

MEZURE PRIVACY POLICY

Your privacy is very important to us. This Privacy Policy (“Policy”) applies to the Mezure Online Assessment, and its associated features, services, and web sites (“The Mezure”), and informs you how personal information is collected, used, disclosed, and protected by Assessment Technologies, Inc. (“ATI”).

IMPORTANT: We never sell, rent, share, or trade any of your Personal Information without your consent.

Changes to This Policy

We may change this Policy from time to time. If we make any changes to this Policy, we will change the “last updated” date at the bottom. Feel free to check this Policy at any time when you use our Web sites and services to better understand exactly what personal information is collected and how that information is protected.

Types of Information Collected

We value your privacy and collect as little information as necessary in order to enable you to use our services and ensure that no one else is trying to gain unauthorized access your data. When you use our Web sites and services, we collect two general types of information, namely personal information and aggregate data. As used in this

Policy, the term “Personal Information” means information that specifically identifies an individual or business entity (such as a name or address), and demographic, clinical, and / or other information, when directly linked to information that can identify an individual or business entity. As used in this Policy, the term “Aggregate Data” is information from which individual user identifiers have been removed, and is typically de-identified anonymous data regarding a group or category of users. In other words, **absolutely no personal information of any kind is included in Aggregate Data.**

Personal Information

As mentioned, “Personal Information” in this Policy refers to information that specifically identifies an individual or business entity, whether that individual or entity is a user directly logging in to the Mezure, or a subject being tested using the Mezure. We have made every reasonable effort – above and beyond the legal requirements for FERPA or HIPAA Compliance - to protect all Personal Information stored on our servers [Please refer to our Security / Compliance document - available from the main menu once logged in to our web service - to see a summary of the many protective measures implemented to continuously protect your Personal Information]. We may grant access to Personal Information to contractors, employees or third-party companies (“Contractors”), who are utilized to help us develop, maintain, improve, host or secure our web sites and services. Each of these Contractors has been carefully selected based, in part, on their trustworthiness, security expertise, and location, and has

committed to maintaining our stringent security policies, usually executing a full Non-Disclosure Agreement and / or a Business Associate Agreement, as required.

We never sell, rent, share, or trade any of your Personal Information without your consent. Other than the aforementioned Contractors, we may disclose personal information to a third party only (a) to comply with laws or respond to lawful requests and legal process, (b) to enforce our agreements, policies and terms of use or (c) in the good faith belief that disclosure is required to protect the personal safety of any person or prevent personal or national harm.

Aggregate Data

Aggregate Data helps us better understand our general users' needs, scores, or preferences so that we may can improve our service with new features or scoring algorithms, or otherwise better adapt our services to user needs. ATI may occasionally utilize sanitized, de-identified Aggregate Data collected while providing our services. Aggregate Data is sanitized and de-identified so that it cannot be personally identified or traced to any specific individual user whatsoever. ATI will only use this Aggregate Data for lawful purposes, including quality assurance, research and development. and to help us better improve our services.

Specific Information Collected

The following lists the specific types of information we collect.

Information You Provide:

We collect information you provide to us on our Web sites or Web Service and when you register for, and use, our services. Examples include the following:

- **Registration and Profile Information:** When you register to use our services or update your User profile, we may collect various kinds of information about you including your name, email address, title, company and other profile information you provide; demographic information; and any other information you may provide.
- **Subject Information:** We collect the information you provide for subjects that you enter into your account. When you choose to create remote logins for subjects, we also require and collect email addresses you provide so that we can send email invitations to those subjects to login to our system.
- **Payment Information:** If you choose to purchase any packages available inside our web service, such as test credits or support hours, our PCI-Compliant payment processing vendor collects your credit card information and billing address directly inside our web application or their portal; ***your credit card information is never stored on our servers during this payment process.***
- **Submissions and Customer Service:** We collect the information you provide when opening a support ticket or contacting our customer service, technical support, or sales personnel in order

to best respond to your request and needs. From time to time we may send you surveys requesting additional personal or demographic information, or offers to participate in specific programs or webinars, or requests to provide customer feedback to help improve our services. Participation in these surveys, offers, or requests is always optional, and if you elect to participate, your responses will be collected so that they can be in whatever offer or survey you chose to participate in.

Information Automatically Collected:

- **Browser Information:** We automatically receive certain types of information when you interact with our Web pages, services and communications. For example, it is standard for your Web browser to automatically send information to every Web site you visit, including ours. That information includes your computer's IP address, access times, your browser type and language, and possibly referring Web site addresses. We may also collect information about the type of operating system you use, your account activity, and records, files and web pages accessed or used by you on our system. This information is very important to help us confirm that no one is attempting to access your information other than you and other legitimate users of your account.
- **Cookies and Web Beacons.** We may also use certain kinds of technology such as cookies and Web beacons to collect

information. Among other things, the use of cookies and Web beacons enables us to improve our Web sites and emails by seeing which areas and features are most popular, to count the number of computers accessing our Web site, to personalize and improve your experience, to record your preferences, and to allow you to visit our Web site without re-entering your member ID and/or password. A cookie is a small amount of data which is sent to your browser from a Web site's computers and stored on your computer's hard drive. Most browsers automatically accept cookies as the default setting. You can modify your browser setting to reject our cookies, or to prompt you before accepting a cookie by editing your browser options. However, if a browser is set not to accept cookies or if a user rejects a cookie, some portions of the Mezure's web site and services may not function properly. For example, you may not be able to sign in to the Mezure, or access certain pages, features or services, or the system may not be able to properly track which subtests you have completed during a live test session. A Web beacon is an electronic image, also called a "gif," that may be used on our Web pages to deliver cookies, count visits and compile statistics on usage or in our emails to tell if an email has been opened and acted upon.

Use of Your Personal Information

In general, we use your personal information to process your requests or transactions, to provide you with information or services you

request, to inform you about updates to current or future products or services, or about specific important events (such as scheduled maintenance windows), to facilitate your use of, and our administration and operation of, the Mezure web site and services, and to otherwise serve you and our users. For example, we may use your personal information:

- To send you an initial “Welcome to Mezure” email with instructions on setting up your Mezure Account, and to contact you about your use of the Mezure web site and services; to respond to your emails, submissions, comments, or requests; to perform after-sales services; to anticipate and resolve problems with our service; to respond to customer support inquiries, for assistance with our product and service development; to send you a password reset link when necessary; and to inform you of updates to our products and services that may better meet your needs;
- To store contacts (including Users and Subjects) you enter or upload into the Mezure web sites and services for your use and viewing;
- To send invitation emails to new users or remote subjects you add to your organization's account, or to send invitation emails to contacts that you specifically enter to request their feedback regarding a particular subject or subjects on your Mezure Account;

- To request feedback and to enable us to develop, maintain, customize and improve the Mezure web site, features, products and services;
- For other purposes about which we need to notify you regarding your Mezure Account.

Acquisition or Merger

In the event of an acquisition, merger, or sale of all or a substantial portion of the Mezure or ATI, with or to another company, your information may become subject to a different privacy policy. In any such event, you will receive notice before your data ever becomes subject to a substantially different privacy policy.

Choice / Opt-Out

We may send you communications regarding our Web sites and services, including but not limited to (i) notices about your use of the Mezure web sites and services, including any notices concerning violations of use, (ii) available updates, and (iii) promotional information and materials regarding our products and services. You may opt-out of receiving promotional emails from us by following the opt-out instructions provided in those emails. Opt-out requests will not apply to transactional service messages, such as security alerts, create password or password reset emails, and notices about your current account and services.

Network and Information Security

We make every reasonable effort to protect information we collect from you to prevent loss, misuse and unauthorized access, disclosure, alteration, and destruction [see our "**Security/ Compliance**" document available from the main menu when logged in to the Mezure].

Encryption

All information you enter within our web application is protected with encryption during transmission over the Internet using the Secured Socket Layer (SSL) protocol, which cannot be viewed by any unauthorized third party and is the same level of encryption used by banks and financial institutions. Data is also encrypted at rest using AES-256 encryption, which is a well-validated industry-standard encryption algorithm. In addition, all highly confidential identifying information entered when creating subjects is encrypted at rest with an additional, second layer of AES encryption at the application level.

Server Monitoring

The servers on which information is stored are kept in a controlled and closely monitored environment with limited / restricted access, and are actively monitored 24/7/365 for security, performance, reliability and availability.

Secure Backups

Backups are made regularly, are fully encrypted, and are stored at a highly restricted, secure off-site location.

While we take all reasonable measures to guard Personal Information we knowingly collect directly from you, no security system is impenetrable. In addition, we cannot guarantee that any passively-collected Personal Information you choose to include in any support ticket, or in other fields that are not intended to store Personal Information, is maintained at adequate levels of protection to meet the specific needs or obligations you may have relating to that information.

Your account information and access to our service is accessible 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 exposed or 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. We also strongly advise that you always maintain a commercially purchased anti-virus, anti-malware, and firewall on your computer, and always keep these programs, as well as your operating system and browser, fully updated with any new versions, security patches or fixes released by the developer of those systems. Lastly, we strongly recommend that you

store your login credentials in a secure, encrypted Password Manager program. We cannot be responsible for any breach of security or unauthorized access of Personal Information or login credentials that occurs on your computer, your subjects' computers, the computers of any individuals that you grant account access to, or any storage system, media or location wherein your Personal Information or login credentials are stored outside of the Mezure platform.

We've invested significant effort to keep your information as secure as possible on our Mezure servers; please help protect your login information from any unauthorized access at your end as well.

Consent / Questions

Logging in to, accessing, or utilizing any component of, the Mezure or its associated features, Web Sites and Web Services, automatically and legally grants your consent to the terms of this Privacy Policy, the Mezure License Agreement, and the Mezure Consent Form (for test subjects) or the Mezure Business Associate Agreement (BAA) (for any user that is considered a "Covered Entity" under HIPAA), as applicable.

Any questions about this Policy should be addressed by email to Privacy@Mezure.com

Last Updated: August 31, 2021