### Privacy Policy

This privacy policy explains how ALMA handles your personal information and data. We value your trust, so we've strived to present this policy in a clear and plain language. The policy is structured so you can quickly find answers to the questions that interest you the most.

### Information We Collect Directly From You

Contact and Billing information. If you submit a service request via online form, ALMA collects your full name, email address, and phone number. If you decide to volunteer more details via online form, ALMA will collect this information for the purpose of providing you with exceptional service. If you make a payment to ALMA, we require that you provide your billing details, including name, address, email address and financial information corresponding to your selected method of payment (e.g. a credit card number and expiration date or a bank account number). If you provide a billing address, we will regard that as the location of the account holder. Our integrations with 3rd party payment gateways are for processing only. ALMA does not store or log any sensitive cardholder data provided by you. ALMA follows industry standard best practices to protect security of cardholder data during processing and transmission.

## Information ALMA collects about you indirectly or passively when you interact with us.

**Usage data.** ALMA collects usage data about you whenever you interact with our services. This may include which web pages you visit, what you click on, when you performed those actions, and so on. Additionally, like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, and timestamps.

**Device data.** ALMA collects data from the device and application you use to access our services, such as your IP address, operating system version, device type, system and performance information, and browser type. We may also infer your geographic location based on your IP address.

**Information from page tags.** ALMA uses third party tracking services that employ cookies and page tags (also known as web beacons) to collect aggregated and anonymized data about visitors to our websites. This data includes usage and user statistics. Emails sent by ALMA or by users through our services may include page tags that allow the sender to collect information about who opened those emails and clicked on links in them. We do this to allow the email sender to measure the performance of their email messaging and to learn how to improve email deliverability and open rates.

**Providing form responses is voluntary.** Remember, you can always choose not to provide an answer to any given form question (especially those requesting your personal information or data). However, sometimes this will prevent you from completing a form if the question requires an answer. We require certain fields to be completed depending on the specific service (s) collected. We do this to expedite our process. If you do not want to submit this information via ALMAs online form, please call or email us directly.

ALMA also uses the information collected from you, including usage data, device data, referral data and information from page tags to manage and improve our services, for research purposes, and for the various purposes described in this privacy policy.

### 2. How does ALMA use the information we collect?

ALMA treats your form questions and responses as information that is private to you, unless you have made your form questions and responses available via a public link. ALMA knows that, in many cases, you want to keep your form questions and responses (which we collectively refer to as "form data") private. Unless you decide to share your form questions and/or responses with the public, such as by making the form questions and responses available via a public link, ALMA does not use your form data other than as described in this privacy policy, or unless we have your consent. We do not sell or make available your form data to third parties without your permission.

To Provide You With Our Services. In order to provide you with exceptional services, we use third party applications and websites to collect information such as Serve Manager. When exporting such information, you may be disclosing your information to the individuals or organizations responsible for operating and maintaining such third party applications and sites, and your information may be accessible by others visiting or using those applications or sites. We do not own or operate the applications or websites that you connect with, and you should review the privacy policies and statements of such websites to ensure you are comfortable with the ways in which they use the information you share with them. We can disclose the names of the third party applications and website upon written request.

To manage our services. ALMA internally uses your information, including certain form data, for the following limited purposes:

- To monitor, maintain, and improve our services and features. ALMA internally performs statistical and other analysis on information we collect, including usage data, device data, referral data, question and response data and information from page tags, to analyze and measure user behavior and trends, to understand how people use our services, and to monitor, troubleshoot and improve our services, including to help us evaluate or devise new features. ALMA may use your information for internal purposes designed to keep our services secure and operational, such as for troubleshooting and testing purposes, and for service improvement, marketing, research and development purposes.
- To enforce our Terms of Use.
- To prevent potentially illegal activities.
- To screen for and prevent undesirable or abusive activity. For example, ALMA has automated systems that screen content for activities such as, phishing, spam, and fraud.

To create new services, features or content. ALMA may use your form data and form metadata (that is, data about the characteristics of a form) for our internal purposes to create and provide new services, features or content. Regarding form metadata, ALMA may look at statistics like response rates, question and answer word counts, and the average number of questions in a form and publish interesting observations about these for informational or marketing purposes. When ALMA does this, neither individual form creators nor form respondents will be identified or identifiable unless we have obtained their permission.

To contact you about your service or account. ALMA occasionally sends you communications of a transactional nature (e.g. service-related announcements, billing-related matters, changes to our services or policies, a welcome email when you first register). You are prevented from opting out of this type of communication since it is required to provide our services to you.

To contact you for marketing purposes. ALMA will send you promotional emails only if you have consented to our contacting you for this purpose. For example, during the service request process, ALMA will ask for your permission to use your information to contact you for promotional purposes. You may opt out of these communications at any time by clicking on the "unsubscribe" link in them.

To respond to legal requests and prevent harm. If ALMA receives a subpoena or other legal request, we may need to inspect the data held to determine the appropriate response.

### 3. With whom do we share or disclose your information?

ALMA does not sell or make available your form data without your express permission. When might ALMA disclose your form data to third parties? Only for a limited number of reasons. ALMA does not hold your information with our service providers who help us to provide our services to you. ALMA has contracts with these service providers to keep your information confidential and to use it only for the purpose of providing their services. For example, ALMA uses payment processors who help us to process credit card transactions. By using our services, you authorize ALMA to sub-contract in this manner on your behalf. In rare circumstances, we may share information if required by law, or in a corporate restructuring or acquisition context (see below for more details).

### Sharing your forms with the public.

ALMA recognizes that you have entrusted us with safeguarding the privacy of your information. Because that trust is very important to us, the only time ALMA will disclose or share your personal information or form data with a third party is when ALMA has done one of three things, in accordance with applicable law: (a) given you notice, such as in this privacy policy; (b) obtained your express consent, such as through an opt-in checkbox; or (c) de-identified or aggregated the information so that individuals or other entities cannot reasonably be identified by it. Where required by law, ALMA will obtain your express consent prior to disclosing or sharing any personal information.

#### We may disclose:

• Your information to our service providers. ALMA uses service providers who help us to provide you with our services. ALMA gives relevant persons working for some of these providers access to your information, but only to the extent necessary for them to perform their services for us. ALMA also implements reasonable contractual and technical protections to ensure the confidentiality of your personal information and data is maintained, used only for the provision of their services to us, and handled in accordance with this privacy policy. Examples of service providers include payment processors, hosting services, CRM service providers, email service providers, and web traffic analytics tools.

- Your account details to your billing contact. If your account holder details are different from the billing contact listed for your account, ALMA may disclose your identity and account details to the billing contact upon their request. ALMA also will usually attempt to notify you of such requests. By using our services and agreeing to this privacy policy, you consent to this disclosure.
- Your email address to your organization. If the email address under which you've registered your account belongs to or is controlled by an organization, ALMA may disclose that email address to that organization in order to help it understand who associated with that organization uses ALMA, and to assist the organization with its enterprise accounts. You are advised not to use a work email address for ALMA services unless you are authorized to do so, and are therefore comfortable with this disclosure.
- Aggregated or de-identified (anonymized) information to third parties to improve or promote ALMA services. No individuals can reasonably be identified or linked to any part of the information we share with third parties to improve or promote ALMA services.
- The presence of a cookie to advertise ALMA services. ALMA may ask advertising networks and exchanges to display ads promoting our services on other websites. ALMA may ask these networks to deliver those ads based on the presence of a cookie, but in doing so will not share any other personal information with the advertiser. Our advertising network partners may use cookies and page tags or web beacons to collect certain non-personal information about your activities on this and other websites to provide you with targeted advertising based upon your interests.
- Your information if required or permitted by law. ALMA may disclose your information as required or permitted by law, or when ALMA believes that disclosure is necessary to protect our rights, protect your safety or the safety of others, and/or to comply with a judicial proceeding, court order, subpoena, or other legal process served on us.
- Your information if there's a change in business ownership or structure. If ownership of all or substantially all of ALMA business changes, or ALMA undertakes a corporate reorganization, including a merger, acquisition or consolidation or any other action or transfer between ALMA entities, you expressly consent to ALMA transferring your information to the new owner or successor entity so that we can continue providing our services. If required, ALMA will notify the applicable data protection agency in each jurisdiction of such a transfer in accordance with the notification procedures under applicable data protection laws.
- Information you expressly consent to be shared. For example, ALMA may expressly request your permission to provide your contact details to third parties for various purposes, including to allow those third parties to contact you for marketing purposes. You may later revoke your permission, but if you wish to stop receiving communications from a third party to which we provided your information with your permission, you will need to contact that third party directly.
- 4. What are your rights to your information?

For how long does ALMA retain your data? We generally retain your data for as long as you have an account with ALMA, or to comply with our legal obligations, resolve disputes, or enforce our agreements. Data that is deleted from our servers may remain as residual copies on offsite backup media for up to approximately 30 days afterward.

Form data deleted from within the account You can request to delete forms and data from within your account at any time. Form data that you delete from your account will be rendered inaccessible, but not permanently deleted, as permitted by law. ALMA retains your data to allow you to restore data that has been deleted accidentally.

ALMA will eventually permanently purge old, deleted data to reclaim storage space, so it cannot be guaranteed that ALMA will be able to restore deleted data. The more recent the deletion, the more likely it will be able to be restored. Once deleted from your account, the data will be fully purged from our system within 30 days.

ALMA generally does not use deleted form data for any purpose other than to give you the opportunity to restore it. Sometimes ALMA may retain deleted data to comply with legal obligations, resolve disputes, or enforce our agreements. In these cases, ALMA ensures that access to such data is blocked except for the purposes for which ALMA has been required to retain the information.

Account deleted from within the account You can request to delete your account and form data associated with it at any time. After you initiate the deletion of your account, the account is disabled immediately, but the account and form data will be held in our database for 30 days until our next regularly scheduled deletion cycle, at which point it will be permanently deleted. You can contact ALMA within that time frame to request the account be restored. After the account is permanently deleted, ALMA won't be able to restore it or the form data it contained.

**User account in a team deleted by an Administrator** The Primary Admin or Admin of a team can delete a user account from a team at any time. This disables the user account immediately, but its form data will be held in a ALMA database for 30 days before being deleted. The Primary Admin can contact ALMA within this 30-day time frame to request the account be restored.

### • 5. Security, cookies and other important information

Changes to this privacy policy. ALMA may modify this privacy policy at any time and you will be notified by publishing the changes on this website. If ALMA determines the changes are material, you will be provided with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of the changes, you continue to use our services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our privacy policy. If you disagree with the terms of this privacy policy or any updated privacy policy, you may close your account, if you have one, at any time or not respond to a form.

**Security.** Details about ALMA's security practices are available through our Security Statement. ALMA is committed to handling your personal information and data with integrity and care. However, regardless of the security protections and precautions ALMA undertakes, there is always a risk that your personal data may be viewed and used by unauthorized third parties as a result of

collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact customer support.

**Data locations.** ALMA servers are based in the United States and Germany, so your personal information will be hosted and processed by ALMA in the United States or Germany. Your personal information may be processed in, or transferred or disclosed to, countries in which ALMA offices are located and in which our service providers are located or have servers.

**Cookie Notification.** ALMA and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. ALMA uses cookies and similar technologies for several reasons:

- o **To make our site easier to use.** If you use the "Save and Exit" feature when you submit a request, ALMA may store your Contact Name in a cookie to make it quicker for you to complete the form.
- o **For security reasons.** ALMA uses cookies to authenticate your identity, such as confirming whether you have submitted a request before.
- To provide you with personalized content. ALMA may store user preferences, such as your default language, in cookies to personalize the content you see. ALMA also uses cookies to ensure that users can't retake certain forms that they have already completed.
- o **To improve our services.** ALMA uses cookies to measure your usage of our websites and track referral data, as well as to occasionally display different versions of content to you. This information helps us to develop and improve our services and optimize the content we display to users.
- o **To advertise to you.** ALMA, or our service providers and other third parties we work with, may place cookies when you visit our website and other websites or when you open emails that are sent to you, in order to provide you with more tailored marketing content (about our services or other services), and to evaluate whether this content is useful or effective. For instance, ALMA may evaluate which advertisements are clicked on most often, and whether those clicks lead users to make better use of our tools, features and services. If you don't want to receive advertisements that are tailored to you based on your anonymous online activity, you may "opt out" of many of the companies that are involved in such tailoring by going to <a href="https://www.aboutads.info">https://www.aboutads.info</a>. Opting out in this way does not mean you will not receive any advertisements; it just means that you will not receive advertisements from such companies that have been tailored to you based on your activities and inferred preferences.
- o Google Analytics. In addition to the above, ALMA has implemented on our websites and other services certain Google Analytics features that support Display Advertising, including re-targeting. Visitors to our websites may opt out of certain types of Google Analytics tracking, customize the Google Display Network ads by using the Google Ad Preferences Manager and learn more about how Google serves ads by viewing its Customer Ads Help Center. If you do not wish to participate in Google Analytics, you may also download the Google Analytics opt-out browser add-on.

ALMA does not believe cookies are sinister, but you can still choose to remove or disable
cookies via your browser. Refer to your web browser's configuration documentation to learn
how to do this. Please note that doing this may adversely impact your ability to use our
services. Enabling cookies ensures a smoother experience when using ALMA websites. To
manage flash cookies, <u>click here</u>. By using ALMA websites and agreeing to this privacy
policy, you expressly consent to the use of cookies as described in this policy.

Blogs and Forums. ALMA websites may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. We're not responsible for any personal information you choose to submit in these areas of our site. Be aware that any personal information you provide may be used for illegal activity. To request removal of your personal information from our blog or community forum, contact Customer Support. In some cases, we may not be able to fulfill your request and we will let you know why. Commenting systems on our blogs are managed by a third party application that may require you to register to post a comment. Please review that application's privacy policy to learn how the third party uses your information.

**Social Media Features.** ALMA websites may include social media features or widgets, such as the Facebook Like button. Use of these features may allow them to collect your IP address, detect which page you are visiting on our site, and set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the third party providing it.

Safety of Minors and COPPA. ALMA services are not intended for and may not be used by minors. "Minors" are individuals under the age of majority in their place of residence (under 13 in general). ALMA does not knowingly collect personal data from minors or allow them to register. If it comes to our attention that we have collected personal data from a minor, ALMA may delete this information without notice. If you have reason to believe that this has occurred, please contact Customer Support. For 13-16 years old minors, ALMA does not sell or share their personal information. ALMA states that prior consent will be taken if further needs come up.

**English version controls.** Non-English translations of this privacy policy are provided for convenience. In the event of any ambiguity or conflict between translations, the English version is authoritative.

# 6. Additional information for European Union users

**Personal data.** For users located in the EU, references to "personal information" in this policy are equivalent to what is commonly referred to as "personal data" in the EU.

o **About IP addresses.** ALMA uses third party servers that record the incoming IP addresses of visitors, whether or not the visitor has an ALMA account, and store the IP addresses in log files. Third parties use these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). By agreeing to this privacy policy, you expressly consent to ALMA using your IP address for the foregoing purposes. If you wish to opt-out from the foregoing consent to use your IP address, you must cancel your account (if you have one) or not respond to a form if requested to do so.

- O Data controller. ALMA, whose contact information is listed above, is the data controller for registration, billing, and other account information that we collect from users in the EU. However, the data controller for form data is the client. ALMA only processes such form data in accordance with the instructions and permissions (including those given under this privacy policy) selected by the client when they complete and submit their request online.
- Accessing and correcting your personal data. If you have an ALMA account, you
  have the right to access and correct the personal information that ALMA holds
  about you. This right may be exercised by contacting customer support.
- **Consents**. By clicking "I Agree" or any other button indicating your acceptance of this privacy policy, you expressly consent to the following:
  - You consent to the collection, use, disclosure, and processing of your personal data in the manner described in this privacy policy, including our procedures relating to cookies, IP addresses, and log files.
  - o ALMA servers for the EU zone are based in Germany, so your personal data will be primarily processed in the EU zone. You consent to the transfer and processing of your personal data in the EU zone by ALMA and in the data locations identified in Section 5 by our various affiliates and service providers.
  - o You consent to ALMA sharing your personal data with relevant persons working for service providers who assist us to provide our services.
  - o If you have enabled Cookies on your web browser, you consent to ALMA's use of cookies as described in this privacy policy.

#### 7. Additional information for California residents

With regard to the California Consumer Privacy Act of 2018, ALMA does not sell or share or make available form responses to third parties without the client's permission and ALMA does not use any contact details collected in our customers' forms to contact form respondents. Although we do not sell or share your personal information, if you would like to fill out a form to opt-out of us ever doing so, please submit a written request to our Customer Support or fill our opt-out form.

Accessing and correcting your personal data. If you have an ALMA account, you have the right to access and correct the personal information that ALMA holds about you. This right may be exercised by visiting My Account page or by contacting Customer Support.

About IP addresses. ALMA servers record the incoming IP addresses of visitors to ALMA websites, whether or not the visitor has a ALMA account, and store the IP addresses in log files. ALMA uses these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). ALMA also stores IP addresses along with certain actions you take on our system. IP addresses are only linked to form responses if a form creator has configured a form to collect IP addresses. By agreeing to this privacy policy, you expressly consent to ALMA using your IP address for the foregoing purposes. If you wish to opt out from the foregoing consent to use your IP address, you must cancel your account (if you have one) or not respond to a form if requested to do so.