Privacy Policy

Last updated August 1, 2025

This Privacy Policy for Signing Paperless LLC ("we," "us," or "our), describes how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services ("Services"), including when you:

- Visit our website http://www.signingpaperless.com or any website of ours that links to this Privacy Policy
- Download and use our mobile application (Signing Paperless LLC), or any other application of our that links to this Privacy Policy
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this Privacy Policy will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any guestions or concerns, please contact us at signingpaperless@qmail.com.

Summary of Key Points

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example what country you reside in. We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

Do we collect any information from third parties? We do not collect information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by visiting http://www.signingpaperless.com, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

What information do we collect?

Personal information you disclose to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in the activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Job titles
- Usernames
- Passwords
- Billing addresses
- debit/credit card numbers
- EIN numbers
- Contact preferences

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Financial data
- Social security or other government identifiers such as EINs
- Legal data

Payment Data. We may collect data necessary to process your payment if you choose to make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is handled and stored by Helcim. You may find their Privacy Policy link here

https://legal.helcim.com/us/privacy-policy/?_gl=1*12tubrx*_gcl_aw*R0NMLjE3NTM3NTE1MzcuQ2p3S0NBand2NXpFQmhCd0Vpd0FPZzJZS09DcUt0dDRub2wwdXZrRGRtX1p4Z2tuN3VIMUlQOGd5OWhMMTNtWXNZNmtfYzZCWG1rUXZ4b0NNUm9RQXZEX0J3RQ..* gcl_au*MTQ0Mzk2OTgyNS4xNzQ5NjkwMTI3LjgyODEwNDM4MS4xNzQ5NjkwMTM1LjE3NDk2OTA0NjQ.*_ga*Njk3ODk0NDEyLjE3NDk2OTAxMzA.* ga_E4FGSTC3VD*czE3NTM3NTE1MzYkbzQkZzAkdDE3NTM3NTE1NDEkajU1JGwwJGgw

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

How do we process your information?

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

What legal bases do we rely on to process your information?

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- Consent. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- Legal obligations. We may process your information where we believe it is necessary
 for compliance with our legal obligations, such as to cooperate with a law enforcement
 body or regulatory agency, exercise or defend our legal rights, or disclose your
 information as evidence in litigation in which we are involved.
- Vital Interests. We may process your information where we believe it is necessary to
 protect your vital interests or the vital interests of a third party, such as situations
 involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention

- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle and insurance claim
- For identifying injured, ill, or deceased persons and communicating with the next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations
- We may disclose de-identified information for approved research or statistics projects, subject to ethics oversight and confidentiality commitments

When and with whom do we share your personal information?

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

How long do we keep your information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than seven years past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if that is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

How do we keep your information safe?

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of

personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

Do we collect information from minors?

We do not knowingly collect, solicit data from, or market to children under 18 years of age or the equivalent age as specified by law in your jurisdiction, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or the equivalent age as specified by law in your jurisdiction or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn the personal information from users less that 18 years of age or the equivalent age as specified by law in your jurisdiction has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records if we are unable to contact a parent or guardian and have them agree to the terms and conditions set forth. If you become aware of any data we may have collected from children under age 18 or the equivalent age as specified by law in your jurisdiction, please contact us at signingpaperless@gmail.com.

What are your privacy rights?

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not be able to automate decision-making. If a decision that produces legal or similarly significant effects is made solely by automated means, we will inform you, explain the main factors, and offer a simple way to request human review. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us at signingpaperless@gmail.com. We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time by contacting us at signingpaperless@gmail.com or by updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can: log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Controls for do-not-track features.

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

Do United States residents have specific privacy rights?

Categories of Personal Information We Collect

The table includes illustrative examples of each category and does not reflect the personal information we collect from you.

Category	Examples	Collected
Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	Yes
Personal Information as defined in the California Customer Records statute	Education, employment, and employment history	No
Protected classification characteristics under state and federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	No
Commercial information	Transaction information, purchase history, financial details, and payment information	Yes
Biometric information	Fingerprints and voiceprints	No
Internet or other network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	No
Geolocation data	Device location	Yes

Audio, electronic, sensory, or similar information	Images and audio, video or call recordings created in connection with our business activities	No
Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	No
Education Information	Student records and directory information	No
Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	No
Sensitive personal Information	Account login information, debit or credit card numbers, driver' licenses, financial information including account access details, national origin, passport numbers, social security numbers and state id card numbers	Yes

We only collect sensitive personal information, as defined by applicable laws or the purposes allowed by law or with your consent. Sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You may have the right to limit the use or disclosure of your sensitive personal information. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for:

- Audio, electronic, sensory, or similar information as long as the user has an account with us
- Sensitive personal information as long as the user has an account with us

How We Use and Share Personal Information

Will your information be shared with anyone else?

We may disclose your personal information with your/our service providers pursuant to a written contract between us and each service provider.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose. We will not sell or share personal information in the future belonging to website visitors, users, and other customers.

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- Right to know whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request the deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to non-discrimination for exercising your rights
- **Right to opt out** of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including the privacy law in Minnesota)
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in California, Delaware, and Maryland)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in Minnesota and Oregon)
- Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including the privacy law in Minnesota)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including the privacy law in California)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including the privacy law in Florida)

How to Exercise Your Rights

To exercise these rights, you can contact us by referring to the contact details at the bottom of this document. Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such a request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at signingpaperless@gmail.com. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

California "Shine The Light" Law

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclose to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by emailing signingpaperless@gmail.com.

Do other regions have specific privacy rights?

Australia and New Zealand

We collect and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).

This Privacy Policy satisfies the notice requirements defined in both Privacy Acts, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular:

- Offer you the products or services that you want
- Respond to or help with your requests
- Manage your account with us
- Confirm your identity and protect your account

At any time, you have the right to request access to or correction of your personal information. You can make such a request by emailing signingpaperless@gmail.com. If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner and a breach of New Zealand's Privacy Principles to the Office of New Zealand Privacy Commissioner.

Republic of South Africa

At any time, you have the right to request access to or correction of your personal information. You can make such a request by emailing signingpaperless@gmail.com. If you are unsatisfied with the manner in which we address any complaint with regard to our processing of personal information, you can contact the office of the regulator, the details of which are:

- The Information Regulator (South Africa)

- General enquiries: enquiries@inforegulator.org.za
- Complaints (complete POPIA/PAIA form 5): <u>PAIAComplaints@inforegulator.org.za</u> & <u>POPIAComplaints@inforegulator.org.za</u>

Do we make updates to this policy?

We may update the Privacy Policy from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Policy. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to renew this Privacy Policy frequently to be informed of how we are protecting your information.

How can you contact us about this policy?

If you have questions or comments about this notice, you may email us at signingpaperless@gmail.com or contact us by post at:

Signing Paperless LLC 2222 W Grand River Ave Ste A Okemos, MI 48864 United States

How can you review, update, or delete the data we collect from you?

Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please visit: http://www.signingpaperless.com.