

Privacy Policy

Last modified: May 4, 2023

Introduction

Adaptive BC Solutions, LLC (“**Adaptive BC Solutions**”, “**Company**”, “**us**”, “**our**”, or “**we**”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.AdaptiveBCS.com (our “**Website**”) and/or use any software, web or mobile application, sample spread sheet, The Readiness Test, Adaptive Business Continuity company website, Adaptive BC Toolkit, ISO22301 Compliance Manager, CMMC Compliance Manager, Ganbatte! BC System, or any other assessment tool made available at the Website (with the Content each a “Readiness Tool” and together the “Readiness Tool Suite”) and any supplemental information, equations, algorithms, questions, methods, ideas, processes of any kind or any other content that Adaptive BC Solutions has made available in connection with the Readiness Tool Suite (the “Content”). This policy also describes our practices for collecting, using, maintaining, protecting and disclosing such information.

This policy applies to information we collect:

- On this Website.
- In connection with any Readiness Tool.
- In e-mail, text and other electronic messages between you and this Website.
- Through mobile and desktop applications or software you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.

It does not apply to information collected by:

- Us offline (except information collected through the Readiness Tool Suite) or through any other means, including on any other website operated by Company or any third party; or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our Website or the Readiness Tool Suite and any Readiness Tool therein. By

accessing or using this Website, you agree to this privacy policy. This privacy policy may change from time to time and your continued use of this Website after we make changes is deemed to be acceptance of those changes, so it is your responsibility to check the policy periodically for updates.

Children Under the Age of 13

Our Website and the Readiness Tool Suite is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features, including but not limited to registering on the Website, making any purchases through the Website, using any of the interactive or public comment features of this Website or providing any information about yourself to us, including without limitation your name, address, telephone number, e-mail address or any screen name or user name you may use. 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 info@readinessanalytics.com.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number, and any other identifier by which you may be contacted online or offline ("**personal information**");
- that is about you but individually does not identify you; and/or
- about your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website and use the Readiness Tool Suite. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.
- From third parties such as Google Analytics.

Information You Provide to Us.

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, purchasing a

Readiness Tool, or requesting further services. We may also ask you for information when you report a problem with our Website or any Readiness Tool.

- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of your responses, scores, and overall results from any Readiness Tool that has been completed, in whole or in part, by you or your company.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

Information We Collect Through Automatic Data Collection Technologies.

As you navigate through and interact with our Website and the Readiness Tool Suite, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system and browser type.

The information we collect automatically is statistical data and may include personal/company information. It helps us to improve our Website, the Readiness Tool Suite and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website and the Readiness Tool Suite. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and

navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Third-party Use of Cookies and Other Tracking Technologies.

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal/company information or they may collect information, including personal/company information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information that we collect about you or your company or that you or your company provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products or services that you request from us, including the Readiness Tool Suite.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- To analyze, publish or make available generally (but anonymously and without identifying any specific individual or company) the cumulative responses, scores and/or results collected in connection with any Readiness Tool.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own goods, products and services that may be of interest to you. If you do not want us to use your information in this way, please contact info@adaptivebcs.com.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual (or any individual company), without restriction.

We may disclose personal/company information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Adaptive BC Solutions' assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Adaptive BC Solutions about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal/company information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our End User License Agreement for use of any Readiness Tool and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Adaptive BC Solutions, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal/company information you provide to us. We have created mechanisms to provide you with the following control over your information:

Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to info@readinessanalytics.com.

Data Security

We employ a third party provider, LiquidWeb, to assist us with safeguarding your personal/company information from accidental loss and from unauthorized access, use, alteration and disclosure. As required by LiquidWeb, the terms and conditions of its Acceptable Use Policy, located at <https://www.liquidweb.com/about-us/policies/acceptable-use-policy/> also apply to you and must be adhered to by you, and are incorporated herein by this reference. Additional information about their secure SSAE-16 certified data centers can be found here: <https://www.liquidweb.com/about-us/data-centers/>.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal/company information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal/company information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at info@adaptivebcs.com.