

Privacy Policy (Version 1.0 - updated 01-02-2022)

Unified Sentinel Data Networks, LLC (“USND”, “we”, or “us”) operates the website located at www.usdatanetworks.com (“Website”). This document serves as USND’s Privacy Policy (the “Policy”) for the Website as it applies to the Website’s users.

USND makes the Website available to individuals (“Users” or “you”). All activities engaged in through the Website are subject to this Policy. This Policy explains what information USND collects about its Users, how USND uses and/or shares this information, and how such information is maintained. By using the Website, you accept the terms of this Policy.

This Policy applies only with respect to the information collected by USND through the Website, and not any information collected or obtained through other methods or sources. Please note that USND may change this Policy at any time (See “Changes to this Policy,” below), and that USND may in the future use your information for additional purposes not currently included in this Policy.

- **Collection of Personally Identifiable Information**

USND collects Users’ personally-identifiable information (“PII”) that is volunteered by Users. Examples of PII that may be requested and/or collected include but are not limited to: first and last name, address, zip code, email address, telephone number, facsimile number, and company or business identity. From time to time, USND may also present opportunities for Users to voluntarily provide additional information about themselves.

- **Other information**

We also use information that is automatically collected, to understand more about our site visitors, to determine how users navigate our site, to improve site performance, to protect the security and integrity of our site and business, to identify and protect our systems from fraudulent activity and access, to provide advertising that may be of interest to our visitors, and to monitor legal compliance.

- **Use and Sharing of PII and other information we collect**

USND uses PII and other information we collect to provide the User with information about USND’s Services, and to provide USND’s third-party vendors with information about User’s needs. YOUR USE OF THE WEBSITE SERVES AS YOUR ACKNOWLEDGEMENT AND APPROVAL OF THIS PRACTICE. IF YOU WANT TO ENSURE THAT YOUR PII IS NOT AVAILABLE TO THIRD PARTIES, YOU MUST DISCONTINUE YOUR USE OF THE WEBSITE.

Users’ PII and other information we collect may also be used to: deliver and improve our services; manage our business; manage your access and provide you with customer support; perform research and analysis about your use of, or interest in, our or others products, services, or content; communicate with you by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us or other third parties; develop, display, and track content and advertising tailored to your interests on our Service and other Websites or websites, including providing our advertisements to you when you visit other websites; analyze data about our Website (i.e., analytics); verify your eligibility to utilize our Service; enforce or exercise any rights in our Terms of Service; and perform functions or services as otherwise described to you at the time of collection.

PII and other information collected by us may be added to our databases and used for future marketing purposes, including but not limited to email and direct marketing. We may also share your PII with third-party vendors that perform certain services on our behalf. These services may include fulfilling orders, providing customer service and marketing assistance, performing business and sales analysis, ad tracking and analytics, member screenings, supporting our Website functionality, and supporting other features offered as part of our services. These vendors may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purposes.

In addition, we may also disclose Users' PII and other information we collect in order to: (1) comply with applicable laws (including, without limitation, the CAN-SPAM Act); (2) respond to governmental inquiries; (3) comply with valid legal process; (4) protect the rights or property of USND, including without limitation, filing copyright applications with the Library of Congress, Copyright Office, or (5) protect the health and personal safety of any individual.

By submitting your PII through the Website, you agree that your PII may be used in any manner contemplated in this section.

- **How PII is Protected**

We appreciate our Users and take your privacy seriously. Any PII that is stored on our computers is protected from unauthorized access and use via passwords as well as other standard industry-acknowledged means. Our servers which store this information are protected by a firewall. We take additional precautions for PII which is especially sensitive, such as financial information. We will only request or transmit this information over secure Internet connections using precautions such as Secure Sockets Layer (SSL) encryption, security keys and password authentication from any third parties receiving this information.

Though we take the utmost precautions to protect your PII, please be informed that no data transmission over a cellular phone or the Internet, nor any storage of information on servers or other media, is ever 100% completely secure. While we aim to protect your PII to the greatest extent possible, this policy is not intended to be, and should not be construed as, a warranty or guarantee of absolute security of your PII.

As always, you should use common sense whenever you disclose personal information over the Internet or a cellular network, regardless of the applications or website(s) you use. If you suspect that your PII is being used in connection with the Website in a manner contrary to this Privacy Policy, please let us know immediately. To contact us, please send an email to admin@usdatanetworks.com.

- **Non-Personally Identifiable Information**

USND may also collect certain non-personally identifiable information, including but not limited to the information more fully described below.

Authentication Tokens. USND may use authentication tokens on the Website. Authentication tokens are small pieces of information that enable the Website to more easily communicate and interact with the User. For example, USND may place an authentication token on a User's mobile device if a User uses that device to register for USND's Website. The next time that User uses the Website, USND's server will recognize the authentication token (and the User) and allow the User to perform certain actions immediately without having to log in.

Mobile Device Identifiers. USND may collect information about the mobile devices from which you access the Website. We may collect and store the unique identifier assigned to your mobile device(s) by the manufacturer, or other identifying information about your device.

- **Cookies.**

To provide better service and a more effective website, we sometimes use first-party and third-party "cookies" as part of our interaction with your browser. A cookie is a small text file placed on your computer's hard drive by our web page server. Cookies are commonly used on websites and do not harm your system. By configuring your preferences or options in your browser, you determine if and how a cookie will be accepted. We use cookies to determine if you have previously visited our websites and the pages you have visited, and for a number of administrative, marketing or remarketing purposes. We use both first-party and third-party cookies for different purposes:

- **First-party cookies and third-party cookies**

Cookies can be first-party or third-party. A first-party cookie is one that you receive directly from Company when visiting our Site. A third-party cookie is one that you have received from another party, such as Google or Facebook. We do not control what third parties do on other sites. However, we may work with certain third-party providers such as Google or Facebook to permit their cookies to function through our Site so we can learn more about your web experience on our Site and better personalize our services for you.

- **Persistent and session cookies**

A persistent cookie is a cookie that is stored by the web browser on your device until it expires or you delete it. The expiration of a persistent cookie is determined by the creator of the cookie and can be upon a certain date or after a length of session time has passed. This means that, for the cookie's entire lifespan, its information will be transmitted to the creator's server every time the user visits the website that it belongs to or another website configured to check for that cookie (such as an advertisement placed on that website). For this reason, persistent cookies are also called "tracking cookies."

A session cookie is created temporarily on your device for use by a website during your visit. This type of cookie may store information you enter and track your activity within the website. A session cookie is deleted after you leave the website or when the web browser is closed. A good example of a session cookie is the shopping cart on an e-commerce site. The session cookie stores the items that you add to your cart so they are not forgotten while you view products on other pages of the website. Using a session cookie, the items will all be in the cart when you go to the checkout page.

- **Other Data.**

All opinions, ideas, suggestions, other feedback, and all other information submitted by You through the Website may be used by us without any restriction and free of charge.

In certain areas of our website, such as when you request more information, should you abandon a form on our website, your information may still be collected and utilized for notices or communications pertaining to the site, products or services. If you choose not to provide personal information, you can still browse most of our website (the areas that do not require registration) anonymously. If you place a call to us, whether by landline or mobile device, we may also capture your phone number and any other information you provide during the call. This information may also be used to communicate with you about the site, products or services via phone, mail, email, social media or third-party applications.

When you visit our site, we may directly and through third-party service providers automatically log certain information about your visit including: the pages you visit while on our site; the IP address of a referring website, if any; the type of browser, device or hardware you are using; your IP address and general geographic information; and the date and time you accessed our site. Through the use of third-party tools, such as Google Analytics (Remarketing, Display Network Impression Reporting, Demographics and Interest Reporting, and other integrated services), we may also collect certain demographic information and information about interests from a portion of the visitors to our site. This information may link to personal data that you voluntarily provide to us which will allow us to serve interest-based ads and content.

Although the information collected through the foregoing methods does not itself contain any PII, USND may analyze and match such information with other information that you provide (including PII) as well as information that USND may obtain elsewhere, and USND may share all or some of such information with actual or prospective movers, van lines, or other third parties. USND may also disclose non-PII in order to comply with applicable laws; respond to governmental inquiries; comply with valid legal process; or protect the rights or property of USND or Users of the Site.

- **Access to Your Information**

If you want to review, correct or change your User information, please submit your request in writing to admin@usdatanetworks.com.

- **Third Party Services**

USND's communications to you as well as the Website, may contain links to the websites of other providers of products and services that may be of interest to you. We may also use third-party service providers to serve interest-based advertisements on our behalf on our site(s), social media networks and across the Internet. These advertising service providers may collect non-identifiable information about your visits to our website, and your interactions with our products and services. Such non-identifiable information does not include your name, address, email address or other personal information. The information is collected through the use of cookies and pixel tags (also known as action tags), which is industry-standard technology used by most major websites. Interest-based ads are then displayed based on the information that is collected.

In addition to the information about your visits to our website, our service providers may also use the information about your visits to other websites to target advertisements for programs and services available from us.

When you click the link to one of these other entities, you will leave the Website and be connected to the website or Website of such entity. In such an event, this Policy will not apply to your use of, and activities on, those third-party websites. USND does not have any control over the information handling practices of these other entities, and you should familiarize yourself with the privacy policies of such other entities before you share any PII with them. We encourage you to read all other legal notices posted by these other entities as well. USND shall have no responsibility or liability for your visitation to, and the data collection and use policies and practices of, these other entities.

- **Note Concerning Individuals 18 Years of Age and Younger**

The Website and the content available in connection therewith are neither intended for, nor directed to, children under the age of 18. You must be eighteen (18) years old or older to use this Website. By using this Website, You represent and assume that You have the authority and capacity to enter into this Agreement and to abide by all the terms listed in this Agreement. If USND learns that a User is under the age of 18, USND will promptly terminate the User's access and delete the User's PII from USND's records. USND will not knowingly disclose or distribute such information to third parties.

- **Security.**

While USND takes reasonable precautions to safeguard information transmitted between USND and Users of the Website USND may be unable to prevent unauthorized access to such information by third parties or inadvertent disclosure of such information. Users acknowledge this risk when communicating with USND.

- **Consent to Processing**

By providing PII and other information to USND, Users of the Website fully understand and unambiguously consent to the collection and processing of such information in, and the transfer of such information to, the United States and other countries or territories, in accordance with the terms of this Policy.

- **Transfer in Certain Circumstances**

In its sole discretion, USND may transfer, sell or assign information collected on or about Users of the Website, including without limitation, PII and other User-provided information, to one or more third parties as a result of the sale, merger, consolidation, change in control, transfer of substantial assets, reorganization or liquidation of USND.

- **Opt Out**

We honor all requests to be removed from our marketing lists. If you do not want to receive e-mail, telephone messages or direct mail from us, contact us at admin@usdatanetworks.com and we will remove your name from our in-house list and add you to our marketing suppression list. You will also have an opportunity to add your phone number to our internal "Do Not Call" list during each phone call you receive from us. You will further have the ability to opt-out or manage certain advertising preferences through links provided in marketing and promotional e-mails you may receive. We honor all requests to be removed from our e-mailing lists within ten days, and update our suppression list every ten days. If you

prefer to learn about new offers from us through a specific medium — for example, through the mail — simply let us know your preference by sending us an email at admin@usdatanetworks.com.

We are fully committed to complying with your wishes regarding receiving commercial e-mail messages from us and with the laws regarding unsolicited e-mail. If for any reason you receive a commercial message directly from us or on our behalf more than ten days after making a request to be taken off our mailing list, we would request that you forward a copy of the e-mail to admin@usdatanetworks.com with a brief explanation of your efforts to unsubscribe and the approximate timeframe you made the request. We will immediately investigate the matter, confirm that you have been removed, and provide a written response to you detailing our efforts. Please note that requests to be removed from our direct mail list will be processed as soon as possible, but given the nature of direct mail, it may be impossible to prevent a mailing that is being processed or underway from reaching you. If you receive multiple mailings from us after your request, please contact us at admin@usdatanetworks.com.

- **EU GDPR - Notice to EU Residents**

As of May 2019, the General Data Protection Regulation (GDPR) provides a series of privacy to rights to EU data that affect how your data can be used and stored by third parties. The GDPR is an EU regulation that establishes a legal framework to protect the personal data of EU residents. It applies to all organizations doing business with individuals in the EU. Organizations that are established in the EU, as well as organizations that process the personal data of EU residents (even if not based in the EU), are required to comply with the GDPR. This Privacy Policy has been written with the GDPR and the CCPA (see below) in mind and attempts to meet the requirements established in both laws.

GDPR aims to bring privacy/data protection laws across Europe in accordance with the rapid pace of technological changes. GDPR introduce new obligations and liabilities on organizations that handle personal data by establishing a number of rights for Data Subjects. If you are a resident of the European Union, under the General Data Protection Regulation (GDPR), you now have the following rights:

1. The right to be informed;
2. The right of access;
3. The right to rectification;
4. The right to erasure;
5. The right to restrict processing;
6. The right to data portability;
7. The right to object/withdrawal prior consent; and
8. Rights in relation to automated decision making and profiling.

Legal Basis for Processing Your Information

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

- **Consent.** We may use your personal information as described in this Privacy Policy subject to your consent. You may also refrain from providing, or withdraw, your consent for cookies.
- **Performance of a contract.** We may need to collect and use your personal information in order to perform our contractual obligations to deliver the programs or services to you.
- **Legitimate Interests.** We may use your personal information for our legitimate interests to provide the programs and services and to improve our services. We may process your information on behalf of third party providers who have a legitimate interests in offering you services, goods or opportunities. We may use technical information as described in this Privacy Policy and use personal information for our marketing purposes consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law.

Transferring personal data from the EU to the US

USND is headquartered in the United States. Information we collect from you will be processed in the United States. The United States has not sought nor received a finding of “adequacy” from the European Union under Article 45 of the GDPR. USND relies on derogations for specific situations as set forth in Article 49 of the GDPR. In particular, USND collects and transfers to the U.S. personal data only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of USND in a manner that does not outweigh your rights and freedoms. USND endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with USND and the practices described in this Privacy Policy. USND also enters into data processing agreements with its vendors whenever feasible and appropriate.

If you wish to exercise any of these rights or have questions as to other components of the GDPR, please make send such request to admin@usdatanetworks.com. This action will trigger our formal Data Subject Action Request (DSAR) process in accordance with the GDPR. Once we verify your identity, we will work to respond to your request within 20 days. Additionally, we have retained the service of a Data Protection Officer (DPO) in accordance with the GDPR to assure the rights of Data Subjects are being met and that our processing remains consistent with the GDPR requirements. Our DPO can be contacted directly at dpo@usdatanetworks.com.

- **Notice to California Residents**

This Section is for California Residents and supplements the information contained in this Privacy Policy. As used in this Section, “consumers” or “you” applies solely to those people who reside in the State of California. We add this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Section.

Sale of Data

We do NOT “sell” personal information as defined by the CCPA. We will continue to monitor and review our processing activities and will notify you if this changes and take the appropriate steps to stay in compliance with the CCPA.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope
- We obtain the categories of personal information listed above from the following categories of sources:
- Directly from you. For example, from documents that you provide to us related to the services for which you engage us.
- Indirectly from our customers or their agents. For example, through information we collect from you in the course of providing services to you.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform.

- From customers for whom we provide services.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order to enroll in a course, we will use that information to assist you in enrolling in such course.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, market research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We disclose your personal information for a business purposes to the following categories of third parties:

- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you or to those third parties whose products or offerings we deem, in our sole discretion, to be of interest to you.

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by emailing us at admin@usdatanetworks.com.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not

require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.

Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

- **Changes to This Policy**

USND may, from time to time, amend this Policy, in whole or part, at its sole discretion. Any changes to this Policy will be effective immediately upon the posting of the revised policy to the Website.

- **Questions About This Policy**

Questions about this privacy policy or USND's privacy practices should be directed to admin@usdatanetworks.com.