

ONLINE PRIVACY NOTICE

1. Introduction.

- (a) **Web Site Owner.** ScrubPlan LLC (“ScrubPlan”) is the owner of this web site (“ScrubPlan Web Site”). ScrubPlan can be contacted by e-mail at support@scrubplan.com. This online privacy notice discloses ScrubPlan information practices for this ScrubPlan Web Site, including what type of personal identifiable information is requested in order to make a purchase, how the information is used, and with whom the information is shared.
- (b) **Web Site Visits.** ScrubPlan collects certain information from ScrubPlan Web Site visitors. This includes, but is not limited to, the home server domain name, e-mail address, type of computer and web browser, what pages visitor accessed, and limited information about search requests. This information is used to solve technical problems and to calculate overall usage statistics.
- (c) **Web Site Transactions.** At times, ScrubPlan will need personal information regarding a customer or a prospect. For example, to process an order or provide a subscription, ScrubPlan may need to know a customer's name, mailing address, e-mail address and credit card details. It is ScrubPlan's intent to inform you before ScrubPlan collects personal information, such as user's name and/or address on the Internet. If you tell us that you do not wish to have this information used as a basis for further contact with you, ScrubPlan will respect your wishes.

2. Personal Information That May Be Collected.

- (a) **Identifying Information.** In order to make a purchase and/or access designated subscriber services and/or restricted areas within the ScrubPlan Web site, ScrubPlan will request a user to provide certain personal identifying information, which may include: legal name, postal address, e-mail address, screen name, password, telephone number, facsimile number, method of payment, and, if applicable, credit card number. ScrubPlan may request additional information necessary to establish and maintain customer's account.
- (b) **Service Quality Monitoring.** Some Web site transactions may require a customer to telephone ScrubPlan, or ScrubPlan to call the customer. ScrubPlan will not contact you by telephone without your prior consent, except to confirm an order placed online and/or to inform a customer of the status of such order. Customer should be aware that it is ScrubPlan's practice to monitor, and in some cases record such calls for staff training or quality assurance purposes.
- (c) **Information from Children.** ScrubPlan does not collect or maintain information from users actually known to be under the age of 13, and no part of ScrubPlan's Web sites are structured to attract anyone under the age of 13.
- (d) **Lost or Stolen Information.** If a customer's credit card and/or password is lost or stolen, the customer should promptly notify ScrubPlan in order to enable ScrubPlan to

cancel the lost or stolen information and to update its records with a changed credit card and/or password.

- (e) **Chat Rooms, Forums and Bulletin Boards.** If customer participates in an ScrubPlan chat room, discussion forum, or posts messages to an ScrubPlan bulletin board, customer should be aware that the information disclosed and shared will be broadly available to other persons, both inside of and/or outside ScrubPlan, who have access to that chat room, forum or bulletin board. Some individual ScrubPlan chat rooms, forums or bulletin boards have additional rules and conditions regarding participation. Also, participant's expressed opinion is his or her own and should not be considered as reflecting the opinion of ScrubPlan.
- (f) **Links to Other Web Sites.** An ScrubPlan Web site may contain links to other web sites. ScrubPlan is not responsible for the privacy practices or the content of those other Web sites.

3. Uses Made of the Information.

- (a) **Limited Uses Identified.** Personal information collected by ScrubPlan will be used by ScrubPlan for the following purposes: product development and improvement; customizing the product and layout of ScrubPlan's Web Site; and internal company review.
- (b) **Marketing Uses.** Unless customer marks an "x" on the opt-out option box herein provided, ScrubPlan reserves the right to provide customer with information about ScrubPlan's Web site, ScrubPlan products and services, and related information in which customer has indicated an interest.

The information you provide to the ScrubPlan Web site may also be collected, used, analyzed and/or processed by ScrubPlan, or selected third parties on ScrubPlan's behalf, for marketing and other business purposes. Before ScrubPlan uses the information, however, ScrubPlan will notify customers and offer customers the opportunity opt-out if a customer wishes not to have personal identifying information used in this way.

- (c) **Stored Information Uses.** ScrubPlan stores and retains the information provided by customer. Stored information is used by ScrubPlan and ScrubPlan agents: to support customer interaction with the ScrubPlan Web site; to deliver customer purchases; and/or to contact customer again about other ScrubPlan services and products.
- (d) **Online Advertising.** Some companies that help ScrubPlan deliver interactive on-line advertising, such as banner ads, may collect and use information about ScrubPlan's customers to help ScrubPlan better understand the types of advertising or promotions that are most appealing to ScrubPlan's customers. After it is collected the information is aggregated so it is not identifiable to a specific individual. If, however, customer would prefer that these companies not collect such information, please mark an "x" on the opt-out option box herein provided.

4. Disclosure of the Information.

- (a) **Within Corporate Organization.** ScrubPlan is a multinational organization, with legal entities, business processes, management structures, and technical systems that cross borders. ScrubPlan may share your personal information within the ScrubPlan corporate organization, and may transfer the information to countries in the world where ScrubPlan conducts business. Some countries may provide less legal protection for customer personal information.
- (b) **Mergers and Acquisitions.** Circumstances may arise where for business reasons, ScrubPlan decides to sell, buy, merge or otherwise reorganize its businesses in the United States or some other country. Such a transaction may involve the disclosure of personal identifying information to prospective or actual purchasers, and/or receiving such information from sellers. It is ScrubPlan's practice to seek appropriate protection for information in these types of transactions.
- (c) **Agents.** ScrubPlan employs or engages other companies and individuals to perform business functions on behalf of ScrubPlan. These persons are provided with personal identifying information required to perform their functions, but are prohibited by contract from using the information for other purposes. These persons engage in a variety of functions which include, but are not limited to, fulfilling orders, delivering packages, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments and providing customer services.
- (d) **Affiliated Businesses.** ScrubPlan works closely with affiliated businesses operating web site stores, providing services or selling products on each other's Web sites. These businesses identify themselves to customers. Customer information related to a transaction with an affiliated business is shared with that affiliated business.
- (e) **Marketing Analysis by Third Parties.** ScrubPlan reserves the right to disclose to third parties personal information about customers for marketing analysis; however, any information disclosed will be in the form of aggregate data that does not describe or identify an individual customer.
- (f) **Disclosure to Governmental Authorities.** ScrubPlan may release personal information to appropriate governmental authorities where release is required by law (for example, a subpoena) or by a regulation, or is requested by a government agency conducting investigations or proceedings.

5. Use of Computer Tracking Technologies.

- (a) **No Tracking of Personal Information.** ScrubPlan's Web site(s) are not set up to track, collect or distribute personal information not entered by visitors. Our site logs do generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our sites. This information is used for internal purposes by technical support staff to provide better services to the public and may also be provided to others, but, again, the statistics contain no personal information and cannot be used to gather such information.
- (b) **Use of Cookies.** ScrubPlan, or its third party vendors, collects non-identifiable and personal information through the use of various technologies, including "cookies." A

cookie is an alphanumeric identifier that a Web site can transfer to customer's hard drive through customer's browser. The cookie is then stored on customer's computer as an anonymous tag that identifies the customer's computer, but not the customer. Cookies may be sent by ScrubPlan or its third party vendors. Customer can set its browser to notify customer before a cookie is received, giving an opportunity to decide whether to accept the cookie. Customer may also set its browser to turn off cookies; however, some Web sites may not then work properly.

- (c) **Use of Web Beacon Technologies.** ScrubPlan may also use Web beacon or other technologies to better tailor its Web site(s) to provide better customer service. If these technologies are in use, when a visitor accesses these pages of the Web site, a non-identifiable notice of that visit is generated which may be processed by ScrubPlan or by its suppliers. Web beacons usually work in conjunction with cookies. If customer does not want cookie information to be associated with customer's visits to these pages, customer can set its browser to turn off cookies; however, Web beacon and other technologies will still detect visits to these pages, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.
- (d) **Collection of Non-Identifiable Information.** ScrubPlan may collect non-identifiable information from user visits to the ScrubPlan Web site(s) in order to provide better customer service. Examples of such collecting include: traffic analysis, such as tracking of the domains from which users visit, or tracking numbers of visitors; measuring visitor activity on ScrubPlan Web site(s); Web site and system administration; user analysis; and business decision making. Such information is sometimes known as "clickstream data." ScrubPlan or its contractors may use this data to analyze trends and statistics.
- (e) **Collection of Personal Information.** ScrubPlan collects personal identifying information from customer during a transaction. ScrubPlan may extract some personally identifying information about that transaction in a non-identifiable format and combine it with other non-identifiable information, such as clickstream data. This information is used and analyzed only at an aggregate level (not at an individual level) to help ScrubPlan understand trends and patterns. This information is not reviewed at an individual level.

6. Information Security.

- (a) **Commitment to Online Security.** ScrubPlan intends to protect customer personal information and to maintain its quality. To achieve information security and quality, ScrubPlan implements appropriate measures and processes, such as using encryption when transmitting certain sensitive information.
- (b) **No Liability for Acts of Third Parties.** ScrubPlan will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, ScrubPlan shall not be liable for unauthorized disclosure of personal information due to no fault of ScrubPlan including, but not limited to, errors in transmission and unauthorized acts of ScrubPlan staff and third parties.

7. Privacy Policy Changes and Opt-Out Rights.

- (a) **Changes to Privacy Policy.** This privacy notice was last updated on March 22, 2021. ScrubPlan reserves the right to update its privacy policy statement at any time. A notice of any material change will be posted on the ScrubPlan Web site home page for thirty (30) days prior to the implementation of such change. There are two boxes at the end of ScrubPlan's notice of change: (1) an "I accept" box, and (2) an "I do not accept" box. If customer does not mark the "I do not accept" box, customer will be deemed to have accepted ScrubPlan's privacy policy updates.
- (b) **Opt-Out Right.** Customer and prospective customer has the right at any time to cease permitting personal information to be collected, used or disclosed by ScrubPlan and/or by any third parties with whom ScrubPlan has shared and/or transferred such personal information. Right of cancellation may be exercised by contacting ScrubPlan via e-mail at support@scrubplan.com. After processing the cancellation, ScrubPlan will delete customer or prospective customer's personal information from its data base.

8. Access Rights to Data.

- (a) **Information Maintained by ScrubPlan.** Upon customer's request, ScrubPlan will provide a reasonable description of customer's personally identifiable information that ScrubPlan maintains in its data bank. ScrubPlan can be contacted by e-mail at support@scrubplan.com.
- (b) **Corrections and Changes to Personal Information.** Help ScrubPlan to keep customer personal information accurate. If customer's personal information changes, or if customer notes an error upon review of customer information that ScrubPlan has on file, please promptly e-mail ScrubPlan at support@scrubplan.com and provide the new or correct information.
- (c) **Your California Privacy Rights.** Beginning on January 1, 2005, California Civil Code Section 1798.83 permits customers of ScrubPlan who are California residents to request certain information regarding ScrubPlan's disclosure of personal information for their direct marketing purposes. To make such a request, please write to support@scrubplan.com. Within 30 days of receiving such a request, ScrubPlan will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. ScrubPlan reserves its right not to respond to requests submitted other than to the e-mail address specified in this paragraph.

California's privacy laws require a company to provide notice to California users of their rights to receive information on to which entities their information was shared for marketing purposes.

9. Accountability.

- (a) **Questions, Problems and Complaints.** If you have a question about this policy statement, or a complaint about ScrubPlan compliance with this privacy policy, you

may contact ScrubPlan by e-mail at support@scrubplan.com. If ScrubPlan is unable to resolve your complaint to your reasonable satisfaction or if customer does not receive acknowledgment of an inquiry, customer may elect to proceed by contacting .

- (b) Terms of Use.** If customer chooses to enter into a purchase order or to subscribe to ScrubPlan's services, customer's action is hereby deemed acceptance of ScrubPlan practices described in this policy statement. Any dispute over privacy between customer and ScrubPlan is subject to the provisions of this notice and to ScrubPlan's Terms of Use Agreement which is hereby incorporated herein and which can be read at .