



## **Privacy Policy**

### **1. Purpose**

Barkley HQ respects your privacy and feels it is important for you to know how we handle the information we receive via our website at [www.barkleyhq.com](http://www.barkleyhq.com) (the "Site") and through our on-demand business productivity software, our support platform, tools and services offered on the Site (the "Service"). This Privacy Policy explains our information practices, the kinds of information we may collect, how we use and share that information, and how you can opt-out of a use or correct or change that information. This Privacy Policy is incorporated by reference into Barkley HQ's Terms of Service (the "Terms"). All other terms not defined in this Privacy Policy will have the meanings set forth in the Terms.

### **2. Scope**

As used in this Privacy Policy, the term "Personal Information" shall mean any information relating to an identified or identifiable natural person. This Privacy Policy applies to Personal Information that Barkley HQ collects and processes in the course of our business, including on the Site and the Barkley HQ platform. This policy also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information. The use of information collected through our service shall be limited to the purpose of providing the service for which Barkley HQ's client has engaged us. This Privacy Policy is intended to meet requirements globally, including those in North America.

This Policy applies to all of Barkley HQ's operating divisions, subsidiaries, affiliates, and branches.

### **3. Types of Information We Collect and How We Use It**

#### **Information Clients Provide**

When you create an account, use the Services, respond to surveys, request services or information, or contact us directly, we may ask you to provide some or all of the following types of information:

**Account Information** - When you register to use the Service with an email address, we collect your full name, company or organization name, email address and password you create. When signing up for a paid plan, Barkley HQ will also collect credit card information and use a third-party intermediary to manage credit card processing. This intermediary is not permitted to



store, retain, or use your billing information except for the sole purpose of credit card processing on Barkley HQ's behalf.

Communications With Us - When you contact us inquire about the Services, request customer service or technical support, or request other information, we may collect your name, email address, phone number or mailing address.

Surveys - We may contact you to participate in online surveys. If you decide to participate, you may be asked to provide certain information which may include Personal Information.

Registration for Sweepstakes or Contests - Occasionally, Barkley HQ may run sweepstakes and contests. We ask those who enter in the sweepstakes or contests to provide contact information (e.g., an e-mail address). If you participate in a sweepstakes or contest, your contact information may be used to reach you about the sweepstakes or contest, and for other promotional, marketing and business purposes. All sweepstakes/contests entry forms will provide a way for participants to opt-out of any communications that are not related to awarding prizes.

Automatic Data Collection - As is true of most web sites and mobile applications, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data, mobile device identifiers, and advertising identifiers. We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link this automatically-collected data to personal information.

#### **4. Information Related to Data Collected for our Clients**

Barkley HQ provides customer relationship management services to its clients, and collects and processes information under the direction of its clients. Barkley HQ has no direct relationship with the individuals whose personal data it processes.

#### **5. Cookies and Tracking Technologies**

We, as well as third parties that provide content, analytics, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies ("Technologies") to automatically collect information through the Services.



## 6. How Barkley HQ Uses the Information We Collect

We acquire, hold, use, and Process Personal Information for a variety of business purposes, including:

- To Provide Services or Information Requested by Clients. Barkley HQ may use Personal Information to provide the Service, fulfill requests for products, Services, or information, including information about potential or future Services.

- Administrative Purposes. Barkley HQ may use Personal Information about you for its administrative purposes, including to:

- a) Measure interest in Barkley HQ's Services;
- b) Develop new products and Services;
- c) Ensure internal quality control;
- d) Verify individual identity;
- e) Send email to the email address a Client provides to us to verify your Account and for informational and operational purposes, such as Account management, customer service, or system maintenance;
- f) Process payment for products or services purchased;
- g) Process applications and transactions;
- h) Prevent potentially prohibited or illegal activities;
- i) Enforce our Terms.

- Marketing Barkley HQ Products and Services to Clients. Barkley HQ may use Personal Information to provide you with materials about offers, products, and Services that may be of interest, including new content or Services. You may contact us at any time to opt-out of the use of your Personal Information for marketing purposes, as further described below.

- Research and Development. Barkley HQ may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services.

- Sharing Content with Friends or Colleagues. Barkley HQ's Services may offer various tools and functionalities. For example, Barkley HQ allows you to provide information about your friends through our referral services, such as "Tell a Friend." Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Email addresses that you may provide for a friend or colleague will



be used to send your friend or colleague the content or link you request, but will not be collected or otherwise used by Barkley HQ or any other Third Parties for any other purpose.

- Other Uses. Barkley HQ may use Personal Information for which we have a legitimate interest, such as direct marketing, individual or market research, anti-fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

## **7. How Barkley HQ Shares the Information We Collect**

Barkley HQ does not sell or otherwise disclose Personal Information about you, except as described in this Policy or as you explicitly consent to. We may share your information as described in this Privacy Policy:

- Vendors and Service Providers. We may share Personal Information we receive with vendors and service providers only as necessary to provide the Services to us.

- Business Partners. Barkley HQ may share Personal Information with our business partners, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. Barkley HQ may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with Barkley HQ. Barkley HQ requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which Barkley HQ provided them.

- User Testimonials. We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name.

- Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures). We may access, preserve, and disclose your Personal Information, other Account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce Barkley HQ policies or contracts; (v) to collect amounts owed to Barkley HQ; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.



- Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, Barkley HQ will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

## **8. Data Retention**

Barkley HQ will retain your information for as long as your account is active or as needed to provide you services. We will also retain personal data we process on behalf of our clients for as long as needed to provide services to our client. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **9. How to Opt-Out**

Email and Telephone Communications. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt-out of receiving future emails. We will process your request within a reasonable time after receipt. You will continue to receive transaction-related emails regarding products or services you have requested and administrative communications, such as updates to the Terms or this Privacy Policy. We maintain telephone “do-not-call” and “do-not-mail” lists as mandated by law. We process requests to be placed on do-not-mail, do-not-phone and do-not-contact lists within 60 days after receipt, or such shorter time as may be required by law.

In App Push Notifications and Location Data. Our app may occasionally send you push notifications. You may at any time opt-out from receiving these types of communications by changing the settings on your account.

## **10. Protection of Information**

The security of your personal information and our clients' information is important to us. Barkley HQ maintains reasonable security measures to protect your information from loss, destruction, misuse, unauthorized access or disclosure. When you enter sensitive information, such as a credit card number, on our order forms and login credentials on our platform login page, we encrypt the transmission of that information using secure socket layer technology (SSL). These technologies help ensure that your data is safe, secure, and only available to you and to those you provided authorized access. However, no data transmission over the Internet or information storage technology can be guaranteed to be 100% secure due to the nature of the distributed



network that is the Internet. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Website, you can contact us at [support@barkleyhq.com](mailto:support@barkleyhq.com) or (416) 678-8171.

#### **11. Links to 3rd Party Sites**

Our site includes links to other web sites whose privacy practices may differ from those of Barkley HQ. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

#### **12. Changes to Privacy Policy**

Barkley HQ may update this policy from time to time. Your continued use of the Site or Service constitutes your agreement to be bound by such changes to the privacy policy. Your only remedy, if you do not accept the terms of this privacy policy, is to discontinue use of the Site and Service. If we make any material changes we will notify you or our client by email sent to the e-mail address on your account.

#### **13. Business Transactions**

Barkley HQ may assign or transfer this privacy policy, and your user account and related information and data, to any person or entity that acquires or is merged with Barkley HQ, you will be notified via email and/or a prominent notice on our web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

#### **14. Terms of Service**

When you access and use the Service, you are subject and bound to the Barkley HQ's Terms of Service.

#### **15. Contact Us**

If you have questions regarding this privacy policy or about the security practices of Barkley HQ, please contact us at [support@barkleyhq.com](mailto:support@barkleyhq.com) or (416) 678-8171.