

# DEELOH TECHNOLOGIES, INC/EXTEMPORE PRIVACY POLICY

Your privacy is important to Deeloh Technologies, Inc, (“Deeloh Technologies”). This Privacy Policy applies to the online collection of information via the software and internet Services and is incorporated into any applicable agreement and service terms and any general terms of use for the Extempore mobile application (“Application”) and the website found at [www.extemporeapp.com](http://www.extemporeapp.com) and [extempore.salesfitness.net](http://extempore.salesfitness.net) (“Site”; Application and Site collectively referenced as “Extempore Services”). By using the above Extempore Services, you consent to the terms of this Privacy Policy and to Deeloh Technologies, Inc’s processing of personal information and non-personal information for the purposes provided in the Privacy Policy. **You expressly consent to the processing of your Personal Information according to this Privacy Policy. Personal Information may be processed by Deeloh in the country where it was collected as well as other countries (including the United States) where laws regarding processing of personal data may be less stringent.** You further consent to reviewing the Privacy Policy from time to time to view any updates.

## WHAT INFORMATION WE COLLECT

We collect information about our users in several ways: directly from the user – whether by email, account registration, requesting services, using services, or taking part in activities in the Extempore services –from our web server logs, through cookies, and through use of applications (such as the Extempore Application).

Please be aware that if you prefer not to provide us with your Personal Information, because such information may be necessary for us to provide certain services, we may not be able to, or may choose not to, make such services available to you.

## HOW WE USE THE INFORMATION

We use the information primarily to provide you with a personalized Internet and application experience that delivers the information, resources, and services that are most relevant and helpful to you, to improve our business processes and services, to provide you the information and services you request from us, and to provide you with notices.

We also respect our contracts with you and other parties and legal processes. As a result, we may collect information to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, or to otherwise protect our rights or those of third parties, and to comply with applicable laws, regulations, and legal process;

Finally, we collect information to fulfill any other purpose for which you provide it and as otherwise necessary or useful for us to conduct our business, including the development of products and services, so long as such use is permitted by law. For example, if you request a newsletter, we will collect information sufficient to provide you with such newsletter. We may disclose personal information to the third parties identified below.

Because non-personal information does not identify who you are, we do not limit the ways we may use or share non-personal information. For example, we may share non-personal information with our affiliates, suppliers, employees and agents, other businesses, and the government.

## **USER-SUPPLIED INFORMATION**

When you register for our services or order products via our mobile application or our site, we ask you to provide some personal information, for example, your name, address, phone number, email address, payment card information, and/or certain additional categories of information resulting from use of the Extempore Services. We keep this information in a contact database for future reference, as needed. We may use certain information you provide to offer you products and services that we believe may be of interest to you. If you don't wish to receive such offers, you may opt out (unsubscribe) by emailing us at: [info@extemporeapp.com](mailto:info@extemporeapp.com).

If you contact us for customer support, we may ask you to provide information about your computer or about the issues you are trying to

resolve. This information is necessary to help us answer your questions. We may record your requests and our responses for quality control purposes.

Deeloh Technologies, Inc may make websites or mobile application space available to you for chat rooms, forums, message boards, or news groups. Please remember that any information disclosed in these areas is public. You should exercise caution when disclosing personal information in these areas. Don't disclose information in these public forums that might be considered confidential.

If you have a paid account for use of our Deeloh Technologies, Inc mobile application, your application-related data, such as employee information, training policies and others, of course is maintained in our secure servers, is not used by us in any fashion unless otherwise stated herein except in anonymized fashion to track general usage statistics and will be deleted at your request upon account termination.

## **USAGE DATA**

We may use statistics or other data regarding your usage of the Extempore Services, such as your use of the Application for training. We may use such statistics and data for product development or other business analytic purposes, but only in the aggregate and without any personally identifiable information about individual users.

We may also track information about your visit to the Site and store that information in web or mobile server logs, which are records of the activities on the Site. Our servers automatically capture and save the information electronically. Examples of the information we may collect include:

- Your unique Internet protocol address
- The name of your unique Internet service provider
- The city, state, and country from which you access our services
- The kind of phone or other mobile device, browser or computer you use
- The number of links you click within the mobile application or site
- The date and time of your visit

- The web page, links or application from which you arrived to our site
- The pages you viewed
- Certain searches/queries that you conducted via Deeloh Technologies, Inc's products

The information we collect in mobile or web server logs helps us administer the Extempore Services, analyze usage, protect the Extempore Services from inappropriate use, and improve the user's experience.

## **COOKIES**

In order to offer and provide a customized and personal service, we may use cookies to store and help track information about you. Cookies are simply small pieces of data that are sent to your browser from a web server and stored on your computer's hard drive. We use cookies to help remind us who you are and to help you navigate our sites during your visits. Cookies allow us to save passwords and preferences for you so you won't have to reenter them each time you visit.

The use of cookies is relatively standard. Most browsers are initially set up to accept cookies. However, if you prefer, you can set your browser to either notify you when you receive a cookie or to refuse to accept cookies. You should understand that some features of many sites may not function properly if you don't accept cookies.

## **THIRD PARTY SERVICES**

We may use services hosted by third parties to assist in providing our services and to help us understand our customers' use of our products. These services may collect information sent by your browser or mobile application, including your IP address, location or cookies. If these third party services collect information, they do so anonymously and in the aggregate to provide information helpful to us such as website trends, without identifying individual visitors. Please see "Cookies" in the section above for information on how you can control the use of cookies on your computer.

## **CHILDREN'S PRIVACY**

## **Information Collected from Children**

The Extempore services will collect two types of information from all its users, including children:

1. Information necessary to use the services: username, password and email address only.
2. Content generated by a child during the use of the Extempore mobile application: uploaded video or audio files generated in response to an instructor's coursework and/or assessments.

## **Consent**

With regard to school-based activities, COPPA allows teachers and school administrators to act in the stead of parents to provide consent for the collection of personal information from children. Schools should always notify parents about these activities. For more information on parental rights with respect to a child's educational record under the Family Educational Rights and Privacy Act (FERPA), please visit the FERPA site.

## **When Information Collected From Children Is Available To Others**

We may share information with our service providers if necessary for them to perform a business, professional, or technology support function for us.

We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

## **Parental Choices and Controls**

At any time, parents can refuse to permit us to collect further personal information from their children in association with a particular account, and can request that we delete from our records the personal information we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of an account or will render the Extempore Services unusable.

## **HOW WE PROTECT THE PERSONAL INFORMATION THAT WE COLLECT**

We have implemented certain appropriate security measures to help protect your personal information from accidental loss and from unauthorized access, use, or disclosure. However, please note that we cannot guarantee that unauthorized persons will always be unable to defeat our security measures.

Also, please note that we may store and process your personal information in systems located outside of your home country. However, regardless of where storage and processing may occur, we take appropriate steps to ensure that your information is protected, consistent with the principles set forth under this policy.

## **WHO HAS ACCESS TO THE PERSONAL INFORMATION?**

We will not sell, rent, or lease mailing lists or other customer data to others, and we will not make your personal information available to any unaffiliated parties, except as follows:

- To agents and/or contractors who may use it on our behalf or in connection with their relationship with us (for example, we may use third parties to help us with promotional campaigns).
- To third parties who assist us in development of products and services.
- To third parties to whom we may license or sell voice recordings (which have otherwise been anonymized or deidentified) for their internal uses, provided those third parties agree that the voice recordings may not be sold or distributed to other parties.

- As required by law, in a matter of public safety or policy, when we believe that disclosure is necessary to protect our rights or property and/or comply with a judicial proceeding, court order, legal process served on our website, law, or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting website visitors who violate our rules, or engage in behavior that is harmful to other visitors, or is illegal.
- We may rely on affiliates for support of the products and services we offer. If so, our affiliates would be required to preserve the confidentiality of any personal information they may access.
- We will not disclose any information about your unique usage to unaffiliated third parties, except as necessary to service the account, to enforce the terms of use, to meet our obligations to content and technology providers, including their ability to offer products and services, or as required by law.
- As noted above, we may use statistics or other data regarding your usage of the Extempore Services for product development or other business analytic purposes, but only in anonymized aggregate form. We may make such data and statistics available to third parties, such as potential or existing customers, for business development, marketing or sales purposes.
- If our company or our assets are acquired by another company, all or part of our business is sold, merged, dissolved, acquired, or in a similar transaction, or in the event of a corporate reorganization

Your access to some of Extempore Services and content may be password protected. We recommend that you refrain from disclosing your username(s) and password(s) to anyone. We also recommend that you sign out of your account or service at the end of each session. You may also wish to close your browser window or mobile application when you have finished your work, especially if you share a computer with someone else or if you are using a computer in a public place like a library or Internet café or allow third parties to have access to your mobile device.

## **HOW TO CORRECT, AMEND, OR DELETE PERSONAL INFORMATION AND/OR UPDATE MY PREFERENCES**

You may cancel your registration or membership, or update your preferences, at any time. If you don't want to receive information about our products or services, please update your account preferences (where available), check the appropriate box when registering, and/or utilize the "unsubscribe" mechanism within the communications that you receive from us. To request deletion or corrections of other information, email [support@extemporeapp.com](mailto:support@extemporeapp.com).

## **LINKS TO OTHER SITES**

Our website and products include links to other web sites whose privacy practices may differ from those of us. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

## **CALIFORNIA PRIVACY RIGHTS**

California Civil code § 1798.83 provides certain rights to California residents, including the right to request information regarding our disclosure of personal information to third parties for marketing purposes. To request such information, please contact us as described below.

## **BREACH RESPONSE POLICY**

**Notification of Security Breach:** In the event of a security breach that leads to the unauthorized release, disclosure, or acquisition of personal information, we will notify all affected users, schools, and districts as soon as possible, but no later than 48 hours after the discovery of the breach. This initial notification will include details about the breach, such as the date and time it occurred, the extent of the breach, and our plan for addressing it. We will also provide a list of students and employees whose data was affected by the breach to schools and districts.

**Additional Notification of Security Breach:** Within five business days of discovering a security breach, we will provide a more detailed notification to



all affected users, schools, and districts. This notification will include information such as the date and time of the breach, the nature and extent of the breach, and the measures we are taking to prevent similar breaches from occurring in the future. We will also provide a list of students and employees whose data was affected by the breach to schools and districts. In some cases, we may also post a notice on our homepage and, depending on where you live, you may have a legal right to receive a written notification of the security breach. If we are unable to provide all of this information at the same time, we will make sure to send it to you as soon as possible.

## **QUESTIONS?**

If you have any additional questions or concerns related to this policy and/or our practices, please email us at [info@extemporeapp.com](mailto:info@extemporeapp.com).

Read more about FERPA compliance [here](#).

## **ADDITIONAL INFORMATION FOR INDIVIDUALS IN EUROPE**

Deeloh Technologies, Inc is participating in the [EU-US Data Privacy Framework](#) and is committed to subjecting all data we collect from European Union, UK and Swiss residents to the DPF principles. If you are located in the European Economic Area (EEA), the United Kingdom, or Switzerland, you have certain rights and protections under the law regarding the processing of your personal information, and this section applies to you.

### **Legal Basis for Processing**

When we process your personal information, we will do so in reliance on the following lawful bases:

To perform our responsibilities under our contract with you (e.g., providing the products and services you requested).

When we have a legitimate interest in processing your personal data to operate our business or protect our interests (e.g., to provide, maintain, and improve our products and services, conduct data analytics, and communicate with you).

To comply with our legal obligations (e.g., to maintain a record of your consents and track those who have opted out of marketing communications).

When we have your consent to do so (e.g., when you opt in to receive marketing communications from us). When consent is the legal basis for our processing your personal information, you may withdraw such consent at any time.

### **Data Subject Requests**

Subject to certain limitations, you have the right to request access to the personal information we hold about you and to receive your data in a portable format, the right to ask that your personal information be corrected or erased, and the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, please contact us at [support@extemporeapp.com](mailto:support@extemporeapp.com).

### **Questions or Complaints**

If you have a concern about our processing of personal information that we are not able to resolve, you have the right to lodge a complaint with the Data Protection Authority where you reside. Contact details for your Data Protection Authority can be found using the links below:

- For individuals in the EEA: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)
- For individuals in the UK: <https://ico.org.uk/global/contact-us/>
- For individuals in Switzerland: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

### **Participation in the EU-US Data Privacy Framework**

Deeloh Technologies, Inc complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Deeloh has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF

Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Deeloh has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit [Data privacy framework website](#).

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Deeloh Technologies, Inc commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

Additionally, Deeloh Technologies, Inc is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

### **Arbitration**

Under certain conditions, more fully described on the Data Privacy Framework Program website

at <https://www.dataprivacyframework.gov/program-articles/How-to-Submit-a-Complaint-Relating-to-a-Participating-Organization%E2%80%99s-Compliance-with-the-DPF-Principles>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

### **Transfer to third parties**

Deeloh Technologies, Inc is responsible for the processing of personal data it received, under the Framework. For personal data transferred from the EU, if Deeloh Technologies, Inc transfers your personal data to a third party, Deeloh

Technologies, Inc will ensure that the third party is contractually obligated to process your data only for limited, specific purposes consistent with this Website Privacy Notice. Deeloh Technologies, Inc will also ensure that the third party will apply the same level of protection to that data as the EU-U.S. Data Privacy Framework Principles and will notify us if it makes a determination that it can no longer meet this obligation. Deeloh Technologies, Inc also complies with the these Principles for the onward transfer liability provisions.

### **PRIVACY POLICY CHANGES**

If our information practices change in a significant way, we will post the policy changes here. This Privacy Policy was last updated on **4/21/2024**.