

# Privacy Policy

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## INTRODUCTION

### Overview

**NexStratus, Inc.** (“Company” “we” or “us”) operates NexStratus.com (the “Website”). This privacy policy (the “Privacy Policy”) describes how we collect, use, and share the personal data or information of users of our Website. Please review this Privacy Policy carefully before using the Website or providing any personal or private information to us through the Website.

## PRIVACY POLICY

Privacy Principles we follow:

Company will ensure that all personal data that it holds will be:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

## 2.1 Types of information we collect

When you visit our Website, we may collect personal data from you for legitimate business purposes. We will use this data in connection with your visit to our Website and to fulfill any business interaction that you may enter into with us.

The personal data that we collect from you may include: your name; email address; and telephone number.

We may also automatically collect data about you, such as technical information about your computer or internet browser. Data may also be collected about you indirectly through monitoring activities which will be conducted by or on our behalf in accordance with relevant legislation or regulatory requirements (for example, monitoring emails that we receive from you or recording telephone calls when you contact us).

We will process your personal data for the purposes listed above on the basis of one or more of the following:

- the processing is necessary for the performance of a contract or for entering into a contract with you. Please note that where this is the case, we may not be able to perform or enter into a contract with you unless you provide your personal data;
- the processing is necessary to comply with a legal obligation;
- you have given your consent (where we rely on this legal basis, we will always seek to obtain your consent separately as and when necessary).

## 2.2 How we collect your information

### 2.2.1 Voluntarily Provided Information

Company may collect information directly from you; for example, when you voluntarily provided such information. The following are examples of how we might collect information that you voluntarily provide:

- Sign up to receive promotional emails or our monthly newsletter.

- Participate in one of our promotional sweepstakes, contests, surveys or focus groups.
- Visit and navigate Company’s Website on any device.
- Enable location-based features on our Website.
- Interact with Company’s social media pages, including but not limited to Twitter and LinkedIn.

We may also combine information we collect about you from the different devices you use to access our Website.

#### 2.2.2 Collection of personal data by automated means or that is passively collected:

Cookies and similar technologies:

- When you visit the Website, we may use “cookies” which are small files stored as text on your computer or device. In some countries, we are not permitted to send cookies to the browser of a user without the prior consent of the affected user. In this case, we will seek such consent. The remainder of this section assumes that either the use of cookies is not restricted by applicable law, or if it is restricted that the individual has explicitly consented to the use of the cookies.
- These “cookies” and other similar technologies like pixels, web beacons (also known as “clear GIFs”) and local storage may be used to collect information about how you use the Website and provide features to you.
- If a visitor does not want information collected through the use of cookies, most browsers allow the visitor to reject cookies. Please note that if you use your browser settings to modify or block all cookies, you may not be able to access parts of the Website and your user experience may be severely degraded.
- Information provided by these cookies are essential to help us provide the Website in a manner that is adapted to each user’s specific needs. We believe that such means are fair, lawful, and proportional to the legitimate interest and needs of our business, and that our methodology fairly addresses each user’s legitimate rights and expectations in view of the context and purpose for the collection and use of the information collected.

#### Mobile Device Unique Identifier

- When you use a mobile device to connect to our Website via a service provider that uniquely identifies your mobile device, we may use this unique identifier to offer you extended services and/or functionality. Certain services may require the collection of your mobile phone number. We may associate that mobile phone number with the mobile device unique identifier.

#### Log file information:

- When you use the Website, our servers automatically record certain log file information, including your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Website, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to our users which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Website.

#### Strictly Necessary Cookies:

- Necessary cookies are used for the purpose of authentication and providing data security. These cookies are necessary for our Website to work and enable us to distinguish users and enable you to use its services and features. Disabling these cookies will encumber our Website’s performance and may make these services and features unavailable.

#### Functional Cookies:

- These cookies enable the Website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly.

#### Analytics or Performance Cookies:

- These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Website. They help us to know which pages are the most and least popular and see how visitors move

around the Website. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our Website and will not be able to monitor its performance.

### 2.3 How we use your information

The following are the examples of how we may use your information for the legitimate interest of our business which include:

- To Understand Your Interests. For example, we may use your information to better understand what services may interest you based on information we collect about you.
- To Communicate with You. We may communicate with you about your account or our relationship. We may also contact you about this Privacy Policy or the services.
- Our Products and Services. We may use your information to enhance our Website and services to serve you better.
- To Respond to Your Requests or Questions. This may include responding to your request for to receive contact from us.
- For Security Purposes. This could include protecting our company and our customers. It may also include protecting our Website.
- For Marketing Purposes. We may provide you with information about new products and special offers. We may use your information to serve you ads about products and offers. We may tell you about new features or updates.
- To Support Our Products and Services. This could include fulfilling your requests for products or Services. It could also include processing purchases or return transactions.
- Law or regulatory obligations. Certain laws and regulations require us to maintain and disclose collected information.

We will not use your personal data for any other purposes unless we have provided you with a separate notice explaining in detail such usage of your personal data.

## 2.4 How we share your information

In generally, we will not sell, share, or rent information about you in ways different from those specifically discussed in this Privacy Policy. We may disclose/share your information in the following ways:

- **On Our Website.** For example, we may display information you post on our Client Testimonials page.
- **With Our Service Providers.** We may share your information with third parties who perform services on our behalf. For example, this may include vendors.
- **Government, courts, and Law enforcement.** We will access, preserve, and share any information about you, without your consent, to government or law enforcement officials or private parties as we in good faith believe necessary or appropriate to respond to claims and legal process (including, but not limited to, subpoenas), to comply with applicable laws, to protect the property and rights of Company, you or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to pose a risk of being, or is illegal, unethical or legally actionable. This may include responding to legal requests from jurisdictions outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards.

We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

If at any time you wish that we cease any activity that affects you, please contact us as indicated in the “How to Contact Us” Section below.

## 2.5 How we store your information

We are a United States based company and our servers are located in the United States. By providing your information and using the Website, you explicitly consent to the transfer, processing, and storage of your information in the United

States. If you do not wish for us to transfer your personal information to the United States, please contact us using the information in the “How to Contact Us” section below.

We will retain your personal information only for as long as necessary to fulfill the legitimate business purpose(s) for which it was collected and to comply with applicable laws and your consent to such purpose remains valid after termination of our relationship with you. When we no longer need information, we take reasonable steps to destroy the information.

## 2.6 How we protect your information

While no data transmission over the internet is 100% secure, we are committed to protecting the information we receive from you. We take appropriate security measures to protect your information against unauthorized access to or unauthorized alteration, disclosure or destruction of data. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we maintain appropriate physical, electronic, and managerial procedures to safeguard and secure the information and data stored on our system.

While no computer system is completely secure; we believe the measures, we have implemented reduce the likelihood of security problems to a level appropriate to the type of data involved. The Website may contain links to other websites that we do not own or control. The Privacy Policy does not apply to these websites, and we are not responsible for the privacy practices of such websites or other services operated by such websites. Once you leave the Website via such a link, we recommend your review the privacy policy applicable to such third-party websites to learn how they use and disclosure your personally identifiable information.

Our staff are trained in how to keep your information safe and secure. We use secure systems and buildings to hold your information. We aim to only keep your information for as long as we need it.

## 2.7 How we dispose your information

Our goal is to dispose your information “no longer than necessary for the purposes that we collect and use data”; Upon the expiry of our data retention periods or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise securely disposed of.

## 2.8 Children’s Privacy

Company does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to register for the Website. The Website and their content are not directed at children under the age of 18. In

the event that we learn that we have collected personal data from a child under age 18 without parental consent, we will delete that data as quickly as possible. If you believe that we might have any information or data from or about a child under 18, please contact Company at info at NexStratus, Inc. dot com.

If you are a California resident under the age of 16, we do not knowingly share any personal data without parental consent. Contact Company at info at NexStratus, Inc. dot com for assistance or any related questions.

## 2.9 Your choices about your information

### Emails

- In all promotional emails, you will be given the opportunity to opt-out of receiving such messages in the future by clicking on the link at the bottom of the email that says “unsubscribe.”
- Please note, we reserve the right to send you Services-related communications (e.g. technical and security notices) for which you may not opt out.

### Cookies

If a visitor does not want information collected through the use of cookies, most browsers allow the visitor to reject cookies.

### Mobile device unique identifier

Unless you choose to opt out, we may also share your mobile phone number with certain select third parties. You can opt out by changing the privacy settings on your profiles/devices.

## 2.10 International Data Transfers

Personal data you submit on the Website may be sent to the other countries, on our service providers’ cloud servers. We will always protect your information in accordance with this Privacy Policy wherever it is processed. We are a US based company and by accessing our Website, you grant us expressed consent to transfer your personal data to US servers. If you do not wish for us to transfer your personal data to the US, please contact us using the information in the “How to Contact Us” section below.

## 3 EU/EEA Residents



The EU General Data Protection Regulation (GDPR) grants individuals who are in the European Union and European Economic Area (EU/EEA) the certain rights, with some limitations. This section sets out the privacy principles we follow with respect to transfers of personal data from the European Economic Area (EEA) to the United States, including personal data we receive from individuals residing in the EEA who visits our Website or otherwise interact with us. Please note that for users located in the EEA, the term personal data used in this privacy is equivalent to the term “personal data” under applicable European data protection laws.

We will establish a system to enable and facilitate the exercise of data subject rights related to:

- Information access;
- Objection to processing;
- Objection to automated decision-making and profiling;
- Restriction of processing;
- Data portability;
- Data rectification; and
- Data Erasure

If you would like to exercise above EU General Data Protection Regulation (GDPR) rights about your personal information we hold about you, or exercise any other data subject right available to you under please submit a written request to info at NexStratus, Inc. dot com or contact us using the information provided in the “How to Contact Us” section below. Our privacy team will examine your request and respond to you as quickly as possible.

#### 4 California Residents

Under the California Consumer Privacy Act (“CCPA”), California consumers have the right to request access to their personal data, additional details about our information practices and deletion of their personal data (subject to certain exceptions). California consumers also have the right to opt out of sales of personal data, if applicable. Please note that you may designate an authorized agent to exercise these rights on your behalf by providing written materials demonstrating that you have granted the authorized agent power of attorney. Please note that if an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your personal data. We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably

verify you are the consumer about whom we collected personal data. We will not discriminate against you if you choose to exercise your rights under the CCPA.

## **RIGHTS TO KNOW**

You may request, no more than twice in a 12-month period, access to the specific pieces of personal data we have collected about you in the last 12 months. You may also request additional details about our information practices, including the categories of personal data we have collected about you, the sources of such collection, the categories of personal data we share for a legitimate business or commercial purposes, and the categories of third parties with whom we share your personal data. You may make these requests by contacting using the contact information provided below in the “How to Contact Us” Section. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

## **COPIES OF PERSONAL DATA**

You may request, no more than twice in a 12-month period, transportable copies of your personal data that we have collected about you in the last 12 months. You may make these requests by contacting using the contact information provided below in the “How to Contact Us” Section. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

## **DELETION**

You may request that we delete the personal data we have collected about you. Please note that we may retain certain information as required or permitted by applicable law. You may make these requests by contacting us using the contact information provided below in the “How to Contact Us” Section. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

## 5 Changes to our privacy policy

Our privacy policy became effective in April 1, 2021

From time to time, it may be necessary for Company to change its Privacy Policy and notice, so we suggest that you check here periodically. Changes to the Privacy Policy will be notated by updates to the “Last Revision Date”. We will use commercially reasonable endeavors to notify you of any material changes to this Privacy Policy. Your continued use of the Website or Services constitutes your expressed agreement to any updates to this Privacy Policy.

## 6 Links to other sites

We may offer links to sites that are not operated by Company such as social media sites. If you visit one of these linked sites, you should review their privacy and other policies as any such information you post or provide through those sites will be subject to the privacy policies associated with those sites. We are not responsible for the policies and practices of other companies.

## 7 How to contact us

If you wish to contact us to update your information or complaints, please feel free to contact us: by telephone at (919) 280-2383; by mail at 167 E. Chatham St., Suite 300, Cary, NC 27511; or by email at [info@NexStratus.com](mailto:info@NexStratus.com)