

# Complete Computer Solutions, Inc.

## Privacy Policy

Updated: August 2, 2022

<https://rpmccs.com/privacy>

At Complete Computer Solutions, Inc. we are committed to protecting our customers' personal data. This document will help you understand how we collect, manage and use you and your users' personal data as part of our provision of products and services to you.

We (Complete Computer Solutions, Inc., together with our affiliates, licensors, partners and contractors, including their respective successors and assigns, referred to as "**CCS**", "**we**", "**us**" or "**our**") need to collect certain personal data about our customer (either you as an individual, or the legal entity that you represent, or for the benefit of which you are agreeing to these terms and have the full power and authority to bind contractually, as applicable; referred to as "**Customer**", "**you**", "**your**" or "**yours**") in order to be able to provide such Customer and/or its employees or other authorized users acting on its behalf (each a "**user**") with our product Representative Payee Manager Software (referred to as "**RPM**"). We promise to work hard to preserve the integrity and the security of Customer's information (including that of its users) under our control. We will only use Customer's data in a manner consistent with this privacy policy and will not share it with anyone for any other purpose. In this document, the expression "**personal data**" means any information relating to an identified or an identifiable natural person. Such information may include, for example, the person's name, address and contact information (such as telephone numbers or email addresses). We further use the term "**product**" to refer to any product, service, solution or other offering made available by CCS including but not limited to RPM.

WE STRONGLY ENCOURAGE YOU TO CAREFULLY READ THIS DOCUMENT. YOUR (INCLUDING YOUR USERS') USE OF OUR PRODUCTS WILL MEAN THAT YOU ARE AWARE OF THE COLLECTION, STORAGE, USE AND DISCLOSURE OF PERSONAL DATA IN THE MANNER DESCRIBED IN THIS DOCUMENT.

### 1. Why we need to collect personal data

We need to collect certain personal data to better understand Customer's needs and preferences, and to provide our products to Customer and its users. Additionally, we may rely on such personal data to contact the Customer regarding their account, upcoming changes, improvements, software updates and upgrades, as well as to improve the effectiveness of our offerings, to conduct research, analysis and other business activities, as further explained in this privacy policy. In any event, the personal data will not be used, made available or otherwise disclosed for purposes other than those specified herein, unless we obtain prior Customer approval or are required to do so by law.

### 2. What kind of personal data may be collected

We access and collect personal data only to the extent necessary to ensure that Customer can access and use the products that you have procured. We may further collect information to identify and associate Customer with its CCS account. This includes Customer name, contact information, including mailing address, email addresses of certain users entitled to access and use the products for or on behalf of Customer, as well as other unique identifiers attributed to Customer (including its users) by us or by other service providers.

Additionally, we may collect and store personal data that Customer (including its users) chooses to provide to us, at its sole discretion, without us requiring it to do so. This may occur, for example, where you disclose certain personal data to us when you contact us, or when you choose to store certain personal data in our products as part of your use of such offerings.

#### Personal data collected in relation to our products

Our products may be grouped in two categories, on premise software and cloud services. Below, you will find an overview of the type of information that may be collected and processed by us in relation to your use of our products.

The first category includes our software products that are installed on infrastructure provided by or on behalf of Customer. Customers use the software to store information (“**Customer Data**”). In these cases, all Customer Data remains stored in the Customer’s systems and cannot be shared with CCS without your permission.

The second category includes cloud products that are hosted on systems made available by us. Customers use the cloud services to store Customer Data. In these cases, we will only access your information with your permission for support purposes. CCS will not review, share, distribute, or reference any such Customer Data. Individual records of Customer Data may be viewed or accessed only for the purpose of resolving a problem, support issues, or suspected violation of the Subscription Agreement, or as may be required by law.

#### Personal data collected in relation to Customer accounts

When you create a customer account with us in association with any CCS product, we will require you to submit to us certain personal data to identify you as the holder of such customer account, but also to protect information associated with your customer account from unauthorized disclosure. Such personal data may include, but is not limited to, Customer full name, user full name, address, contact information, and your CCS cloud account username. It is your responsibility to provide all necessary information to and obtain all relevant approvals and consents from all your users in relation to their access and use of our products.

#### Personal data collected in relation to support services

When Customer contacts us, whether by phone, chat, email, through our websites or otherwise, we may keep a record of such communications to help solve issues that Customer might be dealing with, but also for training, quality assurance and statistical purposes, as well as to improve our products. Please note that we may aggregate personal data to generate various performance, analytical and statistical data, as well as to develop new products. When we do so, we ensure that such information becomes anonymized and may no longer be associated with an identifiable individual.

#### Personal data collected via our websites

When you visit our websites, we may collect certain information automatically from your device. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, preferences, broad geographic location (e.g., country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on

our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology (collectively, “**Cookies**”). We use cookies to collect and use personal data about you.

### **3. Who may have access to personal data**

At CCS, we recognize and respect the importance of protecting our customer’s personal data. Keeping personal data in strict confidence is a core part of our commitment to service excellence. We do not sell or rent any personal data to any third party. However, in order to provide Customer with our products, we may share Customer’s personal data with our affiliated companies, parent entities and subsidiaries, for internal business purposes, as well as with our partners acting on our behalf in relation to the provision of such products.

As many other service providers, we use third party partners in some aspects of our business operations, which, in some cases, involves processing or handling of Customer’s personal data. However, before we do so, we take appropriate measures to safeguard personal data, and to ensure that it is used only in a manner consistent with this privacy policy. These measures also include protecting personal data within our organization. Such information may only be accessible by those employees, agents, representatives and contractors of CCS who need to know such information as part of their duties. We further ensure that our employees, agents, representatives and contractors perform their duties in a way compatible with the terms and conditions described in this document.

We may be required to disclose information that we have on Customer and its users (including its and their personal data) to governing and law enforcement authorities, including where required by law, a court order, or by other legal obligations that we may have in any jurisdiction.

### **4. How we protect personal data**

We work diligently to maintain administrative, technical and physical controls consistent with industry best practices to protect Customer’s personal data against unauthorized access or use. We leverage industry-leading technologies, including server authentication and data encryption, to protect personal data during transit over the internet and at rest.

### **5. Where personal data may be processed**

While our headquarters are based in Indiana, USA, CCS, together with our partners and affiliated companies, operate in various locations worldwide. As a result, we may store or otherwise process personal data in many places around the world, including outside the state, province or country where Customer is located, in which case personal data may become subject to foreign laws, and, therefore, may be available to the governing authorities under local laws and regulations. We will use various legal and contractual means to ensure that data transfers are done in compliance with applicable laws and industry best practices.

### **6. Keeping personal data accurate and up to date**

We rely considerably on your personal data to ensure that we provide Customer with the best possible experience. It is, therefore, important that your personal data available to us remains up to date. As such, if you notice that the information that we have on Customer in our files is no longer accurate or is incomplete, we strongly encourage you to contact us with the most current information. Not doing so may, in some cases,

affect our capacity to deliver to our products. Note that before updating Customer's personal data, we will ask you to verify your identity before we can act on the request.

## **7. Retention of personal data**

Customer's personal data will be stored in accordance with our retention policies and processes. We will keep Customer's information only for as long as it is necessary for us to fulfill our obligations. Thereafter, we will put necessary efforts to permanently dispose of your personal data, unless we are required to keep it for legitimate business or legal purposes.

## **8. Legal basis for processing personal data**

The legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it. However, we will normally collect personal data from you only where we have your consent to do so, where we need the personal data to perform a contract with you or to comply with applicable laws, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data). Similarly, if we collect and use your personal data in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are. In other situations, Customer (including its users) must always give us clear consent for the collection, use and processing of personal data for us to do so. This can be done in several ways, for example, by phone, chat, email, or other similar means.

Occasionally, a customer may give us access to, or provide us with, additional personal data which may be necessary to enable us to provide our products to Customer. This may, for example, happen when Customer chooses to enable a relevant feature in a product. In such case, we will treat such personal data in accordance with the terms of this privacy policy and the applicable laws.

When Customer procures or uses our products, Customer acknowledges and agrees that Customer has the necessary authority and all relevant consents (including those that may be required from its users) to transfer such personal data to us and allow us to treat such personal data in accordance with this privacy policy.

## **9. Minors**

The products that we provide are not intended for individuals below the age of 18. If you are under 18, please do not provide your personal information to us.

## **10. Openness and accountability**

Security, transparency and integrity are among the key values at CCS. We will gladly answer any questions or concerns that you may have with respect to your privacy or the security of your personal data, or if you wish to request a correction of your personal data in our custody or control. Please do not hesitate to reach us by visiting the "contact us" section of our website.

## **11. Your data protection rights**

You have the right to request access to, and obtain a copy of, your personal data. You may also request that any personal data that is inaccurate or incomplete be rectified or completed. Note however that, in some cases, we may not be able to provide you access to your personal data. This may occur when providing such

access would be likely to impact the privacy or the security of a third party, or for other valid reasons in accordance with applicable laws. In these events, we will advise you in writing of the grounds for our decision.

The latest version of this privacy policy may be found at <https://rpmccs.com/privacy>