



doDOC Corporation

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Privacy Policy

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3 Overview

This privacy policy (the “Privacy Policy”) describes how we treat information Customer may provide to us, including how we may use such information, how we protect the security of such information, and how you may change or request that we remove such information from our systems. This includes any information associated directly with you (such as Customer name, title, email address or phone number) that is supplied to us in conjunction with Customer use or potential use of our website and/or doDOC’ permission-based online workspaces, known as the doDOC® platform (the “Service”).

This Privacy Policy explains how information is collected, used and disclosed by doDOC and applies to information collected when you use or access our online websites (such as www.dodoc.com), products, services or applications (collectively, the “doDOC Services”), or when you attend a doDOC event or otherwise interact with us. We respect the privacy rights of users and recognize the importance of protecting information collected about you. If you use the doDOC Services as part of an entity or organization that has an agreement with doDOC (like your employer or a university), the terms of that organization’s contract for the doDOC Services may restrict our collection or use of your information more than what is described in this Privacy Policy.

Please read the following carefully to understand how we will collect, use and maintain your personal information. It also describes your choices regarding use, access and correction of your personal information.

3.1 Changes to This Notice

We may change this Privacy Policy from time to time. If we make any changes, we will notify you by revising the “Last Updated” date at the top of this Privacy Policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). If there are material changes to this Privacy Policy, we will notify you more directly by email or means of a notice on the home page prior to the change becoming effective. We encourage you to review our Privacy Policy whenever you access the doDOC Services to stay informed about our information practices and the ways you can help protect your privacy.

This document is the property of doDOC Corp. It must not be reproduced, in whole or in part or otherwise disclosed without prior writing consent from doDOC Corp.

If you disagree with any changes to this Privacy Policy and do not wish your information to be subject to the revised Privacy Policy, you will need to deactivate with us and stop using the doDOC Services. Your use of any of the doDOC Services after the posting of such changes shall constitute your consent to such changes.

3.2 Information Collected

We may collect certain user information (including personal information and/or sensitive personal information) in the following ways:

- Information You Provide To Us. We collect information you provide directly to us including when you visit one of our websites, register for and/or use one of the doDOC Services. For example, we collect information when you register with doDOC for an account, create or modify your profile and online account, access and use the doDOC Services (including but not limited to when you upload, download, collaborate on or share files or other information), participate in any interactive features of the doDOC Services, participate in a survey, contest, promotion, sweepstakes, activity or event, make a purchase, apply for a job, request customer support, or communicate with us via third-party social media sites
 - The types of information we may collect directly from you include your name, username, email address, phone number, information about your data storage preferences, employer's name and job title. Please be aware that the information you choose to provide in your doDOC profile may reveal or identify information that is not expressly stated (for example, if you choose to provide your picture, your picture may reveal your gender. We also store the files or other information that you upload or provide to the doDOC Services ("Content") in order to be able to provide you with the features and functionality of the doDOC Service.
 - The information of third parties such as name, email address, etc. as may be provided in order to enable the functionality and features of the doDOC Service. For example, if you invite a user to doDOC, we will collect their email address in order to provide them with an invite to the doDOC Service in order to collaborate on the Content you designated.

- Information We Collect Automatically When You Use the doDOC Services. When you access or use the doDOC Services, we may automatically collect information about you, including:
 - Usage Information: We monitor user activity in connection with the doDOC Services and may collect information about the applications and features you use, the websites you visit, the sizes and names of the files or folders you upload, download, share or access while using the doDOC Services, the Content you access and any actions taken in connection with the access and use of your Content in the doDOC Services.
 - Log Information: We log information about you when you access and use the doDOC Services including your Internet Protocol ("IP") address, access times, browser type and language, Internet Service Provider ("ISP"), the Web pages that you visit, the Content you use and the URL of the Web page you visited before navigating to the doDOC Services.
- Information Collected by Cookies and Other Tracking Technologies: We (including service providers who are working on our behalf) use various technologies to collect information, which may include saving cookies to your device. Cookies are small data files stored on your hard drive or in device memory that help us to improve the doDOC Services and your experience, customize your experience and preferences, allow you to access and use the doDOC Services without re-entering your member ID and/or password, understand which areas and features of the doDOC Services are most popular and count visits. We may also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images (also called "gifs") that may be used in the doDOC Services or in emails that help us to deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies and how to disable them, please see "Your Choices" below.
 - Third party cookies: the use of cookies by third parties you may sign-in from into the doDOC Services and/or third party applications, is not covered by our Privacy Policy. We do not have access or control over such cookies.
 - Third Party clear gifs: Our third party partners employ clear gifs (a.k.a. Web Beacons/Web Bugs), images, and scripts that help them better

manage content on our website. We do not tie the information gathered to our Customers' or Users' personal information.

- Local Shared Objects (“LSO”): We use LSOs such as HTML 5 to collect and store information in order to provide certain features on our website. Third parties with whom we partner may also use LSOs in order to provide certain features on our website or to display advertising based upon your Web browsing activity. Various browsers may offer their own management tools for removing HTML5 LSOs.

Do Not Track. Some browsers offer a “do not track” (“DNT”) option. Because no common industry or legal standard for DNT has been adopted by industry groups, technology companies or regulators, we do not respond to DNT signals. We will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

- Information We Collect From Other Sources. We may also obtain information from third parties and combine that with information we collect through the doDOC Services. For example, we may have access to certain information from a third-party social media service if you create or log into your online account through the service or otherwise provide us with access to information from the service. Any access that we may have to such information from a third-party social media service is in accordance with the Privacy Policy and authorization procedures determined by the social media service.

3.3 Use of Information

We may use the information collected through the doDOC Service for the limited purpose of providing the doDOC Service and related functionality and services for which doDOC has been engaged. The information may be used to perform a variety of purposes, including to:

- Provide, operate, maintain and improve the doDOC Services;
- Enable you to access and use the doDOC Services, including uploading, downloading, collaborating on and sharing Content and sending emails on your behalf;
- Send you technical notices, updates, security alerts and support and administrative messages;

- Provide and deliver the services and features you request, process and complete transactions, and send you related information, including purchase confirmations and invoices;
- Respond to your comments, questions, and requests and provide customer service and support;
- Communicate with you about services, features, surveys, newsletters, offers, promotions, contests and events, and provide other news or information about doDOC and our select partners;
- Process and deliver contest or sweepstakes entries and rewards;
- Monitor and analyze trends, usage, and activities in connection with the doDOC Services and for marketing or advertising purposes;
- Investigate and prevent fraudulent transactions, unauthorized access to the doDOC Services, and other illegal activities;
- Personalize and improve the doDOC Services, and provide content, features, and/or advertisements that match your interests and preferences or otherwise customize your experience on the doDOC Services;
- We send you push notifications from time-to-time in order to update you about events or activities related to the doDOC Services. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we collect certain information about your device such as operating system and user identification information;
- Link or combine with other information we receive from third parties to help understand your needs and provide you with better service;
- Enable you to communicate, collaborate, and share files with users you designate; and
- For other purposes about which we notify you.

3.4 Processing

By accessing or using the doDOC Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries and territories, which may have different privacy laws from your country of residence.

3.5 Sharing and Disclosure of Information.

We will not share personal information about you or any Content with any third parties except as described in this Privacy Policy or in connection with the doDOC Services. For example, we may share personal information about you including as follows:

- Vendors, Consultants and Other Service Providers: We may share your information with third-party vendors, consultants and other service providers who are working on our behalf and require access to your information to carry out that work, such as to process billing, provide customer support, etc. These service providers are authorized to use your personal information only as necessary to provide services to doDOC and/or doDOC Services.
- Corporate Account: If you are an individual doDOC registered user and the domain of the primary email address associated with your doDOC account is owned by your employer and was assigned to you as an employee of that organization, and such organization wishes to establish a doDOC corporate account, then certain information concerning past use of your individual account may become accessible to that organization's administrator including your email address.
- For Collaboration: We may share your information, including when you choose to use collaboration features in the doDOC Services that by their nature support sharing with third parties who you choose. Your name, email address, information from your profile and online account (including your photo), and any Content you choose to share will be shared with such third parties, and such third parties may communicate with you (such as by posting comments or emailing you) in connection with your use of the collaboration features of the doDOC Services. For example, third parties who you invite to collaborate with you as "Editors" using the collaboration features of the doDOC Services may also modify Content that you have shared, upload documents and photos to Content you have shared, share such Content outside of the doDOC Services, and provide other third parties with rights to view the Content you have shared.
- Third Party Applications: doDOC provides you with opportunities to connect with third-party applications or services, such as through our doDOC application partner ecosystem. If you choose to use any such third-party applications or services, we may share information about you including your username and any Content you choose to use in connection with those applications and services,

and such third parties may contact you directly as necessary. This Privacy Policy does not apply to your use of such third-party applications and services, and we are not responsible for how those third parties collect, use and disclose your information and Content. We encourage you to review the privacy policies of those third parties before connecting to or using their applications or services to learn more about their information and privacy practices.

- Compliance with Laws: We may disclose your information to a third party if (a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request, (b) to enforce our agreements, policies and Terms of Service, (c) to protect the security or integrity of the doDOC Services, (d) to protect doDOC, our customers or the public from harm or illegal activities, (e) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person or (f) to any other third party with your prior consent.
- Business Transfers: We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- Aggregated or Anonymized Data: We may also share aggregated or anonymized information with third parties that does not directly identify you.

3.6 Collaboration and Sharing Features

The doDOC Services offers collaboration features or other integrated tools, which allow you to share your Content through the doDOC Services. As a function of the collaborative nature of the doDOC Services and based on the permissions and settings you choose, the use of such features enables the sharing of Content with people you want to collaborate with or with the public. You can choose to change your settings at any time for a file or folder through your account. For more information about such collaboration and sharing features, we encourage you to review the information provided on <https://dodoc.zendesk.com>

3.7 Binding Corporate Rules

doDOC, Corp., and the doDOC group of companies use doDOC's Processor and Controller Global Binding Corporate Rules ("BCRs") as the basis for doDOC's approach to global data privacy protection. doDOC's Processor BCRs and Controller BCRs were authorized by the European data protection authorities, as will be listed at the European Commission website: http://ec.europa.eu/justice/data-protection/international-transfers/binding-corporate-rules/bcr_cooperation/index_en.htm.

doDOC's Processor BCRs enable doDOC to transfer personal data that doDOC processes on behalf of Customers from European Economic Area ("EEA") countries to non-EEA countries. doDOC's Controller BCRs enable doDOC to transfer personal data within the doDOC group of companies globally, where doDOC acts as a data controller.

3.8 APEC Participation

doDOC, Corp.'s privacy practices, described in this Privacy Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found at: <http://www.apec.org/Groups/Committee-on-Trade-and-Investment/~//media/Files/Groups/ECSG/CBPR/CBPR-PoliciesRulesGuidelines.ashx>.

3.9 Security

While no service is completely secure, doDOC takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. For example, we encrypt your Content when it is stored in our data centers. In addition, sensitive information such as credit card number and password that we request from you on the doDOC Services is protected with encryption, such as Secured Socket Layer (SSL) protocol, during transmission over the Internet.

The servers on which personal information is stored are kept in a controlled environment with limited access. While we take reasonable efforts to guard personal information we knowingly collect directly from you, no security system is impenetrable. In addition, we

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cannot guarantee that any passively-collected personal information you choose to include in documents you store on our systems are maintained at levels of protection to meet specific needs or obligations you may have relating to that information.

You may access your account information and our service only through the use of an individual user ID and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been misused. In addition, always logout and close your browser when you finish your session. Please note that we will never ask you to disclose your password in an unsolicited phone call or email.

If you have any questions about the security of your personal information, you can contact us at privacy@dodoc.com.

3.10 Your Choices

Account Information & Retention. You may update, correct or delete information about you at any time by logging into your online account and modifying your information or by emailing us at privacy@dodoc.com. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy. If you wish to deactivate your account, please email us at privacy@dodoc.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time. We will respond to your access request within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information to comply with our legal obligations, resolve disputes and enforce our agreements.

We will retain personal data we process on behalf of our customers as directed by paying customers. doDOC will retain this personal information as necessary to comply with legal obligations, resolve disputes, and enforce agreements.

Upon request, doDOC will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information that we are aware of. To request this information, contact us at privacy@dodoc.com.

Promotional and Newsletter Communications. You may opt out of receiving promotional and newsletter emails from doDOC by following the opt-out instructions provided in those emails. You may also opt-out of receiving promotional emails and other promotional communications from us at any time by emailing privacy@dodoc.com with your specific request. If you opt out, we may still send you non-promotional communications, such as security alerts and notices related to your access to or use of the doDOC Services or those about your online account or our ongoing business relations.

Cookies. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies or to prompt you before accepting such a cookie. Please note that, if you choose to remove or reject browser cookies, this could affect the availability or functionality of the doDOC Services.

California Residents. Under California law, California Residents who have an established business relationship with doDOC may choose to opt out of doDOC's disclosure of personal information about them to third parties for direct marketing purposes. If you choose to opt-out at any time after granting approval email privacy@dodoc.com.

3.11 Single Sign-On

You can log in to our website using sign-in services such as Exostar, ActiveDirectory or an Open ID provider. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities on this website to your profile page to share with others within your network.

3.12 Testimonials

We display personal testimonials of satisfied customers on our website in addition to other endorsements. With your consent we may post your testimonial along with your name.

3.13 Links to Third Party Websites

We may place links on the doDOC Services. When you click on a link to a third party website from our website, your activity and use on the linked website is governed by that website's policies, not by those of doDOC. We encourage you to visit their websites and review their privacy and user policies.

3.14 Our Policy Toward Children

The doDOC Services is not directed to individuals under 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information, please contact us at privacy@dodoc.com. If we become aware that a child under 13 has provided us with personal information, we will take steps to delete such information.

Contacting Us

Any questions about this Privacy Policy should be addressed to privacy@dodoc.com.