



## **ISL PRIVACY POLICY**

Last updated: February 19, 2024

This Privacy Policy (“Policy”) describes the information that Information Systems Laboratories, Inc. (ISL) (“ISL,” “we,” “us”) collects, uses, retains, discloses, and otherwise processes personal and business information as well as the rights of individuals (“you,” “your”) regarding such information. Your use of our Services and any dispute over privacy is subject to this Policy and our Terms of Use, including their applicable terms governing limitations on damages and the resolution of disputes. By interacting with ISL as described herein, you accept the terms of this Privacy Policy and consent to our collection, use, retention, disclosure, and other processing of your information as described herein (including to contact you), and for all other purposes permitted under applicable personal information privacy statutes, credit bureau reporting rules, antispam legislation, and consumer protection laws. Any business on behalf of which you are using the Services also accepts these terms.

### **1. Scope**

Except as otherwise noted elsewhere within this Policy, this Policy applies to the personal and business information ISL collects, uses, discloses, and otherwise processes when you: apply or sign up for a ISL account; access or use in any manner any ISL application, product, service, feature, technology, content, or website (collectively, “Services”); or otherwise contact or interact with us. This Policy does not apply to job applicants or to current or former employees in the context of their employment with us. For that information, please see the Employee Privacy Notice on our website.

### **2. Amendment**

We may amend this Privacy Policy from time to time by posting a revised version and updating the “Last updated” date above. The revised version will be effective at the time we post it. We will provide you with reasonable prior notice of substantial changes in how we use your information, including by email at the email address you provide. You may cancel your account at any time; however, doing so may affect your ability to use the Services. We encourage you to review this Privacy Policy and to stay informed about our information practices. We also encourage you to stay informed about the choices available to you and to contact us if you have any questions about this Privacy Policy or changes to it. Your continued use of the Services constitutes your acceptance of any amendment of this Privacy Policy.

### **3. How We Collect Your Information**

#### *Personal Information You Provide*

We may collect the following information you provide us with when you create an ISL account:

- Identifiers and contact information, such as your name, email address, mailing address, phone number;
- Account information, such as your username, password, the company you work for, and any personal information you may submit to us using your account profile; and
- Financial information, including payment card type, details, and numbers as well as billing and shipping addresses.

We also collect information you upload to or send through our Services, including data sets. We collect the information you provide when you participate in contests or promotions offered by ISL, respond to our surveys, or otherwise communicate with us.

#### *Information We Collect from Your Use of our Services*

We may collect the following information about you when you use our Services:

- Transaction Information

We collect information about when and where a transaction occurs, the name of the customer, a description of the transactions, the payment amount, and the devices and payment methods used to complete the transaction when you make a payment to use the Services.

- Use Information

We collect information about how you use our Services, including your access time, browser type and language, location information, and Internet Protocol (“IP”) address.

- Information Collected by Cookies

We use cookies to collect information when you use our Services. Cookies are small data files that are stored on your hard drive when you visit a website. Cookies support the integrity of ISL’s registration process, retain your preferences and account settings, and help evaluate and compile aggregated statistics about user activity. Certain cookies we use last only for the duration of your web or application session and expire when you close your browser or exit the application. Other cookies are used to remember you when you return to use the Services and, as such, will last longer. We may use cookies for the following purposes:

- Remember that you have visited or used the Services before;
- Identify the number of unique visitors we receive, permitting us to ensure we have adequate capacity;
- Customize elements of our promotional layout, the content of our website, the content of our application, or all of these functions; and

- Collect anonymous statistical information about how you use the Services so that we can improve them.

Additional information about blocking cookies appears below.

#### **4. How We Use Your Information**

We may use information about you to provide, maintain, and improve our Services, such as through the following:

- Delivering the products and services and processing and carrying out the transactions you request;
- Recording such transactions;
- Delivering the information and support you request, including technical notices, security alerts, and support and administrative messages;
- Developing new products and Services; and
- For any other purpose in connection with your own use of our specific Services such as our cloud-based services, as disclosed to you separately within those Services.

We may use information about you to improve, personalize and facilitate your use of our Services. ISL may, for example, use information about you to measure, customize, and enhance our Services, including the design, content, and functionality of our applications and websites, or to track and analyze trends and usage in connection with our Services.

We may use information about you to send you news and information, or to conduct surveys and collect feedback, about our Services and to communicate with you about products, services, contests, promotions, discounts, incentives, and rewards offered by us, based on your communication preferences and applicable law. We also may contact you to resolve disputes, collect fees, and provide assistance for problems with our Services or your ISL account.

We may use information about you to perform the following contractual or legal duties or responsibilities or to protect your interests or ours:

- To protect our rights or property, or the security or integrity of our Services;
- To enforce the General Terms or other applicable agreements or policies;
- To investigate, detect, and prevent fraud, security breaches, and other potentially prohibited or illegal activities;
- To comply with any applicable law, regulation, legal process, or governmental request; or
- For any other purpose disclosed to you in connection with our Services.

We may use third party service providers to process and store your information in the United States and other countries.

## **5. Legal Bases of Processing**

Our legal basis for collecting and using your personal information depends on the type of personal information concerned, the specific context in which we collect it and how it is to be used. Generally, we collect and process your personal information on one or more of the following bases:

- With your consent. You are free to withdraw your consent at any time by contacting ISL using the contact details at the end of this Policy. If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it.
- To comply with a contractual obligation. For example, to deliver our product to you for a transaction, we collect and use necessary personal information such as your shipping address.
- To comply with ISL's legal obligations where laws (like taxation laws, for example) require us to process your personal information or where we need your personal information to protect your vital interests or those of another person.
- For ISL's legitimate interests provided that they are not outweighed by any prejudice or harm to your rights and freedoms.

## **6. How We Retain Your Personal Information**

ISL generally retains information about you only as long as reasonably necessary to provide you with our Services. Nevertheless, even after you deactivate your ISL account, we may retain archived copies of information about you and any transactions or Services in which you may have participated for a period of time that is consistent with applicable law, or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request; to prevent fraud; to collect fees owed; to resolve disputes; to address problems with our Services; to assist with investigations; to enforce our General Terms or other applicable agreements or policies; or to take any other actions consistent with applicable law.

Also, where we process business information in association with the use of our cloud-based Services, we will keep that information for as long as specified in our written agreement with you.

## **7. How We Share Your Information**

We do not sell or share your personal or business information to any third parties for monetary or other valuable consideration. We may share the collected information about you as follows:

- With the necessary ISL personnel for the purposes outlined above;

- With trusted third-party business partners to carry out, provide, maintain, and improve our Services, including financial institutions, payment networks, payment card associations, and other entities in connection with the payment and transaction process.
  - As stated in our contract with you, in order to properly run our cloud-based Services, we may allow providers of separately licensed third-party technology to access your data, provided that your content includes separately licensed third-party technology.
  - These third parties to whom we may disclose personal information may be located outside of your jurisdiction of residence, as described below in the “International Users” section.
- Within ISL and with third parties such as outside legal counsel, banks, and accountants in connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture, or dissolution of all or a portion of our business;
- If we believe that disclosure is reasonably necessary to (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce or comply with the terms of our General Terms or other applicable agreements or policies; (iii) protect our rights or property, or the security or integrity of our Services, or (iv) to protect us, users of our Services or the public from harm or potentially prohibited or illegal activities; or
- For additional purposes with your consent.

**8. 12-Month Period Disclosure**

ISL makes the following disclosures regarding your personal information collected by us within the preceding 12-month period:

| <b>Category of Personal Information</b>                     | <b>Category of Source from which Personal Information is Collected</b> | <b>Purpose of Collection</b>   | <b>Category of Service Providers to whom Personal Information is Disclosed</b>   | <b>Category of Non-Service Provider Third Parties to whom Personal Information Is Sold or Shared</b> |
|---|--|--|--|--|
| Identifiers, such as your name, address, and email address. | You and ISL.   | To process sales, provide customer support, in connection with your own use of our | Trusted business partners (including distributors and system integrators), credit card processor/payment card network, and | We do not sell or share this category of personal information.                                       |



*Technology for Real World Solutions*

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|  |   | cloud-based Services, share information about ISL products, services and events, and facilitate contract bids.  | service providers that support our contract bid activities.              |  |
| Financial information.   | You.  | To process sales and in connection with your own use of our cloud-based Services.                               | Credit card processor/payment card network.                              | We do not sell or share this category of personal information. |
| Internet or other electronic network activity information, including IP address, cookies and similar technology. | You, and your activity on our websites. Depending on the type of information, sometimes through email communications. | To improve our website and your experience on it.   | Service providers providing email, website and customer service support. | We do not sell or share this category of personal information. |
| Professional information, such as your employer or job title.  | You or your employer.   | To process sales and facilitate contract bids, and in connection with your own use of our cloud-based Services. | Service providers that support our contract bid activities.              | We do not sell or share this category of personal information. |

## 9. Your Choices

### *Personal Information*

You may access, change, or correct information about you by logging into your ISL account at any time or by making a request to us using the contact details at the end of this Policy.

### *Deactivating Your Account*

You may deactivate your ISL account by logging into it or by contacting us using the contact details provided at the end of this Policy.

### *Cookies*

Most web and mobile device browsers are set to automatically accept cookies by default, but you may change your browser settings to prevent automatic acceptance of cookies, or to notify you each time a cookie is set. The website <http://www.allaboutcookies.org> provides additional information about cookies and how to manage them. Blocking cookies used in the Services, however, may affect the functionality of those Services.

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites.

The Services may not function correctly if cookies are blocked.

### *Promotional Communications*

You may opt out of receiving promotional messages from ISL by following the instructions in those messages or by changing your notification settings by logging into your ISL account. ISL may nonetheless send you non-promotional communications, such as digital receipts and messages about your account or our ongoing business relations.

### *Exercising Your Rights*

To exercise any of your rights in this Policy, please make a request by contacting us using the contact information at the end of this Policy. Depending on the type of request, we may request information from you in order to confirm or verify your identity. We will only use personal information provided in a right to know or deletion request to review and comply with the request. If ISL refuses to take action on your request, you may appeal the refusal using the same contact information at the end of this Policy.

### *Children’s Privacy*

Our Services are not directed to or intended for, and we do not knowingly collect personal information from, minors. If you believe that we have mistakenly or unintentionally collected the personal information of a child under the age of 16 without appropriate consent, please contact us using the contact information at the end of this Policy.

## **10. California and Other US State Data Protection Rights**

In accordance with the requirements of the California Consumer Privacy Act and other US state data privacy laws, you may have certain rights in relation to your Personal Information. These rights may include the rights to:

- Access and receive a portable copy of your personal information.
- Delete your personal information (subject to certain limitations under applicable law).
- Request correction of your personal data.
- Receive information about our use of your personal information.
- Be free from discrimination in response to exercising these rights conferred by law.
- Direct that your personal information not be sold.
- Direct that your personal information will not be profiled. ISL does not engage in profiling for the purposes of making decisions that produce legal or similarly significant effects.
- Direct that your personal information not be shared for targeted advertising purposes. ISL does not share your information for targeted advertising purposes.
- Limit use of sensitive personal information. In our response denying your request, we will notify you of our reasons for denying the request and provide instructions for how you can appeal the decision.
- Be free from discriminatory adverse treatment for exercising these rights. ISL will not discriminate against you for exercising them.

To exercise any of these rights, please make a request by contacting us using the contact information at the end of this Policy. Depending on the type of request, we may request information from you in order to confirm or verify your identity. We will only use personal information provided in a right to know or deletion request to review and comply with the request.

## **11. EU Data Protection Rights**

Where the processing of your Personal Information is subject to EU data protection laws, you have the following data subject rights. Please note that these rights are not absolute and in certain cases are subject to conditions as specified in applicable law.

- **Be Informed:** Receive information about our use of your personal information.
- **Access:** Request access to your personal data, as that term is defined in the GDPR.
- **Rectification:** Request correction of your personal data.
- **Erasure:** Request erasure of your personal data.
- **Objection:** Object to some processing of your personal data.



- **Restriction:** Request restriction of processing of your personal data.
- **Portability:** Request the transfer of your personal data to you or to a third party.
- **Withdrawal of Consent:** Withdraw your consent to processing your personal data.
- **Automated Decision-Making:** The right not to be subject to having a decision made about you that is based solely on automated processing if that decision produces legal or similarly significant effects concerning you.

In addition to the above, you have the right to lodge a complaint with a supervisory authority if you consider that our processing of your Personal Information infringes applicable data protection law. If you wish to submit a request pursuant to these rights, please contact us via the contact information at the end of this Policy. While we will make reasonable efforts to accommodate your request, we reserve the right to reject such access requests or to impose restrictions or requirements upon such requests if required or permitted by applicable law.

## **12. International Users**

ISL and some of its third-party business partners may process or store data in countries outside the United States and outside of your area if that area is the EU. Such countries may include, without limitation, the United States and other countries in which ISL or its authorized distributors and business partners maintain facilities. These countries may have a different level of data protection from your home country. In order to provide adequate protection for the transfer of your personal information, we transfer personal information by entering into written contractual arrangements (as appropriate) with our subsidiaries, authorized distributors and business partners in respect of such transfers or by relying on other legally-approved transfer mechanisms. We take all reasonable technical and organizational measures to safeguard personal information we transfer.

## **13. Security**

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We hold information about you at our own premises and with the assistance of third-party service providers. We restrict access to personal information to those ISL employees, contractors, and agents who need to know that information in order to transmit, store, or process it, who are subject to contractual confidentiality obligations consistent with this Privacy Policy, and who may be disciplined or terminated if they fail to meet these obligations. Our third-party service providers store and transmit personal information in compliance with other appropriate confidentiality and security measures.

Despite these efforts, ISL cannot guarantee that unauthorized third parties will never be able to defeat our security measures or use your personal information for improper purposes. ISL will take reasonable steps to investigate any security breach and, where appropriate, notify those



individuals whose information may have been compromised. We will also take other steps in accordance with applicable laws or regulations.

#### **14. Contact**

You may contact us with any questions or concerns regarding this Privacy Policy, its implementation, or observance at the following address:

Information Systems Laboratories, Inc.

12900 Brookprinter Place

Suite 800

Poway, CA 92064-6875

[unsubscribe@ISLinc.com](mailto:unsubscribe@ISLinc.com)

[Contact Us | ISL - Technology for Real World Solutions \(islinc.com\)](#)