

Privacy Policy

This Data Management Internationale', Inc. (DMI), Privacy Policy ("Privacy Policy") explains how DMI and its subsidiaries (collectively referred to hereinafter as "DMI," "we," or "our") collect, store, use, disclose and otherwise process Personal Data (as defined below) we collect when customers ("Customers," "you," or "yours") visit our websites, including webdocs.us, (collectively the "Sites") or otherwise interact with us online and through other means such as sales and marketing activities and events.

1. Who We Are

DMI offers application subscription services, support services, and professional services (collectively the "Services"). We provide cloud-based enterprise document management software, and we define enterprise document management software as software applications that enable organizations to manage, protect and share documents. Our application(s) enable users to manage documents, share them securely and dispose of them in a timely manner via the web and mobile technologies.

2. About Our Service Offerings

We provide our Services to parties with whom we directly contract ("Customer(s)") We also provide our Services to Customer's employees ("End User(s)") at the Customer(s)'s direction.

DMI is the Data Controller, the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, when we collect, store and use your Personal Data to communicate and market directly to you, our Customers.

DMI is the Data Processor, the natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Data Controller when engaged by the Customer, to process End User Personal Data on behalf of the Data Controller. Your agreement with DMI governs our use of and processing of End User Personal Data.

This Privacy Policy does not apply to when the Customer, as the Data Controller, collects and uses the End User's Personal Data. DMI shall only Processes or Transfer End User Personal Data received from Customer as authorized by Customer and as necessary to provide the Services. The Customer's privacy policy will apply to their customer's (End User) collection and use of such Personal Data.

3. Personal Data We Collect

During the normal course of business interactions with DMI, or our third-party partners, DMI may collect data such as your name, email address, business address, phone number, Internet Protocol (IP) address, and other identifiable information ("Personal Data") you provide via the Sites when, for example, you request information about our Services, provide feedback about our Services or register for sales events or marketing activities. We may collect additional Personal Data, which may be sensitive in nature, such as billing, banking, or payment information ("Sensitive Personal Data"), when you register for our Services and to establish an account with us. For self-service, credit card information may be collected and subsequently shared with a third-party service provider ("Sub-processor") for purposes of billing and collecting payment. Any Sub-processor engaged by DMI are contractually bound to protect Personal Data and Sensitive Personal Data, including as required by applicable law.

If you are from a region that requires a legal basis for the processing of Personal Data, such as, but not limited to, the European Union, European Economic Area, and the United Kingdom, DMI's legal basis for collecting and processing Personal Data described above will depend on the Personal Data collected, how it was collected, and the context it was collected under. Generally, our legal basis for processing will be to perform a contract with you, when we have your consent, or based on DMI's legitimate interest and such legitimate interest has not been overridden by your data protection interest or fundamental rights and freedoms. Additionally, DMI may also have a legal obligation to process your Personal Data or to protect the vital interest of you or someone else.

For clarity, Personal Data and Sensitive Personal Data shall have the meaning as set forth under the applicable data protection legislation, and where not specifically defined as Personal Data, the meaning given in the analogous term under the applicable data protection legislation shall apply. In addition, when referring to Personal Data

4. How Your Personal Data is Collected

We automatically collect certain Personal Data when you visit or use the Sites to help analyze and make improvements to the service configuration, performance, and consumption. This may include Personal Data about the specific computer or device you are using, such as your computer's operating system, Internet Protocol (IP) address, and general geolocation based on IP address. We also automatically collect and store information about your activities on our Sites, such as information about how you came to and used our Sites, event information (like access times, browser type and language) and data collected through Cookies and other similar technologies that uniquely identify your browser, computer and/or another device. A Cookie is small file that is stored on a Site user's computer for record-keeping purposes (session cookies make it easier to navigate within a site and expires when the browser is closed; persistent cookies remain on the hard drive for an extended period and can be used when the user returns to the site for identification and log in).

You may remove or disallow the use of some Cookies on our Sites by following directions provided in your internet browser's help file, or if applicable by following the instructions within the Cookie banner that may appear on the Site depending on where you reside. If you remove or disallow the use of Cookies, you may experience reduced functionality within the Site and will need to reenter Personal Data when, for example, registering.

5. How the Personal Data We Collect is Used

We may use Personal Data collected via the Sites and our Services to:

- Provide, maintain, improve, and protect the Sites and Platforms.
- Resolve technical issues and respond to customer service requests.
- Conduct research and development.
- Confirm your identity, verify accounts and activity.
- Monitor suspicious or fraudulent activity and to identify violations of our terms.
- Provide more tailored services to you.

- Send you requested product or service information, newsletters and/or marketing emails.
- Send you related information, including invoices, technical updates, additional service offerings, account alerts and confirmation and other support and administrative messages.
- Provide you with product information and support services offered on the Site or with respect to the Service.
- Understand our customers and their preferences, to enhance our Sites, products, and services.

6. Disclosure of Your Personal Data

We may disclose your Personal Data with third parties only in the ways that are described in this Privacy Policy. We do not sell your Personal Data but may share it with third parties as set forth in this Privacy Policy.

We may provide your Personal Data to third parties who are acting on our behalf or assist us in providing Services to you, such as data storage, maintenance services, hosting services, database management, web analytics, service providers, and payment processing providers. We do not allow these third parties to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

Such third parties are subject to this Privacy Policy in addition to certain contractual obligations with respect to the use of your Personal Data.

If one of the DMI affiliates or group companies is involved in a merger, acquisition or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Sites of any change in ownership or use of your Personal Data, as well as any choices you may have regarding your Personal Data.

We may post customer reviews on our Sites, which may contain Personal Data. We will obtain your consent via email prior to posting your name and review. If you wish to change or delete your review, you may contact us at privacy@dm-inc.com.

Our Sites may offer publicly accessible blogs or community forums. You should be aware that any Personal Data and information you provide via a blog or community forum, including posting comments, may be read, collected, and used by others who access them. To request removal of your Personal Data from our blog or community forum, contact us at privacy@dm-inc.com.

Our Sites may include links to other sites whose privacy practices may differ from those of DMI. If you submit Personal Data to any of those sites, your information is governed by their privacy policy. We encourage you to carefully read the privacy policy of any site you visit.

Our Sites may include social media features and widgets, that may collect Personal Data, including your IP address and which site page you are visiting. These social media features and widgets are either hosted by a third-party or hosted directly on our Sites. Your interactions with these features are governed by the privacy policy of the company providing it.

DMI may be required to disclose your Personal Data in response to a lawful request by government authorities, including request from national security agencies or law enforcement. Some of these

requests may be by regulatory oversight agencies investigating a complaint, fraud, or some other type of legal inquiry, while others may be by law enforcement seeking information pursuant to another form of investigative inquiry. We may also disclose your Personal Data as required by law such as to comply with a subpoena or similar legal process; when we believe in good faith that disclosure is necessary to protect our rights, your safety, or the safety of others; or another legal basis.

7. Communications

We use your Personal Data to communicate with you on a variety of Service-related topics.

You may choose to stop receiving communications from us, including, for example, email correspondence to confirm your purchase, remind you of upcoming subscription expiration, respond to your comments, questions, requests, provide customer support, inform of security alerts, account updates, and other administrative announcements. These communications are fundamental elements of our Service and in most cases, by opting out of these communications, you may be unable to effectively receive Service. To opt-out, contact us at privacy@dm-i-inc.com

You may also choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in the email.

If you are a Customer and would like to update your account, please contact your sales or customer service representative via email or any other method previously used.

8. Data Retention

We will retain your Personal Data and the End User Personal Data that we process on your behalf for as long as the account is active or as needed to provide Services. Your Personal Data may be stored for one year; after which time, your Personal Data will be archived in accordance with DMI's digital archival and records management policies. We will retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We retain Customer Personal Data and Customer End User Personal Data at the Customer's direction, but only for so long as the Customer's account is active and as needed to provide Services, or as required under contract or law.

9. Data Security

The security of your Personal Data is important to us. We follow accepted industry standards to prevent unlawful destruction, loss, alteration, unauthorized disclosure of or access to your Personal Data. We use appropriate technical and organizational measures to protect your Personal Data which may include physical access controls, encryption, internet firewalls, intrusion detection and network monitoring. Our team members who may have access to your Personal Data are required to keep that information confidential and are provided with security awareness training. To learn more, please visit DMI Security.

10. Data Transfer

Your Personal Data may be transferred to and processed in countries other than the country in which you are a resident. We may transfer Personal Data to companies that help us provide our Services. Transfers to subsequent third parties are covered by the terms of the service agreement we have in place with you.

When transferring Personal Data to third countries, DMI relies on contractual terms that meet or exceed the requirements of applicable data protection legislation, including the contractual requirement that technical and organization measures be implemented to provide for the protection and security of transferred Personal Data.

Notwithstanding Section 11, Data Privacy Framework, DMI also relies on the EU Standard Contractual Clauses adopted pursuant to the European Commission's implementing decision EU 2021/915 of 4 June 2021, and any necessary addendums, for the valid transfer of Personal Data for data transfers outside of European Union ("EU"), European Economic Area ("EEA"), and the United Kingdom ("UK"), to third countries that have not received an adequacy decision by the European Commission, which are incorporated into Data Processing Addendums/Agreements.

11. Data Privacy Framework

DMI complies with the EU-U.S. Data Privacy Framework ("EU-US DPF"), the UK Extension to the EU-U.S. DPF ("UK Extension"), and the Swiss-U.S. Data Privacy Framework ("Swiss-US DPF") (the EU-US DPF, Swiss-US DPF, and UK Extension are collectively referred to as the "Data Privacy Framework") as set forth by the U.S. Department of Commerce. DMI has certified to the U.S. Department of Commerce that it adheres to the EU-US Data Privacy Framework Principles (EU-US DPF Principles) with regard to the processing of Personal Data received from the European Union in reliance on the EU-US DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-US DPF. DMI has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles ("Swiss-US DPF Principles") with regard to the processing of Personal Data received from Switzerland in reliance on the Swiss-US DPF. If there is any conflict between the terms in this Policy and the EU-US DPF Principles or the Swiss-US DPF Principles, the applicable principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Please be advised that DMI will not rely on the Swiss-US DPF or the UK Extension until each enters into force, but DMI will adhere to the requirements and commits of each in anticipation of them entering into force.

Inquiries, ADR, and Binding Arbitration. In compliance with Data Privacy Framework, DMI commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, Swiss, and United Kingdom individuals with inquiries or complaints regarding our handling of Personal Data received in reliance on EU-US DPF, Swiss-US DPF, and UK Extension to the EU-US DPF should first contact DMI at:

Data Protection Officer

privacy@dm-inc.com

In compliance with Data Privacy Framework, DMI commits to refer unresolved complaints concerning our handling of Personal Data received in reliance on Data Privacy Framework, to BBB National Programs Dispute Resolution Process ("BBBDR"), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us,

or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit the BBDR page located [here](#). The services of BBB National Programs Dispute Resolution Process are provided at no cost to you.

If neither DMI nor the BBB National Programs Dispute Resolution Process resolves your complaint, you may have the possibility, under certain conditions, to pursue binding arbitration through Data Privacy Framework Arbitration Panel. To learn more about the Data Privacy Framework Panel, see Annex I located [here](#).

Investigatory Jurisdiction. The Federal Trade Commission has jurisdiction over DMI's compliance with the Data Privacy Framework.

Personal Data Collected, Purpose, and Disclosure to Third Parties (including Government Authorities). Please refer to Sections 3 and 4 for details regarding how and the types of data collected, Section 6 regarding the purpose for which Personal Data is collected, and Section 7 for the third parties for which we may share Personal Data, which may include disclosures to government authorities. If DMI transfers Personal Data received under the Data Privacy Framework to a third party, that third-party's access, use, and disclosure must be in compliance with the Data Privacy Framework obligations, including in the onward transfers, and DMI shall remain liable if the third party fails to meet these obligations and DMI is responsible for the events giving rise to the damages.

Individual Rights. Individuals in the EU, Switzerland, and the United Kingdom, specific rights afforded to them regarding the processing of their Personal Data. Please refer to Section 12 for more detail about the rights afforded. With DMI's self-certification to the EU-US DPF, Swiss-US DPF, and UK Extension, DMI has committed itself to representing those rights. To submit a request and exercise your rights, please contact DMI at privacy@dm-inc.com.

12. Privacy Rights for Individuals in the EU, EEA, Switzerland, and the United Kingdom

If you are an individual residing in the EU, EEA, UK, or Switzerland, you may be afforded certain specific rights regarding your Personal Data under the General Data Protection Regulation ("GDPR"), United Kingdom GDPR ("UK GDPR"), or other applicable data protection law. Subject to certain exceptions and based on your specific region, you may the right to:

- View and request copies of your Personal Data.
- Rectification/Correction. Correct inaccurate or incomplete Personal Data about you.
- Erasure/Deletion. Request deletion of Personal Data about you.
- Restrict or limit the processing of some or all of your Personal Data on a temporary or permanent basis.
- Transfer your Personal Data to you or a third-party in a machine-readable electronic format.
- Object/Opt-Out. Object and opt-out of the processing of your Personal Data: (i) where our use is based on your consent or our legitimate interested; or (ii) to object to our use of your Personal Data for direct marketing.

- Automated Decision-Making. No be subject to a decision based solely on automated processing, including profiling.

However, please be advised that removal of your Personal Data may result in your inability to use some or all features and functionality of the Platform.

Where you believe that we have not complied with our obligation under this Privacy Policy or data protection law, you have the right to submit a complaint to your [local Data Protection Authority](#).

These data protection rights do not apply to DMI where we process Customer Personal Data and Customer End User Personal Data as a data Processor on a Customer's behalf. Where this is the case, any request to exercise data protection rights will be directed to the Customer.

13. Privacy Rights for Individuals Outside of the EU/EEA/UK

For individuals residing outside of the EU/EEA/UK, depending on your location and residence, including but not limited to California, Virginia, Connecticut, and Colorado, the law may provide for rights under applicable data protection laws. In addition to the other terms contained in this Privacy Policy, subject to certain exceptions and based on your specific region, you may have the right to:

- View and request copies of your Personal Data.
- Rectification/Correction. Correct inaccurate or incomplete Personal Data about you.
- Erasure/Deletion. Request deletion of Personal Data about you.
- Transfer your Personal Data to you or a third-party in a machine-readable electronic format.
- Object/Opt-Out. Object and opt-out of the processing of all or specific processing your Personal Data, including the sharing or selling or targeted advertising.
- Specific Use of Sensitive Data. Right to opt-in for the processing of Sensitive Data or limit the use and sharing of Sensitive Data.
- Automated Decision-Making. Not be subject to a decision based solely on automated processing.

If you would like to exercise any of these rights, you may do so by contacting us at privacy@dm-inc.com. Where the applicable data protection law provides a right to appeal, and we inform you that we are unable to respond to your request to exercise your rights, you may appeal our decision within a reasonable period of time following our responsive decision. To submit your appeal, please respond to the original inquiry indicating you are exercising your right to appeal the decision or submit an appeal request to privacy@dm-inc.com.

As provided under application data protection laws, when exercising your privacy rights under data protection laws, you have the right to not be discriminated against for exercising the privacy rights afforded to you as an individual.

Please take notice that when exercising your rights under data protection laws, DMI will take steps to verify that you are authorized to make the request, including verifying the identity of the individual making the request to prevent unauthorized access to Personal Data.

However, please be advised that removal of your Personal Data may result in your inability to use some or all features and functionality of the Platform.

These data protection rights do not apply to DMI where we process Customer Personal Data and Customer End User Personal Data as a data Processor on a Customer's behalf. Where this is the case, any request to exercise data protection rights will be directed to the Customer.

14. California Specific Statements

The California Consumer Privacy Act ("CCPA") distinguishes between the organization collecting consumer Personal Data for its own purposes (Controller) and an organization designated by the Controller to process that Personal Data (Processor). The CCPA imposes obligations only upon "businesses" and not upon "service providers." CCPA defines a "business" and a "service provider", which are analogous to Controller and Processor, as defined in this Privacy Policy.

When acting as a "business" this Privacy Policy applies to the same extent as when DMI is acting as a Controller. When acting as a "service provider," this Privacy Policy applies to the same extent DMI is acting as a Processor.

Please read DMI's Privacy Policy in its entirety for details on the categories of Personal Data collected, as well as our collection, use and disclosure practices.

You may request a copy of Personal Data we collected or disclosed within the past 12 months. You may also request deletion of your Personal Data. Please submit your request to privacy@dm-inc.com.

15. Children's Online Privacy

DMI's services are not directed at children and DMI does not knowingly collect online Personal Data from children under the age of eighteen (18), or younger where required under applicable data protection laws or laws ("Minor"). If you are a parent or legal guardian of a Minor and believe that Minor has disclosed their Personal Data to DMI, please contact DMI at privacy@dm-inc.com so that DMI may dispose of the Minor's Personal Data.

16. Personal Data We Process on Behalf of Our Customers

DMI may process End User Personal Data under the instructions provided as part of the Services, which we will process as a Data Processor (or Sub-processor) on the Customer's behalf and solely on their instructions. DMI has no direct relationship with its Customer's End Users whose Personal Data DMI processes. Personal Data collected by DMI on behalf of the Customer will be governed by Customer's privacy policy and any notices provided by the customer to the End User.

17. Privacy Policy Changes

We may periodically update this Privacy Policy. When we do, we will also revise the "effective date" of the Privacy Policy. If we make any material changes, additional notification will be provided, such as a statement on the Site, posting a notice in the DMI Community portal, or providing email notification.

We encourage you to review this Privacy Policy periodically to stay informed of our privacy practices.

18. Questions and Contact

For questions about this Privacy Policy, how your Personal Data is used, or to submit a request to exercise your rights regarding your Personal Data, please contact us at:

privacy@dm-inc.com or

DMI, Inc.
55 Lukens Drive
Suite "A"
New Castle, DE 19720

Effective August 30, 2023