

## **360 VIEW SMARTPOPS**

### **PRIVACY POLICY**

*Last Updated: January 7, 2021*

inBusiness Services DBA 360 View (“we”, “our” or “us”) are dedicated to protecting users’ privacy and handling personal information with care. This Privacy Policy sets forth our policy with respect to the collection, use, and disclosure of information through your use of our SmartPops tool and the services and features made available through our SmartPops tool (“SmartPops”). We may update this Privacy Policy at any time by posting the amended version.

#### **What Does This Privacy Policy Cover?**

SmartPops is an application that works together with our CRM platform, 360 View (“CRM”). We license SmartPops and CRM to your employer and they may permit you to use SmartPops and CRM in connection with your job duties and responsibilities, subject to their license from us. This Privacy Policy covers the treatment of personally identifiable information (“Personal Information”) gathered when you are using SmartPops. Personal Information is information that identifies, relates to, describes, can reasonably be associated with, or can reasonably be linked to a particular individual or household. We collect information from you both when you provide it voluntarily and also automatically when you use SmartPops.

We collect Personal Information when you use SmartPops and also from your employer, which is our client. We use Personal Information that your employer makes available to us to provide SmartPops to you (such as your username).

#### **What Information Do We Collect?**

We collect very limited information on a temporary basis through your use of SmartPops. The information we gather enables us to provide our services to you and for troubleshooting and support services purposes. We may collect the following categories of Personal Information when you use SmartPops, depending on your interactions with the CRM and the choices you make, and we do not retain any of your information:

- **Identifiers.** Your username and password.
- **Interactions.** What records you search for in our CRM platform, which SmartPops works in conjunction with, and which your employer licenses from us. Also whether a notification appeared and what action you take in response, such as dismissing it, or accessing a record.

#### **How We Use Information**

We only temporarily collect your Personal Information and data related to your interactions with our CRM and SmartPops in order to (1) authenticate your access to SmartPops; and (2) trigger notifications that may be helpful in your service of customers, which Your employer chooses and configures. These SmartPops notifications may include certain reminders, tasks or other information relevant to a customer or campaign that your employer has set up. SmartPops does not retain customer records data, but only temporarily collects information about your use of our CRM and any triggers or tags defined by your employer in order to serve up the SmartPops notifications.

We will only use your information and information that is responsive to your use of our CRM platform and the tasks or campaigns that your employer has set up, or to troubleshoot technical problems or provide support services, unless we reasonably consider that we need to use it for another reason and that reason is compatible with providing you the services enabled by the CRM and/or SmartPops, for troubleshooting or support services. If we need to use your Personal Information for an unrelated purpose or if we change the basis on which we are processing your data, we will notify you and we will explain why we need to use your Personal Information for other purposes.

We do not share your Personal Information with anyone, except your employer. For example, your employer may receive usage reports on use of SmartPops and/or CRM that may include your interactions with our CRM, as well as SmartPops notifications that you received.

We may share your Personal Information with third parties (i) where required by applicable law, regulation, legal process or governmental request, (ii) where it is necessary in connection with our services or products, (iii) to investigate or prevent fraud, abusive or unlawful uses or activities, violations of the terms governing use of our services and/or any law, rule or regulation, and/or (iv) to protect the security or integrity of our services or to protect our rights, property, or safety or to protect our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

## **Security**

We strive to use commercially acceptable means to protect your data; however, no method of transmission over the Internet is 100% secure, and we cannot guarantee or warrant that such techniques will prevent unauthorized access to your Personal Information. Moreover, in many instances, it is your employer who controls security of your Personal Information processed through the services. Any transmission of Personal Information is at your own risk.

## **Your Rights and Options Regarding Your Personal Information**

Depending on where you live in the United States or if you are a resident of the European Union or the United Kingdom, you may have certain rights with respect to Personal Information that is collected and used under certain circumstances. However, because SmartPops only temporarily monitors your interactions with our CRM for purposes of triggering notifications that have been defined and set up by your employer (and which we do not control), SmartPops does not store Personal Information and only temporarily accesses information about your interactions in order to serve up relevant notifications, reminders, etc. that have been set up by your employer. If you have questions about your username or password, please see your administrator.

## **Transfer of Data; Special Notice to Non-U.S. Users**

SmartPops is intended to be used only within the United States and U.S. territories. If you are located in a country outside the United States and submit Personal Information to us, you consent to the general use and disclosure of such information as provided in this Privacy Policy and to the transfer and/or storage of that information to the United States and other countries outside your home country.

## **Policy on Children's Information**

SmartPops is not intended for use by children under the age of 13 ("Children" or "Child"). By using SmartPops, you represent that you are at least 13. If you do not meet this age requirement, please do not access or use SmartPops. We do not knowingly collect personally identifiable information from Children, and we do not target any services to Children.

## **Governing Law and Jurisdiction**

This Privacy Policy shall be construed and governed under the laws of the United States and the State of Tennessee (without regard to rules governing conflicts of laws provisions). You agree that venue for all actions, arising out of or relating in any way to your use of SmartPops, shall be in federal or state court of competent jurisdiction located in Nashville, Tennessee, within one (1) year after the claim arises. Each party waives any objections based on forum non conveniens and waives any objection to venue of any action instituted hereunder to the extent that an action is brought in the courts identified above. Each party consents to personal jurisdiction in the courts identified above.