

PlanSource Privacy Policy

PlanSource takes your privacy very seriously. We share a commitment to protect your privacy and the confidentiality of your personal information.

HIPAA Privacy Practices: To read more about our privacy practices regarding health and medical information under the Health Insurance Portability and Accountability Act ("HIPAA"), please read our HIPAA Privacy Policy.

This Privacy Policy explains how PlanSource collects, uses and shares your information. This Privacy Policy applies to information we collect when you use our websites, mobile applications and other online products and services (collectively, the "Services") or when you otherwise interact with us, including when you attend events hosted or attended by PlanSource and when you contact us for customer support.

Collection of Information

We collect information you provide directly to us. For example, we collect information when you create an account, participate in any interactive features of the Services, fill out a form, participate in a contest, promotion or survey, register for an event or course, make a purchase, apply for a job, request customer support or otherwise communicate with us. The types of information you choose to provide may include your name, email address, postal address, phone number, fax number, payment information, gender, information about your company and current position, and employment history.

When you access or use our Services, we automatically collect some or all the following information about you:

Log Information: We log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services.

- Device Information: We may collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- Product Usage Information: When you use our enterprise products and services on behalf of your organization, we collect information about your device and your use of those products and services, including the device IP address, login credentials,



- time zone, error messages, product interactions and configurations and other similar usage information.
- Information Collected by Cookies and other Tracking Technologies: We use various technologies to collect information, and this includes sending cookies to your computer or mobile device.

We also obtain information from other sources. The data is combined with information we collect through our Services. For example, if you connect a PlanSource account with your social media account, we may have access to certain information from the company that owns or operates the social media account in accordance with the authorization procedures determined by such social media company. Additionally, PlanSource may receive information about you from other third parties whom you have authorized to share your information or who collect information in connection with joint offerings.

Use of Information

We use information about you for the following purposes:

- Provide, maintain and improve our Services;
- Provide and deliver the products and services you request, process transactions and send you related information, including confirmations and invoices;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service;
- Communicate with you about products, services, offers, promotions, rewards, and events offered by PlanSource and others, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Personalize and improve the Services and provide advertisements, content or features that match user profiles or interests;
- · Comply with our legal obligations; and
- Process and deliver contest entries and rewards.

Sharing of Information

We share information about you as follows or as otherwise described in this Privacy Policy:

In connection with a joint marketing campaign, or seminar, PlanSource product
offering or other product or service offered by PlanSource in conjunction with a third
party, we share your information with the third parties participating in such offerings
and such parties may use this information for their direct marketing



- purposes. Please see "Your Rights to Information about Sharing" below for more information about this type of information sharing.
- With resellers of PlanSource products and services or with sellers of products and services complementary to PlanSource products and services, in order to pursue sales opportunities and for other direct marketing purposes. Please see "Your Rights to Information about Sharing" below for more information about this type of information sharing.
- With vendors, consultants and other service providers who need access to such information to perform services for us, including providing product usage information to Google Analytics, which processes data as described at https://policies.google.com/technologies/partner-sites;
- In response to a request for information if we are required by, or believe disclosure
 is required by, any applicable law, regulation or legal process, including in
 connection with lawful requests by law enforcement, national security, or other
 public authorities;
- To protect the rights, property and safety of PlanSource, its employees, and others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company; and
- With your consent or at your direction, including if we notify you through our Services that the information you provide will be shared in a particular manner and you provide such information.

We also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Social Sharing Features

The Services offer social sharing features and other integrated tools (such as the Facebook "Like" button), which let you share actions you take on our Services with other media and vice versa. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

Advertising and Analytics Services Provided by Others

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services on our behalf. These entities use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information is used by PlanSource and these entities to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other



websites, and better understand your online activity. This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies.

Transfer of Information

PlanSource processes information in the United States and at times, other countries. Accordingly, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it. For instance, data transferred from the European Economic Area ("EEA") to PlanSource in the United States will be processed pursuant to the EU Data Protection Regulation. In other cases, we will use European Commission-approved Standard Contractual Clauses to ensure an adequate level of protection for data originating from the EEA.

Residents of the European Economic Area

If you are a resident of the EEA, you have certain rights and protections under the law regarding the processing of your personal data. Please see the sections below for more details.

PlanSource is a voluntary processor of the data collected about you.

If you are a resident of the EEA, when we process your personal data we will only do so in the following situations:

- If we need to use your personal data to perform our responsibilities under our contract with you (e.g., processing payments for and providing our services you have requested).
- If we have a legitimate interest in processing your personal data. For example, we
 process the personal data we collect from you to send you marketing
 communications, to communicate with you about changes to our Services, and to
 provide, secure, and improve our Services.
- If we request your consent to a specific processing activity, and you provide your consent in the manner indicated.
- In some cases, processing will be necessary for compliance with a legal obligation, such as response to legal process requests.

We store the information we collect about residents of the EEA for as long as is necessary for the purposes for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law.



If you are a resident of the EEA, you have the right to access personal data we store about you and to ask that your personal data be corrected. In certain cases, you may also have the right to request that we erase data we are processing or to restrict or object to certain of our processing activities. You may also have the right to request that we provide the personal data you have provided us in a portable form for transmission to another controller's service. If you would like to exercise any of these rights, you may contact us as indicated in the "Contact Us" section below or contact your data controller directly.

If you are a resident of the EEA and have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data protection authority where you reside. For contact details of your local Data Protection Authority, please see: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

Please direct any inquiries or complaints regarding our compliance with the Data Protection Principles (the "Principles") to the point of contact listed in the "Contact Us" section below. Under certain conditions specified by the Principles, you may also be able to invoke binding arbitration to resolve your complaint. PlanSource is subject to the investigatory and enforcement powers of the Federal Trade Commission. If PlanSource shares EU Data with a third-party service provider that processes the data solely on PlanSource's behalf, then PlanSource may be held liable for that third party's processing of EU Data in violation of the Principles, unless PlanSource can prove that it is not responsible for the event giving rise to the damage.

Security

PlanSource takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

Access Rights

If you are a resident of a country that provides you with the right to request a copy of the personal data PlanSource stores about you and/or to correct any inaccuracies within such data, and PlanSource is required by applicable laws to respond to such requests, then you may address such requests to the contact information provided in the "Contact Us" section below. PlanSource will use reasonable efforts to supply, correct or delete information that we store about you or to advise you if we are not required by applicable laws to comply with such requests.



Promotional Communications

You may opt out of receiving promotional communications from PlanSource by following the instructions provided in those communications. Please note that if you opt out of receiving promotional communications, we may still send you transactional or relationship messages, such as those about your account or our ongoing business relations.

Your Rights to Information about Sharing

Residents of California and residents of certain international countries may request certain details, pursuant to applicable laws, about how their information is shared with third parties for direct marketing purposes. If you are a resident of one of these jurisdictions, and would like to make such a request, please contact us.

Changes to this Privacy Policy

We may change this Privacy Policy. If we do so, such change will appear on this page of our website. We will also provide appropriate notice and choices to you, on this website and in other appropriate locations, based on the scope and extent of changes. You may always visit this policy to learn of any updates.

Contact Us

If you have any questions regarding this Privacy Policy, you may contact us at compliance@plansource.com

Effective Date

The Effective Date of this Privacy Policy is September 1, 2013. This Privacy Policy was revised on March 1, 2019.