

NUSPIRE’S GENERAL PRIVACY POLICY

Last updated April 2021

Nuspire, LLC (“Nuspire,” “Us,” or “We”) recognizes that privacy is important, and we want to be clear with you about our privacy practices. This Privacy Policy describes how Nuspire collects, uses and shares information collected from you through your use of Nuspire’s websites (like www.nuspire.com, trax.nuspire.com, myNuspire.io and other websites that reference this Privacy Policy, collectively referred to as the “Sites”) and the services offered through the Sites (the “Services”).

Nuspire is accountable for personal data received and that is subsequently transferred to a third party. Nuspire remains responsible if third party agents process the personal data on Nuspire’s behalf in a manner inconsistent with this Privacy Policy, unless Nuspire proves that it is not responsible for the event giving rise to the damage. We encourage you to contact us should you have privacy-related questions or complaints. Our contact information is below in the “How to Contact Us” section. Nuspire is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

HOW NUSPIRE COLLECTS INFORMATION AND THE TYPES OF INFORMATION COLLECTED

Any time you use Nuspire’s Sites or Services, information is generated. Some of this information is considered “Personal Information,” meaning information that either directly identifies you individually (like your name, address, email, or billing information) or could reasonably be used to identify you or your household in combination with other data. Other information is considered “Anonymous Information,” meaning information that does not directly identify you, and cannot reasonably be linked with other data to identify you individually or your household.

1. Nuspire collects the following types of Personal Information from you:

Categories of Personal Information	Specific Types of Personal Information Collected
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual and Identifiers (e.g., a real name, alias, postal address, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number or state identification card number, or other similar identifiers)	Company name, individual user’s name, business email, business title, phone number

Characteristics of protected classifications under California or federal law.	None
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)	History of purchases with Nuspire
Biometric information	None
Internet or other electronic network activity information	Search history (when redirected to Nuspire Sites), Browser History (only on Nuspire Sites), consumer interaction on Nuspire Sites, interactions with Nuspire on Social Media, and Nuspire downloadable content
Geolocation data	IP address, Country and city
Audio, electronic, visual, thermal, olfactory, or similar information	None
Professional or employment-related information	Job role/Title
Education information	None
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Nuspire uses an individual user's employment title and role in order to customize Nuspire Services and configure defaults to that individual user

2. Nuspire collects information from you in the following ways:

A. YOU GIVE IT TO US

When you visit or use our Sites or use our Services, you may provide us with information. For example, when downloading a Nuspire white paper or submitting a support ticket, we will prompt you to provide us with your name, physical address, email address and phone number.

B. WE RECEIVE IT FROM THIRD PARTIES

Nuspire engages with third-party vendors to try to determine new clients who might be interested in Nuspire's services. In such instances, third parties may give Nuspire your name and contact information.

C. WE AUTOMATICALLY COLLECT IT FROM YOU

While visiting our Sites or using our Services, we may automatically collect information from you through the use of cookies, web server logs, and other mechanisms. For example, when you visit a Site, we automatically collect device identifiers (e.g., device model, operating system, browser version, and other data that may be used to identify a device), IP addresses, device configurations, browser history, information about Site usage, and geographic location data.

NOTE ON CHILDREN'S PERSONAL INFORMATION: Nuspire does not knowingly collect any Personal Information (as defined under the Children's Online Privacy Protection Act) from children under the age of 13. If we learn that we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe that we might have such information, please contact us using the contact details provided below.

NOTE ON COOKIES AND SIMILAR TECHNOLOGY: Nuspire uses cookies and web beacons to automatically collect information in connection with your use of the Sites and Services. "Cookies" are small files that are placed on an individual's computer when you interact with the Sites or Services. Cookies are often used to enable you to more easily communicate and interact with the Sites and Services. "Web beacons" (also known as "single-pixel" or "clear" GIFs) include electronic images embedded in the Site or in communications sent through the Services which are invisible to users. Web beacons collect information, such as identifiers, time and date of access, and descriptions of the pages or communications in which the web beacons are embedded. We may use cookies or web beacons on the Sites or in communications sent through the Services for various purposes, including for example: saving user preferences; customizing content of the Site for individual users; ensuring that users are not repeatedly sent the same banner ads; recording session information; fraud prevention; saving certain information about users of the Sites and others who visit the Sites; keeping track of whether you've had a chance to open an email or view an advertisement; and otherwise facilitating and enhancing interaction with the Sites.

Nuspire may contract with third party service providers who may also use cookies or web beacons in connection with the Sites or communications regarding the Services. For example, Nuspire uses Google Analytics to get aggregated information on our Site's performance (you can learn more about how Google uses data when you use our Sites by visiting www.google.com/policies/privacy/partners/). Similarly, we may use an outside advertisement serving company to display advertisements on the Site or in communications sent through the Services. The advertisement serving company may place and collect cookies or web beacons when it displays an advertisement on the Site or through the Services. The information these third parties collect may be associated with other information about you, or they may collect information about your online activities over time and across different websites and other online services. We do not control these third parties' tracking technologies or how they may be used.

YOUR PRIVACY CHOICES & TRACKING TECHNOLOGIES.

Most browsers will allow you to erase cookies from your computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You may also be able to refuse certain web beacons by adjusting the settings on your browser or email software. Please refer to your browser or email software instructions or help screen to learn more about these functions. **Note** that if you disable or refuse cookies, some parts of the Sites may be inaccessible or not function properly.

HOW AND WHY NUSPIRE USES INFORMATION

Nuspire uses your information for a variety of purposes related to provisioning, maintaining and improving

the Sites and Services, as well as for developing new services Under data protection law, we can only use your Personal Information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your Personal Information for and our reasons for doing so:

What we use your Personal Information for	Our reasons
To provide our Services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Nuspire	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. rules issued by our professional regulator	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
<p>Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures</p>	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price</p>
<p>Preventing unauthorized access and modifications to systems</p>	<p>For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
<p>Updating and enhancing customer records</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> • existing and former customers; • third parties who have previously expressed an interest in our services; • third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p>

<p>External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts</p>	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>
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The above table does not apply to special category Personal Information, which we will only process with your explicit consent.

PROMOTIONAL COMMUNICATIONS.

We may use your Personal Information to send you relevant marketing and advertising updates (by email, text message, telephone or post) about our Services, including exclusive offers, promotions or new services, and to customize the marketing and advertising that we show you.

We have a legitimate interest in processing your Personal Information for promotional purposes (see above “How and why we use your Personal Information”). This means we do not usually need your consent to send you promotional communications.

We will always treat your Personal Information with the utmost respect and never sell OR share it with other organizations for marketing purposes.

UNSUBSCRIBING FROM COMMUNICATIONS.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us by emailing us at info@Nuspire.com; or
- Using the “unsubscribe” link in emails or “STOP” number in texts;

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business. In order to ensure the integrity, security and operation of our systems and networks, we do not allow you to unsubscribe from Service Notices.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share Personal Information with:

- Service providers we use to help deliver our Site and Services to you, such as payment service providers
- Other third parties we use to help us run our business, such as website hosts;
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers;

Other than as described in this Privacy Policy, Nuspire does not share your Personal Information with companies, organizations or individuals outside of Nuspire, unless one of the following circumstances apply:

- Nuspire has your express consent;
- It is for Nuspire’s internal use, research and product development;
- It is for domain registration in accordance with the RAA and ICANN policies. (Please see

Domain Registration section below for more information regarding our treatment of Personal Information in connection with our domain name registration services);

- It is for external processing by our affiliates or other trusted third parties we use to support our business based on our instructions or other appropriate confidentiality and security measures (for example, companies that help Nuspire improve its website's usability or understand client interests); or
- It is to detect, prevent or otherwise address fraud, security or other legal related issues.

Nuspire may also share Personal Information with companies, organizations or individuals outside of Nuspire if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to: meet any applicable law, regulation, legal process or enforceable governmental request; enforce applicable agreements or adherence to terms and conditions, including investigation of potential violations; and protect against harm to the rights, property or safety of Nuspire, our users, third parties or the public as required or permitted by law.

If Nuspire is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any Personal Information and give affected users notice before Personal Information is transferred or becomes subject to a different privacy policy.

Nuspire does not sell or license your Personal Information to a third-party for that third party's own direct marketing purposes.

Note that Nuspire may share Anonymous Information with third parties.

WHERE YOUR PERSONAL INFORMATION IS HELD

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information With").

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your Personal Information when this occurs, see below: "Transferring Your Personal Information Out of the EEA".

HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will keep your Personal Information while you have an account with us or while we are providing Services to you. Thereafter, we will keep your Personal Information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your Personal Information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of Personal Information.

TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your Personal Information outside the European Economic Area (EEA), e.g.:

- With our offices outside the EEA;
- With your and our service providers located outside the EEA;
- If you are based outside the EEA; or
- Where there is an international dimension to the services we are providing to you.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. We will, however, ensure the transfer complies with applicable data protection laws and all Personal Information will be secure. These transfers are subject to special rules under European and UK data protection law. If you are located in the EEA or the United Kingdom, we will only transfer your Personal Information if:

- you provide your explicit consent;
- the country to which the Personal Information will be transferred has been granted a European Commission adequacy decision; or
- we have put in place appropriate safeguards in respect of the transfer, for example we have entered into EEA standard contractual clauses and required additional safeguards with the recipient, or the recipient is a party to binding corporate rules approved by an EEA or UK supervisory authority.

By using the Site or the Services, you consent to the transfer of all such information to the United States of America which may not offer an equivalent level of protection to that required in the EEA and to the processing of that information by us on its servers located in the United States of America as described in this Privacy Policy.

If you would like further information, please contact us (see “Contact Information” below).

ACCESSING AND CORRECTING YOUR INFORMATION.

Should you wish to access, amend, correct, or delete any Personal Information about you, please contact info@Nuspire.com. Nuspire will use commercially reasonable efforts to respond to such requests within thirty days, except where the burden or expense of providing access or requested changes would be disproportionate to the risks to your privacy in the case in question. Please note that your ability to use, and Nuspire’s ability to provide, the Services may depend upon the use of your Personal Information. As such, you agree that Nuspire will not be liable for any inability to provide all or a portion of the Services that may result from Nuspire’s compliance with any request to amend, correct or delete any of your Personal Information.

SECURITY

Nuspire has implemented policies that include administrative, technical, and physical safeguards designed to help protect Personal Information against unauthorized access, use, or disclosure. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

While Nuspire strives to protect your privacy, due to many reasons, including the inherent security flaws in the internet, Nuspire *cannot guarantee the security* of any information you disclose to us and, as such, you agree that your disclosure of such information is at your own risk.

If you want detailed information from Get Safe Online on how to protect your information and your

computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

INFORMATION PROCESSED BY NUSPIRE’S CLIENTS

Our clients may provide us with Personal Information belonging to their customers or other third parties in connection with their use of our services. Nuspire does not control the content or nature of the information processed by our clients in connection with their use of our services. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate Personal Information processed by one of our clients should direct his/her request to the client (the data controller) directly.

PUBLIC FORUMS

Nuspire may make chat rooms, forums, message boards, and/or news groups available to its users. Please note that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your Personal Information.

YOUR RIGHTS UNDER THE GDPR.

If you are a resident of the European Union, you may have certain rights related to the Personal Information we have collected from you, which may or may not be granted based on the circumstances, but only in compliance with applicable law. These rights may include the following under the General Data Protection Regulation (EU) 2016/679 (“GDPR”):

Right to Access	The right to be provided with a copy of your Personal Information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your Personal Information
Right to be Forgotten	The right to require us to delete your Personal Information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your Personal Information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the Personal Information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object: <ul style="list-style-type: none"> • at any time to your Personal Information being processed for direct marketing (including profiling); • in certain other situations to our continued processing of your Personal Information, e.g. processing carried out for the purpose of our legitimate interests.
Right Not to be Subject to Automated Individual	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning

Decision-Making	you or similarly significantly affects you
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For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

YOUR RIGHTS UNDER THE CCPA.

If you are a California resident, you may have certain rights related to the Personal Information we have collected from you, which may or may not be granted based on the circumstances, but only in compliance with applicable law. These rights may include the following under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable:

Disclosure of Personal Information We Collect About You	<p>You have the right to know:</p> <ul style="list-style-type: none"> • The categories of Personal Information we have collected about you; • The categories of sources from which the Personal Information is collected; • Our business or commercial purpose for collecting or selling Personal Information; • The categories of third parties with whom we share Personal Information, if any; and • The specific pieces of Personal Information we have collected about you. <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> • Retain any Personal Information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information; or • Provide the Personal Information to you more than twice in a 12-month period.
Personal Information Sold or Used for a Business Purpose	<p>In connection with any Personal Information we may sell or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> • The categories of Personal Information about you that we sold and the categories of third parties to whom the Personal Information was sold; and • The categories of Personal Information that we disclosed about you for a business purpose. <p>You also have the right under the CCPA and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your Personal Information. If you exercise your right to</p>

	<p>opt-out of the sale or disclosure of your Personal Information, we will refrain from selling your Personal Information, unless you subsequently provide express authorization for the sale of your Personal Information.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your Personal Information from our records; and • Direct any service providers to delete your Personal Information from their records. <p>Please note that we may not delete your Personal Information if it is necessary to:</p> <ul style="list-style-type: none"> • Complete the transaction for which the Personal Information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us; • Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; • Debug to identify and repair errors that impair existing intended functionality; • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; • Comply with the California Electronic Communications Privacy Act; • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; • Comply with an existing legal obligation; or • Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
<p>Protection Against Discrimination</p>	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you;

	<ul style="list-style-type: none"> • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of Services to you, if that difference is reasonably related to the value provided to our business by your Personal Information.</p>
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HOW TO EXERCISE YOUR RIGHTS.

If you would like to exercise any of your rights as described in this Privacy Policy, please contact us through one of the methods listed below in the “Contact Us” section.

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

Please include with your request:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person’s behalf. Any Personal Information we collect from you to verify your identity in connection with you request will be used solely for the purposes of verification.

HOW TO FILE A GDPR COMPLAINT.

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

CHANGES TO PRIVACY POLICY

We reserve the right to modify this Privacy Policy from time to time. We will post any changes to this Privacy Policy on this page and, if the changes are significant, we will provide a more prominent notice which may include sending notice to you by email or posting notice of such changes on Nuspire’s home page (www.Nuspire.com).

CONTACT INFORMATION

If you have any questions regarding this Privacy Policy, Nuspire may be contacted at:

By email:

inquiry@nuspire.com

By mail:

Nuspire, LLC 3155 Dallavo Ct
Commerce, MI 48390 Attn: Privacy