

Privacy Policy

1. Our Commitment to Privacy.

This notice describes our Privacy Policy. Our Privacy Policy explains how Sutherland Consulting Group, Inc. d/b/a eratesync.com. (“ErateSync”, “we” or “our”) collects, uses, and protects the personal information obtained through the use of our website eratesync.com (“Site”) and the ErateSync services available through the Site (collectively, “Services”). Through the Services we provide a SAAS to assist organizations receiving funding from the FCC’s E-rate program to manage and remain compliant with all relevant record retention rules. By visiting the Site or using any of our Services, you agree that your personal information will be handled as described in this Privacy Policy. Your use of our Site or Services, and any dispute over privacy, is subject to this Privacy Policy and our Terms of Use, including its applicable limitations on damages and the resolution of disputes. The ErateSync Terms of Use are incorporated by reference into this Privacy Policy.

2. What Information is Collected.

We collect information about you directly from you and from third parties, as well as automatically through your use of our Site or Services.

- (a) Information We Collect Directly From You. In order to access the Site and use our Services, you must register an account on behalf of your organization. To register you must provide at minimum your organization’s name, address, E-rate Billing Entity number, billing and payment information, a point of contact, the contact individual’s email address and phone number and any other information required in the Terms of Use (“Personal Information”). Personal Information is information that identifies, relates to, describes or is reasonably capable of being associated with you or your organization.
- (b) Login Credentials. We may collect usernames, passwords, password hints and other similar security information used for authentication and account access.
- (c) Information We Collect Automatically. We may automatically collect information about your use of our Services through cookies, web beacons, and other technologies, including technologies designed for mobile applications. We combine this information with other information we collect about you. Please see the section “Cookies and Other Tracking Mechanisms” below for more information.

Site:

- domain name;
- your browser type and operating system;
- web pages you view; links you click; your IP address;
- the length of time you visit our Site and or use our Services;

- the referring URL, or the webpage that led you to our Site.
- (c) Unless you choose to provide it to us or include in your account profile, we do not collect sensitive personal information from users of the Site. This includes your social security number, information regarding race or ethnic origin, political opinions, religious beliefs, health information, criminal background, or trade union memberships. If you elect to submit such information to us, it will be subject to this Privacy Policy.

3. How and When the Information is Used.

(a) Organization Account Information

In order to access our Services, you will create an account on behalf of your organization. The information in your account may be visible to our Service Partners or other Site users. Your organizations records and content, but not your billing information, is accessible only by all other individuals listed on your ErateSync account. Any records or content you add to or create in the course of using our Services is viewable and accessible by the other users on that same account. This is the intended purpose of ErateSync – the centralization of an E-rate organization’s records that can be accessed by account users.

No Personal Information, billing information or account content is viewable or accessible by any other ErateSync users outside of your account.

If you believe that an unauthorized profile has been created about your organization, you can request for it to be removed by contacting us at Support@eratesync.com

(b) We also use your Personal Information for the following reasons:

- Operate and improve our Services;
- To create your account, identify you as a user of the Site, and customize the Services to your account;
- To debug or cap the frequency of, underwriting messages;
- To send you promotional information, such as newsletters. Each e-mail newsletter will provide information on how to opt-out of future mailings by unsubscribing;
- To send you administrative communications, such as administrative e-mails, confirmation e-mails, technical notices, updates on policies, or security alerts;
- To respond to your comments or inquiries;
- To provide you with our user support chat interface;
- To track and measure Site performance;
- To protect, investigate, and deter against unauthorized or illegal activity;
- To notify you of new information or services that may be of interest to you; or,
- To send promotional materials.

ErateSync will rely on legal grounds to process your Personal Information to the extent permitted by applicable law, which may include, without limitation: to honor contractual commitments, to take steps in anticipation of entering into contract, to fulfill legal obligations, your consent, and ErateSync's legitimate interests.

- (c) **Payment Obligations.** When you sign up for an account, the method of payment can be credit card, paypal or invoice. Subscribers will be billed or invoiced beginning 30 days after your account is registered. Invoices will be sent from ErateSync with net 30-day payment terms. Credit card payments are processed through Braintree or Paypal at the end of the 30 day trial, and annually after that. Please refer to Braintree's (<https://www.braintreepayments.com/legal/braintree-privacy-policy>) or Paypal's (<https://www.paypal.com/us/webapps/mpp/ua/privacy-full>) privacy policy for information regarding their own security protections and use of your personal information. Remember that certain payment processors may be located in or have facilities that are located in a different jurisdiction than either you or us. So, if you elect to proceed with a transaction that involves the services of a third-party payment provider, then your information may become subject to the laws of the jurisdiction(s) in which that payment provider or its facilities are located.

4. How We Share Your Information. We may share your information, including personal information, as follows:

- a. **Service Partners.** We will not sell, trade, or rent your personally identifiable information to others. However, we do provide some of our services through contractual arrangements made with affiliates, partners and other third parties ("Service Partners"). Our Service Partners include Hubspot to send our email marketing campaigns. This list may be amended from time to time in ErateSync's sole discretion. We and our Service Partners may need to use some personal information in order to perform tasks on our Site or to deliver the Services to you.

We may also share information in the following circumstances:

- a. **Business Transfers.** If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.
- b. **In Response to Legal Process.** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- c. **To Protect Us and Others.** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action

regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Privacy Policy, or as evidence in litigation in which we are involved.

- d. **Aggregate and De-Identified Information.** We may share aggregate or de-identified information about users with third parties, for example, business partners, or other third parties with reports that contain aggregated and statistical data about our users.

5. How We Protect Your Information. To protect your personal identifiable information, we take reasonable precautions and follow industry standard SSL/TLS end-to-end encryption of data in transit to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to Personal Information. Furthermore, your E-rate records are not visible or accessible to ErateSync staff or 3rd parties under any circumstances.

The computers/servers in which we store personally identifiable information are kept in a secure environment. If you provide us with your financial or any other personal information, the information is encrypted using industry standard protections in our database. Payment information is stored in our database for ongoing payment obligations, as it is processed through integrated third-party software. However, once an account is canceled, all payment info is deleted from our database. All other Personal Information we collect may be stored in perpetuity through our internal database, unless we receive a request by you to remove such information.

Although we have implemented commercially reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, please be aware that despite our best efforts, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

6. Our Use of Cookies and Other Tracking Mechanisms

ErateSync may use cookies to: store user preferences or record user-specific information on what pages users access or visit. This section explains what cookies are, how we use cookies and similar technologies on our Site and what you can do to manage how cookies are used.

WHAT ARE COOKIES?

A cookie is a small text file which is sent to your computer or mobile device (referred to in this policy as a “device”) by the web server so that a website can remember some information about your browsing activity on the Site. The cookie will collect information relating to your use of the Site, information about your device such as the device’s IP address and browser type, demographic data and, if you arrived at our Site via a link from third party site, the URL of the linking page.

In addition to cookies, our Site may use web beacons. Web beacons allow us to count the number of users who have visited or accessed the Site and to recognize users by accessing our cookies. We may employ web beacons to facilitate Site administration and navigation, to track the actions of users of the ErateSync, to compile aggregate statistics about ErateSync usage and response rates, and to provide an enhanced online experience for visitors to the ErateSync. We may also include web beacons in HTML-formatted e-mail messages that we send to determine which e-mail messages were opened. A web beacon is often invisible because it is only 1 x 1 pixel in size with no color. A web beacon can also be known as a web bug, 1 by 1 GIF, invisible GIF and tracker GIF.

WHAT ARE THE DIFFERENT TYPES OF COOKIES AND HOW DO WE USE THEM?

Functional: These cookies are used to remember your preferences on our ErateSync and to provide enhanced, more personal features. The information collected by these cookies is usually anonymized, so we cannot identify you personally. Functional cookies do not track your internet usage or gather information which could be used for selling advertising.

Examples of how we may use functional Cookies include:

- Gathering data about visits to our ErateSync, including numbers of visitors and visits, length of time spent on the site, pages clicked on or where visitors have come from.
- Eliminating the need for returning users to re-enter their login details.

Third Party Cookies: You may notice on some pages of Site that cookies have been set that are not related to us. When you visit a page with content embedded from a third party, these third party Service Partners may set their own cookies on your device. We do not control the use of these third party cookies and cannot access them due to the way that cookies work, as cookies can only be accessed by the party who originally set them. Please check the third-party websites for more information about these cookies.

Disabling Cookies: Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Site who disable cookies will be able to browse certain areas of the Site, but some features may not function. To learn more about how to reject cookies, visit www.allaboutcookies.org or go to the help menu within your internet

browser. If you experience any problems having deleted cookies, you should contact the supplier of your web browser.

Clear GIFs, pixel tags and other technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs, including Google Analytics, (a.k.a. web beacons, web bugs or pixel tags), in connection with our Services to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about our Site usage. We and our third-party Service Partners also use clear GIFs in HTML emails to our users, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

7. Third Party Analytics

We may use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Services. We use these tools to help us improve our Services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties.

8. Third-Party Links

When you click on links on our Site, they may direct you away from our Site. We are not responsible for the privacy practices of other websites or mobile applications and encourage you to read their individual privacy policies. If you visit a third-party website or mobile application link from our Site, you do so at your own risk.

9. How You Can Access and Control Your Information

You may modify Personal Information that you have submitted by logging into your account and updating your organization's account information. Please note that copies of information that you have updated, modified or deleted may remain viewable in cached and archived pages of the Site for a period of time.

Although we describe much of the following processes throughout this Privacy Policy, please do not hesitate to email us at support@eratesync.com to receive the following information:

- What Personal Information pertaining to you is being processed
- Why this Personal Information is being processed
- Who has access to this Personal Information about you
- How this Personal Information is being used in automated decisions
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

10. CAN SPAM Act and Opting Out of Emails:

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations. We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions.
- We may also send you additional information related to your account or our Services.
- Market to our mailing list or continue to send emails to our users after an account has been created.

To be in accordance with CANSPAM we agree to the following:

- NOT use false, or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters
- Monitor third party email marketing services for compliance.
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to 10 business days for us to process opt-out requests. Even if you opt-out, we may still communicate with you about your account or any Services you receive from us.

11. Children

Any authorized contact party registering an account on behalf of their organization must be at least 18 years of age. ErateSync does not allow individuals under the age of 18 to create an account, nor do we knowingly collect or use any personal information from such children. If you are under the age of 18, do not submit any information to our Site. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Information on the Site without their permission. If we learn that we collected personal information from children under the age of 18, we will take steps to delete that information as soon as possible. If a parent, guardian or senior member of the organization believes that ErateSync has personally identifiable information of a child under the age of 18 in its database, please

contact us immediately at support@eratesync.com and we will use our best efforts to promptly remove such information from our records.

12. California Residents: California Consumer Protection Act (“CCPA”)

The California Consumer Privacy Act (CCPA) provides consumers who are residents of the State of California with specific rights related to their personal information (which includes Personally Information), subject to certain exceptions. It also requires us to disclose the information we collect, the purposes for which we collect it, and what we share and disclose.

California Civil Code § 1798.83, also known as the "Shine the Light" law, provides California residents with the right to request, once per year, without charge, information from website operators and owners regarding the Personal Information that they collect online and offline, if any, and the third parties, including affiliates, with which they have shared this information during the preceding calendar year, for the direct marketing purposes of the third party. If such information is collected and shared with third parties for their direct marketing purposes, the website operator or owner is required, upon request, to provide the list of categories of Personal Information they collect, if any, and the names and addresses of all third parties with which it has shared such information for direct marketing purposes.

A website operator or owner may meet its obligations, and be exempt from such disclosures, under the Shine the Light law, if it provides California residents the right to opt-out of, and thereby prohibit, the website operator or owner from sharing such Personal Information with third parties including its affiliates, for the direct marketing purposes of the third party.

In accordance with California Civil Code section 1798.83(c)(2), ErateSync complies with California 's "Shine the Light" law by providing all of its users, including its California users, with a cost-free method to opt-out of the sharing of Personal Information with all third parties for the direct marketing of those third parties, by not disclosing to third parties, for their direct marketing purposes the Personal Information of any customer if the customer has exercised the option to prevent such disclosure, and by disclosing these policies in its Privacy Policy. Consequently, ErateSync is not obligated under Shine the Light to provide California users, who have requested such information, a list of the categories of the Personal Information disclosed by ErateSync to third parties for their direct marketing purposes or the names and addresses of the third parties to which ErateSync has shared such Personal Information for their direct marketing purposes during the preceding calendar year.

California residents may have further rights related to the handling of their Personal Information under the California Consumer Privacy Act. While ErateSync does not "sell" your Personal Information in the traditional sense, it may share your information with third parties. California residents may have certain rights related to this

information, including the right to ask that we "Do Not Sell Your Personal Information," the right to ask that we Delete your Personal Information, or the right to request Access to the categories or specific pieces of Personal Information we have collected about you. California residents also have the right to not be treated differently by ErateSync in response to your decision to exercise any of these rights.

To learn more about these rights, to opt-out of our sharing of your Personal Information, and to exercise other rights that apply, please contact ErateSync by phone (888) 379-7538 or email us at support@eratesync.com. As part of your request, we may ask for certain information including your name and account information, or the manner in which you have previously interacted with ErateSync. We will use this information only to contact you about your request and to verify your request. You may also designate an authorized agent to submit a request on your behalf.

13. Information for Nevada Consumers

Nevada law requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. This information is limited to direct identifiers, such as your name, postal address, and email address. When Nevada consumers opt out of the sale of their information, website operators must ensure that the information is not sold to another business that will further license or sell the information to others.

If you are a Nevada resident and you would like to opt out of any possible sale of this information, please email us at atsupport@eratesync.com. For all requests, you must put the statement "Your Nevada Privacy Rights" in the subject field of your request. You must also include your full name, street address, city, state, and zip code. We will not accept requests via telephone, postal mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

14. Changes to Privacy Policy.

ErateSync reserves the right to change this Privacy Policy from time to time as it sees fit and your continued use of the Service will signify your acceptance of any adjustment to this Privacy Policy. If there are any changes to our Privacy Policy, we will announce that these changes have been made on our home page and on other key pages on our Site. If there are any changes in how we use our users' personal information, notification by e-mail will be made to those affected by this change. Any changes to our Privacy Policy will be posted on our Services 30 days prior to these changes taking place. You are therefore advised to re-read this statement on a regular basis.

If you feel that we are not abiding by this privacy policy, you should contact us immediately via telephone at (888) 379-7538 or via support@eratesync.com

This Policy was last updated on January 4, 2021