

## **PRIVACY POLICY**

Integral Consulting Inc. and its affiliated companies, subsidiaries, agents, consultants, and service providers (collectively, "Integral," "we," or "us") respect your privacy. This Privacy Policy describes the types of personal information we may collect from you when you:

- Visit our website at [www.integral-corp.com](http://www.integral-corp.com) (the "Site")
- Use our SharePoint or Sharefile services
- Use our IWEB or DocManager tools
- Use any of our other products or services that include an authorized link to this Privacy Policy (collectively, the items listed above being the "Services").

This Privacy Policy describes the personal information we collect, how we use it, with whom we share it, how we protect it, and the choices we offer you regarding our collection and use of such personal information.

### **PRIVACY PRINCIPLES**

We rely on the following principles to protect your privacy:

- We do not collect any more personal information about you than is necessary.
- We use your personal information only for the purposes we specify in this Privacy Policy, unless you agree otherwise.
- We do not keep your personal information if it is no longer needed.
- Other than as specified in this Privacy Policy, we do not share your personal information with third parties.

### **INFORMATION WE COLLECT**

We may collect personal information about you, meaning information that can uniquely identify you, from various sources, such as:

- When you voluntarily give us information about yourself including but not limited to by subscription, sending us personal or business emails, and participating in surveys or other contacts using any voice, electronic, or written medium

- Directly from you when you use the Services, such as when you register for a business account, access certain features or content, place an order, or remit payments using credit cards or personal checks.

The personal information we may collect about you may include, without limitation:

- Contact information, such as name, postal address, email address, and phone number
- Demographic information, such as age, date of birth, gender, job information, and postal code
- Login information, such as user name, password, and security questions and answers
- Payment information, such as payment card or bank account number, expiration date, authentication code, and billing address.

In addition, if you access and use the Services on a mobile device and your mobile device's settings allow it, we may collect information about your real-time location. The "Your Choices" section below discusses how you can limit the location information that we may collect when you access and use the Services on a mobile device.

When you use the Services, we may also collect certain information by automated means, such as:

- Browser cookies, which are text files that websites send to a visitor's computer or other internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser.
- Web beacons, also known as internet tags, pixel tags, or clear GIFs, which are used to transmit information about actions of the user opening the page or email containing the beacon back to a web server.
- Local shared objects (or Flash cookies), which certain features of the Services may use to collect and store information about your preferences and how you interact with the Services.
- Analytics tools (such as Google Analytics) that collect information about your use of the Services and user traffic.

The information we may collect by automated means may include, without limitation:

- Information about the devices you use to access the Services (such as the IP address and the type of the device, operating system, and web browser)
- Dates, times, and duration of use of the Services (including whether you are a repeat or first time visitor)

- Information on actions taken when using the Services (such as page views and website navigation patterns).

The information we collect automatically is statistical data, but may in certain limited situations include personal information (e.g., some countries view an IP address as being personal information). We may also associate automatically collected information with personal information we collect in other ways or receive from third parties to improve and personalize our Services, including by enabling us to identify and authenticate users.

## **THIRD-PARTY USE OF TRACKING TECHNOLOGIES**

Some content or applications available through the Services, including advertisements, may be served by third parties. These third parties may use cookies, web beacons, or other tracking technologies to collect information about you when you use the Services, such as your IP address, pages you visit, and when you view a page or open an email in which a tag is embedded. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content and for other purposes. We do not control these third parties' tracking technologies or how they may be used. The information practices of these third parties are governed by their own privacy policies and are not covered by this Privacy Policy. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## **HOW WE USE THE INFORMATION WE COLLECT**

We may use information we obtain about you to:

- Process orders you place and complete other transactions you have requested using the Services, and provide you with products and services you request and maintain a record of your purchases and other transactions using the Services
- Respond to your questions and comments, send you information or materials you may request, and provide customer support
- Operate, evaluate, and improve our business and the products and services we offer
- Communicate with you about our offers and promotions
- Communicate with you about third party products and services that may be of interest to you
- Analyze and enhance our marketing communications and strategies
- Analyze the effectiveness of our communications by identifying when emails sent to you have been received and read

- Analyze trends and statistics regarding use of the Services and transactions conducted using the Services
- Protect against and prevent fraud, unauthorized transactions, claims, and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users
- Enforce our terms of use and other agreements with you
- Comply with applicable legal requirements, industry standards, and any legal obligations to share personal information with law enforcement
- Satisfy any other purposes for which you may have consented, or for which we have a lawful basis for processing and to the extent that we have notified you.

## **COMBINING INFORMATION**

We may combine the information we collect with publicly available information and information we receive from our affiliated companies, subsidiaries, agents, consultants, strategic business partners, and other third parties. We may use that combined information to enhance and personalize your experience with us, to communicate with you about products, services, and events that may be of interest to you, for promotional purposes and for other purposes described in this Privacy Policy.

We also may use the information we obtain about you in other ways for which we provide specific notice and, where necessary obtain your consent, at the time of collection.

## **DISCLOSURE OF INFORMATION**

We may disclose aggregated information about our users (information that does not identify any individual user) without restriction.

We may disclose personal information about you:

- To our third party contractors, service providers, and other third parties we use to support our business and who are obligated to keep personal information confidential and use it only for the purposes for which we disclose it to them
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Integral, users of the Services, or others
- To third parties to market their products or services to you if you have consented to these disclosures
- To enforce or apply our terms of use and other agreements with you

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.

We also reserve the right to transfer your personal information to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets. Should such a sale, merger, or transfer occur, we will use reasonable efforts to direct the transferee to use your personal information in a manner that is consistent with our Privacy Policy.

## **DATA SECURITY**

We have implemented, and will maintain, industry standard measures intended to protect your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Please note that the electronic transmission of information can never be completely secure. We cannot guarantee that the security measures we have in place to safeguard personal information will never be defeated or fail, or that such measures will always be sufficient or effective. Any transmission of personal information is at your own risk.

## **YOUR CHOICES**

We offer you the following choices about the information we collect from you and how we communicate with you:

### **Promotional Communications**

If you wish for us to cease use of your contact information to promote our own or identified third party's products or services, you can:

- Opt out by checking the relevant box located on the form on which we collect such information.
- Log into your account and adjust your user preferences in your account profile.
- Send us an email stating your request or, if you have received a promotional email from us, by following the unsubscribe instructions contained in such email.
- Opt out of receiving materials sent via the postal service by emailing us and including in the email your name and mailing address exactly as they appear on such mailing. We will remove your name from our mailing list as soon as possible.

## Cookie Preferences

Your web browser may let you choose your preference as to whether you want to allow the collection of information about your online activities over time and across different websites or online services. For more information about cookies and how to disable and/or delete them, please visit [www.aboutcookies.org](http://www.aboutcookies.org). Flash cookies operate differently from browser cookies, and cookie management tools available in a web browser may not remove Flash cookies. You can learn more about how you can manage your Flash cookie settings [here](#). Note, however, that without cookies, you may not be able to take full advantage of all of the features of the Services.

## Analytics

For more information about Google analytic cookies, see Google's [privacy policy](#). Google has also developed the Google Analytics opt-out browser add-on. If you want to opt out of Google Analytics, you can download and install the add-on for your web browser [here](#).

## Location Information

If you access our Services using a mobile device, you may adjust the settings on your mobile device to allow or prevent the sharing of location information. For example, you can disable "Location" or "Location Services" on your mobile device to prevent sharing your location information with us. Refer to instructions provided by your mobile service provider or the manufacturer of your mobile device to learn how to adjust your mobile device settings. If you disable the sharing of location information, you may be unable to access some features of our Services that are designed for mobile devices.

## Third-Party Tracking

Although we do not control third parties' collection or use of your information to serve interest-based advertising or other targeted content, a number of these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted advertisements from members of the Network Advertising Initiative by visiting <http://www.networkadvertising.org/choices>.

## YOUR RIGHTS

- You may have the right to request a copy of any personal information that we hold about you. If you would like a copy of your personal information, please contact us using the contact information below. We may request proof of your identity before sharing such information. If you discover that the information we hold about you is

incorrect or out of date, you may ask us to correct that information by contacting us using the contact information below.

- You may ask us to stop processing, or delete, the personal information we hold about you in certain circumstances. This may not be possible where we are fulfilling a transaction or have a legal basis to retain the information; however, we encourage you to contact us using the contact information below to discuss how we can assist you with your request.
- When we process your personal information on the basis that you have consented to such processing, you have the right to withdraw your consent, or ask us to stop or restrict processing the personal information we have about you.
- You may also ask us to transfer your personal information to a third party in certain circumstances. If you would like any further information about your rights or how to exercise them, contact us using the contact information below.
- If you are in the European Union, you have the right to make a complaint at any time to the relevant data protection authority in your country.

You may exercise any of the above rights, at any time, using the contact information below. You can also review and update certain personal information associated with your account by logging into your account and visiting your account profile page.

We will retain your personal information for as long as needed to fulfill your requests, provide you with Services, comply with our legal obligations, resolve disputes, and enforce our agreements.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section § 1798.83 permits users of our Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please use the contact information at the end of this document.

## **CHILDREN UNDER THE AGE OF 16**

The Services are not directed to, and Integral does not knowingly collect or solicit personal information from, children under the age of 16. If we learn we have collected or received personal information from a child under the age of 16, we will delete that information. If you believe that we might have any information from or about a child under the age of 16, please contact us at [privacy@integral-corp.com](mailto:privacy@integral-corp.com).

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update or change this Privacy Policy at any time. Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, provided to you by email. Check back frequently to see any updates or changes.

## **DATA TRANSFERS**

Integral is incorporated in the State of Washington in the United States. To provide the Services, we may transfer your personal information to countries other than the country in which you reside, including the United States. These countries may not provide the same level of data protection as the country in which you reside or be recognized by the European Commission as providing an adequate level of data protection. We transfer personal information to these countries only when it is necessary for the provision of the Services; is necessary for the establishment, exercise, or defense of legal claims; or is otherwise subject to safeguards that ensure the protection of your personal information.

## **RETENTION**

We will keep your personal information only for as long as necessary to fulfill the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements, or where required to assert or defend against legal claims.

## **CONTACT US**

If you have any questions about this Privacy Policy or our information practices, please email us at [privacy@integral-corp.com](mailto:privacy@integral-corp.com), or write to us at Integral Consulting Inc., 285 Century Place, Suite 190, Louisville, CO 80027, Attn: Contracts/Risk Manager.