

Privacy Statement

Welcome to BlueStreet's Privacy Statement ("**Privacy Statement**"). This Privacy Statement describes BlueStreet's privacy practices regarding how we collect, safeguard, and disclose information that results from your use of our services.

We may use your data to provide and improve the Services, where possible, but only in an anonymized fashion that is unassociated in any way with a single customer. By providing your contact information or our website, using the Services, or engaging with our support team, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Statement, defined terms have the same meanings as in your governing terms (either for hosting terms or service terms, the "**Terms**," as applicable). The Terms govern all use of our Service and, together with this Privacy Statement and other referenced policies, constitutes the Agreement.

1. Definitions.

- 1.1. **Cookies** are small files with a small amount of data which may include an anonymous unique identifier that are stored on your computer or mobile device on which you access the Service.
- 1.2. **Data Controller** means a natural or legal person who, either alone or jointly or in common with other persons, determines the purposes for which and the manner in which any personal data are, or are to be, processed. For purposes of this Privacy Statement, we are a Data Controller of your data.
- 1.3. **Data Subject** is any living individual who is the subject of Personal Data.
- 1.4. **Personal Data** means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- 1.5. **Service Providers** means any natural person or company who processes the data on behalf of the Data Controller. We may use the services of various Service Providers to process your data and provide the Services.
- 1.6. **Usage Data** is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).
- 1.7. The **User** is the individual using our Services.



2. **Information Collection.** We collect several different types of information for various purposes to provide and improve our Service.

2.1. **Personal Data.** While using our Service, or if an individual applies for a job with BlueStreet, we may ask you to provide us with certain Personal Data. When we request this type of information, we will notify you as to why we are asking for information and how this information will be used. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link.

For job applicants we may collect your job title, professional certifications details, employment history, and similar information when you register for our events, participate in user research, or apply for a job with us.

We generally do not seek sensitive data but we may collect some sensitive data, such as your gender, diversity and inclusion, veteran, or disability details when you apply for a job.

2.2. **Usage Data.** We may also collect Usage Data which may include information such as your computer's Internet Protocol address (IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access Service with a device, this Usage Data may include information such as the type of device you use, your device unique ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

We may receive non-personal data, such as aggregated or de-identified demographic/profile data, from third-party sources including selected

partners and companies that specialize in providing enterprise data, analytics, and software as a service.

2.3. **Other Information.** Other information that we may collect may include information provided when Users interact online or by phone with our customer support channels, or any additional information Customer elects to provide to us while interacting with our websites, products, and services.

2.4. **Cookies and Other Tracking Technologies.** Our website may utilize cookies and other tracking technologies for us to provide or advertise our Services, and to enable, optimize, and analyze operation of our Services. Certain cookies and other technologies may serve to recall information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

3. **Date Use, Retention, Transfer, and Security**

3.1. **Data Use.** We use the collected data for various purposes such as:

- to provide and maintain our Service;
- to notify you about changes to our Service;
- to allow you to participate in interactive features of our Service when you choose to do so;
- to provide customer support;
- to gather analysis or valuable information so that we can improve our Service and support channels;
- to monitor the usage of our Service;
- to detect, prevent and address technical issues;
- to respond appropriately to your comments, questions, requests, and inquiries;
- to fulfil any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- if we take steps to enter into a reorganization, restructuring, merger, acquisition, or transfer of assets ("**Business Transfer**"), we may also use

your information as reasonably necessary to give effect to that Business Transfer;

- to provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc.;
- to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
- where required, we may use your data to comply with applicable laws, regulations, court orders, government, and law enforcement requests, to investigate security and privacy incidents, and to solve any customer disputes;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

- 3.2. **Data Retention.** We will retain your Personal Data for the duration of your relationship with BlueStreet or as long as is necessary for the purposes set out in this Privacy Statement. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations such as where we are required to retain your data to comply with applicable laws, to resolve disputes, and to enforce the agreement or other agreements to which we are legally bound.

We will also retain Usage Data for internal analysis purpose, to strengthen the security, to improve the functionality of our Service, or where we are legally obligated to retain this data for longer time periods.

- 3.3. **Transfer of Data.** Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. Data will be hosted in the United States.

If you are located outside the United States and choose to provide information to us, you acknowledge that your personal information will be processed in the United States. Your consent to this Privacy Statement followed by your submission of such information represents your agreement to that transfer. BlueStreet will take the steps reasonably necessary to treat

your data securely and in accordance with this Privacy Statement. No transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

3.4. **Security of Data.** The security of your data is important to us and we take steps intended to maintain the security of your data and follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee absolute security of data.

4. **Disclosure of Data.** We may disclose Personal Data that you provide for the following purposes:

4.1. **Law Enforcement.** Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities.

4.2. **Business Transaction.** If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred subject to appropriate confidentiality obligations and protections.

4.3. **Other cases.** We may disclose your information also as follows:

- to our subsidiaries and affiliates (if we should ever has any);
- to contractors, service providers, and other third parties we use to support our business;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information;
- with your consent in any other cases;
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the company, our customers, or others; or
- as required by law, such as to comply with a subpoena, or similar legal process and when we believe, in good faith, that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

BlueStreet will not use or disclose your personal information in ways unrelated to those described above without first notifying you and offering you a choice as to whether we may use your personal information in a different manner.

5. **General.**

- 5.1. **Service Providers.** We may employ third party Service Providers that provide Service on our behalf, perform Service-related support or assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are restricted from disclosing or using it for any other purpose.
- 5.2. **Analytics.** We may use third-party Service Providers to monitor and analyze the use of our Service and to help us improve the Service.
- 5.3. **Payments.** Where the Service is provided for a fee, we may use Service Providers for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your Personal Data is governed by their privacy policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.
- 5.4. **Links to Other Sites.** Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site which is governed by its terms and privacy policy. We strongly advise you to review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.
- 5.5. **Children's Privacy.** Our Services are not intended for use by children under the age of 18 ("**Child**" or "**Children**"). We do not knowingly collect personally identifiable information from Children. If you become aware that a Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.
- 5.6. **Changes to This Privacy Statement.** We may update our Privacy Statement from time to time and post the updated Privacy Statement on this page with an updated effective date. We strongly encourage you to review this Privacy Statement periodically for any changes. Changes to this Privacy Statement are effective as of the posted effective date.
- 5.7. **Contact Us.** If you have any questions about this Privacy Statement, please contact us by email: support@bluestreetinc.com.

6. Country or State-Specific Data Rights.

6.1. **Generally.** If you are a resident of the European Union or other countries or states that have regulations like the General Data Protection Regulation (GDPR) that apply to you as a “data subject” under those laws or regulations, you have certain data protection rights. We endeavor to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please email us at support@bluestreetinc.com. In certain circumstances, you have the following data protection rights:

- the right to access, update or to delete the information we have on you;
- the right to have your information corrected if that information is inaccurate or incomplete;
- the right to object to our processing of your Personal Data;
- the right to request that we restrict the processing of your personal information;
- the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format;
- the right to withdraw your consent at any time where we rely on your consent to process your personal information.

Please note that we may be required to verify your identity before responding to such requests and we may not be able to respond without some necessary data and appropriate validation. You have the right to complain to your data protection authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in your country or state.

6.2. **State-Specific Privacy Supplement.** These additional state-specific privacy disclosures, which serve as a Notice at Collection under the California Privacy Rights Act, are required by the California Consumer Privacy Act, as amended by the California Privacy Rights Act, Colorado Privacy Act, Connecticut Data Privacy Act, Utah Consumer Privacy Act, and Virginia Consumer Data Protection Act and are effective as of June 30, 2023:

6.3. **Categories of personal information collected.** The personal information that we may collect, or may have collected from consumers in the preceding twelve months, fall into the following categories established by the California Privacy Rights Act, depending on how you engage with BlueStreet:

- Identifiers, such as your name, alias, address, phone numbers, or IP address, your BlueStreet account log-in information, or email address;

- personal information as described in subdivision (e) of Section 1798.80 of the California Civil Code, such as a credit card number or other payment information;
- characteristics of protected classifications under California or US federal law, such as age, race, or gender, for example if we conduct user surveys or analysis;
- commercial information, such as purchase activity;
- internet or other electronic network activity information, including content interaction information, such as content downloads, streams, and playback details;
- geolocation data, which may in some cases constitute precise geolocation information, such as the location of your device or computer, for example if you enable location services to enhance your experience through event applications we offer;
- audio, visual, electronic or other similar information, including when you communicate with us by phone or otherwise;
- professional or employment-related information, for example data you may provide about your business; and
- inference data, such as information about your preferences.

6.4. **Categories of personal information disclosed for a business purpose.** The personal information that we may have disclosed about consumers for a business purpose in the preceding twelve months fall into the following categories established by the California Privacy Rights Act, depending on how you engage with BlueStreet:

- Identifiers, such as your name, address, or phone numbers to establish your account, or government identifier, for example if we use a third-party service to verify your identity;
- personal information as described in subdivision (e) of Section 1798.80 of the California Civil Code, such as a credit card number or other payment information, for example if we use a third-party payment processor;
- information that may reveal your age, gender, race, or other protected classifications under California or US federal law, for example if we conduct user surveys or analysis using a third-party service provider;
- commercial information, such as the details of a product or service you purchased if a third-party service provider is assisting to provide that product or service to you;

- Internet or other electronic network activity information, such as if we use a third-party service provider to help us gather reports for analyzing the health of our devices and services;
- audio, visual, electronic or other similar information, for example if a third-party service provider reviews recordings of customer support phone calls for quality assurance purposes;
- professional or employment-related information, for example if we provide information to a third-party service provider for verification or registration as part of the Services; and
- inference data, for example if we use a third-party service provider to store information about your preferences.

6.5. **Your Data Rights.** You may have certain data rights under state privacy laws, including to request information about the collection of your personal information by us, to access your personal information in a portable format, and to correct or delete your personal information. If you wish to do any of these things and you are a BlueStreet customer, please contact us at support@bluestreetinc.com. If you are not a BlueStreet customer, or you are an authorized agent under applicable state law, please contact us at the same email but indicating you are not a customer. Additionally, you may have the right to appeal the denial of any of these rights by submitting a form that will be provided to you if we deny a data request. Depending on your data choices, certain services may be limited or unavailable.

To ensure the security of your account, we will generally ask you to verify your request using the contact information you have already provided. If you are an authorized agent making a request on behalf of a consumer pursuant to applicable state law, we may ask you to provide information verifying you have proper authority to make the request on behalf of the consumer or we may ask the consumer to verify their identity with us directly.

6.6. **No sale or sharing of personal information.** We do not sell or share any personal information of consumers, as those terms are defined under the California Privacy Rights Act.

6.7. **California Privacy Rights Act Sensitive Personal Information Disclosure.** The categories of data that we collect and disclose for a business purpose include "sensitive personal information" as defined under the California Privacy Rights Act. We do not use or disclose sensitive personal information for any purpose not expressly permitted by the California Privacy Rights Act.

- 6.8. **California Privacy Rights Act Retention Disclosure.** We keep your personal information to enable your continued use of BlueStreet Services, for as long as it is required in order to fulfill the relevant purposes described in this BlueStreet Privacy Statement, as permitted or as may be required by law, or as otherwise communicated to you.
- 6.9. **California Privacy Rights Act Non-Discrimination Statement.** We will not discriminate against any consumer for exercising their rights under the California Privacy Rights Act.
- 6.10. **California Privacy Rights Act, Colorado Privacy Act, Connecticut Data Privacy Act, Virginia Consumer Data Protection Act, and Utah Consumer Privacy Act De-identified Data Disclosure.** BlueStreet may use de-identified data in some instances. BlueStreet either maintains such data without attempting to re-identify it or treats such data as personal data subject to applicable law.
- 6.11. **Colorado Privacy Act Profiling Disclosure.** We do not engage in profiling of consumers in furtherance of automated decisions that produce legal or similarly significant effects, as those terms are defined under the Colorado Privacy Act.