individual, or an authorized user (such as an account administrator) creating an account on your behalf may provide information about you.

When one individual provides us with information (including Personal Information) about another individual, we assume that the individual has permission and authority to do so and to consent on behalf of that individual to the collection and use of Personal Information as described in this Privacy Policy. Please contact us immediately if you become aware of an individual providing us with Personal Information about another individual without being authorized to do so.

HOW WE USE PERSONAL INFORMATION

We may use the Personal Information that we collect or receive through the Site for the following purposes:

- To respond to your inquiries and requests and communicate with you about the Site, your account, or services you subscribe to through the Site;
- To send you invoices and other accounting purposes;
- To operate and provide support for your use of the Site;
- To store information about your preferences and customize your experience on the Site;
- To analyze usage trends and patterns and measure the effectiveness of the Site;
- To perform our agreements with customers, including fulfilling orders and requests and processing payments;
- To provide you with customized information about products, services we offer, and other information we think may be of interest to you;
- To administer, evaluate, and improve our business and the Site (including developing new products and services; managing our communications; and performing accounting, auditing, billing, reconciliation and collection activities);
- To comply with legal or regulatory requirements, judicial process, and our company policies (including due diligence and contracting activities);
- To secure the Site, including by protecting against and responding to fraud, illegal activity (such as incidents of hacking or misuse of the Site), and claims and other liabilities, including by enforcing our customer agreements and Terms of Use;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, including as part of bankruptcy, liquidation, or similar proceeding;

- To demonstrate and verify compliance with our internal policies and procedures, and applicable privacy and data security laws and regulations; and
- For any other purpose that you may authorize or direct at the time we collect your Personal Information.

We may also use de-identified or aggregated information for product development, research, analytics and other purposes, including for the purpose of research, advertising, marketing, and promotional purposes.

HOW WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES

We collect information about your use of the Site through tracking technologies such as cookies and web beacons. A “cookie” is a unique numeric code that is transferred to your computer to track your interests and preferences and to recognize you as a return visitor. A “Web beacon” is a transparent graphic image placed on a website, e-mail or advertisement that enables the monitoring of things such as user activity and site traffic.

We and third parties with whom we work may use cookies and web beacons on the Site to improve user experience, to help remember your preferences and allow us to bring you the content and features that are likely to be of interest to you, and to analyze the use of our Site and to improve the Site’s functionality. These third parties may collect information about your online activities over time and across different Web sites. One of the ways we do this is through the use of Google Analytics. For more information about how Google Analytics uses and processes data, please visit <https://www.google.com/policies/privacy/partners/>.

Most web browsers accept cookies automatically, but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. Please note that if you disable cookies, you may not be able to use some customized features available through the Site.

HOW WE SHARE PERSONAL INFORMATION

To accomplish the purposes set out above, we may share your Personal Information with other parties that may include the following:

- Service providers that perform services on our behalf and under our direction;
- Other third parties as necessary to (a) protect or defend our interests and the legal rights or property; (b) protect the rights, interest and safety and security of the Site, our organization, or members of the public; (c) protect against fraud, and (d) investigate and prosecute users who engage in behavior that is illegal or harmful to others or to others’ property;
- A buyer or other successor or organization in the event of an actual or potential merger, divestiture, restructuring, reorganization, dissolution, or other sale or

transfer of some or all of our assets, including as part of bankruptcy, liquidation, or similar proceeding; and

- Such other parties, or for such other purposes, as you may authorize or direct when we collect your Personal Information.

INFORMATION SECURITY

We are committed to protect and secure the information of mPro5 and our users and we use a variety of security technologies and procedures to help protect against unauthorized access to or alteration, disclosure, or destruction of Personal Information. We encrypt many of our services using SSL and we review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to our systems. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

YOUR CHOICES

You can always choose whether or not to provide information to the Site. However, if you choose not to disclose certain information, you may not be able to establish an account on the Site, which may limit your access to certain functions of the Site. Other examples of your choices include:

- You can browse our Site without registering or directly submitting any information to us (although we may still collect some limited information automatically, as described above);
- You may opt out of receiving our messages at any time by using the opt-out mechanism provided in the message; and
- You may change your browser settings or take other steps to block, manage, or delete cookies. Our Sites do not currently respond to browser “do not track” signals, so you will need to use your browser settings to effectively manage cookies. In some cases, blocking or disabling cookies may cause the Site not to work as intended and some features may not be available.

LINKS TO OTHER WEBSITES AND SERVICES

The Site may contain links to other third-party websites and services. These websites and services are not subject to this Privacy Policy. They are not controlled by mPro5 and mPro5 is not responsible for their content or their privacy policies, which may differ from ours. We have not reviewed and make no representations about the accuracy of information on third-party websites, or about their information handling practices. Visits you make to these websites are at your own risk, and we encourage you to review their privacy policies.

ADDITIONAL INFORMATION FOR RESIDENTS OF CALIFORNIA

This section applies only to residents of the State of California and to the Personal Information of a particular California consumer or household (“California Personal Information”). It describes how we collect, use, and share California Personal Information to the extent we act as a “business” under the California Consumer Privacy Act of 2018 (“CCPA”), and the rights that consumers have under the CCPA. California Personal Information does not include, and this section of the Privacy Policy does not apply to:

- Personal information that is exempt from the CCPA;
- Personal information we collect in connection with communications or transactions with consumers who are acting as representatives of companies and other organizations that occur solely within the context of conducting due diligence regarding, or providing or receiving a product or service to or from such companies or organizations; or
- Personal Information we collect, use, and share on behalf of our customers as a “service provider” under the CCPA.

California Personal Information We Collect

We may have collected the following categories of California Personal Information regarding consumers within the last 12 months:

- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, signature, address, telephone number, bank account number, credit card number, debit card number, or any other financial information. Some Personal Information included in this category may overlap with other categories;
- Identifiers such as your real name, alias, postal address, zip code, telephone number, email address and account name;
- Unique and online identifiers such as device identifiers, internet protocol addresses, cookie identifiers, beacon identifiers, pixel tags or mobile ad identifiers or similar technology, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device;
- Commercial information that identifies or could reasonably be linked to you, such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Internet or other electronic network activity information identifies or could reasonably be linked to you, such as browsing history, search history and information regarding an individual’s interaction with an internet website, application, or advertisement;
- Professional or employment-related information, such as current or past job history;
- Sensory data, such as audio, electronic, visual, thermal, olfactory, or similar information;

- Protected classification characteristics under California or federal law, which includes age if 40 years or older, race, color, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information (including familial genetic information);
- Inferences drawn from Personal Information, such as person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes;
- Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records;
- Geolocation data, such as precise location information from your device or rough location generated based on IP address; and
- Other Personal Information that may be contained in online chat, document uploads, and user-generated content.

Sources of California Personal Information

We collect California Personal Information from the sources described in the “Personal Information We Collect and How We Use It” section of this Privacy Policy.

Use of California Personal Information

We may use the categories of California Personal Information that we collect, as described above, for one or more of the business purposes and commercial purposes described in the “How We Use Personal Information” section above.

Disclosures of California Personal Information for a Business Purpose

We may disclose the categories of California Personal Information that we collect as indicated above to the categories of third parties described in the How We Disclose Information section above. In the preceding 12 months, we may have disclosed all of the categories of California Personal Information listed above to our service providers and other third parties when you direct us to do so, or when you use our Services to do so.

Sales of California Personal Information

In the preceding 12 months, we have not sold California Personal Information. We do not sell California Personal Information, and we do not have actual knowledge that we sell California Personal Information of consumers under 16 years of age.

California Personal Information Rights and Choices

The CCPA and other California laws provide consumers with specific rights regarding their California Personal Information. This section describes those rights and explains

how to exercise those rights to the extent we direct the purposes and means of the processing of your California Personal Information processing and otherwise qualify as a “business” under the CCPA.

Access to Specific Information and Data Portability Rights

California residents have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale of your California Personal Information over the past 12 months. If we receive and confirm a verifiable consumer request from you pursuant to the “Exercising Access, Data Portability, and Deletion Rights” section below, we will disclose to you, depending on the scope of the request:

- The categories of California Personal Information we collected about you.
- The categories of sources for the California Personal Information we collected about you.
- Our business or commercial purpose for collecting California Personal Information about you.
- The categories of third parties with which we share your California Personal Information.
- The specific pieces of California Personal Information we collected about you.
- If we disclosed your California Personal Information for a business purpose, a list of the categories of third parties to whom we disclosed California Personal Information for a business purpose identifying the categories of California Personal Information disclosed to those parties in the preceding 12 months.

Deletion Request Rights

California residents have the right to request that we delete California Personal Information, subject to certain exceptions. Once we receive and confirm your verifiable consumer request pursuant to the “Exercising Access, Data Portability, and Deletion Rights” section below, we will delete your California Personal Information from our records, unless an exception applies.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by email or in writing at:

info@mpro5.com

You may designate an authorized agent to submit requests on your behalf through a signed written permission that authorizes the agent to act on your behalf. We may mandate additional requirements when submitted through an authorized agent, such as requiring you to verify your identity directly with us or to directly confirm the authorized agent’s permission to act on your behalf.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Your request must provide information sufficient to permit us

to reasonably verify you are the person about whom we collected California Personal Information, or an authorized agent of that person. To verify your request, we may require you to provide additional information, including account profile information such as your Services email address and other information elements necessary to verify your identity. Your request also must include sufficient detail for us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with California Personal Information if we cannot verify your identity or authority to make the request and confirm the California Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, if you have a password-protected account with us we consider requests made through that account sufficiently verified when the request relates to California Personal Information associated with that specific account.

Any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable request. If we cannot fulfill, or are permitted to decline, your request then we will alert you or your authorized agent. For data portability requests, we will select a format to provide your California Personal Information that is readily usable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision, and we reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request if it is excessive, repetitive, or manifestly unfounded.

Non-Discrimination

Subject to certain exceptions, you have a right to not receive discriminatory treatment for exercising your access, data portability, and deletion rights described above.

Our Global Practices

mPro5 is located in the United States. Personal Information collected through the Services may be stored and processed in the United States or any other country in which mPro5 or its affiliates or service providers maintain facilities, and that your Personal Information may become accessible as permitted by law in those jurisdictions, including to law enforcement and/or national security authorities.

OUR GLOBAL PRACTICES

We may process and store your Personal Information in the United States and in any other country where we or our or service providers operate. By your use of the Site you acknowledge that we will maintain your Personal Information in jurisdictions which may have different data protection rules than in your country, and that your Personal

Information may become accessible as permitted by law in those jurisdictions, including to law enforcement or national security authorities.

HOW TO CONTACT US

If you have any questions or comments about this Privacy Policy, if you need to report a problem, or if you would like to exercise one of your rights under this policy, please contact us at or using the information below. Please include your name, contact information, and the nature of your request so that we can respond appropriately and promptly to your communication.

Email: info@mpro5.com

Postal Mail: 16 W Martin St #1103, Raleigh, NC 27601

MODIFICATIONS AND UPDATES TO THIS PRIVACY POLICY

We reserve the right to change the terms of this Privacy Policy at any time. Any changes to this Privacy Policy will be reflected on this page with a new “Last Updated” date. We encourage you to review this Privacy Policy regularly for any changes. Your continued use of the Site after we post changes is deemed to be acceptance of those changes.

Effective Date: 8/31/2022

Last Updated: 11/23/2022