

# REPLENIUM PRIVACY POLICY

LAST UPDATED: April 30, 2020

This Privacy Policy outlines how, when, and why Replenium, Inc. ("**Replenium**") gathers personal information about individual visitors to Replenium.com ("**Website**") and what we do with it ("**Personal Information**"). You agree that your use of the Website signifies your assent to this Privacy Policy. This Privacy Policy does not apply to other third-party websites, including websites to which we link. Replenium is not responsible for the content or practices of any third parties.

## 1. Who controls your information?

Any Personal Information provided to or gathered by Replenium is controlled by:

Replenium, Inc.  
568 1<sup>st</sup> Avenue, Suite 600  
Seattle, WA 98104  
[info@Replenium.com](mailto:info@Replenium.com)  
(206) 274-5387

## 2. What types of Personal Information do we collect?

Replenium may collect the following categories of Personal Information:

- **Information You Provide to Us.** We collect Personal Information from you when you voluntarily provide it to us over the Website which may include your name, email address and contact information.
- **Device/Internet Connection Information.** When you use the Website, we automatically gather information made available by your web browser, internet service provider, and device, depending on your settings. For example, we may collect your IP address, information about the operating system or type of device you use, the date and time you access the Website, pages you viewed and information about your use of and actions on the Website.
- **Internet Activity Information.** We may collect information about your browsing history, search history, and information regarding your interaction with a particular website, application, or advertisement, including the Website.
- **Geolocation Information.** We may collect information about where you are located, both generally and at the time you access the Website. For example, we may collect your mailing address or ascertain your approximate location from your IP address.

- **Other Information.** From time to time, we may collect other information from you, such as when you request information or make inquiries through the Website.

### 3. How and when do we collect Personal Information about you?

Replenium gathers Personal Information through the following sources and means:

- **When you enter or upload information to the Website.** Replenium collects Personal Information when you enter such information on the Website, sign up for promotional material, upload content, make inquiries and otherwise interact with the Website.
- **When you communicate with us.** Replenium may also collect Personal Information you provide to us, content you make public and geolocation information from you outside of the Website, such as when you email us (including any response to an email communication from Replenium), or communicate with Replenium via social media, such as by posting on a page hosted by Replenium or tagging Replenium in your own post.
- **Through Cookies, tracking tools, and other automated technologies.** Replenium may use Cookies, pixel tags, web beacon technology, etc. to gather device and internet connection information, internet activity information, and geolocation information. "**Cookies**" are files that are placed on your computer or other device by websites you visit. The primary purpose of a Cookie is to identify you as a unique user of the Website.

### 4. How do we use Personal Information?

Replenium may use Personal Information we've gathered as described above for the following business or commercial purposes:

- **To Improve our Products and Services.** Replenium may use Personal Information we collect to improve our product offerings, tools and services. For example, we may consider analytics, demographics, and user feedback collected via the Website in determining whether there is sufficient demand for a new product, tool or service.
- **To Improve the Website.** Replenium may use Personal Information we collect to provide and improve the Website.
- **For Security.** We may use Personal Information we collect to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to identify and prosecute those responsible for that activity.
- **To Personalize Your User Experience.** We may use Personal Information gathered from Cookies to authenticate logins, to allow you to set personal

preferences when using the Website, and to make it so you don't have to reenter the same information when you visit the Website several times within a short timeframe.

- **To Communicate with You.** We may use Personal Information to personalize communication with you, to respond to comments, inquiries and requests regarding our products and services, and to communicate about promotions, alerts, job opportunities, upcoming events, and other news about products and services offered by us and our selected partners.
- **To Market our Products and Services.** We may use Personal Information to provide you with materials about products, and services that may be of interest to you, including:
  - To tailor content and offers;
  - To notify you about offers, products, and services that may be of interest to you;
  - For direct marketing and research (including marketing research); and
  - Other purposes disclosed to you, or that you consent to, when you provide Personal Information.
- **Aggregate Information.** We may combine your Personal Information with that of other users to create statistical information about all users or a subset thereof. Such aggregated Personal Information is pseudonymized and de-identified. In other words, aggregated Personal Information cannot be used to identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular user, including you.

## 5. How do we share Personal Information?

Replenium may share Personal Information with third parties for the following business or commercial purposes:

- **Service Providers.** These third parties provide services to Replenium that allow Replenium to operate the Website, provide services to clients, communicate with clients, and so forth (e.g. cloud services, payment processors, training and development platforms, CRM services, etc.).
- **Affiliated Entities.** Affiliated entities are different than third parties in that they are businesses that are directly related to us and have common ownership with us. We may disclose, transfer, and sell your information to our affiliated entities, in which event, your information shall be treated by the affiliated companies in accordance with this Privacy Policy. Should we be subject to an acquisition, merger, sale, or other change of control or business entity status, we reserve the right to transfer or assign your information as part of that acquisition, merger, or sale.
- **Government Officials and Private Parties Pursuant to Valid Legal Process.** We may disclose Personal Information in response to subpoenas, court orders, and other legal processes. In very rare circumstances, we may

disclose personal information when we believe it is necessary in order to prevent illegal, fraudulent, or injurious actions that may cause harm to individuals.

- **Advertising Partners.** We may disclose Personal Information as needed to our third-party advertising partners. For example, we may share information gathered through Cookies and tracking technology to allow a third party to promote our products and services to you after you leave the Website.

## 6. Do we sell Personal Information to others?

Replenium does not sell Personal Information we collect.

## 7. How do we protect Personal Information?

Replenium uses technical, administrative, and physical security measures (such as SSL encryption and HTTPS protocol) that are designed to protect against the loss, misuse, and alteration of Personal Information under our control. However, no system can be completely secure. Therefore, although we take steps to secure your Personal Information, we cannot promise, and you should not expect, that your Personal Information will always remain secure.

## 8. How long do we keep Personal Information?

Replenium will retain Personal Information for the length of time necessary to fulfill the business and commercial purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law or valid court order.

## 9. Do we transfer Personal Information to a different country?

If you are visiting the Website from a location outside of the United States, your connection will be through and to servers located in the United States, and all information you provide will be processed and maintained in our web servers and internal systems located within the United States. By using the Website, you authorize and consent to the transfer of personal data to the United States and its storage and use as specified above when you provide such information.

## 10. What are your rights when it comes to your Personal Information?

The California Consumer Privacy Act ("CCPA") provides California residents with certain rights relating to their personal information; please note that Replenium is not

considered a "business" under the CCPA. Further, under California's "Shine the Light" law, California residents who provide Personal Information to the Website may request certain information regarding our disclosure of Personal Information to third parties for direct marketing purposes.

To make such a request, or if you have a specific request to access, correct or delete your Personal Information, please contact us at [info@Replenium.com](mailto:info@Replenium.com) or 206-274-5387. Certain consumers may have the right to request disclosure of the following information: (a) categories of Personal Information we have collected about you; (b) categories of sources from which the Personal Information is collected; (c) business or commercial purpose for collecting Personal Information; (d) categories of third parties with whom we share Personal Information; and (e) specific pieces of Personal Information we have collected about you. To protect your privacy and security, we may take reasonable steps to help verify your identity before granting access, making corrections, providing you with information, or deleting Personal Information.

## 11. How do we protect the privacy of children?

You must be 18 or over to use the Website. Replenium will never knowingly collect any Personal Information about children under the age of 13. If we obtain actual knowledge that we have collected Personal Information about a child under the age of 13, that information will be immediately deleted from our database. Because we do not collect such information, we have no such information to use or to disclose to third parties. We have designed this policy in order to comply with the Children's Online Privacy Protection Act (COPPA).

## 12. How can you receive and opt-out from marketing communications?

By providing your email address to Replenium through the Website or an email initiated by you, **you consent to receive emails from us, including information and marketing messages**. Providing consent to promotional emails is NOT a condition of purchasing any products or services from Replenium. You can unsubscribe to marketing emails at any time by clicking the unsubscribe link within the email, or by contacting us at [info@Replenium.com](mailto:info@Replenium.com).

## 13. Do we respond to Do Not Track (DNT) Signals?

DNT is a feature offered by some browsers which sends a signal to websites to request that your browsing is not tracked. Replenium does not currently respond to DNT requests.

## 14. How will you know when we change the Privacy Policy?

Each time you use the Website, the then-current version of this Privacy Policy will apply. Unless we receive your express consent, any revised Privacy Policy will apply only to information collected after the effective date.