

## Covey Privacy Policy

**Effective Date:** September 8, 2020

**Last Updated:** September 8, 2020

This Privacy Policy (the "Policy") applies to the websites, applications, and electronic communications on which it appears (the "Platform"). The Policy describes how the Covey IO Corp. as well as our affiliates and subsidiaries (collectively "Covey" or "we" or "us" or "our") uses the Personal Information that we collect, receive, maintain, and store about you. Please read this Privacy Policy carefully, by interacting with us through the Platform you consent to this Policy.

### **1. Types of Personal Information Collected**

We collect a range of Personal Information. "Personal Information" is information that identifies, relates to, describes, or is reasonably capable of being associated with or linked to an individual. When we combine Personal Information with other information (i.e. information that does not, on its own, identify you), we treat the combined information as Personal Information.

**Contact and Demographic Information** – If you register for an account, sign up for an email list or other medium through which we may contact you, submit an inquiry, or make a purchase, we may collect your contact and mailing information. This may include your email, name, and phone number. We may also collect your age to verify your ability to purchase our products.

**Payment Information** – If you make a purchase through the Platform, we will collect your payment information. We will also collect your purchase details.

**Account Information** – If you create an account with us, you will create and provide us with a user name and password, and may upload other personal information through our customer portal. We may also collect your purchase information.

**Location Data** – While navigating our Platform your mobile device or browser may share you're your location data, both through WiFi and GPS. Covey will collect this information based on the settings of your phone and browser.

**Usage Information** – We may also collect usage and device information when you visit our Platform. This may include information about the browser, operating system, and/or device identifier for the device you are using, your ISP and IP information, your navigation activity on the Platform, as well as the websites that you came from and the site you visit when you leave.

### **2. Method of Information Collection**

We collect personal information in a variety of ways. We collect information directly from you; for example, when you register an account on the Platform, make a purchase, submit a job application, or correspond with us through the Platform.

We also collect information from third parties. For example we work with business partners, subcontractors in technical and delivery services, advertising networks, analytics providers, and search information providers.

We also collect information from you passively. Our Platform uses tracking tools like cookies. We do this both on our Platform and in emails that we send to you. Through these tools we collect information about users over time when you use our Platform. This collection includes usage and browser information. We may also have third parties collect Personal Information in this way. For more information about the trackers that we use, please see Section 6 of this Policy. Additionally, if you enable location data on your device, this data will be collected passively based on the location settings on your device.

### **3. Combining Information**

We may combine Personal Information we obtain. For example we may combine information that we have collected online with information that we have collected offline, for instance during calls and emails between you and our support team. We may also combine information that we have collected across other third party sites or from other third parties with information we already have. Finally, we combine information across devices.

### **4. How We Use Personal Information**

We will use your Personal Information to fulfill your purchases and offer our services, respond to your requests and inquiries, as well as to send you communications. We also use your Personal Information to communication with you for transactional purposes. For example, we might contact you about this Policy or our Terms of Use.

We may also use your Personal Information to improve our Platform, products, and services. This may include using your information to customize your experience with us. We may also use your Personal Information for the security of the Platform and our company, our customers, and other third parties. We may also use your Personal Information to protect against fraud and other malicious activity.

We may also use your information for marketing purposes. For example, we may send you information about new features on the Platform, new services we offer, and special offers. When legally permitted, this may also include using your information to serve you ads and to tell you about products or offers available through third parties we think you might find interesting. These might be our own offers, or third party offers, or products we think you might find interesting.

Finally we may use your information for other purposes, as permitted by law.

### **5. Sharing Personal Information**

We may share your Personal Information in the following circumstances:

- **Within Covey** – We may share your Personal Information within our family of companies.
- **Service providers** – When we hire a service provider to help operate the Platform or our business, we may give access to Personal Information as necessary to perform the service for Covey. This may include service providers that operate our website, send our communications, or run our promotions.
- **Legal obligation or protection from harm** - When Covey has a good faith belief that access, use, preservation or disclosure of the Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Covey, its users, or the public against harm.

- **Merger or sale** - If and when Covey is involved in a merger, acquisition, or any form of transfer or sale of some or all of its business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Personal Information may be transferred along with the business. Where legally required we will give you prior notice and if you have a legal right to do so, an opportunity to object to this transfer.
- **Purposes described to you** – We may share your Personal Information for other purposes, as we describe to you.

## **6. Cookies and Other Technologies**

We use cookies. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow). These cookies enable the site to recognize your browser and, if you have a registered account, associate it with your registered account.

We use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

## **7. Your Choices**

You have certain choices about how we use your Personal Information. You can opt out-out of certain marketing. To opt-out of marketing communications, please email us at [info@covey.io](mailto:info@covey.io) or by following the instructions included in the email or text correspondence. Please note that, even if you unsubscribe from certain correspondences, we may still need to contact you with important transactional or administrative information, as permitted by law.

## **8. Children Under the Age of 13**

The Platform is meant for adults and we will not knowingly collect personally identifiable information from any person under the age of 13 without permission from a parent or guardian. The Platform are not designed to attract the attention of persons under the age of 13. If you are a parent or legal guardian and think your child has given us information you can email us at [info@covey.io](mailto:info@covey.io). You can also write to us at the address listed in the "Contact Us" section of this Policy. Please mark your inquiries "COPPA Inquiry."

## **9. California Privacy Rights**

Pursuant to California's Shine the Light statute (Cal. Civ. Code Sec. 1798.83), you can control if we share information with third parties for their marketing purposes. To opt-out of us sharing your information with third parties for such promotional purposes, email us at [info@covey.io](mailto:info@covey.io) or write to us in the "Contact Us" section of this Policy and include "Marketing Opt-Out" in your request.

In addition, pursuant to the California Consumer Privacy Act of 2018 ("**CCPA**"), California residents have certain other rights concerning their personal information. This section describes (1) the categories of personal information, collected and disclosed by Covey IO Corp. subject to California privacy law, (2) your privacy rights under California privacy law, and (3) how to exercise your rights.

When we use the term “personal information” in this section, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

*a. Personal Information we Collect.*

If you are a California consumer, please be aware that we collect, process, and maintain personal information to fulfill certain business purposes related to our Platform. We will not collect additional categories of personal information or use personal information collected for additional purposes without providing you notice. Within the preceding twelve (12) months we and our service providers have and may collect, and you may consent to provide, the categories of personal information set forth below. We disclose each of these categories of personal information with our service providers for our business purposes (to enable the service providers to provide their services) and as otherwise described in the “How We Disclose Personal Information” section above.

- Identifiers (for example, name, postal address, date of birth, email address, IP address, and online identifiers);
- Categories of personal information as defined by Cal. Civ. Code § 1798.80 (for example, name, signature, Taxpayer Identification Number, telephone number, passport number, driver’s license number, insurance policy number, account numbers);
- Protected classifications under California or federal law (for example, age, citizenship status, national origin or ancestry);
- Commercial information (for example, transaction history);
- Internet or other electronic network activity information, including information on your usage of our Sites;
- Geolocation data;
- Sensory data (for example, audio from call recordings);
- Inferences drawn from any information identified above to create a profile

*b. Your Privacy Rights.*

In accordance with the CCPA, California consumers may exercise under certain conditions the following four (4) categories privacy rights with respect to their personal information. **Please note:** you will not be discriminated against in any way by virtue of your exercise of the rights listed below, which means we will not deny goods or services to you, provide a different prices or rates for goods or services to you, or provide a different level or quality of goods or services to you.

Privacy Right	Description
Notice	You have the right to be notified of what categories of personal information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Access	You have the right to request the categories of personal information that we collected in the previous twelve (12) months, the categories of sources from which the personal information was collected, the specific pieces of personal information we have collected about you, and the business purposes for which such personal information is collected and shared. You also have the right to request the categories of personal information which were disclosed for business purposes, and the

	categories of third parties in the twelve (12) months preceding your request for your personal information.
Data Portability	You have the right to receive the personal information you have previously provided to us.
Erase	You can request to have your personal information deleted from our servers and we will direct our service providers to do the same. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required to retain your personal information for one or more of the following categories of purposes: (1) to complete a transaction for which the personal information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); (4) to otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
To Opt Out	You can request to opt out of us selling your information personal information. To exercise this right please click email <a href="mailto:info@covey.io">info@covey.io</a> and follow the instructions to submit your request.

*c. How to Exercise Your Rights.*

If you would like to exercise your rights listed above, please send (or have your authorized agent send) an email to [info@covey.io](mailto:info@covey.io). You have a right not to receive discriminatory treatment by any business when you exercise your CCPA rights.

While we take measures to ensure that those responsible for receiving and responding to your request are informed of your rights and how to help you exercise those rights, when contacting us to exercise your rights, we ask you to please adhere to the following guidelines:

- **Tell Us Which Right You Are Exercising:** Specify which right you want to exercise and the personal information to which your request relates (if not to you). If you are acting on behalf of another consumer, please clearly indicate this fact and your authority to act on such consumer's behalf;
- **Help Us Verify Your Identity:** Provide us enough information to verify your identity. For example, provide us (at a minimum) your full name, address, and phone number. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any personal information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.
- **Direct Our Response Delivery:** Inform us of the delivery mechanism with which you prefer to receive our response. You may specify, for example, email, mail, or through your account (if you have one with us).

Please note that you don't need to create an account with us in order to make a request to exercise your rights hereunder.

*d. How We Respond to Your Requests.*

In all cases, we will respond to your request within 45 days. However, where reasonably necessary, we may extend our response time by an additional 45 days, provided we send you notice of such extension first. We will provide the information to you via your preferred delivery mechanism. If the information is provided to you electronically, we will provide you the information in a portable format and, to the extent technically feasible, in a machine readable, readily useable format that allows you to freely transmit this information without hindrance.

Please note that we will not charge you for making a request, provided that you make no more than two (2) requests per year. If you make three (3) or more requests in any given twelve (12) month period, we may refuse to respond to such requests, if determined by us to be unfounded or excessive (e.g. repetitive in nature), or we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested. If we refuse to act on the request, we will provide you notice and the reason for our refusal to act.

## **10. Information for Individuals in the EU**

In accordance with the GDPR, individuals in the EU have additional rights relating to the collection and processing of personal information. If you need more information or would like to exercise your rights under the GDPR, you may contact us at [info@covey.io](mailto:info@covey.io).

### *a. Basis for Processing*

Our legal basis for collecting and using the Personal Information described in this Privacy Policy will depend on the Personal Information concerned and the context in which we collect it. We collect Personal Information from you:

- where we need it to perform a contract with you;
- where the processing is in our legitimate interests (including the purposes described, above, in *How We Use Personal Information*); or
- if we otherwise have your consent.

### *b. Your Privacy Rights*

Depending on applicable law, you may have the right to:

- **Request access** to Personal Information about you.
- **Request correction** of the Personal Information that we hold about you.
- **Request erasure** of Personal Information about you. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of Personal Information about you where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of Personal Information about you. You can ask us to suspend the processing of Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of Personal Information to you or to a third party.

- **Withdraw consent** at any time where we are relying on consent to process Personal Information about you.

If you wish to exercise any of these applicable rights, please contact us at [info@covey.io](mailto:info@covey.io).

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Information. We encourage you to first reach out to us at [info@covey.io](mailto:info@covey.io), so we have an opportunity to address your concerns directly before you do so.

#### **11. Storage, Security and Retention of Information**

Covey has taken reasonable steps to protect the information users share with us, including, but not limited to, setup of processes, equipment and software to avoid unauthorized access or disclosure of this information. No transmission of information via the Internet can be entirely secure, however, so please always use caution when submitting Personal Information. We will retain your Personal Information in compliance with the uses described in this Policy, as well as to comply with our legal, financial reporting, or compliance obligations.

We store information both inside the United States. If you live outside of the United States, be advised that we may transfer and store your information to the United States. US law may not provide the same protections as the laws in your country. By providing us with your personal information you agree to the processing of it in the United States as permitted by US law. Information transferred from the EU will be subject to the appropriate safeguards pursuant to GDPR and other applicable law.

#### **12. Contacting Covey**

If you have any questions about this Policy, or the privacy practices of Covey, please email us at [info@covey.io](mailto:info@covey.io).

#### **13. Updates**

Please note that this policy may be amended from time to time. Unless otherwise indicated, any changes to this Policy will apply immediately upon posting to the Platform so please check our site periodically for updates. You can see when this Policy was last updated by reviewing the “Last Updated” legend at the top of this page. We will provide notice of material changes by updating the Policy here, and communicating with you in the manner and format in which we typically communicate with you in our regular course of business, as required by applicable law.