

Attend Safe, LLC (“Attend Safe,” “us”, “we”, or “our”) provides this privacy policy (“Policy”) to explain how we use personal data we collect when you use our website or applications.

Topics:

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This Policy.

Attend Safe operates the Attend Safe mobile application (the "Service"). Attend Safe’s commitment to privacy means we will only use information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual (“Personal Information”) in accordance with the terms of this Policy.

It is Attend Safe’s intention to remain compliant with the General Data Protection Regulation 2016 (GDPR) and the California Consumer Privacy Act (CCPA) and the terms of this Policy are to be interpreted in such a manner.

Attend Safe does not sell User Data or any information for monetary gain or any consideration but does use it to comply with the purposes of our services to Clients and Users. In short, we collect only information you choose to give us and process it with your consent. We seek only the minimum information needed to fulfill our stated purposes. If you are from the European Union, European Economic Area, Switzerland, or the United Kingdom, we comply with EU-US and Swim US Privacy Shield frameworks. We provide a high standard of privacy protection to everyone, regardless of where you live, your citizenship or where you are.

Who We Are, What We Do.

Attend Safe provides several services to customers (“Clients”) including contact tracing, medical testing, vaccination verification and assorted other related services to monitor the health and safety of event attendees, worksite employees and other such situations. Those who provide the information, the end users of the Services (“Users”) are the subject of this Policy.

The Policy describes how we collect, use, protect and disclose Personal Information we obtain through the websites we own or control (today or in the future), including attendsafe.com, attendsafe.health, attendsafe.com, and all sites created for individual event or clients use (collectively, the “Sites”), your use of any mobile applications we own or control (today or in the future), including those created for individual event or client use (collectively, the “Applications” or “Apps”), and when you use any services we provide through the Sites or the

Apps (collectively, together with the Sites and the Apps, the “Services”). You can access the Sites in many ways, including from a computer, tablet, mobile phone or other internet enabled device, and this Policy will apply regardless of the means of access. This Policy also governs the use of Personal Information we obtain from you and any third-party site or application where we post content or invite your feedback or participation. Attend Safe cannot control the privacy policies or practices of sites or of companies that we do not own or control and cannot control the actions of people we do not employ or manage.

Please read this Policy carefully. This Policy is a legally binding contract between us and anyone who accesses or uses any of the Services. This Policy is incorporated into our Terms of Use Policy (“TUP”) for the Sites and Applications. In the event of a conflict between this Policy and our TUP, the TUP will control. If you have any questions about this Policy, please email us at privacy@attendsafe.com. If you do not want us to collect, use or share your Personal Information in the ways described in this Policy, please do not use the Services. By using the Services, you consent to the collection and use of your information (including Personal Information) by us as identified in this Policy.

Data Collected, and Methods of Collection.

Attend Safe collects the following data from Users:

The use of certain Services requires that you to provide certain Personal Information and, in some cases, requires you to register for an account. While using the Services we collect certain Personal Information including, but not limited to, your name, your email address, gender, photo, and date of birth, as well as health and symptom information and vaccination status. In addition, if contact-tracing is part of the client agreement, we will collect the device-to-device interactions through Bluetooth but will not record GPS coordinates. Where applicable, we indicate whether you must provide us with your Personal Information in order to use the Services. If you do not provide the Personal Information, you may not be able to benefit from the Services if that information is necessary to provide you with the applicable Services or if we are legally required to collect it.

When you register for an account, we may access and collect the Personal Information you provide, such as your name, contact information (including your mailing and billing address), e-mail address, date of birth, phone number, username, and password. We may also ask for additional Personal Information including your mobile phone number and, depending on the terms of the contract with our Client, your credit or debit card number or other financial account number. We will also collect and maintain information about all transactions associated with your account.

When you use some of our other Services, you may choose to provide certain information directly to us to request more information about our Services or for other reasons. We will collect, use, share and store this Personal Information consistent with this Policy.

Personal Information Collected from Third Parties

We may collect your Personal Information from third-party business partners such as social media sites, ad networks and analytics providers. We may also collect your Personal Information from others that refer you to our Services including our Clients who facilitate our ability to provide Services.

Personal Information Automatically Collected

When you use our Sites and Applications, our servers automatically record information that your browser or device sends whenever you visit a website or utilize an application. This information may include your IP address, the type of device you are using, the internet service provider or mobile carrier you are using, your device

identifiers, your mobile telephone number, your geographic location and your activities within the Services, including the links you click, the pages or screens you view, your session time, the number of times you click a page/screen or use a feature of the Services, the date and time you click on a page or use a feature and the amount of time you spend on a page or using a feature.

How We Use Your Data.

We may use your Personal Information for various purposes, including, but not limited to, the following:

Non-Marketing Purposes

We may use the Personal Information and other information we collect for non-marketing purposes including: (1) validating your identity; (2) sending you push notifications, text messages, or emails to provide you with alerts and updates about your account and the Services; (3) processing your transactions; (4) conducting statistical or demographic analysis; (5) complying with legal and regulatory requirements; (6) customizing your experience with the Services; (7) protecting and defending Attend Safe and its affiliates against legal actions or claims; (8) preventing fraud; (9) debt collection; (10) satisfying contractual obligations; (11) cooperating with law enforcement or other government agencies for purposes of investigations, national security, public safety or matters of public importance when we believe that disclosure of Personal Information is necessary or appropriate to protect the public interest; and (12) for other business purposes permitted under applicable law (collectively, “Non-Marketing Purposes”), including but not limited to using aggregate private health information to verify vaccine or medical testing status to third parties.

Other Purposes

Attend Safe also uses the collected data for the following public health objectives:

- Helping your employer or administrator understand when symptoms are developing at work, at your school, or in your community group;
- Gaining a better understanding the symptoms of COVID-19;
- Tracking the spread of COVID-19 across geographies and within employers, schools, and households;
- Maintaining User status related to Covid-19 vaccination status and/or test results to verify participation eligibility at events hosted by our clients.

We may also use information in the aggregate to understand how our users as a group use the Services provided on our Sites and Applications. Attend Safe will not collect additional categories of Personal Information or use the Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

How We Store Your Data.

Our Company securely stores your data within Microsoft Azure cloud-based storage. Information about data residency in Azure can be found here: <https://azure.microsoft.com/en-us/global-infrastructure/data-residency/#overview>. Our accounts with Microsoft are governed by HIPAA complaint Business Associate Agreements, and information about this can be found here: <https://docs.microsoft.com/en-us/azure/compliance/offerings/offering-hipaa-us>.

Internal documents, contracts and correspondence is maintained in a Citrix-based cloud storage environment. Information about this residency can be found here: https://www.citrix.com/content/dam/citrix/en_us/documents/buy/enterprise-saas-eusa.pdf.

Our accounts with Citrix are covered by HIPAA compliant Business Associate Agreements, and information about this can be found here: https://www.citrix.com/content/dam/citrix/en_us/documents/other/citrix-business-associate-agreement-for-customers.pdf.

Attend Safe will keep your data for two years after the conclusion of the contract which extends the service to Users, unless ordered by a Court or in the scope of litigation or compliance with Laws requires us to keep it longer or destroy it sooner. Once this time expires, we will delete your data by removing it from the Azure environment and destroying any backups.

Attend Safe is committed to protecting the security of the Personal Information you provide to us and that we collect about you. We maintain commercially reasonable safeguards to maintain the security and privacy of Personal Information we collect. Nevertheless, when disclosing Personal Information, you should remain mindful that there is an inherent risk in the use of email and the internet. Your information may be intercepted without your consent, collected illegally, and used by others. We cannot guarantee the security of any information you disclose online, and you do so at your own risk.

Marketing

Attend Safe does not use your Data for marketing purposes other than to occasionally follow up with you about your experience with the system to improve usability for future Users.

We do so through email. We use MailerLite for this purpose. MailerLite has opt-out functionality, and their privacy policy can be found here: <https://www.mailerlite.com/legal/privacy-policy>.

Sharing of Personal Information

For business purposes, we may share certain Personal Information we receive from and about you, and about your transactions with us, with our affiliates and certain third parties. Doing so allows us to provide the Services you request. We may also share your Personal Information with the following third parties:

Third-Party Service Providers

Your Personal Information may be shared with or collected by third-party service providers who provide us with services, including, but not limited to data hosting or processing and credit card processing. We require these third-party service providers to exercise reasonable care to protect your Personal Information and restrict their use of your Personal Information to the purposes for which it was provided to them.

Anonymous Information

We may provide anonymized information to third parties, including governmental agencies for purposes of contact tracing and/or any governmental agency that requires COVID-19 outbreak/cluster data to be reported. Any anonymized information we provide to third parties is not considered Personal Information and is not subject to the terms of this Policy.

Sale of our Business; Bankruptcy

In the event of a merger, acquisition, bankruptcy or other sale of all or a portion of our assets, we may transfer or allow third parties to use information owned or controlled by us, which may include your Personal Information. We reserve the right, in connection with these types of transactions, to transfer or assign your Personal Information and other information we have collected from our customers to third parties or to authorize third

parties to use any such information retained by us. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred Personal Information will be subject to this Policy. However, any information you submit or that is collected after this type of transfer may be subject to a new privacy policy adopted by the successor entity.

Compliance with Laws and Law Enforcement

Attend Safe cooperates with government and law enforcement officials or private parties to enforce and comply with the law. To the extent permitted under applicable law, we may disclose any information about you, including, but not limited to, your Personal Information, to government or law enforcement officials or private parties as we believe is necessary or appropriate to investigate, respond to, and defend against legal claims, for legal process (including subpoenas), to protect the property and rights of Attend Safe or a third party, to protect Attend Safe against liability, for the safety of the public or any person, to prevent or stop any illegal, unethical, fraudulent, abusive, or legally actionable activity, to protect the security or integrity of the Services and any equipment used to make the Services available, or to comply with applicable law.

Your Data Protection Rights.

Attend Safe wants you to be fully aware of your data protection rights. Every user is entitled to the following:

- The right to access - You have the right to request copies of your personal data from Attend Safe. We may charge you a small fee for this service.
- The right to rectification - You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete information you believe is incomplete.
- The right to erasure - You have the right to request that Our Company erase your personal data, under certain conditions.
- The right to restrict processing - You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
- The right to object to processing - You have the right to object to Our Company's processing of your personal data, under certain conditions.
- The right to data portability - You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

Requests which undermine the purpose for which our Services are used may be denied, or if not denied, may result in loss of use of our sites and apps.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at privacy@attendsafe.com or write to us at Attend Safe Privacy, PO Box 440 St. Charles IL 60174.

Only you, or a person registered with the California Secretary of State authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may make a verifiable consumer request on behalf of a minor child.

You may only make a verifiable consumer request twice within a twelve-month period, and they must:

- Provide sufficient information to allow us to reasonably verify you are the person we collected personal information from or are their authorized representative.

- Describe your request in sufficient detail to allow us to properly understand, evaluate and respond.

Managing Your Personal Information

You may decline to share certain information with us, in which case, we may not be able to provide you some of the Services we offer. To protect your privacy and security, we take reasonable steps to verify your identity before granting your account access or making corrections to your information. You are responsible for always maintaining the secrecy of your unique password and account information.

Text Message Opt-Out

If you have provided us with your prior express consent to receive autodialed text messages, we may use your information to send text messages to any mobile device connected to the cell phone number you provided until you opt out from future text messages. You can opt out from receiving text messages as described in the TUP, including by replying STOP or similar described text to any text message from us. You agree to and will then receive a single final text message confirming you opt-out of the text-messaging program.

Email Opt-Out

From time to time (and with your consent when required), you may receive periodic mailings or emails from us with news or other information on events, services, upcoming events, or other offers from us or on our behalf. If at any time you wish to stop receiving emails or mailings from us, please send us an email to privacy@attendsafe.com with the phrase “Privacy Opt-Out: Attend Safe Mailings” in the subject line, or write to us at the address provided below, and we will remove you from our mailing list.

Alternatively, for email communications, you may opt out of receiving such communications by following the unsubscribe instructions set forth in most email messages from us. Your unsubscribe request or email preferences change will be processed promptly, though this process is usually not immediate. During that processing period, you may receive additional emails from us, as noted in the acknowledgement to your unsubscribe actions.

Please note that opting out of emails and other communications will not apply to any email and other communications sent about your account or your use of the Services.

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit www.allaboutcookies.org.

How do we use cookies?

Attend Safe uses cookies in a range of ways to improve your experience on our website and apps, including keeping you signed in and for our understanding of how you use our website and apps.

What types of cookies do we use?

There are several distinct types of cookies, however, our website and apps:

- *Use Functionality Cookies* – Attend Safe uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- *Do not use Advertising Cookies*

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy Policies of Other Websites.

The Our Company website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Underage Persons

The Services are for use by persons who are at least 18 years of age. If you are younger than eighteen, you may not access, attempt to access, or use the Services. We do not knowingly collect or allow the collection of Personal Information via the Services from persons underage, pursuant to applicable law and regulations, without parental consent. We do not knowingly collect or allow the collection of Personal Information via the Services from persons under the age of thirteen without written parental consent. If we learn that we have collected the Personal Information

of someone under the age of thirteen without parental consent, we will take appropriate steps to delete this information. If you are a parent or guardian of someone under the age of thirteen and discover that your child has submitted Personal Information, you may contact us at privacy@attendsafe.com and ask us to remove your child's Personal Information from our systems.

Changes to Our Privacy Policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. We may revise this Policy from time to time at our sole discretion. We will notify you of any material revisions by placing notice of the revised Policy on our website or any place through which you access the Services. Your continued access or use of the Services following any amendments to the Policy constitutes your acceptance of the Policy as amended. It is your sole responsibility to monitor our website for changes to the Policy. The date of this Policy is on the bottom of each page.

Contact Us.

If you would like to update or correct your information, modify your communication preferences, or if you have questions regarding our Privacy Policy or the use of information collected, please contact us using the following information:

PO Box 440, St. Charles, IL 60174
privacy@attendsafe.com

Contacting the Appropriate Authority.

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office through <https://ico.org.uk/make-a-complaint/> or 0303 123 1113.