

# *ASAP INC. PRIVACY POLICY*

ASAP Inc. and its subsidiaries and affiliated companies, respect your privacy. This Privacy Policy describes the personal data we may collect about you, how we may use and disclose that data, and the choices you can make about how we collect and use your data. By visiting or using our website (“the Website”) and iPad Application (“App”), you agree to our collection, processing, and transfer of your personal data as described in this Policy.

## **What types of personal data does ASAP Inc. collect?**

When you use the Website or App, we may collect and process different types of information data from you. This may include personal data which you provide directly to us and information that we collect automatically.

Certain information is collected automatically when you visit the Website or App. ASAP Inc. utilizes third-party tracking applications like Google Analytics (<http://google.com/analytics>) to measure and analyze the behavior of visitors on the Website as well as traffic patterns. Additional tracking applications might also be used in the future.

Personal data that you provide directly via the Website or App may include:

- Name, address, email address and telephone number
- Employer and/or other corporate affiliation (employer’s name, title, work address, contact telephone number)

## **How does ASAP Inc. use my information?**

When you request information from ASAP Inc., the personal data you provide will be used for our legitimate business interests, including the following purposes:

- to fulfill your requests
- to answer your questions or respond to your feedback
- to carry out due diligence or other background checks on you
- for statistical analysis
- to inform you of changes to this Privacy Policy

- to provide you with the Website and/or App
- to evaluate the security and stability of the Website and/or App
- to improve the Website and/or App

**WITH YOUR CONSENT.** We will not use your information for marketing purposes without your consent. If you have provided consent, we may use your information for the following purposes:

- To send marketing offers
- To make analyses in order to provide you with relevant marketing offers, events and information
- To send you surveys to give you a possibility to influence our offers and services.

#### **How does ASAP Inc. store my information?**

We will keep your data for only as long as necessary to fulfill the purposes as set out above in this Privacy Policy or as long as we are required by law. After this, we will delete your personal data. If you have specific questions about data retention you can contact ASAP Inc.

#### **How does ASAP Inc. share my information?**

**TRANSFERS OUTSIDE THE U.S.** If we transfer personal information outside of the United States in the course of sharing information as set out below, we will ensure that we transfer the information to parties that provide adequate safeguards for your personal data. We share your personal data only with third parties that follow practices at least as protective as those described in this Privacy Policy. If you are an EU data subject, be advised this may include parties that have self-certified to the EU-U.S. Privacy Shield, implemented binding corporate rules, or adopted standard model clauses approved by the European Commission.

**TRANSFERS TO ASAP INC. AFFILIATES.** We intend to transfer information to subsidiary and affiliated companies of ASAP Inc., located inside and outside the United States. An intra-group data transfer agreement has been entered into between all such entities, with appropriate privacy and data protection safeguards.

**TRANSFERS TO THIRD PARTY SERVICE PROVIDERS.** We may engage other companies and individuals, located inside and outside the United States, to perform functions on our behalf.

These third parties may provide us with the following types of services:

- hosting, maintaining and managing our Website
- hosting, maintaining and managing our contact database

**AS REQUIRED BY LAW.** For example, at the request of regulatory authorities.

**WITH YOUR CONSENT.** Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

### **What is a “cookie” and how does ASAP Inc. use them?**

ASAP Inc. may place “cookies” on your computer or device that may contain anonymous information that is associated with you. Cookies are small text files a website uses to recognize users, and are typically placed on your browser by a web server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you or that, in some cases, can be read by a third-party domain.

Our cookies may record information about your visits to the Website and/or App so that we can provide a continuous and more personalized experience for you, including for one or more of the following purposes: to help identify visitors; assess usage patterns; identify preferences; diagnose problems with our servers; gather demographic information; analyze trends and usage patterns; conduct research; deliver editorial content; record registration and personalized information; and otherwise administer ASAP Inc. products and services.

If you do not wish ASAP Inc. to place and use cookies on your computer, you should set your browser preferences to refuse cookies before accessing ASAP Inc.’s site. ASAP Inc. is not responsible for any failure by you or your browser to accurately implement or communicate your browser preferences or settings. If you choose to decline cookies, you may not be able to sign in or use other interactive features of ASAP Inc.’s site that depend on cookies.

### **Your Choices with ASAP Inc.**

You have certain choices about how we use your information. You can opt out of receiving our marketing emails. To stop receiving our promotional

emails, follow the instructions in any promotional message you get from us or log in to your account and change your settings.

If you object to our use of your information for direct marketing purposes, you can contact ASAP Inc.

You have the right to access, correct, erase, and obtain a copy of any information we have on file in your user account. You have the right to object to our processing of your information. You also have the right to restrict our processing of your information. If you are an EU data subject and believe that we have violated any of your rights under the European Union General Data Protection Regulation, you have the right to contact the responsible data protection authority in your jurisdiction. To exercise any of your rights as an EU data subject, you can contact ASAP Inc.

Before we are able to provide, delete, or change any of your information or otherwise respond to your request to exercise your rights, we may ask that you verify your identity. We may also ask for more details to help us respond to your request. We encourage you to promptly update your personal information if it changes.

### **How does ASAP Inc. protect my personal information?**

We take appropriate administrative, physical and technical measures to protect your data from loss, manipulation and unauthorized access. Although we are committed to maintaining accurate information and we use reasonable efforts to safeguard information, transmission via the Internet is not completely secure and we cannot guarantee the security of your information collected through the Website and/or App.

### **ASAP Inc.' Commitment to Children's Privacy**

ASAP Inc. Website is intended for use by adults over the age of 18. ASAP Inc. intends that parents or guardians provide information on children under age 13 when required. If you are a parent or legal guardian and think your child under 13 has given us information, you can call, email, or contact us in writing as indicated in this policy.

### **Changes to ASAP Inc.'s Privacy Policy**

From time to time, we may change our privacy policies. We will notify you of any material changes to our Privacy Policy as required by law. However,

unless you are an EU data subject, you are deemed to have consented to changes in the Privacy Policy unless you send us objections. We will also post an updated version on the Website.