

# Acta Solutions PRIVACY POLICY

Effective Date: June 15, 2023

## 1. INTRODUCTION

Acta Solutions Inc ("Acta Solutions", "we", "us", or "our") want you to be familiar with how we collect, use and disclose information from and about you because we respect your concerns about privacy, and we want to maintain your trust.

This Privacy Policy applies to information we collect from all sources, including in connection with our websites, applications ("apps"), electronic newsletters, conferences, and events (collectively the "Acta Solutions Services") that link to this Privacy Policy. If there is a conflict between this Policy and Acta Solutions' subscription agreement, the subscription agreement will take precedence.

This Policy describes the types of Personal Data we collect, how we use it, and with whom we share it. It also describes Acta's practices for handling Other Information (e.g., interests, demographics and services usage) collected through our Acta Solutions Services or from a third party to the extent such information is associated with a particular device, user or user account. We also describe the measures we take to protect the information, your options for choice and access, and how you can contact us about privacy practices. By using the Acta Solutions Services, you acknowledge you have read and accept this Privacy Policy.

## 2. WHAT WE COLLECT

Acta Solutions collects Personal Data to offer services you have requested or that we have a legitimate interest to believe are of interest to our customers, to manage the relationships we have with our customers and partners, and to perform activities based on your consent. Acta Solutions may collect the following information from and about you:

### 2.1 Personal Data

"Personal Data" for purposes of this Privacy Policy is the information that identifies you as an individual or relates to an identifiable person.

#### 2.1.1 Personal Data You Submit

We collect Personal Data when you submit it to us, such as when you create a profile; participate in a survey; visit Acta Solutions Services; use an interactive feature (such as chat or

feedback); or contact customer service. The Personal Data you submit may include your name, mobile number, email address, or profile picture.

#### 2.1.2 Personal Data We Receive from Third Parties

We do not collect personal data from third parties.

### 2.2 Other Information

"**Other Information**" is any information that is not intended to reveal your specific identity to us, such as browser information, usage data, information collected through cookies and other technologies, demographic information, geolocation data obtained with your consent where required by applicable law, and aggregated information.

#### 2.2.1 Other Information You Submit

We collect Other Information when you submit it to us. This may include your password, username, email, and position within your organization.

#### 2.2.2 Other Information We Receive from Third Parties

We do not receive information about you from third parties.

#### 2.2.3 Other Information Collected Automatically

Our system will track frequency of usage and number of clicks on specific components of our interface.

Acta Solutions is not responsible for the privacy practices of such third parties, and once you leave the Acta Solutions Services you should check the applicable third party privacy policy.

## 3. HOW WE USE YOUR PERSONAL DATA AND OTHER INFORMATION

We may use the Personal Data we collect from and about you for the purposes set forth below. We may use and disclose Other Information for any purpose, except if it is considered Personal Data under applicable law. If we combine Other Information with your Personal Data, we treat the combined information as Personal Data.

To improve the quality of our products and services and to personalize your experience by presenting content, products and offers tailored to you, we may also combine the Personal and Other Information we collect with information relating to your use of other Acta Solutions products, services and websites.

This information can be used to understand usage across sites and devices to help improve our products, remember your preferences, and provide content recommendations.

### **3.1 To Provide, Measure and Improve Our Products and Services**

We use the information we collect from and about you to provide our products, services and features to you, including: to process and fulfill your subscription, to create and manage your accounts, to send you information about your relationship or transactions with us, to measure and improve services and features, to allow you to engage with us , to use collaboration tools to share content and collaborate with other users, to provide you with customer support, including online chats, and to respond to inquiries. If you choose to use the collaboration tools, some of your Personal Data may be included in a directory that can be viewed and used by other users of these collaboration tools.

### **3.2 To Deliver Relevant Content and Recommendations**

To make your experience more interesting and personalized, we may use any of the Personal Data and Other Information we collect to assist us in delivering content on any of our Acta Solutions Services.

### **3.5 To Contact You**

Acta Solutions may periodically send promotional materials, with your permission where required, surveys, market research, or notifications related to our products and services. To help make these materials more relevant to you, we may use and combine any of the Personal Data and Other Information we collect to assist us in sending you these materials. We may also use your information (including a telephone or mobile number you may have provided for this purpose) to contact you, including to respond to your comments, inquiries or requests.

### **3.6 To Protect the Rights of Acta Solutions And Others**

Acta Solutions may use your Personal Data as we believe to be necessary or appropriate in order to: protect, enforce, or defend the legal rights, privacy, safety, or property of Acta Solutions or our employees, agents and contractors (including enforcement of our agreements and our terms of use); protect the safety, privacy, and security of users of our products and services or members of the public; protect against fraud and other unlawful activity or for risk management purposes; comply with and enforce the law or legal process, including laws outside your country of residence, contractual obligations, and our policies; or respond to requests from public and government authorities, including public and government authorities outside your country of residence, to the extent permitted by applicable law.

## **4. HOW WE SHARE YOUR PERSONAL DATA AND OTHER INFORMATION**

## 4.1 Our Disclosure of Personal Data and Other Information

Acta Solutions may share your Personal Data with Acta Solutions Affiliates or with non-affiliated third parties when sharing is permitted by you or authorized by this Privacy Policy, including:

### 4.1.1 To Manage Corporate, Third Party, and School Subscriptions

If your subscription is provided in whole or in part by your employer, school or other third party, we may share with them information about your access to and use of your subscription. When providing this information, we may reveal limited amounts of your Personal Data such as your name or email address.

### 4.1.2 To Allow Third-Party Service Providers to Assist Us in Providing and Managing Our Services

We may make your Personal Data available to third party service providers, such as contractors, agents or sponsors, who help us manage or provide our products and services by, for example: developing or supporting products and features; sending email messages on our behalf; processing payments; fulfilling orders; delivering subscriptions; auditing; processing data or statistics; and serving, customizing or delivering marketing. These third party service providers are required to protect Personal Data entrusted to them and not use it for any other purpose than the specific service they are providing on our behalf.

### 4.1.4 To Protect the Rights of Acta Solutions And Others

There may be instances when Acta Solutions may disclose your Personal Data, including situations where we have a good faith belief that such disclosure is necessary in order to: protect, enforce, or defend the legal rights, privacy, safety, or property of Acta Solutions, our Acta Solutions Affiliates or their employees, agents and contractors (including enforcement of our agreements and our terms of use); protect the safety, privacy, and security of users of our products and services or members of the public; protect against fraud and other unlawful activity or for risk management purposes; comply with and enforce the law or legal process, including laws outside your country of residence, contractual obligations, and our policies; or respond to requests from public and government authorities, including public and government authorities outside your country of residence, to the extent permitted by applicable law.

### 4.1.5 To Complete A Merger, Sale of Assets, Or Bankruptcy

If Acta Solutions sells all or part of its business or assets, or is otherwise involved in a merger, reorganization, dissolution, liquidation, or transfer of all or part of its business, as part of that transaction Acta Solutions may transfer your information to the party or parties and their advisors involved in the transaction.

## 5. HOW WE PROTECT AND RETAIN PERSONAL DATA

Act Solutions uses a combination of administrative, technical, personnel and physical measures to safeguard Personal Data in its possession against accidental, unlawful or unauthorized loss, use, access, disclosure or modification. We make reasonable efforts to ensure a level of security appropriate to the risk of the processing, taking into account the costs of implementation and nature of the processing of Personal Data. However, no one can guarantee the complete safety of your information. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at [andrew@actasolutions.io](mailto:andrew@actasolutions.io).

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

## 6. YOUR RIGHTS AND CHOICES

### 6.1 Your Choices Regarding Our Use and Disclosure of Your Personal Data

You have the following choices regarding our use and disclosure of your Personal Data for marketing purposes.

#### 6.1.1 To Opt Out of Direct Marketing from Acta Solutions

You may opt out of receiving electronic communications from us (including surveys, notifications, or promotions from us on behalf of third parties), or our sharing of your Personal Data with Acta Solutions for their direct marketing purposes, by unsubscribing from Acta Solutions Services.

Please note that there are certain service notifications that you may not opt out of, such as renewal notices and notifications of changes to Acta Solutions products and services or policies.

### 6.2 How to Access, Correct or Update Your Personal Data

You can access, review, correct, update, delete or modify your registration or subscription profile information by contacting Customer Service, as indicated below. Most subscribers and registered users can also update their Personal Data online by signing on to their accounts and visiting the appropriate account management sections of our tools. You can also object to or restrict the processing of your Personal Data.

Where you have provided your consent for our use of your Personal Data, you have the right to withdraw your consent and we will apply your preferences going forward.

For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions you began prior to requesting such change or deletion.

### 6.3 California Privacy Rights

Subject to certain limitations, California Law permits our customers who are California residents to request certain information regarding our disclosure of Personal Data during the preceding calendar year to third parties for their own direct marketing purposes. To make such a request, California residents can write to us at [andrew@actasolutions.io](mailto:andrew@actasolutions.io), Subject: California Resident Privacy Rights, and include your name and the address to which you would like us to respond.

## 7. OTHER IMPORTANT INFORMATION

### 7.1 Updates to Privacy Policy

Acta Solutions may periodically update this Privacy Policy without prior notice to reflect changes in our practices. Please look at the Effective Date at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Acta Solutions Services. We will notify you by posting a prominent notice on the Acta Solutions Services indicating we have updated this Privacy Policy. Your use of the Acta Solutions Services or your provision of Personal Data to us following these changes means you acknowledge you have read and accept the revised Privacy Policy.

## 8. CONTACT US

If you have questions about this Privacy Policy or how we or our service providers handle your Personal Data, please contact us at [andrew@actasolutions.io](mailto:andrew@actasolutions.io)

Or you may write to:

Attention: Privacy

Acta Solutions Inc.

201 West Main Street

Suite 100 PMB 309

Durham NC 27701

We will respond to your questions and complaints about our processing of your Personal Data. If you are not satisfied with our response, you can contact a supervisory authority. Please do not disclose any sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, or trade union membership), social security numbers, or criminal background information when contacting us.