



OpenTech Alliance, Inc. Corporate Privacy Policy

OpenTech Alliance, Inc., 2501 W. Dunlap Ave., Suite 255, Phoenix, AZ 85021 Phone: 602 749 9370 Fax: 602 324 8658

Last Updated: October 2019

OpenTech Alliance, Inc. and our brands, which include but are not limited to INNSOMNIAC (collectively, “OpenTech,” “we,” “us,” or “our”), are committed to providing our website users, tenants, customers, and business partners with clear and concise information regarding our privacy policy and practices. We respect the privacy of our customers and users and have developed this Policy to demonstrate our commitment to protecting your privacy.

1. Scope of this Policy

This Policy is intended to describe our policy and practices with respect to the collection, use, and disclosure of personal information relating to users of our websites, apps, products, and services.

For the purposes of this Policy, the term “websites” shall refer collectively to www.opentechalliance.com as well as the other websites that we operate and that link to this Policy.

In this Policy, personal information means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, and/or online identifier or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural, or social identity. Personal information does not include aggregate information or de-identified information, meaning that the information can no longer be attributed to an identifiable natural person without the use of additional information.

Personal information is required for us to be able to provide the services to you. In addition, some of the services we provide require that we disclose your personal information to third parties, such as to companies that help us to provide our services. If you are not willing to provide your personal information and have it disclosed to third parties in accordance with this Policy, you will not be able to use our services.

Our websites and apps may contain links to other websites that do not operate under this Policy. These third-party websites may independently solicit and collect personal information from you and, in some instances, provide us with information about your activities on those websites. Third party advertisers may also utilize cookies, web beacons, and similar technologies to collect information regarding your website interactions and activities. These third party technologies may be utilized by those entities to provide targeted advertising and web links based upon your activities and preferences. If you choose to interact with specific advertisers who advertise on our sites, the information you provide to them is subject to the conditions of their specific privacy policies and in no way covered by the practices described in this policy.



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While we strongly support the protection of privacy on the Internet, we do not have control over, and cannot be responsible for, the actions of other third parties. We encourage you to review each such third party's privacy statement and other otherwise understand its privacy practices, before providing personal information directly to it.

This Policy does not create rights enforceable by third parties.

2. Personal Information We Collect

We may collect various types of information, both personal and anonymous, through our products, services, websites, and apps, to operate effectively and provide you with the best experiences with our services. The information is gathered from your usage of our products and services, as well as from your entry of information on our websites and apps. We get some of your information, such as your IP address, by recording how you interact with our services. We may also get information about you from our business partners or other third parties.

We may receive and collect certain personal information automatically, as outlined elsewhere in this Policy, and including analytics regarding our Websites and Apps, information your Internet browser automatically sends when you visit our Websites and Apps, and information collected by cookies. We may collect personal information that can identify you such as your name and email address, and other information that does not identify you.

Information Provided By You

We ask for and may collect personal information about you such as your name, address, telephone number, and email address. For certain financial services, personal information may also include data such as payment data and account numbers. You have the option to choose not to provide personal information to us; however, the lack of such personal information will typically prevent us from providing the requested products or services to you.

Information that We Collect From You On Our Websites and Apps

We also may use various technologies to collect information from your computer or device and about your activities on our websites or apps.

- a. Information collected automatically.** When you visit our websites and apps, we may automatically collect information such as your IP address, device information, browser, internet connection speed, past web pages visited, and your link selections on our various website pages. This information may be used to: (1) manage and protect our websites, apps, products, services, and users from fraudulent, abusive, or unlawful uses; and (2) help us research, develop, and improve our websites, apps,



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products, and services. This type of information may also be aggregated or otherwise rendered anonymous for business and marketing uses by us or by third parties.

- b. Cookies, Web Beacons, and Other Technologies.** When you access our websites and/or apps, we may place small text files (“cookies”) on your computer for recordkeeping purposes. Among other things, cookies enable us to gather information about your activity on our websites, products, and services for the purposes of improving your online experience, remembering your preferences and settings, delivering advertising to match your preferences and interests, and for other similar customization purposes.

In addition to cookies, we may utilize web beacons, clear gifs, or other technologies built into our websites, products and services to gather information on how users interact with and utilize various features. These technologies can help personalize your OpenTech usage experience and help associate your interactions with our products and services to other information within your account. For example, these technologies can identify popular pages, viewing patterns, click-through, conversion rates, and other information that can be used to improve, monitor, and operate our websites, products, and services. For greater detail on how these technologies function and how your activity records are used, please review the Google Analytics privacy disclosures at www.google.com/policies/privacy/partners/.

Most internet browsers provide controls that allow users to manage or disable the placement and usage of cookies on their computer. Please note that disabling cookies may deactivate or otherwise restrict certain features on OpenTech websites, products, and services.

- c. Social Media.** Our websites, apps, products, and services may include the option of integration through third party social networking sites and related social media plug-ins or applications. When you integrate or link our websites, apps, products, and services with your social media applications (e.g., Facebook, LinkedIn, Twitter, Google+, etc.), you authorize us to have access to certain information from your social media profile (e.g., name, e-mail address, photo, gender, birthday, location, your list of friends, comments, etc.) to deliver the content or as part of the operation of the integrated application. We may also obtain non-personally identifiable information (e.g., content viewed, advertising viewed, etc.) from your interaction with our integrated content.

By choosing to integrate our websites, apps, product, and services with social media applications, you consent to the use of this information in



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accordance with our privacy policy. When you provide personal information to us through an integrated application, it may be publicly viewed by other members of these sites and we cannot prevent further use of the information by independent third parties. For more information about how social networking sites handle your personal information and available privacy settings, please refer to their privacy policies and terms of use.

Information Collected from Other Sources

If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

3. Mobile Applications and Locations-Based Services

Certain OpenTech websites, apps, products, and services offer mobile applications for access via smartphones and tablet devices. These applications are subject to the information handling practices outlined in this policy.

Our mobile applications may include the option to provide you with helpful information based on where you are. To provide such location-based services, we may collect, use, and share precise location data, including the real-time geographic location of your mobile device. This location data is collected anonymously in a form that does not personally identify you and is solely used by us to provide and improve location-based products and services. If you wish to deactivate this feature, you can disable the location services on your mobile device.

4. How We Use Personal Information

We use the personal information we collect for a variety of purposes. The legal basis for our processing of personal information will depend on the specific context in which we collect it. We will retain personal information for as long as it is needed.

General Uses

We may use information that we collect about you to:

- deliver the products and services that you have requested;
- manage your account and provide you with customer support;
- perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others;
- communicate with you by e-mail, 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;



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- develop and display content and advertising tailored to your interests on our site and other sites;
- verify your eligibility and deliver prizes in connection with promotions, contests and sweepstakes;
- enforce our terms and conditions;
- manage our business and perform functions as otherwise described to you at the time of collection;
- for legal compliance purposes;
- to process payment for any purchases or sales made on our websites and apps, to protect against or identify possible fraudulent transactions, and otherwise as needed to manage our business; and/or
- to use the information you provided to occasionally notify you about special sales or services and other valuable updates to personalize your shopping transactions (if you prefer that we not contact you in this manner please follow the Opt-Out instructions elsewhere in this Policy).

Legal Basis for Processing (GDPR)

If the General Data Protection Regulation (GDPR) is applicable, our legal basis for processing your personal information will depend on the personal information concerned and the specific context in which we collect it.

When we have collected your personal data to provide you with products and services that you have requested, our legal basis for the processing of that personal data is that it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. If you refuse to provide us with your personal data, you may be unable to obtain the products and services from us that you requested.

We also collect and process personal information about you as necessary to operate our business, meet our contractual and legal obligations, and/or fulfill our other legitimate interests (when not overridden by your data protection interests or fundamental rights and freedoms).

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

How Long We Retain Your Personal Information

We will retain your personal information for as long as is needed to fulfill the purposes set forth in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).



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5. Sharing of Personal Information

We share your personal information as necessary to provide the services you request, including sharing information with third party service providers; when required by law; to protect rights and safety, and with your consent.

We may share personal information with:

- **Authorized service providers:** We may share your personal information with our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, processing credit card payments, delivering packages, providing customer service and marketing assistance, performing business and sales analysis, supporting our website and/or app functionality, and supporting contests, promotions, sweepstakes, surveys and other features offered through our websites and apps. These service providers 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.
- **Business partners:** When you make purchases or engage in promotions offered through our websites and apps, we may share personal information with the businesses with which we partner to offer you those products, services, promotions, contests and/or sweepstakes. When you elect to engage in a particular merchant's offer or program, you authorize us to provide your email address and other information to that merchant.
- **Third parties advertisers on our websites and apps:** We may allow third-parties, advertising companies, and ad networks, to display advertisements on our websites and apps. These companies also may use tracking technologies, such as cookies, to collect information about users who view or interact with their advertisements. They may collect information about where you, or others who are using your computer, saw and/or clicked on the advertisements they deliver, and possibly associate this information with your subsequent visits to the advertised websites. They also may combine this information with other personal information they collect from you or from other third parties.
- **Other situations:** We also may disclose your information:
 - i. In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.



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- ii. When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our website terms and conditions or other agreements or policies.
- iii. In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.
- iv. When you provide us with your consent to share your information with third parties.

Third-Party Privacy Policies: Any third parties to whom we may disclose personal information may have their own privacy policies which describe how they use and disclose personal information. Those policies will govern use, handling and disclosure of your personal information once we have shared it with those third parties as described in this Policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties. These entities or their servers may be located either inside or outside the United States.

Aggregated and Non-personal Information: We may share aggregated and non-personal information we collect under any of the circumstances set forth in this Policy and also with respect to compiling industry trends such as publishing “white papers” and producing other industry publications. We may also share it with third parties to develop and deliver targeted advertising on our websites and apps and on websites and apps of third parties. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to our websites and apps and the most popular features or services accessed. This information does not contain any personal information and may be used to develop website content and services that we hope you and other users will find of interest and to target content and advertising.

6. Transfer of Information (GDPR)

Your personal information may be transferred to, stored, and processed within the United States. Additionally, we may transfer your personal information to other countries in certain circumstances, for example because a server or third party service provider is located there. BY PROVIDING YOUR PERSONAL INFORMATION TO US, YOU ARE CONSENTING TO ANY TRANSFER, STORAGE, AND PROCESSING IN ACCORDANCE WITH THIS POLICY.



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There are potential risks to you associated with transferring your information to the United States due to the absence of an adequacy decision and appropriate safeguards. These risks include the risk that you will not be able to exercise your data protection rights under applicable law to protect yourself from unlawful use or disclosure of your information. The data protection and privacy laws of other countries, including the United States, may not afford you the same level of protection as those in your own country.

IF YOU ARE FROM THE EUROPEAN UNION OR OTHER REGIONS WITH LAWS GOVERNING DATA COLLECTION AND USE AND YOU PROVIDE US WITH YOUR PERSONAL INFORMATION, YOU ARE AGREEING TO THE TRANSFER OF YOUR PERSONAL INFORMATION TO THE UNITED STATES AND POSSIBLY OTHER JURISDICTIONS.

7. Information Security

We implement and maintain physical, administrative, and technical safeguards designed to secure user information and prevent unauthorized access to or disclosure of that information. Under our security policies and practices, access to sensitive personal information is authorized only for those who have a business need for such access, and sensitive records are retained only as long as reasonably necessary for business or legal purposes. We strive to protect the user information that we collect and store, however, no security program is 100% secure and we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use, or disclose personal information. We maintain security incident response policies and procedures to handle incidents involving unauthorized access to private information we collect or store.

8. Children's Personal Information

We do not knowingly collect personal information from children under the age of 13. Our products, services, apps, and websites are not designed to attract the attention of persons under the age of 13. If you are under the age of 13, please do not submit any personal information through our websites, apps, products, or services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy.

9. Your Privacy Rights

In the event that your personal information is found to be outdated, incomplete, or inaccurate, you may access and update your information by logging into your OpenTech product or service account. If you require verification that your requested changes have been completed, and such verification is not readily displayed in your product or service account, you may request confirmation at the email address listed below (See "Contact Us").



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If you are in the European Union

You can contact us to exercise any of the rights you are granted under applicable data protection laws, which may include the right to (1) access your data, (2) rectify the data, (3) erase data, (4) restrict the processing of your data, (5) the right to receive a file of your personal data, (6) the right to object to the processing, and (7) where we have asked for your consent for processing, withdraw this consent. These rights will be limited in some situations. We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data if the processing of such data is necessary for compliance with legal or regulatory obligations. You also have the right to lodge a complaint with the local Supervisory Authority.

If you are a resident of California

The California Consumer Privacy Act of 2018 permits you to request the following from us: (1) disclosure of information about our collection of your personal information; (2) disclosure of information regarding the sale of personal information; (3) a list of categories of personal information collected about you in the preceding 12 months, including (a) categories of personal information collected about you, (b) categories of sources from which the personal information is collected, (c) the business or commercial purpose for collection or selling personal information, (d) categories of third parties with whom we share personal information, and (e) specific pieces of information that we have collected about you; and (4) deletion of any personal information about you that we have collected from you. These rights are subject to certain limitations. You have the right not to face discrimination for exercising any of your rights under the California Consumer Privacy Act. As stated above, we do not sell your personal information.

When you would like to exercise your rights, please send your request to the contact details below. Please note that we may need to take reasonable steps to verify your identity.

You can also contact us if you have any questions, remarks, or complaints in relation to this Notice.

10. Privacy Policy Changes

As we develop new products and services, update or expand technologies, and develop new information uses, we reserve the right to update this Policy as necessary to reflect such changes. We recommend that you review this policy periodically for any changes that may have been made. Your continued use of our products, services, apps, and websites subsequent to any changes made after your initial consent means that you agree to be bound by those changes. The most current version of this Privacy Policy supersedes all previous versions.



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11. Contact Us

If you have any questions or concerns about this Privacy Policy or our privacy practices, you may contact us at Legal@opentechalliance.com or mail your written inquiry to:

OpenTech Alliance, Inc.
Attn: Legal Department
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