

# Data Security and Privacy Policy

GrowSumo Inc. operating as GrowSumo (“GrowSumo” / “we” / “us”) is committed to protecting your data and your clients’ data. We review this policy regularly to ensure continued compliance with applicable regulatory and legislative regimes governing personal information and data collection. Within this document companies that are using GrowSumo for their partner programs will be referred to as companies (the “Companies”), partners of those companies, will be referred to as partners (the “Partners”). For the purpose of this Data Security and Privacy Policy, our services refer to the collection and storage of data, which we receive from our Users and use to facilitate our users partner programs (the “Services”). This Data Security and Privacy Policy describes how we collect, store, use and distribute information and data that you submit to us through the use of our Services, including without limitation, the Personal Information of your end users (“Customer Data”).

## **Consent:**

By using our Services you consent to the use Customer Data described in this Data Security and Privacy Policy. Except as set forth in this Data Security and Privacy Policy, Customer Data will not be used for any other purpose without consent. We do not collect Customer Data for the purpose of sale or marketing in a way that specifically identifies individuals.

## **Collection of Information:**

We aim to collect, use and disclose only such information as is required to enable us to manage Users accounts, to provide the Services, and for service improvement. We will maintain the confidentiality of any Customer Data provided to us in using the Services and we will use it only for the purposes for which we have collected it (subject to the exclusions and disclosures we have listed below).

Two types of information may be collected through our Services: Personal Information and Non-Personal Information.

"Personal Information" is personally identifiable information, such as names and e-mails. We may collect such information about the end users.

"Non-Personal Information" is information of an anonymous nature, aggregate information, such as demographic statistics of end users (e.g. average age, or geographical allocation of end users) is not considered Personal Information. Similarly, tracked events generated by an end user are not considered Personal Information. These events include but are not limited to subscribing to the Companies’ services and upgrades to such subscriptions.

Although the use of certain Non-Personal Information collected, used or disclosed through the Internet as described herein is not restricted (and to the extent that such is the case, the obligations under this Data

Security and Privacy Policy do not apply to such information), we provide information in this Data Security and Privacy Policy about the collection of such information for the sake of transparency with respect to the operation of our Services. Such Non-Personal Information may be collected or derived by us in the course of providing the Services.

**Use of Information:**

We collect events from Companies directly or through third parties Companies integrate with. Any content contained within those events, which may include, without limitation, end user names, email addresses and amounts purchased. We encrypt and store this information securely in a database . We use this information to facilitate the Companies' partner program. Specifically, for attributing sales to partners. We also collect statistics about use of the Services. This information will be kept confidential, however, Non-Personal Information that does not personally identify an individual will be kept by us and may be made available to other members or third parties. If we plan to use Customer Data in future for any other purposes not identified above, we will only do so after informing you by updating this Data Security and Privacy Policy. See further the section of this Data Security and Privacy Policy entitled 'Amendment of this Policy'.

**Security:**

The security of Customer Data is important to us. We use commercially reasonable efforts to store and maintain your Customer Data in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Customer Data. We have implemented procedures designed to limit the dissemination of Customer Data to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

Disclosures & Transfers: We have put in place contractual and other organizational safeguards with our agents to ensure a proper level of protection of Customer Data. In addition to those measures, we will not disclose or transfer Customer Data to third parties except as specified in this Data Security and Privacy Policy (see further Important Exceptions below).

As at the date of this Data Security and Privacy Policy, we share Customer Data only with our agents and partners such as service providers, and database hosts. We use the cloud based server Amazon Web Services, and accordingly Customer Data may be available to governments or its agencies anywhere in the world, under a lawful order, irrespective of the safeguards we have put in place for the protection of your Customer Data.

From time to time we may employ third parties to help us improve the Services. These third parties may have limited access to databases of user information solely for the purpose of helping us to improve the Services and they will be subject to contractual restrictions prohibiting them from using the information about our members for any other purpose.

**Important Exceptions:**

We may disclose Customer Data to third parties without your consent under lawful order by a court of competent jurisdiction, tribunal or other government agency. We may we may also disclose Customer Data where such disclosure is required by and in accordance with the law.

We may also disclose Customer Data in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the information disclosed continues to be used for the purposes permitted by this Data Security and Privacy Policy by the entity acquiring the information.

**Retention:**

We will keep Customer Data for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained Customer Data will remain subject to the terms of this Data Security and Privacy Policy. If you request that certain Customer Data be removed from our databases, it may not be possible to completely delete all your Customer Data due to technological and legal constraints.

**Amendment of this Policy:**

We reserve the right to change this Data Security and Privacy Policy at any time. If we decide to change this Data Security and Privacy Policy in the future, we will notify you by e-mail. Any non-material change (such as clarifications) to this Data Security and Privacy Policy will become effective on the date the change is posted and any material changes will become effective 30 days from the date of notification. Unless stated otherwise, our current Data Security and Privacy Policy applies to all Customer Data that we in the course of providing our Services to Customers. The date on which the latest update was made is indicated at the bottom of this document. We recommend that you print a copy of this Data Security and Privacy Policy for your reference. Your continued use of the Services signifies your acceptance of any changes.

**Access and Accuracy:**

You have the right to access the Customer Data we hold about your end users. Upon receipt of your written request, we will provide you with a copy of your Customer Data although in certain limited circumstances, we may not be able to make all relevant information available to where such disclosure would result in a breach of our confidentiality obligations to our other Customers. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access in a timely manner.

**Contact Us:**

If you have any questions about this Data Protection and Privacy Policy, you can contact us at [hello@growsumo.com](mailto:hello@growsumo.com).