

Claritypoint Privacy Policy

PRIVACY POLICY HIGHLIGHTS

We collect personal data that you provide us directly, we do not obtain any personal data through the use of cookies and other technologies, as well as from third parties.

We use your name, email, phone number, and assessment results for the following business purposes only:

- To fulfill or meet the reason for which the information is provided.
- To provide you with information, products or services that you request from us.
- To provide you with information concerning Claritypoint's products or services, or events or news, or opportunities that may be of interest to you.
- For testing, research, analysis and product development.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

Claritypoint does not sell your personal information in the conventional sense (i.e., for money). Like many companies.

FULL PRIVACY POLICY

We at Claritypoint Coaching (or "we" or "us" or "our") know that your privacy is important. This privacy policy ("Policy") is designed to assist you in understanding how we process your personal data when you (1) use our websites, and web applications, (2) contact us or we contact you (including through telephone, text messaging (SMS/MMS), email, and website channels), or (5) otherwise interact with us. Personal data does not include information which is not personally identifiable or which cannot be reasonably associated or linked with an individual or household. Please read this Policy carefully to learn how we collect, use, share and otherwise process your personal data, and to learn about your rights and choices regarding our processing of your personal data.

Within the scope of this Policy, Claritypoint is the business that makes the decisions about the processing of your personal data (also known as the "data controller"), unless expressly specified otherwise.

Collection of Your Personal Data

What We Collect. In some situations you may provide us with your personal data, which could include your name, street address, telephone number, email address, and the types of information specified in the *Summary of Data Use, Collection, and Disclosure* section of this Policy, and any other information we collect about you that by itself is not personally identifiable information but if combined with personally identifiable information could be used to personally identify you.

You may provide us with personally identifiable information when you enter a sweepstakes or contest; complete a survey; make a purchase; download an e-book; request customer support; evaluate or subscribe to certain services or to sign up for email or text message (SMS/MMS) notifications and/or newsletters; provide comments, reviews, feedback, or testimonials about our products or services, request support or information about our services or Platform; and participate in any other transactions or interactions between you and us.

Information We Automatically Collect. When you interact with us by computer, telephone, mobile phone or other device, we automatically collect certain information. This information may include, without limitation: telephone number,

Cookies, Web Beacons, and other Technologies. When you interact with us, we try to make that experience simple and meaningful. When you visit our website, use our Platform, or receive email from us, our servers may send cookies, web beacons, and similar technologies to your device. The data collected may include how you navigate around a web page and the most commonly clicked links on a specific web page. Certain technical information, such as your browser version and operating system, are also collected. We may also from time to time engage third parties to track and analyze non-personally identifiable usage and volume statistical information from visitors to our websites to help us administer our websites and improve their quality. Such third parties may use cookies, web beacons, and similar non-cookie technologies to help track visitor behavior, how you interact with a website (including how you navigate around a web page and the most commonly clicked links on a specific web page).

Telephone Information. If you use certain features of our services or Platform, we may collect telephony information (like phone numbers).

Third Party Sites. We do not provide your information to third party websites.

Use of Widgets and Social Media. We may provide widgets that make it possible to share information on third-party services. We may also include social media features, such as the Facebook® or Twitter® button and similar widgets and interactive mini-programs that run on our site (each, a “Feature”). To the extent we use these Features, they may collect your Internet Protocol address, record which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social media Features and widgets are either hosted by a third party or hosted directly by us. Your interactions with these Features are governed by the privacy statement of the company providing the Feature or widget.

Use of Testimonials. We may select and post testimonials about us or our Platform, which may contain personal data such as your name and/or the city, state, or country in which you live. We will obtain your consent prior to posting any testimonial with your name. If you post such content, it will be available to other customers and visitors. Your posting may also become public and we cannot prevent such information from being used in a manner that may violate this Policy or the law.

Reviews. We may post reviews provided by you about us or our systems, which may contain personal data such as your name. When submitting your review, you are giving us permission to

post your review. If you post such content, it will be available to other users of our website or Platform. Your posting may also become public and we cannot prevent such information from being used in a manner that may violate this Policy or the law.

Your Choices. You have choices with respect to your personal data and can choose to not provide personal data to us. Our Platform may require some personal data to provide you with a service. If you choose not to provide data required to provide you with a service or feature, you cannot use that service or feature. We may also need to collect personal data as required by law or to enter into or carry out an agreement with you. If you do not provide any such required personal data, we will not be able to enter into the agreement. If you are already using our Platform and choose not to provide us with any necessary personal data we may have to suspend or cancel the impacted services.

Use of Your Personal Data

General. We may process your personal data as described in this Policy to perform our contract or other obligations we have with you, for our legitimate interests, as needed or permitted to comply with applicable laws, or based on your consent. These uses may include:

- providing our websites, services, and functionality (for example, to perform our contract with you for the use of our websites and services and to fulfill our obligations under applicable terms of service or to operate and administer our websites and to provide you with content you access and request);
- providing customized service content (for example, so that we can provide you with customized content or keep track of preferences you specify);
- maintaining and improving the security and safety of our websites and services (for example, by tracking the use of our websites and services, creating aggregated, non-personal data, verifying accounts and activity, investigating suspicious activity and enforcing our terms and policies, to promote the safety and security of the services, systems and applications and in protecting our rights and the rights of others);
- account management (for example, managing your subscription or other registration to provide you with services, servicing your account, providing information related to your purchase, use, payments and invoices, and contacting you about your purchase);
- handling contact and user support requests (for example, when you contact us, request contact, or request user support, including by telephone, email, webform or otherwise, to fulfill your requests, assist you with your use of our Platform, and communicate with you);
- providing you with service, company updates, and other notifications (for example, if you are a customer, we may provide you with company news, and service information);
- managing event registrations and attendance;
- managing contests/promotions/sweepstakes (for example, if you register for a contest, promotion, or sweepstakes, then and subject to any additional applicable rules);
- managing and processing payments including facilitating payment card transactions initiated directly with us or through a third-party payment processor and related authentication, security and fraud prevention activities; (for example, if you are a

customer purchasing services from us or using our services to process payment card transactions);

- developing and improving our websites, services, and user experience (for example, to debug and repair any errors impacting functionality, to assess systems capacity requirements, to analyze trends and to track your usage of and interactions with our websites and services for developing and improving our websites and services and providing our users with more relevant content and service offerings);
- auditing and reviewing compliance with applicable usage terms, policies, laws, rules, and regulations;
- complying with legal obligations (for example when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of personal data to protect our rights or is necessary to protect against misuse or abuse of our websites, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes or to respond to lawful requests);
- fraud prevention and authentication purposes, and to monitor compliance with our contract and any applicable Platform use requirements and restrictions;
- with your consent for any purpose permitted by law and for which you have provided consent;
- use of anonymous data (for example, we may use anonymous, aggregated data for any legal purpose);
- as specifically set forth in any agreement or terms of service we have with you; or
- for those other purposes which may be permitted by applicable law.

Requests for Information. If you provided us with your email address or phone number to receive information from us, we and our fulfillment partners may contact you using the contact information you provided us regarding our Platform and services, such as offers, support and product updates. We may make such contact by email, phone and/or text (SMS/MMS), including the phone number you provide us. Your mobile phone carrier's standard message and data rates may apply to text messages. You are not required to provide your phone number as a condition of purchasing access to our Platform or services, and you can opt out of text messages at any time as described in the "Unsubscribe" section found below within this Policy.

Email and SMS. We may communicate with you through email and text messaging (SMS/MMS) using your personal contact information on file in our systems to inform you of new products, important industry and company news, information about our Platform and services, and as otherwise provided in this Policy, unless you opt out of such communications.

Disclosure of Your Personal Data

General. We may disclose your personal data to our independent contractors, business partners, processors, or service providers who have agreed to (i) hold this information in confidence, and (ii) not use it for any purpose except to carry out the services they are providing for Claritypoint. Such vendors may include providing services enabling us to use personal data as described in the

Policy, such as hosting our Platform, services or other data; managing the functionality of our Platform or services; hosting customer relationship management, marketing automation, customer service and other software platforms on our behalf; processing and facilitating payment card transactions and related authentication, security and fraud prevention activities; collecting delinquent accounts; fulfilling and processing orders; delivering products or services you have ordered; conducting background checks and other pre-employment screening; assisting with marketing and promotions; and enabling us to send you email.

We may also disclose your personal data (i) to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings; (ii) if we sell or transfer all or a portion of our company's business interests, assets, or both, or in connection with a corporate merger, consolidation, restructuring, or other company change.

Disclosures Made by You. If you use a bulletin board, blog, comment or discussion forum or chat room we make available, or connect with social media, you should be aware that any personal data you submit there can be read, collected, or used by other users of these forums, could be used to send you unsolicited messages, and could be potentially searchable through search engines. We are not responsible for the potential misuse by third parties of any personal data that you choose to submit in these various forums.

Data Retention

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required law or permitted by law (including without limitation, where required by our legal and regulatory obligations, or where we believe it is necessary to establish, defend or protect our legal rights and interests or those of others). When the purposes of processing are satisfied, we will delete or depersonalize your personal data within a reasonable time period.

Data Integrity and Security

We have implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect personal data from unauthorized processing, including unauthorized access, disclosure, alteration, or destruction. Although Claritypoing will use reasonable efforts to secure our systems, we cannot guarantee that the information submitted to, maintained on, or transmitted from our systems will be completely secure. In addition, if we have to disclose your personal data to governmental/law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your personal data.

Your Rights & Choices

You may have certain rights relating to your personal data, subject to local data protection laws. Please note that you can only exercise these rights with respect to personal data that we process

about you when we act as a data controller. This is when Claritypoint decides why and how your personal data will be processed, rather than our customers making those decisions. To exercise your rights with respect to information processed by us on behalf of one of our customers, please read the privacy notice of our customer.

For State of California, United States of America, residents and households:

- You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:
 - The categories of personal information we collected about you and the categories of sources for the personal information we collected about you.
 - Our business or commercial purpose for collecting that personal information.
 - The categories of third parties with whom we share that personal information.
 - The specific pieces of personal information we collected about you (also called a data portability request).
- You have the right to request that we delete any of your personal information we collected from you and retained, subject to certain exceptions provided by law. Once we receive and confirm your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

Unsubscribe. You may opt out of receiving future promotional/marketing messages from us by submitting the opt-out request form and the "Unsubscribe" link found in the footer of our email messages or by replying or texting 'STOP' if you receive text message (SMS/MMS) communications. Please note that if you opt out of promotional/marketing messages, you may continue to receive certain communications from us, such as administrative and services announcements and/or messages about your account/profile. You may also contact us using the information in the *How to Contact Us* or *Exercising Your Rights* sections of this Policy.

Exercising Your Rights. To exercise your rights described above or as otherwise available under applicable law, please submit your request to us by

- Email: coachkingiles@gmail.com;
- Telephone: [801-201-8315](tel:801-201-8315);
- If you are an authorized agent duly acting on behalf of another person, we ask you to submit your request by email or telephone.

We try to acknowledge all requests within ten (10) days and respond to all legitimate requests within one month. We will contact you if we need additional information from you in order to honor your request. Occasionally it may take us longer than a month, taking into account the complexity and number of requests we receive.

Only you (or if you are resident of California, a person registered with the California Secretary of State that you authorize to act on your behalf), may make a request related to your personal data. You will need to provide us with sufficient information or proof that allows us to reasonably verify you are the person about whom we collected personal data or that the person

about whom we collected personal data gave you the necessary and valid signed permission to submit a request on their behalf. Generally, we will request only information that we may have about you to confirm your identity, but under some circumstances, we may require additional information or documentation to complete your request. When we receive requests from your agent, we can ask you to verify your identity with us or directly confirm with us that you provided the agent permission to submit the request unless your agent provides us with a valid power of attorney. We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request. Making a request does not require you to create an account with us. Unless otherwise permitted or required by applicable law, we will only use the information provided in a request to verify your identity or authority to make the request.

We generally do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded, and permitted by law. If we determine that the request warrants a fee and such fee is permitted by law, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination. We will not discriminate against you for exercising any right afforded to you by any data protection law. Unless otherwise permitted by law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other Requests. You may ask us to remove content or information that you have posted to our websites. Please note that while we will make reasonable efforts to accommodate such requests, your request does not ensure complete or comprehensive removal of the content or information, because, for example, some of your content may have been reposted by another visitor or third-party.

Our Customers. As described above, we may also process personal data submitted by or for a customer of ours in our capacity of a processor or service provider. We are not responsible for and have no control over the privacy and data security practices of our customers, which may differ from those set forth in this Policy. If your data has been submitted to us by or on behalf of our customer and you wish to exercise any rights you may have under applicable data protection laws, please inquire with the applicable customer directly. Because we may only act upon instruction from that customer, if you wish to make your request directly to us, please provide to us the name of our customer who submitted your data to us. We will refer your request to that customer, and will support them as needed in responding to your request within a reasonable timeframe.

How To Contact Us

General. If you have any questions or concerns about this Policy or the way your information is being used by Keap, you can contact us (i) by email directed coachkingiles@gmail.com or (ii) by mail addressed to 3000 Connor St. #14 SLC, Utah 84109, attention Legal / Privacy Compliance. If you have a disability you may also contact us to access this Policy in an alternative format.

Other Information

Changes and Effective Date. We may change this Policy at any time and from time to time. The most recent version of the Policy is reflected by the version date located at the top of this Policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version or other notice on our website. We encourage you to review this Policy often to stay informed of changes that may affect you. If you would like to see an earlier version of this Policy, please contact us using one of the methods set forth above and specify the applicable date or time period for the prior Policy version requested.

Contract Terms. You consent to our collection, use, and disclosure of your information as described in this Policy. For the purposes of our Policy, when we refer to "you" or to a "customer" we mean any past, current or prospective customer of Claritypoint and any individual whose personal data is obtained pursuant to this Policy. By choosing to visit and interact with Claritypoint, you agree to comply with the terms of this Policy, and that your visit and any dispute regarding the protection of your privacy during such visit is subject to this Policy and if you are a customer of ours, the dispute resolution provisions in our separate Terms of Services or other agreement applicable to our services. Please note that to the extent a customer enters into other contractual agreements with Claritypoint, the privacy terms and conditions of such agreements (including the separate Terms of Service) may by express reference supplement or supersede portions of this Policy.