

# **Privacy Policy**

## **The Small Print**

We respect your concerns about privacy and value the relationship we have with you. This Privacy Notice describes the types of personal information we may collect on our website, how we may use that information, with whom we may share it, and the measures we take to protect the security of the information. In addition, we describe the choices you can make about how we use the information you provide to us. We also provide you direction on how you can reach us to update certain information you've given us, ask us not to send you future communications, or answer any questions you may have about our privacy practices.

This Privacy Notice applies only to information we collect on our website and through your interaction with our website. This Privacy Notice does not apply to any other website, service, product, or application operated or provided by us or a third party.

## **Information We Collect and How We Use It**

You may choose to provide personal information (such as your name, address, telephone number and e-mail address) on this website, and we may collect personal information about you when you visit or use this website. This privacy notice summarizes the ways you may provide the information, the types of information you may submit, and the information we may collect from you when you visit or use this website. We also tell you how we may use the information.

## **Contact Us**

You may choose to contact us through our website. If you e-mail us via the "Contact Us" link on this site, we ask you for information such as name and e-mail address so we can respond to your questions and comments. You may choose to provide additional information and we use the information you provide to respond to your inquiries.

## **Use of Website**

When you visit our website, we collect information from you through automated means. This includes, in particular, your internet protocol (IP) address, device information, browser information, and details on your usage of our website, so we can determine whether you are a repeat visitor to our website.

## **Information We Share**

We do not sell, rent, trade or otherwise disclose personal information about our website visitors, except as described here. We share information about our website visitors with service providers we have retained to perform services on our behalf, such as website hosting, customer service, and information technology services. These service providers are not authorized by us to use or disclose the information, except as necessary to perform services on our behalf or to comply with legal requirements. We also may share information about you with other members of our corporate family. In addition, we may disclose information about you (i) if we are required to do so by law, (ii) in response to a request from law enforcement authorities or other government officials, (iii) when we believe disclosure is necessary

or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity, or (iv) to exercise our legal rights or defend against legal claims.

We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to try to direct the transferee to use personal information you have provided through this website in a manner that is consistent with this Privacy Notice.

## **Links to Other Sites**

We may provide links to other websites for your convenience and information. These sites operate independently from our site and are not under our control. These sites may have their own privacy notices in place, which we strongly suggest you review if you visit any linked websites. We are not responsible for the content of these sites, any products or services that may be offered through these sites, or any other use of these sites.

## **Security**

We maintain administrative, technical and physical safeguards designed to protect against unauthorized disclosure, use, alteration or destruction of the personal information we have about you. When you provide credit card information to make a purchase, we use the industry standard for Internet security -- Secure Socket Layer (SSL) technology -- to help protect the information you provide. This Internet encryption standard scrambles data as it travels from your computer to our server. Please note, however, that perfect security does not exist on the Internet. You'll know that you're in a secure area of our website when a "lock" icon appears on your screen and the "http" portion of our URL address changes to "https." The "s" stands for "secure."

## **Your Choices**

If you would like to update your contact information or prefer not to receive certain communications from us (such as e-mail), please call us or write us using one of the options provided below.

## **Updates to this Privacy Notice**

We may update or change this Privacy Notice from time to time and without prior notice to you. We will post a prominent notice on this site to notify you of any significant changes to our Privacy Notice and indicate below when it was most recently updated.

## **How to Contact Us**

If you have any questions or comments about this Privacy Notice, or if you would like us to update certain information you have provided to us or your communication preferences, contact us by:

calling us at:

833-774-8223

writing us at:

InComm Privacy

250 Williams Street 5th Floor  
Atlanta, GA 30303

## **Last Update**

This notice was last updated on October 23, 2019 (the “Last Update”).

## **Additional Notice for California Consumers**

This portion of our Privacy Notice applies to California consumers only. Most visitors to our website are representatives of businesses seeking to interact with us as part of their jobs. This Notice does not apply to information that we collect through these business-to-business interactions.

### **Personal Information Collected on California Consumers, Sources of Collection, and Business Purposes for Collection for the Last Twelve Months**

We collect information from users of our website, as further described above in “Information we collect and how we use it,” when users visit and use our website. The personal information we have obtained on California residents includes the following:

- Identifiers such as name, postal and email addresses, internet protocol (IP) address, and other contact information when you submit your name and email address to learn more about InComm products and services.
- The following categories of personal information described in California Civil Code § 1798.80(e): (1) the personal information listed in the preceding bullet point as “identifiers,” (2) the other information that identifies, relates to, describes, or is capable of being associated with, a particular individual that we describe in “Information we collect and how we use it” above.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site.
- Geolocation data.

### **Disclosures of Personal Information on California Consumers for Business Purposes for the Last Twelve Months**

We have disclosed the categories of personal information identified in this Additional Notice to service providers for various business purposes as specified below. For more information on the service providers with whom we share information, please see “Information we Share” above.

### **No Sales of Personal information for the Last Twelve Months**

InComm has not sold any personal information described in this Privacy Notice to third parties within the previous twelve (12) months and will not sell personal information.

### **Business Purposes for Collecting Personal Information for the Last Twelve Months**

We collected the personal information identified in this Additional Notice for the following business purposes:

- Detecting and protecting against security incidents, and malicious, deceptive, fraudulent or illegal activity, and prosecuting the same;
- Debugging to identify and repair errors in our systems; and
- Undertaking activities to verify, maintain, and enhance the quality or safety of services we own, control, or provide.

## Your California Privacy Rights

If you are a California resident, you have the following rights for purposes of the personal information covered by this Privacy Notice.

- **Right to Know About Personal Information Collected, Disclosed, or Sold and Right to Access.** You have the right to request that we disclose the following information about your personal information we collect, use, and disclose:
  - the categories of personal information we have collected about you;
  - the categories of sources from which the personal information is collected;
  - our business or commercial purpose for collecting or selling personal information;
  - the categories of third parties with whom we share personal information; and
  - the specific pieces of information we have collected about you.
  - if any, the categories of personal information about you that we have sold, by category or categories of personal information for each third party to which we sold the personal information; and
  - the categories of personal information about you that we disclosed for a business purpose.
- **Right to Deletion of Personal Information.** You have the right to request deletion of your personal information we collected from you.
- **Right to Non-Discrimination for Exercise of a California Privacy Rights.** We may not discriminate against you because of your exercise of any of the foregoing rights, or any other rights under the California Consumer Privacy Act, including by:
  - Denying you goods or services;
  - Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
  - Providing you a different level or quality of goods or services; or
  - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

We may, however, charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to InComm by your personal information.

## How to Exercise Your California Rights; How We May Verify Your Request

You may request the rights listed above by:

calling us at:

833-774-8223

writing us at:

InComm Privacy 250 Williams Street

5th Floor Atlanta, GA

30303

using the webform available at [this link](https://privacyportal-cdn.onetrust.com/dsarwebform/ea5d3546-de9d-4d3d-b30f-0f1f288cdf74/680df056-ef17-4cf7-922b-4f8b6de48b2c.html). (https://privacyportal-cdn.onetrust.com/dsarwebform/ea5d3546-de9d-4d3d-b30f-0f1f288cdf74/680df056-ef17-4cf7-922b-4f8b6de48b2c.html)

When you make a request, we may take steps to verify your identity before responding to your request. In order to verify your identity with respect to the non-sensitive data that is subject to this notice, we will ask you to confirm your email address by sending you an email, or if your request is made via telephone call or via letter, we will ask you to verify your identity by confirming your email, account or asking questions about the scope of your interaction with us. We reserve the right to take additional steps to verify your identity using other information we have about you.

You may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. As permitted by law, we may take steps to verify your own identity in response to a request even if you choose to use an agent.

### **Accessibility**

To access this Privacy Notice by an alternative method, please contact us at 833-774-8223.