

# PRIVACY POLICY FOR ONEPROTECTION, LLC

Date: November 4, 2020

OneProtection, LLC, a Minnesota limited liability company (the “Company,” “we,” “our,” or “us”), is committed to safeguarding and handling your Personal Information in a responsible and secure manner.

This Privacy Policy (the “Policy”) describes how we process Personal Information of users of [www.OneProtection.tech](http://www.OneProtection.tech) and any sub-domains or sites affiliated with the Company (collectively, the “Website”), and any services, tools, technology, products, features, and mobile apps (together with the Website, the “Services”) provided, operated, and owned by the Company. When we collect, access, use, or do anything with your Personal Information through our Services, we are “processing” your Personal Information. For purposes of this policy, “you” or “your” refers to browsers and/or customers of the Company who access, browse, or in any way interact with the Website or utilize the Services.

**Use of our Services or provision of any Personal Information constitutes agreement to this Policy as well as the terms and conditions of use for the Website. Do not use the Website or provide information (or allow others to do so on your behalf) if you do not agree with all of the terms of use including this Policy and any applicable supplemental privacy policy.**

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### **1. INFORMATION WE COLLECT THROUGH YOUR USE OF THE SERVICES**

“Personal Information” is any information that identifies you or makes you identifiable. We collect different types of Personal Information when you are accessing or using our Services, including:

- (a) *Information You Provide to Us.*

In connection with the Services, we may ask you to provide these categories of Personal Information:

- **Account Information:** Information you provide about yourself to access our Services, including your name, email address, phone number, mailing address, and password, so that we may communicate with you and provide you with the Services. We do not request nor do we ask for you to disclose sensitive information to use such as religious denomination, race, ethnicity, philosophical beliefs, or physical or mental health information.
- **Self-Reported Information:** Information you provide about yourself, as well as records and copies of such correspondence, should you contact us.
- **Transaction Information:** If and when you make a payment through our Services, we collect information regarding the transaction, including the location, description, payment amounts, billing information, and payment methods. A Service Provider, Stripe, directly collects payment information, including payment card number, expiration date, and authorization number or security code. Stripe's use of your Personal Information is governed by their privacy policy, (<https://stripe.com/us/privacy>) and may be modified by Stripe from time to time. By conducting payments through our Services, you hereby agree to be bound by Stripe's privacy policy and other related agreements. Per Stripe's requirements, you shall have the right to affirmatively opt-in to have your full card information and payment method stored. Nonetheless, we may retain certain payment information (such as the last four digits of a payment card number) to enhance your experience in using the Services and for internal purposes (such as accounting and auditing) as permitted by law.
- **User's Client Information:** In order to provide you with our Services, we may collect information that you upload relating to your clients, including their name, date of birth, medical and financial information.<sup>1</sup> The Company does not collect any additional information on behalf of your clients, either directly or indirectly, including client social security numbers.
- **Voluntary Information:** Information you provide to us voluntarily by filling in forms on our Website, subscribing to certain offerings on the Website (such as mailing lists, etc.), contacting us, or posting material. We may also ask you for Personal Information if you report a problem with the Website.
- **User Contributions:** Information you may provide that is to be published or displayed on (i) public areas of the Website, (ii) websites you access through the Website, or (iii) transmitted to other users of the Website or third parties. Your User Contributions are posted and transmitted to others at your own risk. We cannot control the actions of other users or third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will be shielded from unauthorized persons.

Please keep in mind that if you disclose Personal Information in a public manner whether through collaborative postings, message boards or other public online forums, this information may be collected and used by others. We do not monitor or collect

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<sup>1</sup> Note to OP: Please include any further specifics as to what you may be collecting from user's clients here.

information you disclose inside online public forums, nor do we accept any liability associated with your voluntary disclosure of same.

We also collect certain statistics and non-Personal Information concerning the Account Information, Self-Reported Information, Voluntary Information, and User Contributions of you and our other users. We use this information to better understand our users and improve upon the Website. We may also share this information as discussed below.

(b) *Usage Information Automatically Collected.*<sup>2</sup>

When you visit the Website or access and use the Services, we automatically collect information about the Services you use and how you use them (“Usage Information”), as described below:

- **Service Data:** We collect information about your interactions with the Services, such as the pages or other content you view, and other actions you perform while using the Services.
- **Log Data:** We automatically collect log information when you use the Services. This might include information about your computer, mobile, and internet connection, including the mobile devices’ unique device identifier, IP address, click activity, operating system, browser type, mobile network information, the mobile device’s telephone number, device event information (e.g. crashes, unsuccessful logins, browser type), the web page you’ve viewed or engaged with before or after using the Services, and other relevant information. We collect and monitor this data in order to keep track of the security and privacy of your account. This information may also be used to gather and aggregate broad demographic information and profile data. If you do not want us to collect this information you should cease use of the Website.
- **Cookies and Similar Tracking Technologies:** We may use various tracking technologies to collect and store information about your use of our Services. We use these tools to ensure that you receive a personalized experience, to provide you with certain functions on our Services, to keep your account safe, and to improve and optimize our Services. Please refer to the Cookies and Similar Tracking Technologies section below for more information.

(c) *Information from Third Parties*

By using the Website to access or connect to a social network or other third-party platform or service (e.g., Facebook, Twitter), you authorize us to collect, store, and use any and all information in the same manner and to the same extent that you agreed the social network or third-party platform could collect, store, or use the information. Once the Personal Information has been transferred to the Website from a third party, you may or may not be able to rescind or remove the information.

## 2. HOW WE USE YOUR INFORMATION

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<sup>2</sup> Note to OP: This information is often collected by your web / technical team, whether or not you actively “use” it for any marketing. Most often, this information is used to provide the user with the application, work adequately on the specific device, and, as it relates to cookies, develop effective marketing strategies. Please feel free to edit as factually necessary.

Your Personal Information may be used for various purposes, including:

(a) *To Provide You with the Services.*

When you access or use our Services, we process certain Personal Information about you to be able to provide you with our Services. This may include:

- Providing you with the products and feature presented as part of the Services, including the Income Protection Software Analysis tool (“IPSA”);
- Determining whether the Services are available in your country;
- Processing or recording payment transactions or subscriptions to the Services;
- Displaying your historical transaction or information;
- Developing new products and services;
- Delivering the information and support you request, including technical notices, security alerts, and support and administrative messages including to resolve disputes, collect fees, and provide assistance for problems with our Services or your account;
- Improving, personalizing, and facilitating your use of our Services; measuring, tracking, and analyzing trends and usage in connection with your use or the performance of our Services; or
- For any other purpose with your consent.

We cannot provide you with our Services without such processing of your Personal Information.

(b) *To Communicate with You.*

If you sign up for our Services, you will receive Service-related communications, via email, phone, push notification, or otherwise, utilizing the contact information you provide to us or make available through your account. Our Service-related communications are transactional messages about your account, billing information, surveys, customer support, research you may be interested in or are participating in, Policy changes, or other Service-related notifications. We may also use your Personal Information for marketing, promotional, or sweepstakes related communications and initiatives. You can manage your email preferences and push notification preferences and opt out of certain communications. However, Service-related communications, as well as security and legal notices, are necessary for us to continue to provide our Services to you.

(c) *To Enforce our Terms, Agreements, or Policies.*

To maintain a safe, secure, and trusted environment for you when you use the Services, we use your Personal Information to make sure our terms, policies, and agreements with you and any third parties are enforced. We actively monitor, investigate, prevent, and mitigate any suspected or actual prohibited activities on our Services. We are required to process your Personal Information for this purpose to provide our Services.

(d) *For Research and Development.*

We want to ensure our Services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we may process your Personal Information to improve, optimize, or expand our Services or features of our Services. We do so by processing information about your use of the Services, any information you provide to us, and by measuring, tracking, and analyzing trends and usage in connection to your use or the performance of our Services. We take additional security measures when processing your Personal Information for such purposes, such as by de-identifying (or “pseudonymizing”) your Personal Information and limiting access to such data. Without processing your information for such purposes, we may not be able to ensure your continued satisfaction when using our Services.

(e) *To Comply with Applicable Laws.*

We may be required to process your Personal Information under certain laws and regulations, such as tax laws. We will also process any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that we may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the Company’s Terms of Service and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of the Company, its employees, its users, its clients, and the public. We cannot provide the Services to you without such processing.

### **3. HOW WE SHARE YOUR INFORMATION**

We may share your Personal Information we collect and you provide as discussed below:

(a) *Disclosure to Our Service Providers.*

We may disclose data, including Personal Information, that we collect or you provide as described in this Policy, to service providers we use in connection with the Services, such as:

- To process and store data, including Personal Information;
- To aid in the maintenance of the Website and Services;
- For auditing purposes;
- To process payments on the Website;
- To track, analyze, and modify our Services;
- To aid in marketing, advertising, and distribution efforts;
- To assist us in providing you with customer support; and
- To support our IT and security efforts.

These and other service providers to which we give your Personal Information will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose nor use it for other purposes.

**Contentful.** We use Contentful as a Service Provider to assist us in managing the content provided on the Services. In connection with providing these services, we may disclose Personal

Information that we collect or you provide to Contentful, only to the extent needed for Contentful to provide their services. Further detail on how Contentful handles Personal Information can be found on their privacy policy, located at <https://www.contentful.com/legal/privacy/>.

**[Google Analytics.** Google Analytics is an analytics service provider. Learn more about how Google collects and uses data [here](#). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](#). To opt out of Google Analytics entirely please use [this link](#).]<sup>3</sup>

(b) *Merger, Bankruptcy, or Corporate Reorganization.*

We may disclose and transfer your Personal Information to a subsequent owner, co-owner, or operator of the Company or the Services, or in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets (i.e., a bankruptcy proceeding), or other corporate change. We will notify you with any choices you may have regarding your Personal Information when we are engaged in a merger, bankruptcy, or reorganization.

(c) *Legal Obligations and Safety.*

We may share your Personal Information if it is reasonably necessary to:

- Comply with a valid legal process (e.g., subpoenas, warrants, court orders, etc.);
- Comply with requests or investigations by public authorities;
- Comply with applicable laws or regulations;
- Enforce or apply the Company's policies or policies of our partners;
- Protect the security or integrity of the Services; or
- Protect or defend the rights, property, or safety of the Company, our employees, users, partners, and affiliates, or other natural persons.

(d) *For any other Purpose, with your Consent.*

We may disclose your Personal Information that we collect or you provide on your behalf or at your request. Such disclosures will only occur with your specific consent. If you provide your consent to share your information, you may withdraw your consent at any time. Withdrawing your consent will not undo or reverse the lawfulness of any previous processing, and in some cases Personal Information may not be retrieved once shared. Contact us at [Contact@OneProtection.tech](mailto:Contact@OneProtection.tech) if you would like to withdraw your consent.

#### **4. YOUR CHOICES**

For Personal Information that we have about you, you have the following choices:

(a) *Your Account.*

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<sup>3</sup> Note: If the site intends to utilize Google Analytics (as is common), please include this language. Per our conversation, it did not sound like OP utilized Google Analytics; however, I've included here as optional in case you do decide in the future (you can remove until you do).

You may edit some of your Personal Information through your account or ask us to change, update, or fix your Personal Information in certain cases, including if it's inaccurate. When you update your account information, we may keep a copy of your previous account details for our records and to prevent fraud or other activities that violate our terms, policies, and agreements. Additionally, please note that by removing some of your data, your ability to use certain functionality of the Services may be limited. Further, if you do not provide us with some of your Personal Information, such as your name or email, we will no longer be able to provide you with access to certain Services.

(b) *Self-Reported and Voluntary Information.*

You may choose not to provide us with some of your Personal Information. In some instances, you may be able to edit your answers to forms, surveys or features you submit to us. If you cannot find the information you are looking for in your account, please contact us at [Contact@OneProtection.tech](mailto:Contact@OneProtection.tech) with your request.

(c) *Communication Preferences.*

If you do not want to receive emails from us, please adjust your communication preferences or click the unsubscribe link within the email you received from us. You will not be able to unsubscribe from Service-related communications as they are necessary for us to continue offering you the Services.

(d) *Deletion.*

At any time, you may delete your account or any related applications downloaded on your devices. Deleting related applications does not delete your account nor any related Personal Information. If you wish to delete your account completely, please email us at [Contact@OneProtection.tech](mailto:Contact@OneProtection.tech).<sup>4</sup>

To make these or any other requests with respect to your choices as to your Personal Information, you may email us at [Contact@OneProtection.tech](mailto:Contact@OneProtection.tech). We ask that individuals making requests identify themselves and identify the information requested to be accessed, corrected, or removed before we process any requests. We may decline to process requests if we cannot verify the requestor's identity, if we believe the change would violate any law or legal requirement or cause the information to be incorrect, or for a similar purpose. In any case, where we provide information access, deletion, or correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

If you choose to close your account or ask that we modify or delete some or all of your Personal Information, we will retain your personal data if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce obligations or fulfill any other requests from you (for example, to opt-out of further messages or for a copy of your data).

## **5. THIRD-PARTY SERVICES**

You may find links to other websites, third party applications, and widgets on our Services that we do not own nor control. When you click on links on our Services, they may direct you away from

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<sup>4</sup> Note: Please edit if necessary to align with the process for users to "cancel their account."

our Website. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements and policies. Once you leave our Services or are redirected to a third-party website or application, you are no longer governed by this Policy or our Website's Terms of Service. Websites containing co-branding (referencing our name and a third party's name) contain content delivered by the third party and not us.

## **6. SECURITY**

We take reasonable precautions and implement industry standard security safeguards designed to protect your Personal Information, in order to ensure that it is not inappropriately lost, misused, accessed, disclosed, altered, or destroyed. These include using encryption for your data while it is being transmitted between your device or browser and our servers.

However, given the nature of communications and information technology and that the use of the internet has inherent risks, we cannot warrant or guarantee that information provided to us through the Website or stored in our systems or otherwise will be absolutely free from unauthorized intrusion by others, nor can we warrant or guarantee that such data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

## **7. CHILDREN'S PRIVACY**

The Services are not designed or intended to attract children under 13 years of age. The Services do not collect Personal Information from any person we actually know is under the age of 13. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [Contact@OneProtection.tech](mailto:Contact@OneProtection.tech).

## **8. COOKIES AND SIMILAR TRACKING TECHNOLOGIES<sup>5</sup>**

### *(a) Summary*

We may use cookies and similar tracking technology (such as web beacons and pixels) to collect Usage Information about your use of our Website. Cookies are small files, typically comprised of letters and numbers, that your computer or mobile device saves when you visit certain websites. When you return to the Websites that save cookies on your device—or visit other websites that use the same cookies—that website recognizes such cookie and your browsing device. Generally, we use first-party and third-party cookies for the following purposes:

- To make our Website function properly;
- To provide a secure browsing experience during your use of our Website;
- To collect Usage Information about your use of our Website to help us improve and optimize our Website; and
- To remember your preferences for your convenience.

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<sup>5</sup> Note to OP: We've included this section conservatively, should you aim to implement future pixels / cookies onsite. This language covers OP broadly; to the extent you wish to specify it further (which is not necessary, though nice-to-have), please feel free to do so.

Cookies set by us are called “first-party cookies,” while cookies set by parties other than the Company are called “third-party cookies.” The parties that set third-party cookies can recognize your computer both when it visits the Company’s Website and when it visits certain other websites or mobile apps. We do not control how third-party cookies are used. You should check the third-party’s website for more information about how they use cookies. Both first-party and third-party cookies can be serve a number of different functions, such as analytics, marketing, and advertising.

(b) *Types of Cookies on Our Services*

The Website may use both “session” cookies and “persistent” first and third-party cookies. A session cookie is temporary and disappears after you close your browser. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the Website. Persistent cookies can be removed by following your web browser’s directions.

(c) *Managing Cookies Through Browser Settings*

You can enable, disable, or delete cookies through the browser you are using to access our Services. Many browser manufacturers provide helpful information about cookie management, including, but not limited to:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

Please note, if you set your browser to disable cookies, you may not be able to access secure areas of our Services, and/or parts of the Services may not work properly for you. You can find more information about how to change your browser cookie settings at <https://www.allaboutcookies.org>.

## **9. USERS FROM OUTSIDE THE UNITED STATES & NO RIGHTS TO THIRD PARTIES<sup>6</sup>**

The Website is offered in the United States and is governed by the laws of the United States and the State of Minnesota. If you are using the Website from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the State of Minnesota, the United States, and other countries might not be as comprehensive as

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<sup>6</sup> To OP: We’ve included this language under the premise that OP will not operate in the EU or cater to EU customers. if EU customers are a target client base / if OP plans to operate in Europe, we will need to adjust this language accordingly.

those in your country. By using the Website, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it with as described in this Policy. This Policy does not create rights enforceable by third parties.

#### **10. DO NOT TRACK SIGNALS**

Currently, we do not monitor or take any action with respect to Do Not Track signals or other mechanisms, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

#### **11. CHANGES TO POLICY**

We may modify this Policy from time to time, without prior notice, and any changes may apply to any Personal Information we already hold about you, as well as any new Personal Information collected after the Policy is modified. When changes are made, we will notify you by revising the date at the top of this Policy. We will provide you with advance notice if we make any material changes to how we collect, use, or disclose your Personal Information that impacts your rights under this Policy. You agree to review the Policy posted on the Website each time you use the Website so that you are aware of any modifications to this Policy. Your continued usage of the Website following any changes constitutes your acceptance of those changes.

#### **12. CONTACT THE SITE**

If you have any questions or comments about this Policy, please contact us at [Contact@OneProtection.tech](mailto:Contact@OneProtection.tech) or by mail at:

OneProtection, LLC  
7820 Terrey Pine Court, Suite #200  
Eden Prairie, MN 55347