

FreeThink Technologies, Inc. Privacy Policy

This Privacy Policy was last updated on 02 October 2023 and describes policies in place at FreeThink Technologies, Inc. (“FreeThink”) and procedures on the collection, use and disclosure of private information (“Personal Data”). FreeThink uses Personal Data as part of marketing and raising awareness of FreeThink’s products, services, news, and events and to provide a method of communication with current and past customers (FreeThink’s “Services” on behalf of “Clients”).

Collecting and Using Personal Data

Types of Data Collected

Personal Data

FreeThink may ask for certain Personal Data of a Client that can be used for communications. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Title
- Employer

Tracking Technologies and Cookies

FreeThink does not use Cookies and similar tracking technologies to track activity on FreeThink websites.

Use of Personal Data

FreeThink uses Personal Data for the following purposes:

- To provide and maintain Services, including to monitor the usage of Services.
- To manage Accounts of Clients including users of the Services.
- For the performance of business contracts with the client or the client’s employer.
- To contact Clients by email, telephone, SMS, or other equivalent forms of electronic communication regarding updates or informative communications related to the functionalities, products or contracted services, when necessary or reasonable for their implementation.
- To provide news about special offers and general information about Services.
- To manage requests: To respond to Client queries.

FreeThink only shares Personal Data with the following organizations:

- Service Providers who monitor and analyze the use of Services.
- FreeThink affiliates who are required to honor this Privacy Policy. Affiliates include subsidiaries, joint venture partners or other companies that FreeThink controls or has an ownership share in.
- Business partners who offer certain products, services, or promotions.

Retention of Personal Data

Unless a Client requests to have Personal Data no longer retained by FreeThink, FreeThink can retain Personal Data for a period up three years after the latter of either a confirmed communication is received by the Client or a business account for Services remains active (such as a license for FreeThink-provided software).

Transfer of Personal Data

Personal Data is processed at FreeThink’s operating offices; therefore, information may be transferred to — and maintained on — computers located outside of the Client’s state, province, country or other governmental

jurisdiction where the data protection laws may differ than those from the Client's jurisdiction. Any submission of Personal Data by a Client represents an agreement to that transfer as governed by this Privacy Policy.

FreeThink will take all steps reasonably necessary to ensure that Personal Data are treated securely and in accordance with this Privacy Policy and no transfer of Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of that Personal Data.

Disclosure of Personal Data

Law Enforcement

FreeThink may be required to disclose Personal Data in response to valid requests by public authorities (e.g. a court or a government agency).

Other Potential Disclosures

FreeThink may disclose Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation.
- Protect and defend the rights or property of FreeThink.
- Prevent or investigate possible wrongdoing in connection with Services.
- Protect the personal safety of Clients or the public.
- Protect against legal liability.

Security of Personal Data

No method of electronic storage is perfectly secure and FreeThink cannot therefore guarantee its absolute security.

Detailed Information on the Processing of Personal Data

Service Provider

FreeThink uses 3PRIME, LLC as a service provider. This vendor may have access to Personal Data about Client activity. These Personal Data are maintained in accordance with 3PRIME's Privacy Policies.

Email Marketing

FreeThink may use Personal Data to contact Clients with newsletters, marketing or promotional materials and other information that may be of interest. Clients have the right to opt-out of receiving any, or all, of these communications from FreeThink by following the "unsubscribe" link or instructions provided in any email or by contacting FreeThink.

Payments

FreeThink may provide paid offerings within the Services. In the event that FreeThink uses third-party services for payment processing, FreeThink will not store Client payment card details. That information is provided directly to third-party payment processors whose use of Personal Data is governed by their Privacy Policies. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Privacy Policy for Compliance with GDPR

FreeThink may use Personal Data under the following conditions:

- **Consent:** A Client has given consent for the use of Personal Data for one or more purposes.
- **Performance of a contract:** Personal Data are necessary for the performance of an agreement with Client and/or for any pre-contractual obligations thereof.
- **Legitimate interests:** Personal Data are necessary to pursue the legitimate interests of FreeThink.

Client Rights under the GDPR

FreeThink undertakes to respect the confidentiality of Personal Data and to guarantee legal rights including the following:

- The right to access, update, correct or delete Personal Data upon request.

- The right to object to the use of Personal Data for direct marketing purposes.
- The right to ask FreeThink to delete or remove Personal Data for any reason.
- The right to withdraw consent on using Personal Data wherein FreeThink will no longer provide access to specific functionalities of the Services or communicate directly with the Client.

Exercising GDPR Data Protection Rights

Clients may exercise their rights of access, rectification, cancellation and opposition by contacting FreeThink. Clients maintain the right to complain to a governmental authority about FreeThink's collection and use of Personal Data. For more information, Clients in the European Economic Area (EEA) can contact the local data protection authority in the EEA.

CCPA Privacy Policy

This privacy notice section for California residents supplements the information contained in FreeThink's Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

Categories of Personal Data Collected

FreeThink collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Client. The following is a list of categories of Personal Data which may be collected or may have been collected from California residents within the last twelve (12) months. Please note that the categories and examples provided in the list below are those defined in the CCPA. This does not mean that all examples of that category of Personal Data were in fact collected but reflects FreeThink's good faith belief that some of that information from the applicable category may be and may have been collected. For example, certain categories of Personal Data would only be collected if such Personal Data was provided directly to FreeThink.

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.
Collected: Yes.

- **Category B: Personal Data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
Some Personal Data included in this category may overlap with other categories.
Collected: Yes.

- **Category C: Protected classification characteristics under California or federal law.**

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
Collected: No.

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.
Collected: Yes.

- **Category E: Biometric information.**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and

voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

- **Category F: Internet or other similar network activity.**

Examples: Interaction with our Service or advertisement.

Collected: Yes.

- **Category G: Geolocation data.**

Examples: Approximate physical location.

Collected: No.

- **Category H: Sensory data.**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

- **Category I: Professional or employment-related information.**

Examples: Current or past job history or performance evaluations.

Collected: Yes.

- **Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).**

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: No.

- **Category K: Inferences drawn from other Personal Data.**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

Under CCPA, Personal Data does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Information excluded from the CCPA's scope, such as:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data
- Personal Data covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

Sources of Personal Data

FreeThink obtains the categories of Personal Data listed above from the following categories of sources:

- Directly from Clients. For example, from the forms Clients complete on FreeThink's Services, preferences Clients express or provide through FreeThink's Services, or from Clients' purchases on FreeThink's Services.
- Indirectly from Clients. For example, from observing activity on FreeThink's Services.
- Automatically from Clients. For example, through cookies FreeThink or FreeThink's Service Providers set on Clients' Devices as they navigate through FreeThink's Services.
- From Service Providers. For example, third-party vendors to monitor and analyze the use of FreeThink's Services, third-party vendors for payment processing, or other third-party vendors that FreeThink uses to provide the Services to Clients.

Use of Personal Data for Business Purposes or Commercial Purposes

FreeThink may use or disclose Personal Data collected for "business purposes" or "commercial purposes" (as defined under the CCPA), which may include the following examples:

- To operate and provide FreeThink's Services.
- To provide support and respond to inquiries, including to investigate and address concerns and monitor and improve Services.
- To fulfill or meet the reason Client provided the information. For example, if Client shares contact information, to ask a question about Services, FreeThink will use that Personal Data to respond to the inquiry. If Client provides Personal Data to purchase a product or service, FreeThink will use that information to process payments and facilitate delivery.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to Clients when collecting Personal Data or as otherwise set forth in the CCPA.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity, including, when necessary, to prosecute those responsible for such activities.

It should be noted that the examples provided above are illustrative and not intended to be exhaustive. For more details on how FreeThink uses this information, refer to the "Use of Personal Data" section. If FreeThink decides to collect additional categories of Personal Data or use the Personal Data it collected for materially different, unrelated, or incompatible purposes, FreeThink will update this Privacy Policy.

Disclosure of Personal Data for Business Purposes or Commercial Purposes

FreeThink may use or disclose and may have used or disclosed in the last twelve (12) months the following categories of Personal Data for business or commercial purposes:

- Category A: Identifiers
- Category B: Personal Data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

Note that the categories listed above are those defined in the CCPA. This does not mean that all examples of that category of Personal Data were in fact disclosed but reflects FreeThink's good faith belief that some of that information from the applicable category may be and may have been disclosed. When FreeThink discloses Personal Data for a business purpose or a commercial purpose, it enters a contract that describes the purpose and requires the recipient to both keep that Personal Data confidential and not use it for any purpose except performing the contract.

Sale of Personal Data

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Data by the business to a third party for valuable consideration. This means that FreeThink may have received some kind of benefit in return for sharing Personal Data, but not necessarily a monetary benefit. It should be noted that the categories listed below are those defined in the CCPA. This does not mean that all examples of that category of Personal Data were in fact sold but reflect FreeThink's good faith belief that some of that information from the applicable category may be and may have been shared for value in return. FreeThink may sell and may have sold in the last twelve (12) months the following categories of Personal Data:

- Category A: Identifiers
- Category B: Personal Data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

Share of Personal Data

FreeThink may share Personal Data identified in the above categories with the following categories of third parties:

- Service Providers
- Payment processors
- FreeThink affiliates
- FreeThink business partners
- Third party vendors to whom Clients or Client agents authorize FreeThink to disclose Client Personal Data in connection with products or services provided to Client

Sale of Personal Data of Minors Under 16 Years of Age

FreeThink does not knowingly collect Personal Data from minors under the age of 16 through FreeThink's Services, although certain third party websites that FreeThink links to may do so. These third-party websites have their own terms of use and privacy policies, and FreeThink encourages parents and legal guardians to monitor children's Internet usage and instruct them to never provide information on other websites without parental permission.

FreeThink does not sell the Personal Data of Consumers known to be less than 16 years of age. If a Client has reason to believe that a child under the age of 13 (or 16) has provided FreeThink with Personal Data, contact and provide FreeThink with sufficient details to enable FreeThink to delete that information.

Rights under the CCPA

The CCPA provides California residents with specific rights regarding their Personal Data. Clients who are residents of California have the following rights:

- **The right to notice.** Clients have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to request.** Under CCPA, Clients have the right to request that FreeThink disclose information to Clients about the collection, use, sale, disclosure for business purposes and share of Personal Data. Once FreeThink receives and confirm a Client request, FreeThink will disclose:
 - The categories of Personal Data collected about Client
 - The categories of sources for the Personal Data collected about Client
 - FreeThink's business or commercial purpose for collecting or selling that Personal Data
 - The categories of third parties with whom FreeThink shares that Personal Data
 - The specific pieces of Personal Data FreeThink collected about Client
 - If FreeThink sold Client Personal Data or disclosed Client Personal Data for a business purpose, FreeThink will disclose to Client:
 - The categories of Personal Data categories sold
 - The categories of Personal Data categories disclosed
- **The right to say no to the sale of Personal Data (opt-out).** Clients have the right to direct FreeThink to not sell Client Personal Data. Contact FreeThink to submit an opt-out request.
- **The right to delete Personal Data.** Clients have the right to request the deletion of Personal Data, subject to certain exceptions. Once FreeThink receives and confirms a request, FreeThink will delete (and direct FreeThink Service Providers to delete) Client's Personal Data from FreeThink's records, unless an exception applies. FreeThink may deny the deletion request if retaining the information is necessary for FreeThink or FreeThink's Service Providers to:
 - Complete the transaction for which FreeThink collected the Personal Data, provide a good or service that Client requested, take actions reasonably anticipated within the context of FreeThink's ongoing business relationship with Client, or otherwise perform FreeThink's contract with Client.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on Client's relationship with FreeThink.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which Client provided it.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your consumer's rights, including by:
 - Denying goods or services to You
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
 - Providing a different level or quality of goods or services to You
 - Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services

Exercising CCPA Data Protection Rights

In order to exercise any rights under the CCPA as a California resident, contact FreeThink:

- By visiting this page on website: [WEBSITE_CONTACT_PAGE_URL]
- By sending an email: [WEBSITE_CONTACT_EMAIL]

Only a Client, or a person registered with the California Secretary of State that is authorized to act on a Client's behalf, may make a verifiable request related to Personal Data.

Request must provide sufficient information to enable a reasonable verification of identity and enable appropriate actions. FreeThink cannot respond to requests or provide required information if the identity or authority is not verified. FreeThink will disclose and deliver the required information free of charge within 45 days of receiving the verified request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice. Any disclosures provided by FreeThink will only cover the 12-month period preceding the verifiable request's receipt. For data portability requests, FreeThink will select a format to provide Personal Data that is readily usable and should allow the transmission of the information from one entity to another entity without hindrance.

Do Not Sell Personal Data

Clients maintain the right to opt-out of the sale of Personal Data. Once FreeThink receives and confirms a verifiable Client request, it will stop selling Personal Data. To exercise this right to opt-out, Clients should contact FreeThink. The Service Providers FreeThink partners with (for example, its analytics or advertising partners) may use technology on the Services that sells Personal Data as defined by the CCPA law. If a Client wishes to opt out of the use of Personal Data for interest-based advertising purposes and these potential sales as defined under CCPA law, Clients may do so by following the instructions below. Please note that any opt out is specific to the browser used and Clients may need to opt out on every browser used.

Website

Clients can opt out of receiving ads that are personalized as served by FreeThink's Service Providers by following instructions presented on the Services.

Mobile Devices

Mobile device may enable opting out of the use of information about the apps used:

- "Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices
- Changing preferences on mobile devices

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

FreeThink's Services do not respond to Do Not Track signals; however, some third party websites do keep track of browsing activities. When visiting such websites, Clients can set preferences in their web browsers to inform websites that they do not want to be tracked. Clients can enable or disable DNT by visiting the preferences or settings page of their web browsers.

Children's Privacy

FreeThink's Services do not address anyone under the age of 13. FreeThink does not knowingly collect personally identifiable information from anyone under the age of 13. If a parent or guardian becomes aware that a child has provided FreeThink with Personal Data, that person should contact FreeThink. If FreeThink becomes aware that FreeThink has collected Personal Data from anyone under the age of 13 without verification of parental consent, FreeThink will take steps to remove that information from its servers.

California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with FreeThink can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes. To request more information under the California Shine the Light law, and if a Client is a California resident, that Client can contact FreeThink using the contact information provided below.

California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code Section 22581 allows California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. To request removal of such data, as a California resident, Clients can contact FreeThink using the contact information provided below and include the email address associated with the Clients' account. It should be noted that the request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Links to Other Websites

FreeThink's Services may contain links to other websites that are not operated by FreeThink. If a Client clicks on a third party link, the Client will be directed to that third party's site. FreeThink advises Clients to review the Privacy Policy of every site visited. FreeThink has no control over and assumes no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

FreeThink may update its Privacy Policy from time to time with changes to this Privacy Policy being effective when posted. Clients are advised to review this Privacy Policy periodically for any changes.

Contact Us

If Clients have any questions about this Privacy Policy, Clients can contact FreeThink:

- By visiting this page on FreeThink's website: [WEBSITE_CONTACT_PAGE_URL]
- By sending FreeThink an email: [WEBSITE_CONTACT_EMAIL]