

PRIVACY POLICY

Revised February 10, 2023

This Privacy Policy governs your use of the website, software, service, extension, or mobile application, that links to this Privacy Policy (collectively, this “Service”) and is by and between Approach Software LLC (referred to herein as “Company,” “we,” “us,” or “our”) and you, the user, on behalf of yourself and the user, customer or supplier (herein referred to as “you” or “your”) for which you are visiting or using our Service.

This page is used to inform users regarding our policies concerning the collection, use, and disclosure of personal data when you use our Service.

You do not have to give us personal data to visit our website.

Information Collection and Use

This Privacy Policy explains:

- What information we gather;
- How we gather information;
- How we use the information;
- With whom we may share information;
- Security of the information;
- Storage of the information;
- Your rights and choices; and
- Contact Information.

Please note that we may update this Privacy Policy without notice from time to time by posting the updated terms on our Website. You are responsible for periodically reading this Privacy Policy. If you use our Service after we have updated this Privacy Policy, you acknowledge that you have read the updated terms and consent to our revised privacy practices.

By becoming a registered member or otherwise using our Service, you acknowledge that you have read this Privacy Policy and consent to our privacy practices as described in this Privacy Policy, including our use and disclosure of personal data for the purposes described below.

If you or your customers are residents of a country in the European Union, Iceland, Lichtenstein, Norway or the United Kingdom, please read this Privacy Policy to understand additional rights you or your customers may have pursuant to the General Data Protection Regulation (GDPR).

If you are a resident of the State of California, please also read “California Residents—Your Privacy Rights” below to understand additional rights you may have pursuant to California Civil Code Section 1798.83 and the California Consumer Privacy Act of 2018.

Information we gather and track.

We may collect two types of information from you and other registered users of our Website: (1) "personal data" and (2) "non-personal data".

"Personal data" is information that identifies an individual personally, such as your name, address, telephone number, email address, or company name.

"Non-personal data" does not identify an individual personally. This can be technical information, such as aggregated tracking information derived mainly by tallying page views throughout our Service, or it can be demographic information. To better serve you and improve this Service, we may conduct research utilizing certain anonymized Personal Information in statistical form. This research may be compiled and analyzed on an aggregate basis, and we may share this de-identified or aggregated information with our affiliates and third parties with whom we do business. This de-identified or aggregate information does not identify a user personally. We may also disclose de-identified or aggregated information in order to describe this Service to current and prospective third parties with whom we conduct business. We may use de-identified or aggregate information for the purposes described in this Privacy Policy or for any other legal purpose.

We do not offer the Service to children. Should an individual whom we know to be a child under age 18 send personal data to us, we will take measures to remove that user's personal data from our databases. From time-to-time we may come into contact with persons under the age of 18 as may be necessary in the performance of our contractual obligations. In such instances we take reasonable efforts to not collect or store any personally identifiable data of such persons.

This Service may allow you to disclose Personal Information relating to another person (for example, a family member). If you disclose any Personal Information relating to other people in connection with this Service, you represent to us that you have the right and authority to (i) submit that information to us, and (ii) to permit us and our third-party service providers to manage, process, use, and disclose that information in accordance with this Privacy Notice.

How we gather and track information.

Personally Identifiable Information.

As part of the registration process, we may collect your or your company and/or trade name, contact name, telephone number, principal address, credit card information and email address.

We may collect your current location.

Additionally, we may collect/retain your preference information, such as product wish lists, order history, marketing preferences.

As part of the utilization of the Service by you, we store in our databases certain information regarding your customers and prospective customers, including name, telephone number and/or email address, operational notes, pricing, photographs and other business-related information,

log in times, all details about your usage of the Service. In some cases, individual preferences and requirements will also be maintained as part of the customer or potential customer profile.

From time-to-time visitors to our website may request information about our We Service and provide their name and email address. We collect and retain that information.

Non-Personally Identifiable Information.

We may place a text file called a “cookie” in the browser files of your computer (if you or your browser accept the cookie) to collect information about your activity on our website. A cookie can’t read data off your hard disk or read cookie files created by other sites. You can refuse cookies by turning them off in your browser but if you do, you may not have access to some areas of our website, or to the personalized features of our website. You may also set your browser to warn you before accepting cookies.

As is true of most web sites, we gather certain information automatically and store it in log files. This information includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp and clickstream data.

How we use Information we gather and track.

Personal data.

We use personal data that we gather from registered users and store in our databases (whether the personal data relates to the registered user or any customers or potential customers of the registered user) to provide the Service and functionality for which registered users subscribe. Under no circumstances do we divulge any personal data to any third party other than as described in this Privacy Policy.

We may purchase marketing data about our customers from third parties and combine it with information we already have about you, to create more tailored advertising and products.

For example, we use your personal data:

To provide notifications for certain activities relating to your use of our Service despite your indicated e-mail preferences, for example we may send you notices of any updates to our Terms of Use or Privacy Policy.

To authorize your access to appropriate services, pages, screens and data in our system;

To send promotional materials to you or your customers and potential customers that you have requested that we send on your behalf;

To communicate with you regarding our Service, new services and changes to our Service that we may make from time to time;

To provide customer and technical service to you;

To assess your needs or the needs of your business to determine suitable products;

To send you a newsletter;

To send you marketing communications;

To comply with law, or in the good faith belief that such action is necessary to conform to the requirements of law, or comply with legal process served on us, and to protect and defend our rights or property, including our rights and property and our Service, or act in urgent circumstances to protect the personal safety of you and our other visitors; and

To protect against fraud or potential fraud.

We use name and email addresses provided by visitors to our website who expressly request information from us in order to provide the requested information to them.

Non-Personal data.

We use non-personal data that we gather and track to analyze trends, to administer the site, understand how our Service is utilized, to gather demographic information about our user base as a whole, and for any other lawful purpose.

With whom we may share information

We may share, as controller or as processor providing Service at the direction of our clients, personal data to third parties who perform services on our behalf, including our technology providers, payment card processor, administrative personnel and providers and professional advisors.

Company uses a limited number of third-party service providers to assist us in providing our services to customers. These third-party providers assist with the transmission of data and provide data storage services. These third parties may access, process, or store personal data in the course of providing their services. Company maintains contracts with these third parties restricting their access, use and disclosure of personal data.

If you are a registered user and have opted to use our payment processing, we may require additional information from you in order to collect payments on your behalf and provide payments to you. We use a third-party payment processor, who will require the collection of payment information for you from your customers, your vendors, and other parties to whom we provide payments on your behalf and from whom we collect payments on your behalf. This information is used solely to collect and provide payments related to these Website and is stored by the payment processing service. We cannot guarantee that there will not be a security breach of the payment processing company.

We may disclose information if we have a good faith belief that disclosure is necessary by law or the legal process, to protect and defend our or others' interests or property, or to enforce agreements you or our clients enter into with us. Company may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We may obtain your written consent from time to time in electronic form by using online agreements or other acknowledgements through our application, including for any other contemplated uses of your personal data not addressed in this Privacy Policy. Please read all online agreements carefully before accepting them.

In the event Company goes through a business transition, such as a merger, acquisition by another company, or sale of all or substantial portion of its assets, your personal data will likely be among the assets transferred.

Security of the information.

We follow generally accepted industry standards to protect the personal data as well as the financial data submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security.

If we learn of a breach of our security system or processes, we may attempt to notify you electronically so that you can take appropriate protective steps. By using our Service, or providing personal data to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Service. In the event of a breach, we may post a notice on our website and/or send you an email at the email address you provided.

YOU MAY HAVE ADDITIONAL RIGHTS TO RECEIVE WRITTEN NOTICE OF SECURITY BREACHES UNDER APPLICABLE LAW OF YOUR JURISDICTION.

Storage of Information

We retain the personal data we collect for so long as reasonably necessary to fulfill the purposes for which the data was collected, to perform our contractual and legal obligations, and for any applicable statute of limitations periods for the purposes of bringing and defending claims.

Legal Basis for Processing

We rely on the following legal grounds to process your personal data:

Consent. We may use your personal data as described in this Privacy Policy subject to your consent.

Performance of a contract. We may need to collect and use your personal data and the personal data of your customers, as applicable, to perform our contractual obligations. When we process personal data on behalf of third parties, we do so pursuant to agreements with such third parties.

Legitimate Interests. We may use your personal data for our legitimate interests to provide our Service and to improve our Service and the content on our website. We process information on behalf of third parties who have legitimate interests in operating their businesses. We may use technical information as described in this Privacy Policy and use personal data for our marketing

purposes consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law.

Your rights and choices

We communicate with our registered members on a regular basis via email. For example, we may use your email address to confirm your request, to send you notice of payments, to send you information about changes to our products and services, and to send notices and other disclosures as required by law. Users can opt-out of all email communications regarding commercial advertisement or commercial products and services promotion from Company by contacting us. We will process your unsubscribe request as soon as possible, but please be aware that in some circumstances you may receive a few more messages until your request is processed. You also may opt-out of receiving such emails by clicking on the "unsubscribe" link within the text of the applicable email.

You may contact us to request information about the personal data we have collected from you and to request the correction, modification or deletion of such personal data, which requests we will do our best to honor subject to any legal and contractual obligations.

Our Director for Compliance is responsible for our privacy programs.

For information about the personal data we have collected from you and to request the correction, modification or deletion of such personal data, please email compliance.PC66@fullsteam.com or request by mail addressed to:

Fullsteam Operations LLC
Attn. Compliance PC66
540 Devall Drive, Suite 301
Auburn, AL 36832

Subject to local law, you may have additional rights under the laws of your jurisdiction regarding your personal data, such as the right to complain to your local data protection authority.

Data processed: Company provides online tools that our customers use to operate their services businesses, including by providing access to certain of those tools to their own customers. In providing these tools, Company processes data our customers and our customers' customers submit to our Service or instruct us to process on their behalf. While Company's customers and their customers' customers decide what data to submit, it typically includes information about their customers, sales prospects, services and services rendered, products used, management, and goods ordering.

Purposes of data processing: Company processes data submitted by our customers and our customers' customers for the purpose of providing Company's Service to them. To fulfill these purposes, Company may access the data to provide the Service, to correct and address technical or service problems, or to follow instructions of the customer who submitted the data, or in response to contractual requirements.

Inquiries and complaints: If you believe Company maintains your personal data in the Company Service within the scope of the GDPR or applicable law of another jurisdiction, you may direct any inquiries or complaints concerning our compliance to our address noted above. Company will respond within 45 days. We are committed to respond to complaints and to provide appropriate recourse at no cost to you.

Third parties who may receive personal data: Company uses a limited number of third-party service providers to assist us in providing our Service to customers. These third-party providers assist with the transmission of data and provide data storage services. These third parties may access, process, or store personal data in the course of providing their services. Company maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance with our obligations, and Company may be liable if they fail to meet those obligations and we are responsible for the event giving rise to the damage.

Your rights to access, to limit use, and to limit disclosure: Residents of the EU, UK, Iceland, Lichtenstein and Norway and certain other jurisdictions have rights to access personal data about them, and to limit use and disclosure of their personal data. Company has committed to respect those rights. Because Company personnel have limited ability to access data our customers submit to our Service, if you wish to request access, to limit use, or to limit disclosure, please provide the name of the Company customer who submitted your data to our Service. We will refer your request to that customer, and will support them as needed in responding to your request.

Compelled disclosure: Company may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Third-Party Websites and Advertisers

Our Service may contain links to third-party websites. While we endeavor to work with third-parties that share our respect for user privacy, we are not responsible for the websites or privacy practices of such third-parties. We may also use third-party advertisers, ad networks, and other advertising, marketing, and promotional companies, to serve advertisements in our Service. Such third parties may gather information about your visit to our Service or other websites, monitor your access to or market products or services to you, monitor the ads you view, click-on, or interact with, when they were delivered, and the screens and pages that they are on.

We do not endorse these parties, their content, or any products and services they offer. You are responsible for knowing when you are leaving our Service to visit a third-party website, and for reading and understanding the terms of use and privacy policy statements for each such third party.

Feedback

This Privacy Policy does not apply to any unsolicited free-form information you provide to us through the Service or through any other means. This includes, but is not limited to, information posted to any public areas of the Service, such as forums, blogs, and any ideas for new services

or modifications to this Service, and other unsolicited feedback (collectively, "Feedback"). All Feedback shall be deemed to be non-confidential and we shall be free to reproduce, use, disclose, and distribute such Feedback to others without limitation or attribution.

California Residents – Your Privacy Rights

California Information-Sharing Disclosure

(As provided by California Civil Code Section 1798.83)

A California resident who has provided personal information to a business with whom he/she has established a business relationship for personal, family, or household purposes ("California customer") is entitled to request information about whether the business has disclosed personal information to any third parties for the third parties' direct marketing purposes. In general, if the business has made such a disclosure of personal information, upon receipt of a request by a California customer, the business is required to provide a list of all third parties to whom personal information was disclosed in the preceding calendar year, as well as a list of the categories of personal information that were disclosed.

However, under the law, a business is not required to provide the above-described lists if the business adopts and discloses to the public (in its privacy policy statement) a policy of not disclosing customer's personal information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of personal information and providing a cost free means to exercise that right.

As stated in our Privacy Policy, we do not share personal information with third parties for their direct marketing purposes unless you affirmatively agree to such disclosure -- typically by opting-in to receive information from a third party. To prevent disclosure of your personal information for use in direct marketing by a third party, do not opt-in to such use when you provide personal information on our Service. Please note that whenever you opt-in to receive future communications from a third party, your information will be subject to the third-party's privacy policies and practices. If you later decide that you do not want that third party to use your information, you will need to contact the third party directly, as we have no control over how third parties use information. You should always review the privacy policies and practices of any party that collects your information to determine how that party will handle your information.

California customers may request further information about our compliance with this law by e-mailing compliance.PC66@fullsteam.com. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address.

California Do Not Track Disclosure:

Our Website do not respond to “do not track” browser signals. Depending on the browser you are using, you may be able to choose to block third party cookies or browse in a private browsing mode. Our Website is accessible even when private browsing is turned on. The information we collect is governed by this Privacy Policy.

California Consumer Additional Information under California Consumer Privacy Act of 2018 (“CCPA”)

You will not receive discriminatory treatment by us for exercising your privacy rights conferred on you by the CCPA.

You have certain additional rights regarding your personal information, pursuant to California law. These include the rights to:

- receive a list of the categories of personal information we have collected about you;
- receive a list of the categories of sources from which your personal information was collected;
- receive a list of the categories of your personal information that we have disclosed for a business purpose;
- receive a list of the categories of third parties to whom your personal information was disclosed for a business purpose;
- know the business or commercial purpose for collecting your personal information;
- receive a list of specific personal information we collected and for what purposes;
- have your personal information deleted by us and direct our service providers to delete your information. However, it may be retained pursuant to an allowed exception if applicable;
- know if personal information was collected from sources other than from you and the categories of sources from which the information was obtained; and
- receive your personal information in a useable electronic format and transmit it to a third party (right to data portability).

Please submit your request for information or deletion of information concerning you as noted below. In order to provide you with your requested information or to delete the information which we have concerning you, we must be able to verify that you are the person requesting the information or deletion. With your request please provide at least two items of information which you have previously provided to us for us to use for verification of your identity. If this is not sufficient, we will contact you for additional means of verification.

You may designate an authorized agent to make a request for you. If your agent has a power of attorney pursuant to California Probate Code sections 4000 to 4465, please provide proof to the same. If your agent does not have a power of attorney pursuant to California Probate Code sections 4000 to 4465, we will require you to provide the authorized agent written permission to

make the request, verify your own identity directly with us and require your agent to submit proof that they are authorized by you to act on your behalf.

For information concerning you or for deletion of information concerning you, please email compliance.PC66@fullsteam.com or request by mail addressed to:

Fullsteam Operations LLC
Attn. Compliance PC66
540 Devall Drive, Suite 301
Auburn, AL 36832

Jurisdiction and Contact Information

Our Service is controlled and operated from Canada and the United States. If you are an individual from the European Union, Iceland, Lichtenstein, Norway or any other jurisdiction with laws or regulations governing personal data collection, use, and disclosure that differ from United States and/or Canadian laws, please be advised that we may store the information we collect in Canada, the United States or in other countries where we or our third-party service providers have operations. Personal data may also be transferred from the country of your residence to other countries, including Canada and the United States.

VeraSafe has been appointed as Company representative in the United Kingdom for data protection matters, pursuant to Article 27 of the United Kingdom General Data Protection Regulation. If you are located within the United Kingdom, VeraSafe can be contacted in addition to or instead of compliance.PC66@fullsteam.com, only on matters related to the processing of personal data. To make such an inquiry, please contact VeraSafe using this contact form: <https://verasafe.com/public-resources/contact-data-protection-representative> or via telephone at: +44 (20) 4532 2003. Alternatively, VeraSafe can be contacted at:

VeraSafe United Kingdom Ltd.
37 Albert Embankment
London SE1 7TL
United Kingdom

VeraSafe has been appointed as Company representative in the European Union for data protection matters, pursuant to Article 27 of the General Data Protection Regulation of the European Union. If you are in the European Economic Area, VeraSafe can be contacted in addition to compliance.PC66@fullsteam.com, only on matters related to the processing of personal data. To make such an inquiry, please contact VeraSafe using this contact form: <https://verasafe.com/public-resources/contact-data-protection-representative> or via telephone at: +420 228 881 031.

Alternatively, VeraSafe can be contacted at:

VeraSafe Ireland Ltd.
Unit 3D North Point House
North Point Business Park
New Mallow Road
Cork T23AT2P

Ireland

If you have any questions or suggestions regarding our Privacy Policy, please contact us:

By mail:

Fullsteam Operations LLC

Attn. Compliance PC66

540 Devall Drive, Suite 301

Auburn, AL 36832

By email: compliance.PC66@fullsteam.com