

The iOFFICE Privacy Policy is effective as of January 1, 2018.

## Introduction

iOFFICE, Inc. (“Company”) is committed to protecting the privacy of individuals who visit the Company’s Web sites (“Visitors”), individuals who register to use the Services as defined below (“Customers”), and individuals who register to attend the Company’s corporate events (“Attendees”). This Privacy Statement describes iOFFICE’s privacy practices in relation to the use of the Company’s Web sites and the related applications and services offered by iOFFICE, Inc. (the “Services”).

iOFFICE, Inc., through its data center partner, Rackspace, Inc., complies with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. Rackspace has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view Rackspace’s certification, please visit <https://www.privacyshield.gov/>.

## 1. Web Sites Covered

This Privacy Statement covers the information practices of Web sites that link to this Privacy Statement, including: <http://www.iofficecorp.com>; [https://\\*.iofficeconnect.com](https://*.iofficeconnect.com); [https://\\*.ricohtrac.com](https://*.ricohtrac.com); [https://\\*.ikontrac.com](https://*.ikontrac.com); [https://\\*.foxfms.com](https://*.foxfms.com) (collectively referred to as “iOfficecorp.com Web sites” or “the Company’s Web sites”).

iOFFICE, Inc. Web sites may contain links to other Web sites. The information practices or the content of such other Web sites is governed by the privacy statements of such other Web sites. The Company encourages you to review the privacy statements of other Web sites to understand their information practices.

## 2. Information Collected

When expressing an interest in obtaining additional information about the Services or registering to use the Services, iOFFICE, Inc. requires you to provide the Company with personal contact information, such as name, company name, address, phone number, and email address (“Required Contact Information”). When purchasing the Services, iOFFICE, Inc. may require you to provide the Company with financial qualification and billing information, such as billing name and address, contact and purchasing information, and the size of the company real estate portfolio, the number of assets to be stored by services along with the number of employees within the organization that will be using the Services (“Billing Information”). Required Contact Information, Billing Information, and Optional Information about Customers are referred to collectively as “Data About the Company’s Customers”, or in the case of Attendees, “Data About Company’s Attendees”.



As you navigate the Company's Web sites, iOFFICE, Inc. may also collect information through the use of commonly used information-gathering tools, such as cookies and Web beacons ("Web Site Navigational Information"). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Company's Web sites (such as the Web pages viewed and the links clicked).

### 3. Use of Information Collected

The Company uses Data About the Company's Customers to perform the services requested. For example, if you fill out a "Contact Me" Web form, the Company will use the information provided to contact you about your interest in the Services.

The Company also uses Data About the Company's Attendees to plan and host corporate events, host online forums and social networks in which event attendees may participate, and to populate online profiles for Attendees on the Company's Web sites.

The Company may also use Data About the Company's Customers and Data About the Company's Attendees for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in the Services and to send you information regarding the Company, its affiliates, and its partners, such as information about promotions or events.

iOFFICE, Inc. does not collect and store credit card information from "Visitors", "Customers" or "Attendees".

### 4. Web Site Navigational Information

#### Cookies, Web Beacons and IP Addresses

iOFFICE, Inc. uses commonly used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Web sites ("Web Site Navigational Information"). This section describes the types of Web Site Navigational Information used on the Company's Web sites and how this information may be used.

#### Cookies

iOFFICE, Inc. uses cookies to make interactions with the Company's Web sites easy and meaningful. When you visit one of the Company's Web sites, iOFFICE, Inc. servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to iOFFICE, Inc., either by responding to a promotional offer, opening an account, or filling out a Web form (such as a "Contact Me" Web form), you remain anonymous to the Company.

iOFFICE, Inc. uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your Web browser's ability to accept cookies, you will be able to navigate the Company's Web sites, but you will not be able to successfully use the Services.



## Web Beacons

iOFFICE, Inc. uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors' usage of the Company's Web sites and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Web site tied to the Web beacon and a description of a Web site tied to the Web beacon. For example, iOFFICE, Inc. may place Web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company's Web sites. iOFFICE, Inc. uses Web beacons to operate and improve the Company's Web sites and email communications.

## IP Addresses

When you visit iOFFICE, Inc. Web sites, the Company collects your Internet Protocol ("IP") addresses to track and aggregate non-personal information. For example, iOFFICE, Inc. uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company's Web sites. iOFFICE, Inc. also collects IP addresses from Customers when they log into the Services as part of the Company's "Identity Confirmation" and "IP Range Restrictions" security features.

## 5. Public Forums and Customer Testimonials

iOFFICE, Inc. may provide bulletin boards, blogs, or chat rooms on the Company's Web sites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. iOFFICE, Inc. is not responsible for the personal information you choose to submit in these forums.

iOFFICE, Inc. posts a list of Customers and testimonials on the Company's Web sites that contain information such as Customer's. iOFFICE, Inc. obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

## 6. Sharing of Information Collected

### Service Providers

iOFFICE, Inc. may share Data About the Company's Customers and Attendees with the Company's contracted service providers so that these service providers can provide services on our behalf. Without limiting the foregoing, iOFFICE, Inc. may also share Data About the Company's Customers and Attendees with the Company's service providers to ensure the quality of information provided, and with third-party social networking and media Web sites, such as Facebook, for marketing and advertising on those Web sites. Unless described in this Privacy Statement, iOFFICE, Inc. does not share, sell, rent, or trade any information with third parties for their promotional purposes.



## Business Partners

From time to time, iOFFICE, Inc. may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from iOFFICE, Inc., the Company may share Data About Company's Customers collected in connection with your purchase or expression of interest with our joint promotion partner(s). iOFFICE, Inc. does not control our business partners' use of the Data About the Company's Customers we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service.

iOFFICE, Inc. does not share Data About the Company's Attendees with business partners.

## Compelled Disclosure

iOFFICE, Inc. reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

## 7. Communication Preferences

iOFFICE, Inc. offers Visitors, Customers, and Attendees who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of the Company's marketing emails. Additionally, you may send a request specifying your communications preferences to [privacy@iofficecorp.com](mailto:privacy@iofficecorp.com). Customers cannot opt out of receiving transactional emails related to their account with iOFFICE, Inc. or the Services.

## 8. Correcting and Updating Your Information

Customers may update or change their registration information by editing their record. To update a user profile, please login to your site account ( example: [https://\[organization name\].iofficeconnect.com](https://[organization name].iofficeconnect.com)) with your account username and password and click "Tools."

## 9. Customer Data

iOFFICE, Inc. Customers may electronically submit data or information to the Services for hosting and processing purposes ("Customer Data"). iOFFICE, Inc. will not share, distribute, or reference any such Customer Data except as provided in the iOFFICE, Inc. Master Subscription Agreement, or as may be required by law. In accordance with the iOFFICE, Inc. Master Subscription Agreement, iOFFICE may access Customer Data only for the purpose of providing the Services, preventing or addressing service or technical problems, at a Customer's request in connection with customer support matters, or as may be required by law.



## 10. Security

iOFFICE, Inc. uses robust security measures to protect Customer Data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of Customer Data. When the Services are accessed using Internet Explorer version 10.0 or later, or the latest version of Google Chrome, Firefox, or Safari, Transport Layer Security (TLS) technology protects Customer Data using both server authentication and data encryption. These technologies help ensure that Customer Data is safe, secure, and only available to the Customer to whom the information belongs and those to whom the Customer has granted access. iOFFICE, Inc. also implements an advanced security method based on dynamic data and encoded session identifications, and the Company hosts its Web sites in a secure server environment that use firewalls, intrusion detection systems, and other advanced technology to prevent interference or access from outside intruders. iOFFICE, Inc. also offers enhanced security features within the Services that permit Customers to configure security settings to the level they deem necessary. Customers are responsible for maintaining the security and confidentiality of their iOFFICE, Inc. usernames and passwords.

## 11. Changes to Privacy Statement

iOFFICE, Inc. reserves the right to change this Privacy Statement. iOFFICE, Inc. will provide notification of the material changes to this Privacy Statement through the Company's Web sites at least thirty (30) business days prior to the change taking effect.

## 12. Contacting Us

Questions regarding this Privacy Statement or the information practices of the Company's Web sites should be directed to iOFFICE, Inc. Privacy by emailing [privacy@iofficecorp.com](mailto:privacy@iofficecorp.com) or by mailing iOFFICE, Inc. at the following address:  
**iOFFICE, Inc., Attention Privacy, 1210 W Clay Suite 2, Houston Texas 77019.**

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## Specific Disclosures for the European Economic Area

This section is effective on May 25, 2018.

This section applies to data processing activities of data subjects residing in the European Economic Area as well as, regardless of residence, to the processing of any Personal Data in the European Economic Area.

“Personal Data,” for purposes of this section, means any information relating to an identified or identifiable natural person (‘data subject’). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Services” means any of our products, services, or deliverables.

“Site” means any website operated and controlled by us.

Pursuant to the European Union General Data Protection Regulation (GDPR), we function as a “processor” for the Services we offer to our customers. The scope of applicable data protections and processing for those Services are set forth in contractual agreements with our customers and are therefore not covered by this Privacy Notice.

We may process certain Personal Data in order to maintain and provide the Services to our customers, such as names, addresses, email addresses, and other contact information for designated customer representatives or personnel (“Customer Relationship Data”). In addition, we may send marketing materials or communications to potential or existing customers (“Marketing Activities”). For purposes of Customer Relationship Data and Marketing Activities, we function as a “controller.” Our disclosures with respect to our processing of data as a controller are set forth in this section.

### 1. HOW WE COLLECT AND USE PERSONAL DATA

We describe how we collect and use Personal Data in the [Information Collected section](#) of the Privacy Notice.

The Information Collected section is expressly incorporated by reference herein.

### 2. HOW WE DISCLOSE PERSONAL DATA

Our disclosure is limited to circumstances where we are permitted to do so under applicable European and national data protection laws and regulations. A list of companies with whom we share data for purposes of marketing our Services to potential and existing customers is available here:

- Hubspot
- Salesforce
- Kuno Creative
- MindTouch



## 3. LEGAL BASIS FOR PROCESSING

We collect and process your Personal Data for a variety of different purposes which are set out in further detail in this section.

In some cases, we will ask for your consent so that we may process your Personal Data. However, in certain circumstances, applicable data protection laws allow us to process your Personal Data without needing to obtain your consent.

### 3.1. PROCESSING PERSONAL DATA WHERE CONSENT NOT REQUIRED

In certain cases, separate consent is not required, including:

#### **For the performance of a contract.**

To perform our contractual obligations to you, including our fulfilling orders or purchases you have made, contacting you in relation to any issues with your order or use of our Services, in relation to the provision of our Services, or where we need to provide your Personal Data to our service providers related to the provision of the Services, including for license activation and management.

#### **To comply with legal obligations.**

To comply with laws, regulators, court orders, or other legal obligations, or pursuant to legal process.

#### **Legitimate Interests.**

To operate our business and provide our Services (other than in performing our contractual obligations to you) for our “legitimate interests” and for the purposes of applicable law, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Legitimate interests may include:

- To communicate with you regarding the Services, including to provide you important notices regarding changes to our Online Services Agreement (OSA) and to address and respond to your requests, inquiries, and complaints.
- For our direct marketing purposes.
- To send you surveys in connection with our Services.
- To assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties.
- To develop, provide, and improve our Services.

To enforce our OSA, License Agreements, this Privacy Notice, or agreements with third parties.



## 3.2 CONSENT FOR PROCESSING

In cases where we are not already authorized to process the Personal Data under applicable law, we may ask for your consent to process your Personal Data, including:

- **Marketing**

We may ask for your consent for [Client Name] or our partners or vendors to contact you by telephone, SMS, post and/or email about other offers, products, promotions, developments or Services which we think may be of interest to you and for other marketing purposes.

- **Use of Cookies**

Our Site uses cookies and similar technologies to improve user experience and for analytics. We also use cookies and similar technologies for purposes of marketing and advertising, including interest-based advertising. For more information on interest-based advertising, see section 3 (Interest-Based Advertising). In those jurisdictions that require it, we allow the data subject to give explicit permission or to deny the use of certain categories of cookies.

A “cookie” is a small text file that a web server stores in browser software. A browser sends cookies to a server when the browser makes a connection to the server (for example, when requesting a web page from the same domain that created the cookie). The purpose of cookies is to remember the browser over time and distinguish one browser instance (or user) from all others. Some cookies and other technologies may serve to track Personal Data previously entered by a web user on our site. Most browsers allow you to control cookies, including whether or not to accept them, and how to remove them. Cookies can remember login information, preferences, and similar information.

Cookies, as well as other tracking technologies such as HTML5 local storage, and Local Shared Objects (such as “Flash” cookies), and similar mechanisms, may record information such as a unique identifier, information you enter in a form, IP address, and other categories of data.

We also use web beacons or “pixels,” and in certain circumstances may collect IP address, screen resolution and browser software and operating system types; clickstream patterns; dates and times that our site is accessed, and other categories of data.

If you want to block the use and saving of cookies from the Site on to their computers hard drive, you should take the necessary steps within your web browser’s settings to block all cookies from the Site and its external serving vendors, or use the cookie control system, which, if available upon your first visit, will be linked here. Please note that if you choose to erase or block your cookies, certain parts of our Site may not function correctly. For information on how to disable cookies, refer to your browser’s documentation.

## 4. INTEREST-BASED ADVERTISING

Interest-based advertising is advertising that is targeted to you based on your web browsing and app usage over time and across websites or apps. You have the option to restrict the use of information for interest-based advertising and to opt-out of receiving interest-based ads. Depending on from where you access our Site, you may also be asked to consent to our use of cookies, including advertising cookies.

The opt-outs for interest-based advertising require that strictly necessary cookies are not blocked by the settings in your web browser. We support the Self-Regulatory Principles for Online Behavioral Advertising of the [Digital Advertising](#)





[Alliance](#) in the U.S., the [Canadian Digital Advertising Alliance](#) in Canada, and the [European Digital Advertising Alliance](#) in the EU. If you live in the United States, Canada, or the European Union, you can visit [Ad Choices](#) (US), [Your Ad Choices](#) (Canada), or [Your Online Choices](#) (EU) to find a convenient place to opt-out of interest-based advertising with participating entities for each region. These websites also provide detailed information about how interest-based advertising works. Opting out does not mean that you will no longer receive advertising from us, or when you use the Internet. It just means that the data collected from our website will not be used for interest-based advertising and that the advertising you see displayed on websites will not be customized to your interests.

## 5. WITHDRAWING YOUR CONSENT

You may at any time withdraw the consent you provide for the processing of your Personal Data for the purposes set forth in this Privacy Notice by emailing us at [privacy@iofficecorp.com](mailto:privacy@iofficecorp.com), provided that we are not required by applicable law or professional standards to retain such information.

If you want to stop receiving future marketing messages and materials, you can do so by clicking the “unsubscribe” link included in our email marketing messages or by emailing us at [privacy@iofficecorp.com](mailto:privacy@iofficecorp.com).

## 6. DATA SUBJECT RIGHTS

You have the right in certain circumstances to request confirmation from us as to whether or not we are processing your Personal Data. Where we are processing your Personal Data, you also have the right to request access to, modification of, or deletion of such Personal Data.

You also have the right in certain circumstances to receive the Personal Data concerning you that you provided to us, to restrict processing of your Personal Data, or to transmit such data to another controller.

To exercise your rights with respect to your Personal Data, please email us at [privacy@iofficecorp.com](mailto:privacy@iofficecorp.com). As permitted by law, certain data elements may not be subject to access, modification, portability, restriction, and/or deletion.

Furthermore, where permissible, we may charge for this service. We will respond to reasonable requests as soon as practicable and as required by law.

## 7. DE-IDENTIFIED OR ANONYMIZED DATA

We may create de-identified or anonymous data from Personal Data by removing data components (such as your name, email address, or linkable tracking ID) that make the data personally identifiable to you or through obfuscation or through other means. Our use of anonymized data is not subject to this Privacy Notice.

## 8. DATA RETENTION

We will retain your Personal Data for as long as long as you maintain an account or subscription agreement or as otherwise necessary to provide you the Services. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.



### 9. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

You may have a right to lodge a complaint with a supervisory authority.

### 10. CONTACT US

For questions regarding this Privacy Notice, please contact us at by emailing [privacy@iofficecorp.com](mailto:privacy@iofficecorp.com) or by mailing iOFFICE, Inc. at the following address: **iOFFICE, Inc., Attention Privacy, 1210 W Clay Suite 2, Houston Texas 77019.**

