Workgroups DaVinci, Inc. Privacy Policy

We at Workgroups DaVinci, Inc., (“Workgroups,” “we,” or “our”) are committed to protecting your privacy. This Privacy Policy applies to our websites (including workgroups.com and workgroups.io) (“Websites”) and our online workflow automation and creative collaboration tools that we make available as a subscription service (the “Subscription Service”) to our customers. This Privacy Policy governs our data collection, storage, processing, retention, and usage practices. It also describes your choices regarding use, access, and correction of your personal information. If you do not agree with the practices described in this Privacy Policy, you should not use the Websites or the Subscription Service.

1. Information We Collect

Personal Information

In connection with your use of the Websites and Subscription Service, we may collect Personal Information from you. “Personal Information” refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail
address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you enter into on the Websites, and information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or publicly available information that we acquire from service providers.

Personal Information also includes Navigational Information and Payment Information where such information can directly or indirectly identify an individual. “Navigational information” refers to information about your computer and your visits to this website such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed. We collect and process payment information from you when you subscribe to the Subscription Service, including credit cards numbers and billing information, using third party PCI-compliant service providers (“Payment Information”).

Sensitive Information

“Sensitive Information” refers to credit or debit card numbers, personal financial account information, Social Security numbers, passport numbers, driver's license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other employment, financial or health information. Except for the Payment Information mentioned above, we do not collect Sensitive Information from you.

Log Files

When you visit the Websites or use the Subscription Service we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and
referring website addresses. This information is used by Workgroups DaVinci for the operation of the Subscription Service, to maintain quality of the Subscription Service, and to provide general statistics regarding use of the Websites. For these purposes, we do link this automatically-collected data to Personal Information such as name, email address, address, and phone number.

**Information we collect from third parties**

From time to time, we may receive Personal Information about you from third party sources including partners with which we offer co-branded services or engage in joint marketing activities, and publicly available sources such as social media websites.

**Information About Children**

The Websites are not intended for or targeted at children under 16, and we do not knowingly or intentionally collect information about children under 16. If you believe that we have collected information about a child under 16, please contact us at legal@Workgroups DaVinci-comm.com, so that we may delete the information.

**2. How We Use Information We Collect**

We use the information we collect only in compliance with this Privacy Policy. We will never sell your Personal Information to any third party.

**Use of Personal Information**

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to:

- improve your browsing experience by personalizing the Websites and to improve the Subscription Service;

Privacy Policy Version: 24 Feb 2020
• send information or Workgroups DaVinci content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business;

• promote use of our services to you and share promotional and information content with you in accordance with your communication preferences;

• provide other companies with statistical information about our users -- but this information will not be used to identify any individual user;

• send information to you regarding changes to our Subscription Service Terms of Service, Privacy Policy, or other legal agreements

• meet legal requirements.

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your Personal Information to the third party.

We use the information collected through our Subscription Service by our customers for the following purposes:

• to provide the Subscription Service (which may include the detection, prevention and resolution of security and technical issues);

• to respond to customer support requests; and

• otherwise to fulfill the obligations under the Workgroups DaVinci Subscription Service Terms of Service.

Legal basis for processing Personal Information (EEA visitors only)

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we

Privacy Policy Version: 24 Feb 2020
will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

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). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

Use of Navigational Information

We use Navigational Information to operate and improve the Websites and the Subscription Service. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized information about Workgroups DaVinci.

Customer Testimonials and Comments

We post customer testimonials and comments on our Websites, which may contain Personal Information. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

Use of Credit Card Information

If you give us credit card information, we use it solely to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is PCI compliant and will only store data required to process
authorized payments on our behalf and retain required data to allow it to comply with financial or auditing purposes.

**Security of your Personal Information**

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Information is protected using appropriate physical, technical and organizational measures.

**Social Media Features**

Our Websites may include social media features, such as the Facebook Like button (“Social Media Features”) and widgets, such as the Share This button or other interactive mini-programs that run on our sites (“Widgets”). These elements may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the element to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Websites. This Privacy Policy does not apply to these elements. Your interactions with these elements are governed by the privacy policy and other policies of the companies providing them.

**External Websites**

Our Websites provide links to other websites. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

Privacy Policy Version: 24 Feb 2020
Public Forums

We offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you directly disclose any information through our public message boards, blogs, or forums, this information may be collected and used by others. We will correct or delete any information you have posted on the Websites if you so request, as described in "Opting Out and Unsubscribing" below.

Retention of Personal Information

How long we keep information we collect about you depends on the type of information, as described in further detail below.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so (for example, as long as is required in order to contact you about the Subscription Service or our other services, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Information, we securely delete the information or anonymise it or, if this is not possible, then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request, as described in "To Unsubscribe from Our Communications" below.

If you provide information to our customers as part of their use of the Subscription Service, our customers decide how long to retain the personal information they collect from you. If a customer terminates its use of the Subscription Service, then we will provide customer with access to all information stored for the customer by the Subscription Service, including any Personal Information provided by you, for export by the customer according to our agreement.

Privacy Policy Version: 24 Feb 2020
with our customer. After termination, we may, unless legally prohibited, delete all customer
information, including your Personal Information, from the Subscription Service.

If you have elected to receive marketing communications from us, we retain information about
your marketing preferences for a reasonable period of time from the date you last expressed
interest in our content, products, or services, such as when you last opened an email from us or
ceased using your Workgroups DaVinci account. We retain information derived from cookies
and other tracking technologies for a reasonable period of time from the date such information
was created.

3. How We Share Information We Collect

Service Providers

We employ other companies and people to provide services to visitors to our Websites, our
customers, and users of the Subscription Service and may need to share your information with
them to provide information, products or services to you. Examples may include removing
repetitive information from prospect lists, analyzing data or performing statistical analysis,
providing marketing assistance, processing credit card payments, supplementing the
information you provide us in order to provide you with better service, and providing hosting and
customer service or support. In all cases where we share your information with such agents, we
explicitly require the agent to acknowledge and adhere to privacy and customer data handling
policies that are consistent with our Privacy Policy.

Workgroups DaVinci Partners

In addition, we may share data with trusted partners to contact you based on your request to
receive such communications, help us perform statistical analysis, or provide customer support.
Such third parties are prohibited from using your Personal Information except for these
purposes, and they are required to maintain the confidentiality of your information.

Privacy Policy Version: 24 Feb 2020
We partner with trusted third parties to provide you with co-marketing content that we think may be relevant to you. When you engage with these co-marketing partners, we will tell you who we are sharing data with, and provide a link to the co-marketing partner’s privacy policy so you can learn more about how to opt-out of the partner’s communications. These co-marketing partners are required to adhere to our privacy and data protection policies.

**Corporate Events**

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Workgroups DaVinci on the Websites and the Subscription Service. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.

**Compelled Disclosure**

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

**4. Cookies and Similar Technologies**

Meta and its partners use cookies or similar technologies (such as web beacons) to analyze trends, administer the Websites, track users’ movements around the Websites, and to gather demographic information about our user base as a whole.

A cookie is a small software file stored temporarily or placed on your computer’s hard drive. The main purpose of cookie is to allow a web server to identify a user’s computer and web browser,
and tailor web pages and/or login information to user’s preferences. Cookies help us promptly display the information needed to use the capabilities on the Websites and Subscription Service and other information which we consider to be of interest to visitors to the Websites and users of the Subscription Service. By gathering and remembering information about website preferences through cookies, we can provide a better web and marketing experience. Cookies don’t give us access to users’ computers, and the information we collect through cookies doesn’t include Personal Information.

Many jurisdictions require or recommend that website operators inform users as to the nature of cookies they utilize and, in certain circumstances, obtain the consent of their users to the placement of certain cookies. If you require more specific information as to the nature of the cookies utilized in the Service for purposes of fulfilling these obligations, please contact us by email at legal@workgroups.com.

**Single Sign-On**

You can log in to our site using a Single Sign-on (SSO) service like your Google account. This service will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign up form. Such services may give you the option to post information about your activities on this Website to your profile page to share with others within your network.
Do Not Track Requests

We do not respond to browser “Do Not Track” requests.

5. How to Access & Control Your Personal Data

Reviewing, Correcting and Removing Your Personal Information

You have the following data protection rights:

- You can request access, correction, updates or deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information.

To exercise any of these rights, please contact us at legal@workgroups.com or by mail to Workgroups DaVinci, Inc., 666 Walnut Street, Suite 1280, Des Moines, IA 50309 USA, Attention: Legal. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our emails, updating your communication preferences, or by sending
us email us at legal@workgroups.com or postal mail to Workgroups DaVinci, Inc., 666 Walnut Street, Suite 1280, Des Moines, IA 50309 USA, Attention: Legal. Customers cannot opt out of receiving transactional emails related to their account with us or the Subscription Service.

6. Changes to This Policy

We periodically update this Privacy Policy. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by sending you an email notification, or if you subscribe to the Subscription Service, through the notification app in your Workgroups DaVinci portal at workgroups.io.

While we will notify you of any material changes to this Privacy Policy, we encourage you to review this Privacy Policy periodically. We will also keep prior versions of this Privacy Policy in an archive for your review.

7. Contacting Us

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please write to us by email at legal@workgroups.com or by mail to Workgroups DaVinci, Inc., 666 Walnut Street, Suite 1280., Des Moines, IA 50309 USA, Attn: Legal.