

Springhouse Compliance, LLC Privacy Policy

Last modified: April 26, 2018

Springhouse Compliance, LLC ("**Company**" or "**We**") respect Your privacy and are committed to protecting it through Our compliance with this Privacy Policy. ("Policy").

This Policy describes the types of information We may collect from You or that You may provide when You visit one or more of Our websites: www.springhousecompliance.com, www.committeelink.com, www.auditbridge.com or www.fihub.com (Our "**Websites**") or the related web and mobile apps (the "**Apps**") and Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information We collect:

- On the Websites and Apps.
- In email, text, and other electronic messages between You and the Websites or Apps.
- Through mobile and desktop applications You download from the Websites, which provide dedicated non-browser-based interaction between You and the Websites.
- When You interact with Our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy.

It does not apply to information:

- We collect offline or through any other means, including on any other website operated by Company or any third party (including Our affiliates and subsidiaries); or
- any third party (including Our affiliates and subsidiaries) collects, including through any application or content (including advertising) that may link to or be accessible from or on the Websites or the Apps or information collected by any payment processors we utilize.

Please read this Policy carefully to understand Our policies and practices regarding Your information and how We will treat it. If You do not agree with Our policies and practices, do not use Our Websites or Apps. By accessing or using the Websites or Apps, You agree to the terms of this Policy. This Policy may change from time to time and any changes will be posted here. Your continued use of the Websites or Apps after We make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Children Under the Age of 13

Our Website is not intended for and we do not knowingly collect information about children under 13 years of age. No one under age 13 may provide Company with any information through the Websites or the Apps. If You are under 13, do not use or provide any information on these Websites, the Apps or on or through any of their features, make any purchases through the Websites or Apps, use any of the interactive or public comment features of the Websites or Apps or provide any information about yourself to Us, including Your name,

address, telephone number, email address, or any screen name or user name You may use. If We are informed in writing that We have collected or received personal information from a child under 13 without verification of parental consent, We will delete that information. If You believe We might have any information from or about a child under 13, please contact Us at support@springhousecompliance.com.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of the Websites and Apps, including information:

- by which You may be personally identified, such as name, postal address, e-mail address, telephone number, user credentials or other online identifiers, or ANY OTHER INFORMATION THE WEBSITES OR APPS COLLECT THAT IS DEFINED AS PERSONAL OR PERSONALLY IDENTIFIABLE INFORMATION UNDER AN APPLICABLE LAW ("**personal information**");
- that is about You but individually does not identify You; and/or
- about Your internet connection, the equipment You use to access the Websites or Apps and usage details.

We collect this information:

- Directly from You when You provide it to Us.
- Automatically as You navigate through the Websites and/or Apps. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Information You Provide to Us. The information We collect on or through Our Websites or Apps may include:

- Information that You provide by filling in forms on the Websites or in the Apps. This includes information provided at the time of registering to use the Websites, Apps, subscribing to the Services, posting material on the Websites or in the Apps, or requesting further services. We may also ask You for information if You choose to enter a contest or promotion sponsored by Us, and when You report a problem with the Websites, Apps or Services.
- Records and copies of Your correspondence (including email addresses), if You contact Us.
- Your responses to surveys that We might ask You to complete for research purposes.
- Details of transactions You carry out through the Websites or Apps and of the fulfillment of Your orders. You may be required to provide financial information before placing an order through the Websites or Apps.
- Your search queries on the Websites or in the Apps.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website, or transmitted to other users of the Websites or Apps or third

parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at Your own risk.

Please be aware that no security measures are perfect or impenetrable. Additionally, We cannot control the actions of other users of the Websites or Apps to whom Your User Contributions may be available. Therefore, We cannot and do not guarantee that Your User Contributions will not be viewed by unauthorized persons.

Information we Collect Through Automatic Data Collection Technologies. As You navigate through and interact with the Websites and Apps, We may use automatic data collection technologies to collect certain information about Your equipment, browsing actions, and patterns, including:

- Details of Your visits to and use of the Websites and Apps, including traffic data, location data, logs, and other communication data and the resources that You access and use on the Websites and Apps.
- Information about Your computer and internet connection, including Your IP address, operating system, and browser type.

We also may use these technologies to collect information about Your online activities over time and across third-party websites or other online services (behavioral tracking). <<Click here>> for information on how You can opt out of behavioral tracking on the Websites and the Apps and how We respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information We collect automatically is statistical in nature and does not include personal information, but We may maintain it or associate it with personal information We collect in other ways or receive from third parties. It helps Us to improve the Websites and Apps and to deliver a better and more personalized service, including by enabling Us to:

- Estimate Our audience size and usage patterns.
- Store information about Your preferences, allowing Us to customize the Websites and Apps according to Your individual interests.
- Speed up Your searches.
- Recognize You when You return to the Websites or Apps.

The technologies We use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of Your computer. You may refuse to accept browser cookies by activating the appropriate setting on Your browser. However, if You select this setting You may be unable to access or fully utilize certain parts of the Websites or Apps. Unless You have adjusted Your browser setting so that it will refuse cookies, the Websites and Apps will issue cookies when You direct Your browser to the Websites or access the Apps.
- **Web Beacons.** Portions of the Websites, Apps and Our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have

visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but We may tie this information to personal information about You that We collect from other sources or You provide to Us.

Third-Party Use of Cookies and Other Tracking Technologies.

Some content or applications, including advertisements, on the Websites or in the Apps are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about You when You use Our Website or Apps. The information they collect may be associated with Your personal information or they may collect information, including personal information, about Your online activities over time and across different websites and other online services. They may use this information to provide You with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If You have any questions about an advertisement or other targeted content, You should contact the responsible provider directly. For information about how You can opt out of receiving targeted advertising from many providers, see Choices About How We Use and Disclose Your Information.

How We Use Your Information

We use information that We collect about You or that You provide to Us, including any personal information:

- To provide the Services.
- To provide the Content.
- To fulfill any other purpose for which You provide it.
- To provide You with notices about Your account.
- To carry out Our obligations and enforce Our rights arising from any contracts entered into between You and Us, including for billing and collection.
- To notify You about changes to Our Websites, Apps or any products or services We offer or provide through them.
- To allow You to participate in interactive features on Our Websites and Our Apps.
- In any other way We may describe when You provide the information.
- For any other purpose with Your consent.

We may also use Your information to contact You about Our own and third-parties' goods and services that may be of interest to You. If You do not want Us to use Your information in this way, please notify us at support@springhousecompliance.com.

Disclosure of Your Information

We may disclose aggregated, deidentified information about Our users without restriction.

We may disclose personal information that We collect or You provide as described in this privacy Policy:

- To Our subsidiaries and affiliates.
- To contractors, service providers, and other third parties We use to support Our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which We disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company or its affiliates and subsidiaries about our users is among the assets transferred.
- To fulfill the purpose for which You provide it. For example, if You give Us an email address to use the "email a friend" feature of the Websites or Apps, We will transmit the contents of that email and Your email address to the recipients.
- For any other purpose disclosed by Us when You provide the information.
- With Your consent.

We may also disclose Your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply the <<Terms of Use>> and other agreements, including for billing and collection purposes.
- If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of Springhouse Compliance and its affiliates, Our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide You with choices regarding the personal information You provide to Us. We have created mechanisms to provide You with the following control over Your information:

- **Tracking Technologies and Advertising.** You can set Your browser to refuse all or some browser cookies, or to alert You when cookies are being sent. To learn how You

can manage Your Flash cookie settings, visit the Flash player settings page on Adobe's website. If You disable or refuse cookies, please note that some parts of the Websites and Apps may then be inaccessible or not function properly.

- **Disclosure of Your Information for Third-Party Advertising.** If You do not want Us to share Your personal information with unaffiliated or non-agent third parties for promotional purposes, email us at support@springhousecompliance.com.
- **Promotional Offers from the Company.** If We have sent You a promotional email, You may send Us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided by or to the Company as a result of a product or service purchase, warranty registration, product service experience or other transactions.
- **Targeted Advertising.** If You do not want Us to use information that We collect or that You provide to Us to deliver advertisements according to Our advertisers' target-audience preferences, You can opt-out by setting Your account preferences to opt-out. For this opt-out to function, You must have Your browser set to accept browser cookies.

We do not control third parties' collection or use of Your information to serve interest-based advertising. However these third parties may provide You with ways to choose not to have Your information collected or used in this way.

Accessing and Correcting Your Information

You may send Us an email at support@springhousedigital.com to request access to, correct or delete any personal information that You have provided to Us. We cannot delete Your personal information except by also deleting Your user account. We may not accommodate a request to change information if We believe the change would violate any law or legal requirement or cause the information to be incorrect and we do not delete information for any Authorized Users without the consent of the organization with which the Authorized Users are affiliated.

If You delete Your User Contributions from the Website, copies of Your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other users of the Websites or Apps. Proper access and use of information provided on the Websites or in the Apps, including User Contributions, is governed by Our <<Terms of Use>>.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of Our Websites or Apps that are California residents to request certain information regarding Our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to support@springhousedigital.com.

Data Security

We utilize Amazon Web Services ("AWS") to store Your data and to secure Your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information You provide to Us is stored by AWS within the United States. If You initiate any purchases through Our Websites or Apps, We will use an identified third party processing service for such payments.

The safety and security of Your information also depends on You. You are responsible for keeping Your User Credentials confidential. We ask You not to share Your User Credentials with anyone, and to be careful about giving out information in public areas of the Websites or Apps, such as the message boards. The information You share in public areas may be viewed by any user of the Websites or Apps.

We do Our best to protect the personal information submitted to Us; however, because of the inherent nature of the Internet and the fact that information is not under Our control during transmission, We cannot and do not completely guarantee the security of information transmitted to or from the Websites or Apps. We will use reasonable efforts to protect Your information, but You accept the risk associated with the transmission of Your information.

Changes to Our Privacy Policy

It is Our Policy to post any changes We make to this Policy on this page or log-in screens with a notice that the Policy has been updated on the Websites and Apps home pages. If We make material changes to how We treat Our users' personal information, We will notify You by email to the primary email address specified in Your account or through a notice on the Websites or Apps home pages. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring We have an up-to-date active and deliverable email address for You, and for periodically visiting Our Websites and Apps and this Policy to check for any changes.

Contact Information

To ask questions or comment about this Policy and Our privacy practices, contact Us at:

support@springhousecompliance.com
Springhouse Compliance, LLC 850 Corporate
Pkwy Ste. 110-A Birmingham, AL 35242