

Simplr Solutions Inc. Privacy Policy

Last Updated: May 22, 2018

We value privacy, especially yours.

At Simplr, we take protecting your privacy seriously. In order for you to participate in the job application and recruitment process or to inquire about our services, we need to collect and use some of your personal information. We want you to understand what personal information we collect and how it is used.

What's covered by this policy

This policy explains:

- What information we collect and why we collect it;
- How we use that information;
- How we share that information; and
- How to access and update that information.

Information we collect from you

Applicants - If you are interested in employment with Simplr and choose to participate in the application or recruitment process, we will need to collect your personal information which may include:

- Your name, address, email address, telephone number and other contact information;
- Your resume or CV, cover letter, previous work experience or other experience, education, transcripts, or other information you provide to us during the application and recruitment process;
- Governmental identification information, if applicable;
- Information from interviews and phone-screenings you may have;
- Details of the type of employment you are looking for, current or desired salary and other terms relating to compensation and benefits packages, or other job preferences;
- Any demographic information obtained during the application or recruitment process;

- Reference information and information received from background checks (where applicable), including personal information provided by third parties.

Simplr may leverage external data sources in order to provide context and background on applicants in order to improve the application/recruiting experience, mitigate fraud or malicious activity, or comply with internal company and external regulatory requirements.

Where permitted by applicable law, you may be given the opportunity to provide information on your gender, race, or ethnicity. We may gather this information from you for reporting and record-keeping requirements but we will only use this information in accordance with applicable law and will not use it in making any employment decisions. Providing this information is strictly voluntary, and you will not be subject to any adverse action or treatment if you choose not to provide it.

Customers – If you contact Simplr in order to inquire about or otherwise make use of our services, we may collect personal information such as:

- Your name, address, email address, telephone number and other contact information;
- Any additional information about you or your company that you provide when you communicate with us about Simplr services

Information we collect when you visit our websites

Simplr and its partners use cookies or similar technologies on our websites to analyze trends, administer the site, track users' movements around the site, and to gather demographic information about our user base as a whole.

Simplr also gathers certain information about the use of Simplr's services, including the number of unique visitors, the frequency of visits, how users interact with the sites, user experience preferences, IP address, and other information that may help Simplr improve the user experience, mitigate fraudulent activity, and comply with legal requirements. Such information may include, but is not limited to the following:

Log information

When you visit Simplr's sites we automatically collect and store certain information in our server logs. This type of information includes details of how you interacted with our services. It may include personal information such as: IP address, Unique Device Identifier, or CallerID / ANI (Automatic Number Identification) information, content of web pages, transaction with APIs (Application Program Interface), transactions with IVR (Interactive Voice

Response) systems, activity and content of visitor interaction with call center representatives; application usage activity, hardware information, hardware and system settings, browser type, browser language, the date and time of your request, referral URL, etc.

Cookies

A cookie is a small data file that is managed by your web browser or other application and stored on your local system. Simplr uses session and persistent cookies to, among other things, identify your computer during a particular interaction and analyze your behavior during a particular visit. Most web browsers provide you with the ability to accept or decline cookies, as well as to be warned each time a cookie is being sent. If you choose to decline cookies, you may not be able to fully use Simplr's services.

Pixel tags

Pixel tags, also known as web beacons, help Simplr better manage user experience and content tracking. Pixel tags are tiny graphics with a unique identifier, which provide a similar function to cookies and are used to track user interaction with content provided by Simplr or an affiliate organization. In contrast to cookies, which are stored on a user's computer hard drive, pixel tags are embedded invisibly within content. The small size and transparency of pixel tags are not intended to deceive content recipients, but minimize distraction.

How we use your personal information

Applicants - Simplr will use your personal information for the purposes of carrying out the application and recruitment process which includes:

- Assessing your skills, qualifications and interests;
- Verifying your information and carrying out reference checks and/or conducting background checks (where applicable) if you are offered a job;
- Communications with you about the recruitment process and your application(s), including, in appropriate cases, informing you of other potential career opportunities at Simplr;
- Creating and submitting reports as required under any local laws or regulations, where applicable;
- Making improvements to Simplr's application and recruitment process;
- Complying with applicable laws, regulations, legal processes or enforceable governmental requests.

If you are offered and accept a position with us, some of the personal information you provide during the application and recruitment process will be transferred into our internal human resources and related systems for use during your employment. By participating in the applicant process, you agree to such a transfer and use of your personal information.

Customers - For individuals sharing personal information with Simplr in order to inquire about or otherwise make use of our services, we will use your personal information in order to provide the requested information, products, and/or services. Such uses may include:

- processing requested transactions;
- improving the quality of our services;
- sending communications about our products and services;
- enabling our business partners and service providers to perform certain activities on our behalf; and
- complying with our legal obligations, policies and procedures and for other internal administrative purposes.

We may transfer personal information that we collect about you outside of the country in which it was collected. If you reside in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring personal information about yourself to a country and jurisdiction that does not have the same data protection laws as the European Union. By doing so, you are consenting to the transfer, use, and disclosure of personal information about yourself to the U.S. as described in this policy.

How we share your personal information

We will not use or disclose your personal information to non-affiliated third parties except as disclosed in this policy.

Simplr may transfer your personal information to:

Non-affiliated companies to assist us in providing, maintaining and operating our application or recruiting services. These companies are required to comply with the principles set out in this policy and only use such personal information for the purposes for which it was provided to them;

A third-party, in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of its business or of any assets or shares of our business or a division thereof. In such an event, we will provide notice of any material change to this policy, in the manner described in this policy. In these circumstances, personal information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

Simplr may also disclose your personal information to:

Comply with the law and/or legal process in which a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);

Defend our rights and/or property or the rights and property of others;

Enforce our Terms of Use and/or this policy;

Respond to claims that the content(s) of a communication violates the rights of another;

Detect, prevent or otherwise address fraud, security, or technical issues.

Applicants - Our recruiters (including both our employees and contracted recruiters for us) may contact you about other jobs for which you have not applied but that may be of interest to you based on information you provide about yourself during the application and recruitment process.

How we protect your personal information

We use commercially reasonable technical, administrative, and physical controls best practices to protect your personal information including data encryption where appropriate; however, since the internet is not a 100% secure environment, we cannot ensure the security of personal information during its transmission between you and us. Accordingly, you acknowledge that when you transmit such personal information, you do so at your own risk. We will notify you of any confirmed security breach of your personal information to the extent required by and in accordance with applicable law.

How long we keep your personal information

Simplr will retain your personal information as long as necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or not prohibited by applicable law.

Your rights related to your personal information

While we take various steps to ensure the accuracy and completeness of your personal information, we rely upon you to provide accurate and complete personal information when interacting with us.

Upon your request and as allowed or required by law and consistent with our policies, you may request Simplr to take the following actions with your personal information: (i) provide you with a copy, (ii) correct, (iii) update, (iv) delete, To make such a request, or if you have a privacy-related complaint, please contact Simplr via postal mail or email as provided in the "Where to turn with questions" section of this policy.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider at <https://feedback-form.truste.com/watchdog/request>.

Your California privacy rights

Under California law, California residents may opt-out of Simplr disclosing their personal information to third parties for their marketing purposes. If you are a California resident and do not want Simplr to disclose your personal information to third parties for their marketing purposes, please contact Simplr by any of the ways described in the Where to turn with questions section below and we will respond within 30 days.

For non-U.S. residents

We may transfer personal information that we collect about you outside of the country in which it was collected. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring personal information about yourself to a country and jurisdiction that does not have the same data protection laws as the European Union. By doing so, you are consenting to the transfer, use, and disclosure of personal information about yourself to the U.S. as described in this policy.

Children under 13

The site, product or service is not directed to children under 13. We do not knowingly collect personal information from children under 13. If you become aware that your child is accessing the site, product or service and providing personal information without your consent, please contact us by using the information provided below. We will take steps to remove personal information from our storage systems and terminate the account if we determine that a child under 13 has accessed the services.

How you are notified if the policy changes

We may change this policy from time to time. If we do, we will post the updated policy with the last revised date. Your continued participation in the application or recruitment process means that you consent to the updates. You should periodically read the policy to understand our privacy practices.

Communicating with you electronically

By participating in the application or recruitment process, you agree that we can communicate with you electronically. This includes any required notifications (i.e. legal, technical, regulatory, security, privacy).

Accountability and governance

Simplr has implemented various measures to monitor compliance with and enforce this policy.

Where to turn with questions

If you have any questions about this policy, about our site, or want to request access to, correction, or deletion of your personal information, or have a privacy-related complaint, you can contact Simplr by email at privacy@gosimplr.com.

You may also contact us at:

Simplr Solutions Inc.

Attn: Privacy Office

c/o Office of the General Counsel

648 Grassmere Park

Nashville, TN 37211