

## **Privacy Policy Markable Solutions, LLC**

### **Introduction:**

Markable Solutions, LLC, (“Markable”) is committed to protecting the privacy of clients and the information they provide through registration at our many websites. This document lays out our Privacy Policy. Markable respects your privacy, protecting is a very high priority. We are focused on protecting your privacy from unauthorized access and/or use. This complements other agreements you have with Markable.

This Privacy Policy explains how we collect, use and disclose the information shared with us or what we collect on our websites: [www.markablesolutions.com](http://www.markablesolutions.com), [www.alltechguru.com](http://www.alltechguru.com), [www.mybinternational.com](http://www.mybinternational.com) and [www.softwarevaluation.com](http://www.softwarevaluation.com).

By using our services, you automatically consent to the collection, processing, storage, transfer, disclosure and other uses of your information as described in this Privacy Policy. The collected information will only be used for the purpose for which it was collected and to provide our services.

Markable is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). If you have questions or concerns regarding this Privacy Policy or concerns regarding your personal information, please contact our Privacy Officer by e-mail at [radhika.vivek@markablesolutions.com](mailto:radhika.vivek@markablesolutions.com).

Markable Solutions, LLC complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Markable Solutions, LLC has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

### **Information Collected and Stored:**

Markable may collect and store the following information in order to provide its services. Markable may collect and process personal information and data including, but not limited to, application and Website usage data, file transfer and viewing data, email and personal and/or business contact information, and other identifiable information provided to us.

Markable tags and tracks such as, harmless cookies, clear GIFs, and other technologies to track and correlate data.

Markable may collect the following personal information about you: name, company name, job title, address, mobile and work phone, email address and other researched data. We may also collect data from registration forms you complete at our websites for various purposes of data exchange or purchases.

- **Cookies:** Information collected on you during your visit to our websites is automatic through our cookies. This helps us identify you when you visit our websites. Markable could utilize session cookies and persistent cookies for tracking data points. Using cookies helps to speed your access to the Website as they serve as ‘reminders’ as to who you are to our programming, remembers your username and preferences, or allows us to recommend content of interest to you. While we recommend that you allow these cookies to perform their tasks, you may adjust your computer’s settings to restrict or refuse them. We do not link the information we store in cookies to any personal information you submit while on our site.

- Clear .GIFs: Markable may use “clear .GIFs” to track the online usage patterns of our Users in a non- personally identifiable manner. Markable may also use clear .GIFs in HTML-based emails dispatched to users so as to track which emails are being opened by the recipients. This allows Markable to determine active and inactive email addresses.

- **Log File Data:** When you log into our system, our servers will automatically record and archive certain information that web-browsers send whenever visiting a website. These server logs may include information vital to validating your authorization to access your account and/or Services. Information, such as a Web request, Internet Protocol (the “IP”) address, browser type, browser language, referring pages, exit pages and visited URLs, platform type, click counts, pages viewed and in what order, time spent, the date and time of the request, and other important data is necessary to validate and authorize a User’s entry and activity on the website.

### **Supplementing Data:**

Markable may collect information from other sources to help us correct or supplement our records, improve the quality or personalization of our services, and prevent or detect fraud. We work closely with trusted third parties (for example, business partners, service providers, sub-contractors, advertising networks, analytics providers, search information providers, and fraud protection services) and may receive and combine this new information with information we already have about you. We use this data to update and analyze our records, and to provide products and additional services that you may be interested in. In addition to receiving data from these third parties, Markable may have legitimate interests to share the information it has collected from you with them.

### **Use of Personal Information:**

- a. Personal information submitted by you to Markable is used to operate, maintain, and provide features, general and unique, of the website for your use and for Markable to provide its services.
- b. All personal information, data, or content that provided to Markable is used in conformity with the Services being provided by Markable.
- c. Markable does not work with third parties, so we do not disclose your information to business partners and third parties we engage to provide other services.
- d. With your permission, Markable may also provide you with information about products and services we offer and share your personal information with third party organizations that we feel may be of interest to you.
- e. Markable uses personal information and certain non-personal information, such as, but not limited to, anonymous data, browser type, cookies, IP addresses, clickstream data, and the like, to improve the quality and use designs of the Website through analysis of this data and usage trends.
- f. Markable uses clear .GIFs and log file data to: (i) provide custom content and preferences; (ii) remember information necessary for logging in to your Website account so as to save you time in re- entering such information; (iii) monitor the impact and effectiveness of Markable marketing efforts; (iv) monitor aggregate metrics providing detailed data on your activities while on the Website; and (v) track your submissions, entries, and status.

### **Updating Your Personal Information:**

You may, at any time, update or edit your profile information and email preferences by sending a request to [radhika.vivek@markablesolutions.com](mailto:radhika.vivek@markablesolutions.com)

Your rights to access, to limit use, and to limit disclosure: European Union and Swiss individuals have the right to access personal information about them, and to limit use and disclosure of their personal information. If you wish to request access, to limit use, or to limit disclosure, please email Markable privacy team at [radika.vivek@markablesolutions.com](mailto:radika.vivek@markablesolutions.com) or send a written request to the contact information provided below.

### **Disclosure of Personal Information:**

- a. Markable will not rent or sell your personal information to others but may disclose personal information with third-party vendors and service providers that work with Markable. We will only share personal information to these vendors and service providers to help us provide a product or service to you. Examples of third parties we work with are call center operators, shippers, servicers, information processors, financial institutions, data appending and surge scoring companies. These third parties only have access to personal information necessary for them to complete their service.
- b. Markable provides both personal and non-personal information to subsidiaries, affiliated companies, and other businesses or persons for the purpose of processing such information on behalf of Markable. Markable may use third parties such as a credit card processing company to bill Users for transactions, and a credit scoring company to determine business credit scores (when applicable, for extending credit terms to Users upon request). At all times, these parties are required to agree to process such information in compliance with this Privacy Policy, and we deploy reasonable efforts to limit their use of such information.
- c. Markable reserves the right to disclose personal and non-personal information that is believed, in good faith, to be appropriate or necessary for the purpose of providing Services. Other causes of release of data may be due to, but not limited to: (i) taking precautions against liability issues; (ii) to assist government enforcement agencies; (iii) to investigate and defend Markable against third party claims or allegations; (iv) to protect the security or integrity of the Website and/or Services; and/or (v) to protect the rights, property, or personal safety of Markable or others.
- d. Markable does not share personal information with other non-affiliated thirdparty companies for their commercial use or marketing use without your consent, except as part of Services.
- e. Markable shares non-personal information, such as anonymous user data and traffic data, with interested third parties to assist them in understanding the usage patterns and trends analysis for certain content, advertisements, promotions, services, and/or functionality of our Websites.
- f. Markable may release any information available if required to do so by law, or in the good faith belief that such action is necessary to comply with law or the powers of government enforcement agencies. Other causes for release of information could be for needs to comply with copyright laws or to respond to a court order, subpoena, and/or search warrant. We also may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.
- g. Markable's accountability for personal information it receives pursuant to the EUUS and Swiss-US Privacy Shield ("Privacy Shield Principles") and subsequent transfer of that data to third parties is detailed in the Privacy Shield Principles. Markable may be liable pursuant to the Privacy Shield Principles if said third party agents claim that Markable processes personal information in a manner inconsistent with pursuant to the Privacy Shield principles, unless Markable can demonstrate that it is not responsible for the act or omission giving rise to the damage. In cases of onward transfer to third parties of data of EU and Swiss individuals received, pursuant to the Privacy Shield Principles, Markable is potentially liable.

In compliance with the Privacy Shield Principles, Markable commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact *Markable* at:

Markable Solutions  
Attention: Radhika Vivek, Head of  
Operations 21451 Continental Circle,  
Saratoga, CA 95070 Email:  
[radhika.vivek@markablesolutions.com](mailto:radhika.vivek@markablesolutions.com)

Markable has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

Finally, as a last resort under the Privacy Shield Framework, and under limited circumstances, individuals with unresolved complaints may invoke binding arbitration before a Privacy Shield Panel.

### **Data Security:**

Markable utilizes commercially reasonable physical, technical, and managerial safeguards to preserve the integrity and security of personal information and to protect it against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. However, Markable cannot ensure or warrant the security of any information you transmit to Markable or place upon the Website and you do so at your own risk. This is not a guarantee that such information may not be accessed, altered, disclosed, or destroyed by breach of any of our physical, technical, or managerial safeguards. Personal information may be transferred outside Markable to data processors, but they will only act on our instructions to provide the necessary services.

### **California Privacy Rights:**

California Civil Code Section 1798.83 permits individual California residents to request certain information regarding Markable's disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please write to [radhika.vivek@markablesolutions.com](mailto:radhika.vivek@markablesolutions.com). Please include your name, mailing address, and email address if you want to receive a response by email. Otherwise, we will respond by postal mail within the time required by applicable law.

If you are a California resident under age 18 and are a registered user of any of the services, then you may request that we remove any content that you created and publicly posted on our website ("User Content"). To request removal of your User Content, please send an email with a detailed description of the specific Data User Content to [radhika.vivek@markablesolutions.com](mailto:radhika.vivek@markablesolutions.com).

Markable reserves the right to request that you provide information that will enable us to confirm that the User Content that you want removed was created and posted by you.

Markable will make a good faith effort to delete or remove your User Content from public view as soon as reasonably practicable. Please note, however, that your request that we delete your User Content does not ensure complete or comprehensive removal of your User Content. Your User Content may remain on backup media, cached or otherwise retained by Markable for administrative or legal purposes or your User Content may remain publicly available if you or someone else has forwarded or reposted your User Content on another website or service prior to its deletion. Markable may also be required by law to not remove (or allow removal) of your User Content.

### **Children's Privacy:**

Markable complies with the Children's Online Privacy Protection Act of 1998 (COPPA) and does recognize the responsibility to protect the privacy of young children at all times and to the best of everyone's ability. For that reason, Markable does not knowingly collect or maintain any information via the Website from persons under the age of thirteen (13), and no part of our Website is directed to persons under the age of thirteen (13). If an underage person provides such information and Markable has unknowingly collected said information, then Markable will take the appropriate steps to delete this information immediately.

### **Transfer of Rights:**

Should Markable be acquired, merged, or endeavor to become closed for business, Markable reserves the right, in any of these circumstances, to transfer or assign the information collected, during the due course of business. This information may be held as part of any such acquisition, merger, sale, or other change of control or business entity status.

**Contact Information:**

Markable Solutions  
Attention: Radhika Vivek,  
Head of Operations  
21451 Continental Circle, Saratoga, CA  
95070  
Email:  
[radhika.vivek@markablesolutions.com](mailto:radhika.vivek@markablesolutions.com)

**Changes and Updates:**

If we decide to change our privacy policy, we will post those changes to this privacy policy on our home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

**Communications:**

On occasion as deemed necessary by Markable (daily, weekly, monthly, etc.), Markable will send you various communications as part of the service, such as, but not limited to, account activity alerts and updates. Said communications shall originate from Markable only and shall be conducted in compliance with this Privacy Policy. At any time, the User may entirely opt-out of such communications as instructed on the email communication.

**Presiding Language:**

This Agreement and all Markable policies are written and executed in English, which is considered the prevailing language for purposes of interpretation or laws of contract. If this Agreement is translated into any other language, the English version shall be considered the primary binding legal document.