

MY SOLUTION ADVOCATE, LLC – PRIVACY POLICY

This Privacy Policy was last modified on 25th August, 2019.

This Privacy Policy governs your use of the website My Solution Advocate LLC www.msacares.com OR www.mysolutionadvocate.com (also referred to as “we”, “us” or “our”).

My Solution Advocate is strongly committed to protecting your privacy and complying with your choices. Both personal and non-personal information collected is safeguarded according to the highest privacy and data protection standards adopted worldwide. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognize our obligations in updating and expanding this program to meet the demands of the General Data Protection Regulation (GDPR).

Our Commitment

- Your information will not be shared, rented or sold to any third party.
- We use state-of-the-art security measures to protect your information from unauthorized users.
- We give you the possibility to control the information that you shared with us (opt-out)
- My Solution Advocate is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.”

1. NOTICE

We will clearly inform you when information that personally identifies you ("personal information") is asked for and you will have the choice to provide it or not. Generally, this information is requested when you subscribe to updates, newsletters or other online services.

2. USAGE

We use your personal information for the following purposes:

- Create your account.
- Create things that are relevant to you.
- Process your subscriptions.
- For statistical or survey purposes to improve this website and its services to you.
- Complete payments you make on our website with your billing information.
- Enable you find services and information quickly.
- Ensure that you don't have to add information more than once; this makes the website easier for you to navigate through.

- Send you email about our services.
- To provide you information that will allow you to use our services
- To automatically customize your documents with your information
- To alert you of updates, discounts or other services from My Solution Advocate

We may also collect your name, language, currency, operating system, document searched and country information for a better experience with My Solution Advocate services.

When you subscribe to our services, we collect your email in order to process your subscription. We also collect your phone number in order to contact you in case these emails bounce back because of a typo in your email address and if we cannot figure out what the correct email address is.

We also contact the phone number that is provided if we suspect that the cardholder's credit card information has been compromised, i.e. used in a fraudulent way.

We also use our clients' email in order to notify of the release of updated versions of the software, new services or promotional offers.

You agree that you do not object to us contacting you for any of the above purposes whether by telephone, e-mail or in writing and you confirm that you do not and will not consider any of the above as being a breach of any of your rights under the GDPR.

3. CONSENT

When you provide your personal information, you consent that it can be used for the above purposes and that My Solution Advocate is an authorized holder of such information. If you choose not to register or provide personal information, you can still use our website but you will not be able to receive additional services or access certain areas that require registration. When you activate your account, you are providing your consent to occasionally receive information from us. In each communication from us you will have the opportunity to unsubscribe from further communications; alternatively, you may contact us to express your choices at the address provided at the bottom of this page.

4. COOKIES

This Website uses cookies to monitor browsing preferences. A cookie is a computer file containing information about a user that is sent to the central computer with each request. The server uses this information to customize data sent back to the user and to log the user's requests. If you do allow cookies to be used, the following personal information may be stored by us:

- Date and time of visits.
- Pages viewed.
- Time spent at our Website.
- Websites visited before and after our Website.
- Your IP address.

IP address is a number used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser. When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

5. USER PROFILES

Every registered user has a unique personal profile. Each profile is assigned a unique personal identification number, which helps us ensure that only you can access your profile.

When you register, we create your profile, assign a personal identification number, and then send this personal identification number back to your hard drive in form of a cookie, which is a very small bit of code. This code is uniquely yours. It is your passport to seamless travel across the website, without having to fill out registration

forms with information you have already provided. Even if you switch computers, you won't have to re-register – just use your Registration ID to identify yourself.

6. ACCESS TO YOUR INFORMATION

You are entitled to review the personal information you have provided us and ensure that it is accurate and current at all times. To review or update this information simply log in to your account or request that we send you this information.

7. DATA SUBJECT RIGHTS

By virtue of the General Data Protection Regulation (GDPR) our website users have, with certain statutory exceptions, multiple rights with regard to My Solution Advocate's processing of personal data. Users have:

- (1) the right to request access to their personal data and to find out how they are processed;
- (2) the right to correct or complete incorrect or incomplete information;
- (3) the right to delete personal data for data processed illegally where the lawful basis is consent;
- (4) the right to restrict personal data processing;
- (5) the right to transfer personal data in electronic format (data portability);
- (6) the right to object to personal data processing based on the legitimate interest of My Solution Advocate.

Users have the right at any time to withdraw consent previously given regarding My Solution Advocate's processing of users personal data.

8. SECURITY OF INFORMATION

My Solution Advocate is strongly committed to protecting your information and ensuring that your choices are honored. We have taken strong security measures to protect your data from loss, misuse, unauthorized access, disclosure, alteration, or

destruction. All sensitive data is stored behind multiple firewalls on secure servers with restricted employee access.

9. RETENTION OF INFORMATION

We retain information as long as it is necessary to provide the services requested by you and others, subject to any legal obligations to further retain such information. Information associated with your account will generally be kept until it is no longer necessary to provide the services or until you ask us to delete it or your account is deleted whichever comes first. Additionally, we may retain information from deleted accounts to comply with the law, prevent fraud, resolve disputes, troubleshoot problems, assist with investigations, enforce the Terms and Conditions, and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy. Finally, your data could also be stored for sales statistical purposes.

10. EU AND EEA USERS' RIGHTS

If you are habitually located in the European Union or European Economic Area, you have the right to access, rectify, download or erase your information, as well as the right to restrict and object to certain processing of your information. While some of these rights apply generally, certain rights apply only in certain limited circumstances. We describe these rights below:

You have the right to access your personal data and, if necessary, have it amended or deleted or restricted. In certain instances, you may have the right to the portability of your data. You can also ask us to not send marketing communications and not to use your personal data when we carry out profiling for direct marketing purposes. You can opt out of receiving email newsletters and other marketing communications by following the opt-out instructions provided to you in those emails. Transactional account messages will be unaffected if you opt-out from marketing communications.

11. WHAT WE DO WITH THE INFORMATION YOU SHARE

Your information is never shared outside the company without your permission. Inside the company, data is stored behind multiple firewalls on secure servers with

restricted user access. When you register to our website, you are asked to provide your contact information, including a valid email address. We use this information to send you updates about My Solution Advocate order confirmations and information about our services. When you subscribe to our services, we ask for your credit card number and billing address. We use this information only to bill you for the services you subscribed for at that time.

In very rare instances My Solution Advocate may disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on My Solution Advocate or the site; (b) protect and defend the rights or property of My Solution Advocate and its family of websites and properties; and (c) act in urgent circumstances to protect the personal safety of users of My Solution Advocate, its websites, or the public.

12. HOW TO OPT-OUT

We provide users with the opportunity to opt-out from receiving updates on our services, newsletters and other communications from us. You can opt-out by clicking on the link provided in our electronic mailings or by contacting us at the address at the bottom of this page.

13. DOES MY SOLUTION ADVOCATE PRIVACY POLICY APPLY TO LINKED WEBSITES?

Our Privacy Policy applies solely to information collected on our website.

The Site contains links to web sites of third parties. My Solution Advocate is not responsible for the actions of these third parties, including their privacy practices and any content posted on their web sites. We encourage you to review their privacy policies to learn more about what, why and how they collect and use personal information. My Solution Advocate adheres to industry recognized standards to secure any personal information in our possession, and to secure it from unauthorized access and tampering.

However, as is true with all online actions, it is possible that third parties may unlawfully intercept transmissions of personal information, or other users of the Site may misuse or abuse your personal information that they may collect from the Site.

14. CHANGES TO THIS POLICY

If we make changes to our Privacy Policy, we will post these changes here so that you are always aware of what information we collect, how we use it and under what circumstances, if any, we disclose it. If at any point we decide to use your information in a manner different from that stated at the time it was collected, we will notify you by email.

15. ENFORCEMENT OF POLICY

If for some reason you believe My Solution Advocate has not adhered to these principles, please notify us and we will do our best to promptly make corrections.

16. AGREEMENT AND LITIGATION

By using My Solution Advocate website and our services you agree to the terms and conditions contained in this Privacy Policy and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use My Solution Advocate website. You agree that any dispute over privacy or the terms contained in this Privacy Policy, or any other agreement we have with you, will be governed by the laws of the the State of New York. You also agree to arbitrate such disputes in New York County in the State of New York and to abide by any limitation on damages contained in any agreement we may have with you.

17. QUESTIONS OR COMMENTS

If you have questions or comments about this privacy policy, please questions or comments concerning My Solution Advocate should be sent to My Solution Advocate customer service.