

## Privacy Policy

**Last Updated: May 19, 2023**

Welcome to Ready. Ready Management Solutions, together with its affiliates and related entities (collectively, “Ready,” “we,” “us,” or similar terms) offers information about our innovative business services, including tools such as our retail services chatbot powered by [OpenAI](#) (“Chatbot”), via our website located at [readyms.com](#) (collectively, including the Chatbot, the “Website”).

We understand the importance of your privacy and we take our responsibility to protect it seriously. This Privacy Policy (the “Policy”) describes the types of information we collect from you through your access and use of the Website, when you interact with us, or communicate with us, how we share the information, and certain rights and options you have regarding your information. Use of the Website is also subject to our Terms of Use.

By providing us with personal information or using the Website, you expressly consent to the information-handling practices described in this Policy. If you do not agree with this Policy, please do not use the Website or provide us with your information.

### Important Information About This Policy

While we always aim to provide complete and transparent information about how we process your personal information, we reserve the right to amend or update this Policy from time to time or to create additional policies in order to accurately reflect changed circumstances or new legal requirements. As a result, it is important that you read this Policy closely so that you are fully aware of how and why we are using your personal information.

To assist us in ensuring that we can provide the most accurate information possible, we ask that you check this Policy for updates. We also ask that where we have an ongoing relationship with you and any of the data you have provided becomes no longer accurate that you keep us informed of this so we can amend our records accordingly. By providing us with personal information or using our website, you expressly consent to the information-handling practices described in this Policy. If you do not agree with this Policy, please do not use our Website or provide us with your information.

### Personal Information We May Collect or Receive About You

For the purposes of this Policy, “personal information” is any information that identifies, relates to, or can be used to contact a particular individual. Because we are a business-to-business company, the types of personal information we collect are typically limited to the types of information contained in a business card—name, job title, business email, address, and phone number. The types of personal information we receive includes the following categories.

- **Contact information** – first name, last name, company email address, employment position, physical address for your company, billing address, and company telephone number.
- **Transactional information** – details about your company’s transactions with us, including method of payment, payments received, payment details, transaction history, and other information relating to the services purchased by your company.

- **Marketing information** – details regarding informational and promotional materials you may have requested or received from us, the services in which you are interested, your receipt of promotional communications, and information on your marketing or communication preferences.
- **Communication information** – copies of communications and inquiries you have submitted to us, including through email, calls, and features available on our Website, including text you transmit or upload to our Chatbot.
- **Device and usage information** – details regarding how and when you use our Website, including the device used to connect to our Website, your IP address and device identifier, the frequency and duration of your usage, the pages you view, what websites or search terms referred you to our Website, and information about your interaction with our Website.

We collect this information when you access, use, or navigate our Website, fill in forms on our Website, request information on our Website, communicate with us (including by phone, email, or otherwise), interact with our Chatbot or other features on our Website, visit or engage with our social media pages, participate in surveys or sponsored activities, or otherwise provide us with personal information.

Please note that we may aggregate or anonymize the foregoing types of data such that they are no longer capable of identifying you, in which case they are no longer considered “personal information.”

#### **Other Information We Collect From You**

Like most websites, we use various technologies to automatically collect the following types of information about you:

- **Cookies.** Cookies are small text files that a website transfers to a visitor’s device for recordkeeping purposes. We use cookies to personalize visitors’ experiences on our Website, provide content that we believe may be of interest, track visitor trends and patterns, engage in marketing and advertising, and otherwise analyze our Website traffic. For further information about cookies, including how to refuse cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that if cookies are disabled, you may not be able to enjoy certain features of our Website.
- **Log Files and Device Identifiers.** We use log files to track actions occurring on the website and mobile application and collect data about visitors, including IP address, browser type, Internet service provider, referring/exit pages, date/time stamps, and device identifiers.
- **Web beacons and other technologies.** Our Website may use other tracking tools, including web beacons (also known as clear gifs, pixel tags, and single-pixel gifs), which are small electronic images embedded in content and email messages that are not ordinarily visible to users. Web beacons allow us to track pages and content accessed and viewed by users, as well as to monitor email readership.
- **Analytics.** Our Website may also use third-party analytics tools, such as Google Analytics. You can find more information about how data is collected and processed in connection with the Google Analytics service [here](#). You can also read Google’s privacy policy [here](#).

The information collected through these technologies may be combined with personal information. We may share information about your use of our Website with our advertising and analytics partners, who may combine it with other information that you previously provided to them.

### **Information from Other Sources**

We may obtain both personal and non-personal information about you from affiliates, business partners, vendors, contractors, suppliers, and other third parties and add it to other information we have collected. We, and the third parties we engage, may combine information we collect from you over time, and across the Website, with information obtained from other sources. This helps us improve the information's overall accuracy and completeness, and also helps us better tailor our interactions with you.

### **Information from Social Media**

If you interact with us on any social media platform: (i) depending on your social media privacy settings, the personal information that you submit on the social media platform may be read, collected, or used by us as described in this Policy, and (ii) where we respond to any interaction with you on social media, your account name/handle may be viewable by any and all members or users of our social media accounts. Social media platforms operate independently from us and we are not responsible for the personal information that you choose to submit or link on any social media platform. We encourage you to review the privacy policies and settings of any social media platform with which you interact to help you understand their privacy practices.

### **How We Use Your Information**

We (or the service providers acting on our behalf) use the personal information identified above for the following purposes:

- Negotiating, entering into, and managing our business relationship and agreements with your company, including providing our products and services and processing payments from your company.
- Providing and optimizing your experience on our Website and ensuring that our content is presented to you in the most effective manner.
- Communicating with you and responding to your inquiries and communicating regarding our services, our agreements with your company, and other issues.
- Sending you promotional or informational communications and solicitations, tracking your marketing preferences, and for our internal marketing purposes.
- Managing customer service issues, including issues relating to the performance of our services and customer feedback.
- Developing, updating, and improving our services, customer service, and customer experience, and otherwise improving our knowledge and insights regarding customers.
- Preventing and detecting fraud, financial crime, hacking activities, security breaches, and other unlawful activities in connection with the Website or the purchase or use of our services.
- Enforcing our agreements with your company, complying with our legal or regulatory obligations, and defending or advancing legal claims.
- Notifying you about changes to our Website, services, or material changes to this Policy.
- Providing you with surveys or otherwise soliciting feedback from you.

- Performing other functions as otherwise described to you at the time of collection or to which you otherwise consent.

For more information about your options relating to your personal information and your communication preferences, see “Your Choices About Collection and Use of Your Information” below.

### **Our Marketing Efforts**

We may send you direct marketing communications from time to time including news, updates, offers, and other announcements relating to our services and business. We will only send marketing messages where the law allows us to do so and, in the event that you no longer wish to receive marketing communications from us, then you can always unsubscribe using the option provided in the communication you have received (e.g., in the footer of the email) or by contacting us using the information below.

### **Disclosure of Your Information**

When the information we collect is aggregated, anonymized, or otherwise does not identify you, it is no longer considered “personal information.” We may use such information for any purpose or disclose it to third parties, to the extent permitted by applicable law.

In addition, we may disclose your information to the following types of entities:

- Business partners, service providers, and third-party vendors necessary for the performance of any contract we enter into with you. For example, our IT providers, secure payment processing providers on the Website, customer contact center services, insurance providers, and document storage providers.
- Service providers we use to facilitate our business operations and administration. These third parties have access to your personal information only to perform specific tasks on our behalf and are obliged not to disclose or use it for any other purpose. For example, our service providers include (i) IT and system administration providers, (ii) data storage providers, and (iii) vendors to facilitate payments and payment processing.
- Marketing and advertising vendors that may assist with lead generation, hosting information relating to clients and potential clients, marketing automation, advertisement placement and targeting, and marketing campaigns and communications.
- Analytics vendors in order to understand our Website traffic and usage patterns, optimize our Website, and identify potential new clients.
- Regulatory and governmental authorities, law enforcement agencies, and courts, as necessary to comply with applicable laws and regulations, respond to a subpoena, search warrant, or other lawful request for information, or to otherwise protect our rights.
- Our professional advisors, such as lawyers, accountants, and other similar advisors.
- Buyers or other successors prior to or in the event of a merger, acquisition, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets,

whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, where the information is among the assets being transferred.

- Other parties for any purpose we disclose at the time you provide the information.

### **Protection of Personal Information**

We use appropriate administrative, technical, and physical measures to protect your personal information from loss, theft, and unauthorized use, disclosure, or modification. Please be aware that no data transmission over the Internet is 100% secure. While we strive to protect your personal information, we cannot ensure or warranty the security of any information you transmit to us and you do so at your own risk.

### **Your Choices About Collection and Use of Your Information**

We respect your right to make choices about the ways we collect, use, and disclose your information. We try to offer you meaningful choices regarding your personal information. Some choices you have regarding personal information include the following.

- **Marketing Emails** – As required by applicable laws, you can opt-out of receiving promotional emails from us by clicking the “opt out,” “unsubscribe,” or similar link in any such promotional emails and following the instructions provided.
- **Cookies** – Depending on your browser or device, you may have the option to set the browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies. Each browser and device are different, so we recommend you evaluate the tools and settings available in your browser or device, as well as any available instructions for the same. Please note that if you disable or delete cookies, you may not be able to access or use certain features of the Website.
- **Google Analytics** – As discussed above, we use Google Analytics in connection with the Website. If you would like to refrain from having your data collected by Google Analytics, Google has developed an opt-out browser that you can [use](#). You can find more information on how Google uses information it collects [here](#).
- **Declining to Provide Information** – You can choose not to provide us with information we may request through our Website, but that may result in you being unable to use certain features of our Website, request information about our services, apply for or fund Jobs, or initiate other transactions with us.
- **Do Not Track Mechanisms** – Please note that our Website does not honor “Do Not Track” signals, and such signals will not impact the operation of the Website.
- **Jurisdiction-specific Choices** – See below for additional choices that may be afforded to you under the laws of your place of residence, see our “Rights Afforded to Certain Individuals” section below.

In addition to the above, you may contact us using the details provided at the end of this Policy with any questions about the choices relating to your personal information.

## **Rights Afforded to Certain Individuals**

### ***A. California Residents***

California Civil Code § 1798.83 (California's Shine the Light Act) further permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, you may ask us to refrain from sharing your personal information with certain of our affiliates and other third parties for their direct marketing purposes. Please tell us your preference by contacting us at the contact information below.

### ***B. Canadian Residents***

If you reside in Canada, various Canadian laws, including Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"), may provide you certain rights with respect to your personal information, including the right to request information about the collection, use, or disclosure of your personal information, to request access to your personal information, and to challenge the accuracy and completeness of your personal information and have it amended as appropriate.

If you are a Canadian resident and would like to make a request regarding your personal information, please send a request to [info@readyms.com](mailto:info@readyms.com) with the subject line, "Canada Resident Request," or otherwise contact us using the information in the "How to Contact Us" section below. We will attempt to respond to your request as quickly as possible but may ask you to provide additional information to enable us to locate the personal information or determine how it has been used or disclosed. We will provide you access, as appropriate, at minimal or no cost to you.

### ***C. EU/UK Residents***

#### *1) Rights under GDPR*

The European Union's General Data Protection Regulation and the United Kingdom's version of the same (collectively, the "GDPR") afford certain rights to individuals in the European Economic Area ("EEA"). If you are in the EEA, you have the following rights. Note, however, that not all rights apply in all circumstances.

- **Right of access**: subject to certain exceptions, you have the right of access to your personal information that we hold. If you are requesting access to your data in order to protect the rights of others, we may require you to validate your identity before we can release that information to you
- **Right to rectify your personal information**: if you discover that the information, we hold about you is inaccurate or incomplete, you have the right to have this information rectified (i.e., corrected).
- **Right to be forgotten**: you may ask us to delete information we hold about you in certain circumstances. This right is not absolute, and it may not be possible for us to delete the information we hold about you, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.

- **Right to restriction of processing:** in some cases, you may have the right to have the processing of your personal information restricted. For example, where you contest the accuracy of your personal information, its use may be restricted until the accuracy is verified.
- **Right to object to processing:** you may object to the processing of your personal information (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal information for the purposes of direct marketing and for the purposes of statistical analysis.
- **Right to data portability:** you have the right to receive, move, copy, or transfer your personal information to another controller when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.

With regard to the personal information discussed in this Policy, we are typically the “data controller” for such information under the GDPR. As a result, if you wish to exercise one of the rights discussed above, you may do so by submitting a written request to [info@readyms.com](mailto:info@readyms.com) with the subject line, “GDPR Request.” This is normally free, unless this process is unduly difficult or is clearly unfounded, repetitive, or excessive, in which case we may charge a reasonable fee or decline to respond. Once we have received your request, we will review it and contact you within thirty (30) days of receipt of your request, will notify you of any delay in processing your request and, in any event, will respond to the request within three (3) months. Please note that we may need to request specific information from you to help us confirm your identity. If you are located in the EEA or UK and have a concern about our processing of your data, you may have the right to make a complaint to the appropriate data protection authority in the EEA or UK.

## 2) Lawful Basis under GDPR

We will process different types of information under different lawful bases under the GDPR depending on the nature of the information and your relationship with us. The following table describes how we plan to use your personal information and our lawful basis for doing so. We may process your personal information on more than one basis depending on the specific purpose for which we have collected or are otherwise using your information.

Purpose/Activity	Type of Information	Basis of Processing
<p>To enter into and subsequently to manage our business relationship with your company, including:</p> <ul style="list-style-type: none"> <li>• Negotiating, entering into, and performing agreements with your company</li> <li>• Responding to inquiries and providing customer support and service</li> <li>• Managing and processing transactions for our services</li> </ul>	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Transactional Information</li> <li>• Communications Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to manage our business relationships and administer our operations including through the keeping of appropriate records)</li> <li>• Performance of a contract with you</li> <li>• Necessary to comply with legal obligations</li> </ul>

<ul style="list-style-type: none"> <li>• Notifying you about changes to our website, business terms, or this Policy</li> <li>• Communicating with you and responding to your inquiries regarding our services, agreements with your company, and other issues</li> </ul>		
<p>To administer and protect our business and website including:</p> <ul style="list-style-type: none"> <li>• Maintaining business records for legal purposes and to comply with tax requirements</li> <li>• Defending and advancing legal claims</li> <li>• Enforcing our rights under any agreements</li> <li>• Ensuring effective security for our services and website</li> <li>• Conducting website maintenance</li> <li>• Identify and address security risks and unlawful activity</li> </ul>	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Transactional Information</li> <li>• Communications Information</li> <li>• Device and Usage Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (running our business, facilitating administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</li> <li>• Necessary to comply with legal obligations</li> </ul>
<p>To make decisions about how best to deliver relevant website content and advertisements to you, and otherwise market to you, and to better understand the effectiveness of our marketing efforts</p>	<ul style="list-style-type: none"> <li>• Marketing Information</li> <li>• Transactional Information</li> <li>• Communications Information</li> <li>• Device and Usage Information</li> </ul>	<p>Necessary for our legitimate interests (better understanding website functionality and how website users navigate and interact with the site)</p>
<p>To advance and promote our business interests including contacting you regarding products, services, or promotions that may be of interest to your company, conducting surveys or soliciting feedback on our services, and updating, developing, and improving our products/services,</p>	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Marketing Information</li> <li>• Transaction Information</li> <li>• Device and Usage Information</li> </ul>	<p>Necessary for our legitimate interests (to enhance our services, improve our marketing strategies and develop our business)</p>



customer service, and marketing efforts		
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### 3) *Transfers from EEA, Switzerland, or UK*

If we transfer personal information from the EEA, Switzerland, or UK to the United States or any other country, we will implement appropriate legal mechanisms to ensure an adequate level of personal data protection consistent with the GDPR's requirements. For example, if the recipient country has not received an Adequacy Decision from the European Commission (such as the United States), we will rely on Standard Contractual Clauses (SCC) that have been approved by the European Commission as the lawful mechanisms for such transfers. Further, we will enter into appropriate data processing agreements with all non-EU (sub)processors that contain SCCs and define data protection standards to be employed by each (sub)processor.

#### **D. Brazil Residents**

##### 1) *Rights under LGPD*

If you are a resident of, or otherwise located in, Brazil or any of its national territory, the General Personal Data Protection Law of Brazil, as amended ("LGPD") may afford you certain rights with respect to your personal information that is "processed" by us in our capacity as a "controller" (as those terms are defined by the LGPD), including the following:

- Right to obtain confirmation of the existence of the processing of your personal information by Ready.
- Right to obtain access to the personal information processed by Ready.
- Right to obtain correction of incomplete, inaccurate, or out-dated personal information.
- Right to obtain anonymization, blocking, or deletion of unnecessary or excessive personal information or personal information processed in noncompliance with the provisions of the LGPD.
- Right to obtain portability of the personal information processed by Ready to another service provider or product provider, by the means of an express request, in accordance with Brazil's regulations, and subject to commercial and industrial secrets.
- Right to obtain deletion of personal information processed with your consent, except when storage of the personal information is authorized by applicable law (e.g., in order for Ready to comply with its legal or regulatory obligations, or where use is exclusive to Ready and the personal information has been anonymized).
- Right to obtain information about entities with which Ready has shared your personal information.
- Right to obtain information about the possibility of denying consent for Ready to process your personal information and the consequences of such denial.
- Right to revoke consent at any time, by express request, through a facilitated and free of charge procedure, with processing carried under previously given consent remaining valid as long as there is no request for deletion.

If you wish to exercise one of the rights discussed above, you or your legally constituted representative, may do so by submitting an express written request to [info@readymys.com](mailto:info@readymys.com) with the subject line, "Brazil Resident Request." Please note that, consistent with the LGPD, we strive to adopt security, technical, and administrative measures to protect personal information from unauthorized access and accidental or unlawful situations of destruction, loss, or improper or unlawful processing. Such measures may result in us requesting specific information from you to help us confirm your identity, which may affect the timeliness of our response to your request.

You also have the right to petition, regarding your personal information, against us before the national authority responsible for supervising, implementing and monitoring compliance with the LGPD in Brazil.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

## *2) Purposes, Types and Duration of Processing and Sharing Activities*

We will process different types of information for different purposes under different lawful bases under the LGPD depending on the nature of the information and your relationship with us. We may process your personal information on more than one basis depending on the specific purpose for which we have collected or are otherwise using your information. We only process "sensitive personal information," as that term is defined by the LGPD, with your consent or to comply with our legal obligations.

The table in Section C(2) above ("Lawful Basis under GDPR") provides information concerning the specific purposes of the processing of your personal information and the lawful bases for processing your personal information under the LGPD.

We process your personal information by collecting, classifying, using, transmitting, distributing, storing, deleting, evaluating, controlling, modifying, communicating, transferring and disseminating the information as described in this Policy. We will process your personal information for as long as is necessary to fulfill the purposes for which it was collected or as required for us to comply with our legal obligations or contractual obligations with you.

Please refer to the "Disclosure of Your Information" portion of this Policy to learn more about the third parties with whom we share your personal information and the purposes for such sharing. Processing agents (as defined by the LGPD) with whom we share your information are bound by contracts or conditions of engagement that require care be taken by the agent with respect to the processing of your personal information and/or that such processing be at our direction and according to our instructions.

## *3) International Transfers*

If we transfer personal information from Brazil to the United States or any other country, we will implement appropriate legal mechanisms to ensure an adequate level of personal data protection consistent with the LGPD's requirements. For example, we may transfer to countries that provide a level

of protection of personal information that is similar to the protections afforded under the LGPD, or we may guarantee compliance with the LGPD through the use of standard contractual clauses.

### **Links to Third-Party Websites**

Our Website may contain links to third-party websites. Such websites have separate privacy policies that you should review. We cannot take responsibility for the content of linked websites or those companies' data-handling practices.

### **Children's Privacy**

Our Website is a general audience website and is not directed at children under the age of 16. Accordingly, we do not knowingly collect personal information from children under age 16 through the Website. Should we discover that a child under age 16 provided us with personal information, we will use that information only to inform the child that we must have parental consent before receiving such information.

### **International Transfers**

Ready is headquartered in the United States and, as a result, the information you provide to us may reside on servers or workstations located the United States. You understand and consent that information you provide may be transferred to the United States. You also understand that the data protection laws in the United States may be different from those of the country where you reside. When we transfer personal information to the United States, we will implement appropriate and suitable safeguards to protect such information as may be required by applicable data protection laws.

### **Data Retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or other mandatory reporting requirements. To determine the appropriate retention period we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements. We also consider any specific limitation periods under applicable law.

### **Changes to this Policy**

Please note that we may change this Policy from time to time. If there are changes to our Policy, we will post them here and update the "Last Updated" date at the top of this document. Continued use of this Website after any changes is deemed to be acceptance of those changes. Accordingly, we encourage you to check the Policy periodically for updates.

### **How to Contact Us**

For questions or more information about our privacy practices, or to raise any challenges or concerns, please contact us by e-mail at [info@readym.com](mailto:info@readym.com) or by using the contact information provided below:

### **Ready Management Solutions**

**Phone: 515-388-2800**

Email: [info@readyms.com](mailto:info@readyms.com)