

## **STRYNG MESSAGING, INC.**

### **PRIVACY POLICY**

Effective as of February 14, 2018

Stryng Messaging, Inc., and its parents and affiliates (collectively “Stryng”, “we”, “us”, or “our”), are committed to keeping any and all personal information collected from individuals that visit our website and who use our products, software and services (collectively, “Services”) confidential, secure and private.

By accessing and using our website and Services, you (“you” or “your”) acknowledge and agree that you accept the policies set forth in this Privacy Policy as a condition of your use of our Services. If your use of the Services is through or on behalf of an organization or corporate entity, you are agreeing to accept the policies set forth in this Privacy Policy on behalf of such organization or entity, and are representing to us that you are authorized to do so.

This Privacy Policy applies only to parties that contract with Stryng to utilize the Services, subject to applicable U.S. law governing privacy and data collection.

#### **Information We Collect**

We collect and use the following information to provide, improve and protect our Services:

We may collect certain information that you specifically and intentionally provide to us. For example, when you create a user account with us, we may collect personal information about you such as your name, email address, phone number, age, sex, physical address, as well as images and/or video of you, your employees and agents (“Agents”), and third parties utilizing our services (“End Users”). We also collect financial information that you choose to share with us, such as your credit or debit card number, billing address, and other billing information. Other unique information that we may collect includes product and service preferences, contact preferences, educational and employment background, and job interest data - in some cases, your business contact data may be provided to Stryng by a designated entity within your company (such as a member of your Purchasing/IT/Facility Management department).

We also may collect information that you do not specifically and intentionally provide to us. This would include your Internet Protocol address, browser type and language, the device you are using to access the Services, your Internet Service Provider, referring pages, and operating system. Additionally, we monitor and collect information about your use of the Services, including the manner and means through which individual Agents interact with End Users through the Services. To preserve anonymity, individual Agents are assigned random internal identification numbers when information is collected in this manner.

WE DO NOT AND WILL NOT KNOWINGLY ALLOW ANYONE UNDER 13 YEARS OF AGE TO PROVIDE US ANY PERSONAL IDENTIFYING INFORMATION OR USE THE SERVICES. IF WE LEARN THAT WE HAVE COLLECTED PERSONAL INFORMATION FROM A CHILD UNDER AGE 13, WE WILL DELETE THAT INFORMATION AS QUICKLY AS POSSIBLE. IF YOU BELIEVE THAT WE MIGHT HAVE ANY INFORMATION FROM A CHILD UNDER AGE 13, PLEASE CONTACT US USING THE CONTACT INFORMATION PROVIDED BELOW.

### **How We Collect Information**

We use various technologies to collect the information described above, and to provide, improve and protect our Services, which may include the use of cookies and pixel tags. For example, cookies are small data files stored on your computer or device that enable our website to recognize your browser and capture and remember certain information. If we use cookies, we will do so in order to understand and save your preferences for future visits, compile aggregate data about website traffic and interaction so that we can offer a better user experience and tools in the future. You can set your browser to not accept cookies, but this may limit your experience with, and ability to use, the Services.

### **Access to and Control of Personal Information**

You can access, review and/or update your user profile and settings at Stryng.com, which will allow you to modify, update, or restrict access to certain information.

### **Use of Information**

We use the information that we collect for the express purpose of providing, operating, maintaining and improving the Services. Your information will not be sold, exchanged, transferred, or given to any other person or entity for any other reason whatsoever, without your consent, except as follows:

- We may provide your information to trusted third parties to help us provide, operate, maintain and improve the Services. To achieve this purpose, we may, at our discretion, choose to aggregate your information so that it does not allow the third party to identify you.
- We may use your information to help personalize your experience using the Services.
- We may use your information to process transactions and assist you in completing a transaction or order.
- We may use your information to keep you apprised of Stryng's latest product announcements, software updates, and upcoming events – however, you can opt out of receiving these messages at any time by updating your profile.

- We may use your information to administer contests, promotions, surveys, or other features of our Services, such as analytics reports.
- We may also release certain information to our attorneys, accountants and professional advisors in order to help us comply with applicable laws, and to third parties as we deem necessary to enforce our website policies, or protect our rights, property, or safety, and/or the rights, property or safety of others. This includes disclosures required to comply with legal processes such as subpoenas or court orders.
- If Stryng is involved in a merger, acquisition, reorganization, or sale of all or substantially all of our assets, your information may be transferred as part of such transaction. In such event, we will notify you of any such transaction, and explain your options in such event.
- To provide you with the Services, we may store, process and transmit information in locations around the world - including those outside your country. Information may also be stored locally on the devices you use to access the Services.
- We may use the information we collect to conduct random audits and ensure the Acceptable Use Policy is being complied with.
- We will not use your personal information, except for the express purposes described above. This prevents us from selling, exchanging, or transferring your information without your consent.

### **Notice to Users Outside the United States**

If you are using the Services outside the United States, the laws of your country governing data collection and privacy may differ from U.S. law and may be more restrictive than U.S. law. Please note that by utilizing the Services, you are consenting to the transfer of your personal information from your country to Stryng in the United States.

### **Links to Other Websites**

Stryng may link to or work with third party websites, applications, products and services (“Third Party Tools”). We are not responsible for the practices employed by Third Party Tools that work with the Services, nor the information or content contained therein. Please remember that when you use a link to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those to which we link, is subject to that third party website's own rules and policies. Please make sure to read over those rules and policies before proceeding.

### **Security**

Stryng uses reasonable security controls to protect your data and information from loss, misuse, unauthorized access, disclosure, alteration and destruction. The personal information you provide us is stored on computer systems located in controlled facilities which have limited access, and

only carefully selected, authorized personnel have access to unencrypted user information. When collecting or transferring sensitive information such as credit card information, we use a variety of additional security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. When we transmit sensitive information over the internet, we protect it through the use of advanced encryption techniques, such as the Secure Socket Layer (SSL) protocol, and firewall. Additionally, as part of real-time payment processing, Stryng subscribes to fraud management services. This service provides Stryng with an extra level of security to guard against credit card fraud and to protect your financial data. Despite these precautions, no security safeguards guarantee 100% security all of the time, and no guarantees are made with respect to same.

### **Enforcement and Dispute Resolution**

If you have any questions, complaints or disputes regarding the manner in which we use or protect your information, please contact us using the contact information provided below. We will investigate and attempt to resolve any complaints and disputes in a reasonable time and in a manner that complies with the principles described in this Policy.

With respect to any complaints related to this Privacy Policy that cannot be resolved through our internal process, the laws of the State of New York will govern this Privacy Policy, as well as any claim that might arise between you and us in connection with this Privacy Policy, without regard to conflict of law provisions. You agree that jurisdiction for any legal action will be a court of competent jurisdiction location in New York County, New York. You further agree to submit to the personal jurisdiction of the courts located in New York County, New York for any such legal action.

### **Changes to this Policy**

This Privacy Policy is effective as of the effective date provided above. We reserve the right to amend and revise our Privacy Policy at any time, with or without notice. For example, we may amend or revise our Privacy Policy to comply with local, state, or federal laws or to accommodate changes in technology, or to accommodate the needs of our users. This Privacy Policy may therefore be amended from time to time, consistent with applicable data protection and privacy laws and principles. If we make any material changes to this Privacy Policy, we will post a notice on our website for 30 days from the date of any such material changes.

### **Contacting Us**

Any questions or complaints about this Privacy Policy should be addressed to [support@Stryng.com](mailto:support@Stryng.com).