

While SAPIT Corporation ("SAPIT") uses encryption to protect sensitive information transmitted online, SAPIT also protects your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which SAPIT stores personally identifiable information are kept in a secure environment.

## Privacy Policy

Effective date: 01 October 2020

SAPIT ("us", "we", or "our") operates the [HTTPS://WWW.SAPITCORP.COM](https://www.sapitcorp.com) website (hereinafter referred to as the "Service").

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

SAPIT is committed to your privacy and the protection of your Personal Data. Personal Data is defined herein as any information that can be used to identify a particular individual under applicable data protection laws, including the General Data Protection Regulation ("GDPR") (EU) (2016/679), California Consumer Privacy Act of 2018 etc. (collectively, "Data Protection Laws). This Privacy Statement describes our privacy practices as required by Data Protection Laws. This Privacy Statement applies where SAPIT is acting as a data Controller with respect to the Personal Data of our customers, partners, resellers, suppliers and website users; in other words, where we determine the purposes and means of the processing of Personal Data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

## Definitions

1. **Service** - Service is the [HTTPS://WWW.SAPITCORP.COM](https://www.sapitcorp.com) website operated by SAPIT.
2. **Personal Data** - Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
3. **Usage Data** - Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
4. **Cookies** - Cookies are small files stored on your device (computer or mobile device).
5. **Data Controller** - Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.
6. **Data Processors (or Service Providers)** - Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
7. **Data Subject (or User)** - Data Subject is any living individual who is using our Service and is the subject of Personal Data.

## Information Collection and Use

### Types of Data Collected

## ***Personal Data***

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email Address
- First Name and Last Name
- Phone Number
- Address, State, Province, ZIP/Postal Code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

## ***Usage Data***

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## ***Tracking Cookies Data***

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

## ***Use of Data***

SAPIT uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service

- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## **Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)**

If you are from the European Economic Area (EEA), SAPIT legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

SAPIT may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- For payment processing purposes
- To comply with the law

## **Retention of Data**

SAPIT will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

SAPIT will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

## **Transfer of Data**

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

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

## **Disclosure of Data**

### **Disclosure for Law Enforcement**

Under certain circumstances, SAPIT may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## Legal Requirements

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

- To comply with a legal obligation
- To protect and defend the rights or property of SAPIT
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA)

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

If you feel that SAPIT is not abiding by this privacy policy, you should contact us immediately.

## Your Data Protection Rights under the General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. SAPIT aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where SAPIT relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

For more information, please contact your local data protection authority in the European Economic Area (EEA).

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

### Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

## Behavioral Remarketing

SAPIT uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

### Google Ads (AdWords)

Google Ads (AdWords) remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads> Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

### Bing Ads Remarketing

Bing Ads remarketing service is provided by Microsoft Inc. You can opt-out of Bing Ads interest-based ads by following their instructions: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalizedads>. You can learn more about the privacy practices and policies of Microsoft by visiting their Privacy Policy page: <https://privacy.microsoft.com/en-us/PrivacyStatement>

## **Facebook**

Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this

page: <https://www.facebook.com/help/164968693837950> To opt-out from Facebook's interest-based ads, follow these instructions from

Facebook: <https://www.facebook.com/help/568137493302217> Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or optout using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

## **Payments & Fraud Mitigation**

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. 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.

The payment processors & fraud mitigation service providers we work with are:

### **Chase**

Their Privacy Policy can be viewed at <https://www.chase.com/digital/resources/privacy-security>

### **Dun and Bradstreet**

Their Privacy Policy can be viewed at <https://www.dnb.com/utility-pages/privacy-policy.html>

### **Elavon**

Their Privacy Policy can be viewed at <https://www.elavon.com/privacy-pledge.html>

### **Forter**

Their Privacy Policy can be viewed at <https://www.forter.com/service-privacy-policy/>

### **Intuit**

Their Privacy Policy can be viewed at <https://www.intuit.com/privacy/>

### **PayPal**

Their Privacy Policy can be viewed at <https://www.paypal.com/webapps/mpp/ua/privacy-full>

### **Stripe**

Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>

### **Wix**

Their Privacy Policy can be viewed at <https://www.wix.com/about/privacy>

## **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **California Consumer Privacy Act Notice**

Effective Date: 01 January 2020

Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), SAPIT in scope of the CCPA ("us", "we", or "our") is providing this California Consumer Privacy Act Notice ("CCPA Notice"). This CCPA Notice supplements our Privacy Policy and applies solely to California consumers, effective 01 January 2020. Terms used but not defined shall have the meaning ascribed to them in the CCPA.

Subject to certain limits under the California Civil Code, if you are a California resident, you have the right to submit certain requests relating to your personal information as outlined below.

Categories of personally identifying information that we collect include the following: name, postal address, email address, phone number, and purchase history, including specific items you have purchased; browsing history and search history, including your IP address, and interactions with electronic communications; preference data that you have shared, or that we have derived from your purchase and browsing history

In addition to the above, we may use information for any purpose if the information does not identify you and cannot be combined with other information accessible to us to identify you.

We do not sell your personal information to third parties. We may, however, share your personal information with third-party service providers in accordance with the business purposes set out in this Privacy Policy.

## **Specific Rights**

California residents are entitled to (1) request more information regarding the categories and specific pieces of personal information we collect; and (2) request the deletion of their personal information. Our policies with respect to each of these rights are discussed below. This section also states our policy on the verification of identity for purposes of requests for more information or deletion of information, which is required under law.

## **Right to Request More Information**

You may request more information regarding the following, to the extent applicable:

- (A) The categories of personal information we have collected about you
- (B) The categories of sources from which we have collected your personal information
- (C) The business or commercial purpose why we collected your personal information
- (D) The categories of third parties with whom we shared your personal information in the past 12 months
- (E) The specific pieces of personal information we have collected about you

- (F) The categories of personal information that we have shared with third parties about you for a business purpose
- (G) A list of all third parties to which we have disclosed your personal information (as defined under California Civil Code Section 1798.83(e)) during the preceding year for third-party direct marketing purposes

You may submit a request for the information above by using the contact page on our web site <https://www.sapitcorp.com/contact-us>. In connection with the submission of your request, we will take steps to verify your identity as outlined below, and you will need to verify your identity before action is taken.

Please note that due to the different requirements of the applicable laws, our response times may vary depending on the specific type(s) of information sought. We respond to all verifiable requests for information as soon as we reasonably can and no later than legally required.

### **Right to Request Deletion of Your Personal Information**

Upon your request and confirmation of your identity, we will let you know what, if any, personal information we can delete from our records, and we will direct any service providers with whom we shared your personal information also to delete your personal information from their records. There may be circumstances where we (or our service providers) cannot delete your personal information. For example, if we need to: (A) retain your personal information to complete a transaction or provide goods or services; (B) detect security incidents; (C) protect against unlawful activities; (D) identify, debug or repair errors; (E) comply with a legal obligation (for example to comply with warranty return obligations) or (F) to document activities and communications with you, including any specific request related to this policy.

You may submit a request to delete your personal information by using the contact form on our web site <https://www.sapitcorp.com/contact-us>.

### **Verification of Requests for Further Information or to Delete Information**

Upon submission of a request for information or a request to delete information, we will take reasonable steps to confirm that the person submitting the request to know or request to delete is the person to whom the information relates, and to prevent unauthorized access or deletion of information. The specific steps taken to verify the identity of the requesting person may vary based on the nature of the request, including the type, sensitivity and value of the information requested, the risk of harm posed by unauthorized access or deletion, the likelihood that fraudulent or malicious actors may seek the information, the robustness of personal information provided to verify your identity, the nature of our business relationship with you, and available technology for verification.

We will generally try to avoid requesting additional information from you for the purpose of verification, but we may need to do so if we cannot verify your identity based on the information already maintained by us. If we request additional information to verify your identity, it will be for that purpose only, and will be deleted as soon as practical after processing the request, except as otherwise provided by law.

The following generally describes the verification processes we use:

- **Password Protected Accounts.** If you have a password-protected account with us, we may use existing authentication practices to verify your identity but will require re-authentication before disclosing or deleting data. If we suspect fraudulent or malicious

activity relating to your account, we will require further verification (as described below) before complying with a request to know or delete.

- **Verification for Non-Account holders.** If you do not have, or cannot access, a password-protected account with us, we will generally verify your identity as follows:
  - For **requests to known categories of personal information**, we will verify your identity to a reasonable degree of certainty by matching at least two data points provided by you with reliable data points maintained by us.
  - For **requests to know specific pieces of personal information**, we will verify your identity to a reasonably high degree of certainty by matching at least three data points provided by you with reliable data points maintained by us. We will also require a declaration, signed under penalty of perjury, that the person requesting the information is the person whose information is the subject of the request. We will maintain all signed declarations as part of our records.
  - For **requests to delete personal information**, we will verify your identity to a reasonable degree or a reasonably high degree of certainty depending on the sensitivity of the personal information and the risk of harm posed by unauthorized deletion. We will act in good faith when determining the appropriate standard to apply.
- **Verification by Authorized Agent.** You may designate an authorized agent to make the requests below on your behalf. An authorized agent must submit proof to us that he or she has been authorized by you to act on your behalf, and you will need to verify your identity directly with us through the process described below.

If there is no reasonable method by which we can verify your identity, we will state so in response to a request to know or delete personal information, including an explanation of why we have no reasonable method to verify your identity.

### **Right to Non-Discrimination for the Exercise of Your California Privacy Rights**

If you choose to exercise any of the privacy rights conferred by the California Consumer Privacy Act of 2018, you also have the right not to receive discriminatory treatment by us. This means that, consistent with California law, we will not deny providing goods or services to you, charge you different prices or provide a different level or quality of goods and services to you unless those differences are related to the value of your personal information.

### **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contacting Customer Service**

If you have any questions about this Privacy Policy, please contact us

- By visiting this page on our website: <https://www.sapitcorp.com/contact-us>