

## Privacy Statement

**Effective Date: January 1, 2017**

This Privacy Statement (this “Statement”) describes the type of information that ReposiTrak, Inc. (“ReposiTrak” or “we”) collects through your use of our and our affiliates’ online platforms, including [www.repositrak.com](http://www.repositrak.com) and cloud-based services (collectively, the “Services”). This Statement does not apply to information collected about you through any other means, including information collected by third parties or through non-electronic or offline means.

This Statement covers:

- What personal information is collected by ReposiTrak through our Services.
- How ReposiTrak uses this information.
- With whom ReposiTrak may share personal information.
- What choices are available to you with respect to collection, use and sharing of this information.
- What types of security procedures are in place to protect the loss or misuse of this information under our control.

By accessing or using the Services, or by clicking the “accept” button when you register to use a Service, you consent to our use of your personal information as described in this Statement. This Statement may change from time to time. Your continued use of a Service after we make changes is deemed to be acceptance of those changes, so please check the Statement periodically for updates.

This Statement is part of, and is governed by, the ReposiTrak Terms and Conditions, which can be viewed at <http://repositrak.com/TandC>. Capitalized Terms used, but not defined, in this Statement will have the meanings set forth in the ReposiTrak Terms and Conditions.

### **A. Information We Collect**

We collect information from you in three ways. First, you provide us with certain information when you register for and use our Services. Second, we collect certain information automatically as you interact with our Services. Third, you may supply us with information in response to our request or the request of your Hub(s).

#### **1. Information You Provide to Us**

We may collect personally identifiable information from you when you register as a user, provide comments and suggestions, interact with us on our social media channels, order products or services, send us information in response to our requests or the requests of your Hub(s), or send us feedback. If you do not want us to collect this information, please do not provide it. We directly collect the following types of information that you provide to us:

- Identifying information. We may collect personally identifying information, including your name, work email address, work phone number, work address, employer name and work title/position.

- Supplier Documentation and Information. If you are a Supplier, you may provide us with documentation and information related to your Hub(s)' Compliance Plan, including, without limitation, documents and information relating to your various agreements and compliance with laws, rules and regulations.
- User Data Submission. We may collect personally identifying information through your submission of User Data as set forth in the ReposiTrak Terms and Conditions.
- Correspondence. We may collect personally identifying information through records and copies of your correspondence (including email addresses), if you contact us.
- Surveys. Your responses to polls or surveys that we might ask you to complete for research purposes may provide us with your personally identifying information.
- Customer service interactions. To ensure the quality of your interactions with our customer service representatives, we may monitor and record voicemails, phone calls or other communications between you and our representatives.

Depending on the transaction type, we use the third-party payment processors 2CP, Concur, and US Bank to handle certain payment transactions. You can read about their respective privacy practices by viewing their privacy notices here: (i) [www.usbank.com/privacy](http://www.usbank.com/privacy); (ii) [www.concur.com/en-us/privacy-policy](http://www.concur.com/en-us/privacy-policy); and (iii) [www.2cpusa.com/privacy-policy](http://www.2cpusa.com/privacy-policy).

## **2. Information We Automatically Collect from You When You Use the Services**

- Information collected through our cookies. We (or service providers on our behalf) may use technologies, including "cookies," to automatically collect information from you when you use the Services. Cookies are small amounts of data that are stored within your Internet browser, which saves and recognizes your browsing habits. ReposiTrak uses both session cookies (which track a user's progression during one site visit) and persistent cookies (which track a user over time).

Information that may be collected by cookies when you use the Services may include, without limitation:

- web pages you visit;
- date and time of your visit to or use of the Services;
- usage and activity data related to the Services;
- websites you visit before or after visiting the Services;
- browser type;
- Internet Protocol (IP) address used to connect your computer or mobile device to the Internet;
- geolocation data;
- your computer or mobile device and connection information, such as your browser type and version, operating system, and platform; and
- your device identifier.

You can delete cookie files from your hard drive, or avoid them altogether, by configuring your browser to reject them or to notify you when a cookie is being placed on your hard drive. Not all

features of the Services will function as intended if you reject cookies. You can read more about this automatic data collection below.

The information we collect automatically is statistical information and may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. If you do not want us to collect this information, please do not use the Services.

#### **B. “Do Not Track” Requests**

Your Internet browser and mobile device may allow you to adjust your browser settings so that “do not track” requests are sent to the websites you visit. ReposiTrak respects your wishes and will not track user activity once “do not track” signals have been activated.

#### **C. How We Use the Information We Collect**

We may use information collected from or about you for any of the following purposes:

- developing, providing and improving the ReposiTrak products and Services and for other purposes in accordance with the ReposiTrak Terms and Conditions;
- to operate Marketplace, including making the User Data identified in the ReposiTrak Terms and Conditions available to others in the searchable Marketplace database;
- assisting with fulfillment of product orders;
- managing and verifying your account and the identity of users of the Services;
- contacting you when necessary about your account or your use of the Services;
- sending you information and promotional materials about our products and Services as well as our company in general;
- responding to support requests;
- complying with regulatory requirements for the maintenance of records;
- conducting internal reviews of our Services to help us better understand visitors’ and customers’ uses of our Services;
- protecting the security and integrity of our Services;
- complying with court orders and legal process, and to enforce our Terms of Service and this Statement; and
- any other legal, business or marketing purposes that are not inconsistent with the terms of this Statement.

We may combine information we collect about you through the Services with other information about you that we receive from third-party sources. By way of example and not limitation, we may use a change of address or other list service to ensure that our records for your account are accurate.

#### **D. How We Share Your Information with Third Parties.**

We may share the personally identifiable information we collect in connection with the Services with third parties, as described below:

##### **1. Project Creators**

If you are a user, we may share your personal information with project creators, who may use the information to fulfill product or service orders, develop and improve products and services, and contact you about product and service orders, future products and services, or their company in general.

## **2. Service Providers**

We may share your personal information with our third-party distributors, vendors, suppliers and other service providers who provide services to us or on our behalf, such as operating and supporting the Services, performing marketing or consulting services, and assisting us with the preparation and mailing of our business and marketing communications and with processing and fulfillment functions. These third-party service providers may use your personal information for their own marketing purposes.

## **3. Marketplace Subscribers**

We may share your personal information with Marketplace subscribers, who are searching for new Suppliers. Marketplace subscribers may use your personal information to contact you and inquire about a potential commercial relationship or for their own marketing purposes.

## **4. Hubs**

If you are a Supplier, you may provide us with documents and information related to your Hub(s)' Compliance Plan, including, without limitation, documents and information relating to your various agreements and compliance with laws, rules and regulations. The documents and information may contain personal information. We may share the documents and information with your Hub(s) (and any other Hubs in your products' supply chain(s)) to use for any purposes relating to the Hubs' Compliance Plans.

## **5. Third-Party Analytics Providers**

We may share your personal information with third parties who conduct marketing studies and data analytics. These third parties may combine your information with the information of other consumers for purposes of conducting these studies and/or analytics. For example, we use certain Google products to track and report activity within the Services:

- We use **Google Analytics** for tracking and reporting activity within the Services. This allows us to better understand our users and to optimize their digital experience.
- We use the **Google User ID** features to associate data from the different devices and multiple sessions of users, and we may stitch together session data from unauthenticated user visits with authenticated user visits to give us a more accurate count of our users in order to improve usage data.

Note that Google prohibits the transmission of personally identifiable information to Google, so we will not transmit any such information to Google. You have choices regarding Google's use of your information:

- For more information about how Google collects and processes data when you visit websites or use apps that use Google technologies, please see "How Google uses data when you use our partners' sites or apps" at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).

- If you wish to opt out of having your data used by Google Analytics, you may download and install on all your browsers the Google Analytics Opt-out Browser Add-on developed by Google for this purpose, available at <https://tools.google.com/dlpage/gaoptout/>.

## **6. Our Affiliates**

We may share some or all of your information with our subsidiaries and corporate affiliates, joint venturers, or other companies that are or may become under common control with us. We will require these entities to comply with the terms of this Statement with regard to their use of your information.

## **7. Transfer or Assignment in Connection with Business Transfers or Bankruptcy**

In the event of a merger, acquisition, reorganization, bankruptcy or other sale of all or a portion of our assets, any user information owned or controlled by us may be one of the assets transferred to third parties. We reserve the right, as part of this type of transaction, to transfer or assign your personal information and other information we have collected from users of the Services to third parties. Other than to the extent ordered by a bankruptcy or other court, or as otherwise agreed to by you, the use and disclosure of all transferred user information will be subject to this Statement. 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.

## **8. Response to Subpoenas or Court Orders, or Protection of Our Rights**

We may disclose your information to government authorities or third parties if:

- you have given us permission to share your information;
- we are required to do so by law, or in response to a subpoena or court order;
- we believe in our sole discretion that disclosure is reasonably necessary to protect against fraud, or to protect our property or other rights, or those of other users of the Services, third parties, or the public at large; or
- we believe that you have abused a Service by using it to attack or gain unauthorized access to a system or to engage in spamming or other conduct that violates applicable laws or the ReposiTrak Terms of Service.

## **9. Aggregate Information**

We may share aggregate or de-identified information without restriction. While this information will not identify you personally, in some instances third parties may be able to combine this aggregate information with other data they have about you, or that they receive from other third parties, in a manner that allows them to identify you personally.

## **E. Your Choices**

We may provide the opportunity to opt out of receiving communications from us and our partners at the point where we request information about you. In addition, you may unsubscribe or opt out of receiving communications from us by clicking the unsubscribe link on any email marketing communication you receive. You may also change certain details in your profile by logging in and revising or deleting your account information.

## **F. California Privacy Rights**

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice that identifies the categories of personal information we share with affiliates and/or third parties for marketing purposes, and provides contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address:

Park City Group, Inc., Legal Dep't.  
299 S Main St., Ste. 2370  
Salt Lake City, UT 84111

#### **G. How We Protect Your Information**

We place great importance on information security. Customer information stored on our servers is protected through policies, training, access controls and the use of security devices such as firewalls, which are integrated into the infrastructure for the data center, and routers. A security awareness program (including policies and periodic security emails) is in place to inform employees regarding good security practices and recent security trends. A structured on-boarding process is in place and designed to allow only the minimum access required for the role of each user. Customer data access is restricted only to employees with "need-to-know" access, which is based on their job function. Redundant network-level devices are also used to protect data at the network communications level and provide redundancy. You acknowledge that: (a) the limitations of the Internet are beyond our control; (b) the security, integrity and privacy of information and data exchanged between you and us cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party. ReposiTrak has no responsibility or liability for the security of information transmitted via the Internet.

#### **H. Correcting/Updating Your Information**

You may have the right to access the personal information we collect about you. You may also have the right to correct any errors contained in that information. For details, please email us at [legal@parkcitygroup.com](mailto:legal@parkcitygroup.com).

#### **I. No Use by Children**

The Services are not intended for users younger than 18. We do not knowingly collect contact information from children under the age of 13 without verifiable parental consent. If we become aware that a visitor under the age of 13 has submitted personal information without verifiable parental consent, we will remove his or her information from our files.

#### **J. Use of Information Outside Your Country of Residence**

The Services are directed to users located in the United States. If you are located outside of the United States and choose to use the Services or provide your information to us, you should be aware that we may transfer your information to the United States and process it there. The privacy laws in the United States may not be as protective as those in your jurisdiction. **Your consent to this Statement followed by your submission of information to us through or in connection with the Services represents your agreement to the transfer of your information to the United States.**

#### **K. Changes to This Privacy Statement**

We may change this Statement from time to time. If we decide to make a material change in this Statement, we will post it on this page. Your continued use of the Services after the posting of changes to this Statement will mean you accept these changes. In some cases, we may attempt to contact you through an email or other address you have provided, so we can give you choices about our using your information in a manner different from that stated at the time of collection. If we make any material changes in our privacy practices that affect your personally identifiable information that is already in our possession, we will apply those changes to that older information only with your consent or as otherwise allowed by law.

**L. Contact Us**

If you have any questions about this Statement or our use of the information we collect from you in connection with the Services, email us at [legal@parkcitygroup.com](mailto:legal@parkcitygroup.com).