

PRIVACY POLICY

This is the privacy policy (“**Privacy Policy**”) that governs how Macorva, Inc. and our affiliated companies (“**Macorva**”, “**we**”, “**our**” or “**us**”), use Personal Data (defined below) that we process in connection with your use of our (i) website: <https://www.macorva.com/> and any other website that links to this **Privacy Policy** (each, together with its sub-domains, content, and services, a “**Site**”); (ii) our widgets, tools, software, API’s and other services that we provide (collectively, our “**Technology**”); and (iii) our mobile applications (collectively, our “**Apps**”) (the Service together with our Software and Apps, collectively, our “**Service**”).

You may choose whether or not to provide or disclose Personal Data in connection with your use of our Service. If you choose not to provide the Personal Data we request, you may still visit and use parts of our Service, but may be unable to access or use certain features, options, programs, and services. Our Service may contain links to third-party websites and services that are not owned or controlled by Macorva. We are not responsible for the privacy practices or the content of third party websites, services and advertisements, and you visit them at your own risk.

1. INTRODUCTION.

We are committed to respecting privacy and recognize the need for appropriate protection and management of any Personal Data that is shared with us as part of using our Service. As used in this Privacy Policy, “**Personal Data**” means any information that may be used, either alone or in combination with other information, to personally identify an individual. We and our service providers collect the Personal Data set forth below in order to provide our Service to you, or because we are legally required to do so. You may choose whether or not to provide or disclose Personal Data in connection with your use of our Service. If you choose not to provide the Personal Data we request, you may still visit and use parts of our Service, but may be unable to access or use certain features, options, programs, products, and services.

Our Service may contain links to third-party websites, products, services, and advertisements that are not owned or controlled by Macorva. We are not responsible for the privacy practices or the content of those third party websites, products, services, and advertisements, and you visit them at your own risk.

2. CATEGORIES OF PERSONAL DATA WE COLLECT.

We and our service providers may collect, and you may consent to provide, the categories of Personal Data set forth below in order to provide our Service to you, or because we are legally required to do so:

- Your name;
- Email address;
- Salary;
- Date of birth;
- Phone number;

- Payment information;
- Profile picture;
- User name;
- Password;
- Work address; and
- Communications you send to us.

3. WHEN PERSONAL DATA IS COLLECTED.

You may be required to provide us with certain information that may constitute Personal Data in the following ways:

a. Contact Information.

In various areas of our Service and in printed materials, we provide you the opportunity to submit a form with basic contact information, such as your name, email, or mailing address. With your permission, Macorva uses such information to inform you of new products, technical information and services, and upcoming events that may be of interest. If you no longer wish to receive these emails, the opt-out process is described in Section 10 of this Privacy Policy. In addition, if you choose, you may participate in a Macorva e-mail list server by subscribing within our Service or by contacting Macorva staff directly. You may unsubscribe from these e-mail list servers by following the unsubscribe instructions found within the list email.

b. Member Login Information.

We process your username and password to enable you to securely log into our Service, and we process information regarding your role with Macorva to appropriately control access to restricted content. We process this Personal Data only as necessary to provide you services on our Service under our Terms of Use: <https://www.macorva.com/terms-of-use> and to further our legitimate interests in protecting our Service and content.

c. Payment Information.

When you purchase a subscription to our Service, third-party service providers acting on our behalf process payment information, including payment card details and billing addresses, to help us fulfill your purchase. Any Personal Data collected by such third parties will be subject to the third parties' privacy policy, rather than this Privacy Policy.

d. Information Collected Through Various Forms.

We and our service providers may collect Personal Data in a variety of ways, including: (i) through use of our Service, e.g., when you sign up for a newsletter, submit information through a “contact us”, “get a quote”, or “request a demo” form, or submit a survey, report, or other user rating content; (ii) offline, such as when you attend one of our events

or through a sales visit or call; or (iii) from other sources, such as public databases, joint marketing partners, social media platforms.

e. Document Submissions.

Our Service may allow users to upload documents relating to their employment. If you choose to submit documents of this nature, you may disclose certain Personal Data through our Service as a product of your submission. Macorva uses commercially reasonable efforts to ensure the appropriate administrative, physical, and technical safeguards are in place as it relates to the Personal Data you provide through our Service as part of any document submission.

f. Social Media.

We have worked with certain third-party social media providers to offer you their social networking services through our Service. For example, you can use third-party social networking services to share information about your experience on our Service with your friends and followers on those social networking services. These social networking services may be able to collect information about you, including your activity on our Service. Third-party social networking services also may notify your friends, both on our Service and on the social networking services themselves, that you are a user of our Service or about your use of our Service, in accordance with applicable law and their own privacy policies. If you choose to access or make use of third-party social networking services, we may receive information about you that you have made available to those social networking services, including information about your contacts on those social networking services.

g. Personal Data You Disclose Relating to Others.

If you disclose any Personal Data relating to other people to us or to our service providers in connection with our Service, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

4. PERSONAL DATA COLLECTED FROM YOUR EMPLOYER.

We make our Service available at an enterprise level for company customers (our “**Customers**”). If your employer is our Customer, your employer may provide us certain Personal Data that you have disclosed over the course of your employment relationship. Macorva processes Personal Data it receives from Customers to efficiently onboard employees and to make our Services more meaningful for you. The categories of Personal Data we receive depend on the nature of the relationship between Macorva and our Customer, but generally include the categories of Personal Data included in Section 1 of this Privacy Policy. Your employer may also provide us information that, standing alone, does not constitute Personal Data, such as your employment start date, job performance metrics, or internal employee performance ratings. Please see your employer’s handbook, privacy notice, or other supplemental privacy documentation for information addressing your employer’s Personal Data disclosure practices.

5. PERSONAL DATA YOU PROVIDE TO THIRD PARTIES ON OUR SERVICE.

Please note that we use certain third party service providers on our Service to enhance your experience or deliver certain services. These providers may collect Personal Data about you in performing their services and/or functions on our Service. We use the following categories of service providers to perform the functions specified below:

Category of Third Party	Description
Web Analytics	Web analytics providers (such as Google Analytics) help us analyze website traffic, ad impressions, and anonymized conversion data. By using a browser plugin http://www.google.com/ads/preferences/plugin/ provided by Google, you can opt out of Google Analytics.
Web Tools	Web Tools help us manage our website and services to deliver the best user experience possible.
Hosting Services	Hosting Services allow us to host our website, track visits and host forms on our Service that may collect Personal Data.
Ad Providers	Where the processing is necessary for the purposes of the legitimate interests pursued by Macorva or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.
Webinar Providers	Online webinar providers allow us to facilitate online webinars and collect webinar registration details, which may include Personal Data.
Payment Processors	Payment processors help us to collect payment-related information to confirm or complete a transaction with you.

6. INFORMATION COLLECTED AUTOMATICALLY.

Certain information on our Service is collected automatically by means of various software tools. We have a legitimate interest in using such information to assist in log-in, systems administration purposes, information security and abuse prevention, to track user trends, and to analyze the effectiveness of our Service. Alone or in combination with other information, such automatically collected information may constitute Personal Data. Some of our service providers (described in

Section 8, below) may use cookies or other methods to gather information regarding your use of our Service. Such third parties may use these cookies or other tracking methods for their own purposes by relating information about your use of our Service with any Personal Data about you that they may have. The use of such information by a third party depends on the privacy policy of that third party.

a. Log Files On Our Service.

The information inside the log files includes internet protocol (“**IP**”) addresses, type of browser, Internet Service Provider (“**ISP**”), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us.

b. Cookies.

We use cookies to make interactions with our Service easy and meaningful. When you visit our Service, our servers may send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your web browser. We may use cookies that are session-based or persistent. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. We use cookies that enable you to navigate our Service and use its features, such as accessing secure areas of our Service. Because required cookies are essential to operate our Service, there is no option to opt out of these cookies. For more information on how we use cookies in our Service, please review our Cookie Policy <https://www.macorva.com/cookie-settings>.

c. Do Not Track Signals.

Macorva does not track Service users over time and across third party websites to provide targeted advertising. Accordingly, we do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Data about an individual consumer's online activities over time and across third-party websites or online services.

d. Other Tracking Technologies.

When you visit our Service, we may collect your IP address for certain purposes such as, for example, to monitor the regions from which you navigate our Service. We may also use web beacons alone or in conjunction with cookies to compile information about your usage of our Service and interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular site tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to our Service. We may use web beacons to operate and improve our Service and email communications.

7. THE PURPOSES FOR WHICH WE USE PERSONAL DATA.

If you submit or we collect Personal Data through our Service, then such Personal Data may be used in the following ways: (i) to provide, analyze, administer, and improve our Service and related services, (ii) to contact you in connection with our Service and certain services, notifications, events, programs or offerings that you may have registered for, (iii) to send you updates and promotional materials that you have registered for, (iv) to identify and authenticate your access to the parts of our Service and related services that you are authorized to access; (v) for recruiting and human resources administration purposes, and (vi) to protect our rights and/or our property and to ensure the technical functionality and security of our Service.

8. HOW WE DISCLOSE PERSONAL DATA.

We do not sell, lease, rent or otherwise disclose the Personal Data collected from our Service to third parties unless otherwise stated below or with your consent.

a. Our Third Party Providers.

We transfer Personal Data to our third party service providers to perform tasks on our behalf and to assist us in providing our Service, as more fully described in Section 5. Additionally, as directed by you, we may provide data, including Personal Data, to third-party service providers on your behalf. This enables you to better integrate our Service with other similar services to enhance your user experience. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Data. Notwithstanding the foregoing, we will comply with applicable laws regarding Personal Data transfers as well as any transfer restriction that is specified in an agreement between Macorva and a customer.

b. Our Customer's Third Party Providers.

As directed by our Customers, we may provide data, including Personal Data, to third-party service providers on our Customer's behalf. This enables our Customers to integrate our Service with other services they use, such as customer relation management systems. For more information on the manner in which our Customers have implemented our Service on their websites, including integrations with third-party services, we recommend that you review such Customers' posted privacy policies.

c. Advertising.

From time-to-time, we engage advertising services to assist us in advertising our brand and Service. Those services may target advertisements on third-party websites based on cookies or other information indicating previous interaction with our Service.

d. Aggregate Information.

To better serve you and improve our Services, Macorva may conduct research on user demographics, interests and behavior based on the Personal Data and other information provided to Macorva. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregated information with our affiliates, agents and business partners. This aggregate information does not identify a user personally. Macorva may also disclose aggregated information in order to describe our Services to current and prospective business partners and to other third parties for other lawful purposes.

e. Business Partners.

From time to time, we may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from us, we may share Personal Data collected in connection with your purchase or expression of interest with our joint promotion partner(s). We do not control our business partners' use of Personal Data we collect, and their use of the information will be in accordance with their own privacy policies.

f. In the Event of Merger, Sale, or Change of Control.

We may transfer or assign this Privacy Policy and any Personal Data to a third party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control.

g. Other Disclosures.

We may disclose Personal Data about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our terms of use, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of Macorva, our users, or the public.

9. GDPR POLICY (FOR EUROPEAN DATA SUBJECTS ONLY).

We have created this General Data Protection Regulation (“**GDPR**”) Policy to explain how we process Personal Data about you as a data subject. As used in this Section 7, a “**data subject**” is an identified or identifiable person who is located in the European Union/European Economic Area (“**EU/EEA**”), and “**process**” or “**processing**” means any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

a. Macorva’s Basis for Processing.

The following sets out four (4) lawful bases under the GDPR to which Macorva may process your Personal Data:

Basis	Description
Your Consent	Where you have given us consent to process your Personal Data for one or more specified purposes, such as to provide our Service and other services as requested by you.
To Perform a Contract	Where the processing is necessary for the performance of contract to which you (or our Customer) are a party and to which Macorva is acting as a processor.
Comply with the Law	Where the processing is necessary for compliance with a legal obligation to which we are subject.
Legitimate Interests	Where the processing is necessary for the purposes of the legitimate interests pursued by Macorva or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

b. Data Subject Privacy Rights.

In certain circumstances, local data protection laws and certain local laws (including the GDPR) may give you rights with respect to Personal Data if you are located in the EEA. These rights differ by country/region, but may include the right to request:

Privacy Right	Description
Access to your Personal Data	You may have the right to obtain from us confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data. This access information includes the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipient to whom the Personal Data have been or will be disclosed. You may have the right to obtain a copy of the Personal Data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative

costs.

Rectification	You may have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.
Erasure	You may have the right to obtain from us the erasure of Personal Data concerning you and we may be obliged to erase such Personal Data.
Restriction of processing	You may have the right to obtain from us restriction of processing your Personal Data. In such cases, the respective data will be marked and may only be processed by us for certain purposes.
Data portability	You may have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and you may have the right to transmit those data to another entity without hindrance from us.
Object	You may have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us, and we can be required to no longer process your Personal Data. If you have a right to object and you exercise this right, your Personal Data will no longer be processed for such purposes by us. However, such a right to object may in particular not exist if the processing of your Personal Data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

c. How to Exercise Your Rights.

You may exercise these rights at any time by sending an email to support@macorva.com or write to us at:

MACORVA, INC.

4615 SOUTHWEST FWY, STE 330

HOUSTON, TX 77027-2709

If you have an account on our Service, we provide access to—and the ability to edit or delete—certain categories of Personal Data through the account.

We have appointed EU Business Partners as our representatives in the EU for the purposes of Article 27 of the General Data Protection Regulation. You may contact our EU representative, as well as us directly, with any query that you may have in relation to your personal data. The contact details of our EU representative are as follows:

EU Business Partners,
10 Ashe Street,
Clonakilty,
Co. Cork
P85 E403,
Ireland

Point of contact: Flor McCarthy

Email: info@eubusinesspartners.com

Depending on where you live, you may have the right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Data about you. We encourage you to first reach out to us at support@macorva.com, so we have an opportunity to address your concerns directly before you do so.

d. Personal Data Transferred to the United States.

Macorva complies with the EU-US Privacy Shield Framework and Swiss-US Privacy Shield Framework (collectively, “**Privacy Shield**”) as set forth by the US Department of Commerce regarding the collection, use, and retention of Personal Data from European Union (the “**EU**”) member countries, United Kingdom, and Switzerland. Macorva has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity, Purpose Limitation, Access, Recourse, Enforcement, and Liability. A violation of our commitment to Privacy Shield may be investigated by the Federal Trade Commission and/or the United States Department of Commerce. If there is any conflict between the policies in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, to the extent available, please visit <https://www.privacyshield.gov>.

In compliance with the Privacy Shield Principles, Macorva commits to resolve complaints about your privacy and our collection or use of Personal Data about you.

Persons from the EU or Switzerland who have inquiries or complaints regarding this Privacy Policy should first contact us via email at: support@macorva.com.

Macorva has committed to refer unresolved privacy complaints under the Privacy Shield Principles to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.jamsadr.com/eu-us-privacy-shield> for more information and to file a complaint.

These recourse mechanisms are available at no cost to you. Damages may be awarded in accordance with applicable law. Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel. In cases of onward transfer to third parties of data of EU or Swiss individuals received pursuant to the Privacy Shield, Macorva is potentially liable.

Pursuant to the Privacy Shield, Macorva remains liable for the transfer of Personal Data to third parties acting as our agents unless we can prove we were not a party to the events giving rise to the damages.

10. DATA SECURITY.

The security of Personal Data is important to us. We follow generally accepted industry standards to protect the Personal Data submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect Personal Data, we cannot guarantee its absolute security.

11. CHILDREN'S PRIVACY.

We do not target children and do not knowingly collect any Personal Data from children under the age of thirteen (13). When a user discloses Personal Data on our Services, the user is representing to us that he or she is at least thirteen (13) years of age.

If you are the parent or guardian of a child under the age of thirteen (13) who you believe has provided Macorva with Personal Data through our Services without your consent, please e-mail us at support@macorva.com so that we can delete the child's information from our records.

12. EMAIL COMMUNICATIONS.

You may choose not to receive future promotional or advertising emails from us by selecting an unsubscribe link at the bottom of each email that you receive from us. Additionally, you may send a request specifying your communications preferences to support@macorva.com. You cannot opt out of receiving transactional emails related to the performance of our services. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response

to any “**Contact**” request as well as administrative, maintenance and operational emails (for example, in connection with a password reset request).

13. EXCLUSIONS.

This Privacy Policy does not apply to any Personal Data collected by Macorva other than Personal Data collected through the Services. This Privacy Policy shall not apply to any unsolicited information you provide to Macorva through the Services or through any other means. This includes, but is not limited to, information posted to any public areas of the Services, such as forums, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, “**Unsolicited Information**”). All Unsolicited Information shall be deemed to be non-confidential and Macorva shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution. You are responsible for the Personal Data you choose to submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

14. YOUR CALIFORNIA PRIVACY RIGHTS.

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of Personal Data about you by Macorva to third parties for the third parties’ direct marketing purposes. To make such a request, please send an email to support@macorva.com or write to us:

MACORVA, INC.

4615 SOUTHWEST FWY, STE 330

HOUSTON, TX 77027-2709

15. CHANGES TO THIS PRIVACY POLICY.

As our organization changes over time, this Privacy Policy is expected to change as well. We reserve the right to amend the Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy on our Service. We may e-mail periodic reminders of our notices and terms and conditions, but you should check our Service frequently to see the current Privacy Policy that is in effect and any changes that may have been made to it. You can see when this Privacy Policy was last updated by reviewing the “Last Updated” legend on the top of this page.

16. CONTACTING US.

Any comments, concerns, complaints, or questions regarding our Privacy Policy may be addressed to support@macorva.com.