

Privacy Policy

Last Updated: 12/22/2022

Gentuity, LLC (“Gentuity,” “us”, “we”, or “our”) operates the <https://gentuity.com/> website and other services where this Privacy Policy is posted (the “Service”). We are committed to protecting your Personal Data and your right to privacy. If you have any questions or concerns about this Privacy Policy or our practices regarding your Personal Data, please contact legal@gentuity.com.

When you use our Services, we understand and appreciate that you are trusting us with your Personal Data. We take your privacy very seriously. In this Privacy Policy, we aim to clearly explain the information we collect, how we use it, and your rights. Please read through our Privacy Policy carefully. If there is anything in this Privacy Policy that you do not agree with, please discontinue use of our Services immediately.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our [Terms of Service](#).

For a printable version of this Privacy Policy, please click [here](#).

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Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you. While using our Service, we may ask you to provide us with information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, device, or household (“Personal Data”). Below, we describe how we handle your Personal Data and describe the information we may have collected, how it may be used, and the sources:

- **Identifiers**, which may include first and last name, address, Internet Protocol address, phone number, or email address. These are sourced directly from you or indirectly from you (e.g., from observing your actions on the Service). They are used to fulfill or meet the reason you provided the information, to contact you in relation to our Service, to respond to an inquiry, for product and service improvement, to screen for potential risk or fraud, to provide customer service or marketing. For example, when you use our contact form, you provide your first name, last name, and address. We disclose identifiers for business purposes to internet service providers and administrative service providers.
- **Characteristics of protected classifications**, such as age or gender. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, marketing, or to provide relevant services. For example, we may use this information for targeted advertising. We do not disclose this information to third parties.
- **Biometric information**, such as physiological, biological, or behavioral characteristics. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, to provide our Services, and improve our Services.
- **Internet, technical or other similar network activity**, which may include usage and browsing history; IP address; browser type; browser version; the pages of our Service that you visit; the time and date of your visit; the time spent on those pages; unique device identifiers and other diagnostic data. We source this information directly or indirectly from you (e.g., from observing your actions on our Service). We use this information to fulfill or meet the reason you

provided the information, to screen for potential risk or fraud, or to improve our Service. We disclose this information for business purposes to administrative service providers, data analytics providers, and internet service providers. Please see our Cookie Policy for more information.

- **Inferences drawn from other personal information**, which may include a profile reflecting a person's preferences, interests, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. We source this information directly or indirectly from you, (e.g., from observing your actions on our Service). We use this information to fulfill or meet the reason you provided the information or for marketing. We do not disclose this information to third parties.

Your decision to provide any Personal Data is voluntary. However, please note that, if you do not provide certain Personal Data, we may not be able to accomplish some purposes outlined in this Privacy Policy and you may not be able to use or access certain Services.

Tracking and Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

We may also work with service providers that use cookies to collect information and to serve advertisements to you across the Internet based on that information.

Please see our Cookie Policy for more information.

Sources of Data

We collect Personal Data in the following ways:

- Directly from you when you enter information on our Service. For example, when you contact us, you provide your first name, last name, email, and phone number.
- Indirectly from you when you visit our Service. For example, our Service collects information through cookies when you visit our Site.

Please see our Tracking and Cookies Data section above for more information.

- From service providers. For example, we may use service providers who retrieve publicly available information about you and we may combine it with Personal Data we have about you.

Use of Data

Genuity uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues
- For advertising and marketing purposes
- To fulfill or meet the reason you provided the data

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

You acknowledge you understand that by providing your Personal Data to us, your Personal Data (i) will be used for the uses identified in accordance with this Privacy Policy, and (ii) may be transferred to the U.S. as indicated above, in accordance with applicable law. For example, where Personal Data is transferred from the European Economic Area to areas which have not been determined to have an adequate level of protection, we take measures designed to transfer the information in accordance with lawful requirements, such as standard contractual clauses.

Disclosure of Data

With Your Consent

We may share or disclose Personal Data if you ask, direct, or authorize us to do so.

Affiliates, Strategic Partners, Agents, Other Unaffiliated Parties

We may share or disclose Personal Data to our affiliates, strategic partners, agents, and other unaffiliated parties. For example, we may contact you with an offer or advertisement related to a product or service that we believe you may be interested in.

Third-Party Service Providers

We may engage third-party service providers to perform services in connection with the operation of our business. Examples of these services include fraud protection, Service evaluation, and data analysis. We provide Personal Data to these third-party service providers, but we authorize them to use this information only in connection with the services they perform.

Reorganization

In the unlikely event of a direct or indirect reorganization process including, but not limited to, assignments, mergers, acquisitions, divestitures, bankruptcies, insolvencies, and sales of all or a part of our assets, we may disclose your Personal Data following completion of such transaction and/or during the assessment process pending transfer. If transferred in such a case, the purchaser will abide by the terms and conditions of this Privacy Policy.

Legal Requirements

Genuity may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Genuity
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. You play a role in protecting your Personal Data as well. While we strive to use commercially acceptable means to protect your Personal Data,

we cannot guarantee its absolute security, and you understand that any information that you transfer to us is done at your own risk. If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Service or providing Personal Data to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service. We may post a notice via our Service if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Legal Basis for Processing

In processing Personal Data, we may rely upon the following lawful bases:

- **Consent** – We may process Personal Data with the consent of the individual whose data is being processed.
- **Contract** – When we enter a contract with you, we process Personal Data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract. This is necessary to provide the Service to you.
- **As Required by Law** – We may process Personal Data as required to comply with legal obligations to which we are subject for the purpose of compliance with EEA, UK, or Swiss public, governmental, judicial, or other regulatory authorities.
- **Public Interest** – We may process Personal Data as necessary for the performance of a task carried out in the public interest.
- **For Legitimate Business Purposes** – This includes but is not limited to legal compliance and the purposes described above.

Links to Third Party and External Pages

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

We do not knowingly collect Personal Data from anyone under the age of 13. If you are a parent or guardian and you are aware that your children have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children, we take steps to remove that information from our servers.

Privacy Rights

Depending on your residence, the rights available to you may differ in some respects. We will respond to any rights request in accordance with local legal regulations. Information about rights available to California residents is provided further below under the “California Residents” section.

- **Right to Access or Update Your Information** – You may have the right to access or update your information. Subject to the exceptions set out in applicable law, we will provide you with access to any of your Personal Data that we have collected, used, or disclosed upon written request. We will also advise you to whom that Personal Data has been disclosed, except where we are permitted or required not to do so by applicable law. Upon request, we will provide a list of service providers who may receive Personal Data.
- **Right to Rectification/Correction** – You may have the right to rectify, correct, or complete your Personal Data if inaccurate or incomplete.
- **Right to Erasure (‘Right to Be Forgotten’)** – You may have the right to the erasure of your Personal Data in certain circumstances.
- **Right to Lodge a Complaint with a Supervisory Authority** – We are committed to working with you in the event that you have a complaint about privacy. If you need help lodging a complaint, you can contact us through the contact methods provided at the end of the Privacy Policy. You may also have the right to lodge a complaint with a supervisory authority.
- **Right to Anonymity** – You may also have a right to request anonymity. This means that your Personal Data would not be collected or processed. If you choose to exercise this right, we may not be able to provide you with our Service.
- **Right to Data Portability** – You may have the right to receive the Personal Data that you have given us, in a structured, commonly used and machine-readable format. You have the right to send that Personal Data to another controller if the processing is based on consent pursuant to or on a contract and is carried out by automated means.

- **Right to Withdraw Consent** – Where the processing of Personal Data is based on your consent, you may have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before withdrawal.
- **Right to Object** – You may have the right to object, on grounds relating to your particular situation, to the processing of your Personal Data which is based on our legitimate purposes. We will stop processing the Personal Data unless we have compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise or defense of legal claims. If Personal Information is processed for direct marketing purposes, including profiling, you may object at any time.
- **Automated decision-making, including profiling** – Automated decision-making does not occur. You may have the right not to be subject to a decision based solely on automated processing, including profiling, except under certain exceptions under local law.

To exercise any of these rights, you may contact us at legal@genuity.com, or by mail using the information provided in our Contact Us section below.

California Residents

If you are a California resident and the processing of Personal Data about you is subject to the California Consumer Privacy Act (“CCPA”), you may have certain rights with respect to that information.

PLEASE NOTE THAT PERSONAL DATA COLLECTED IN BUSINESS-TO-BUSINESS (“B2B”) TRANSACTIONS IS EXEMPT FROM MOST OF CCPA’S REQUIREMENTS UNTIL JANUARY 1, 2023. Accordingly, since Genuity is a B2B business, some of the rights described in this California Privacy Rights section may not apply to you.

- **Right to Know** – You may request information about the categories and specific pieces of Personal Data we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the sale or disclosure for business purposes of your Personal Data to third parties, and the categories of third parties with whom this information was shared. You may also request a copy of the Personal Data we have collected, and upon request, we will provide this information to you in electronic form.

- **Right to Request Deletion** – You also have a right to request that we delete Personal Data under certain circumstances, subject to a number of exceptions.
- **Right to Opt-Out** – You have a right to opt-out from “sales” of Personal Data. We do not “sell” Personal Data and we do not knowingly “sell” the Personal Data of children under 16 years old.
- **Right to Non-Discrimination** – You have the right not to be discriminated against for exercising any of these rights.

You can exercise your rights by contacting us using the details set out in the Contact Us section below. You may designate an authorized agent to make requests on your behalf to exercise your rights under the CCPA. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us. Further, to provide or delete specific pieces of Personal Data we will need to verify your identity to the degree of certainty required by law.

We may offer various financial incentives from time to time. The terms of a financial incentive will be provided at the time you sign up for a financial incentive. You may withdraw from any of the financial incentives. We have calculated the value of a financial incentive by using the expense related to the offer, and the value of your data is the value of the offer presented to you.

How We Respond to Do Not Track Signals

The “Do Not Track” (“DNT”) privacy preference is an option that may be made in some web browsers allowing you to opt-out of tracking by websites and online services. At this time, global standard DNT technology is not yet finalized and not all browsers support DNT. We, therefore, do not recognize DNT signals and do not respond to them. For more information on tracking and targeted advertising, please see our Cookie Policy.

Record Retention Policy

We will maintain your Personal Data for our records only for as long as necessary to fulfill the purpose for which it is collected and in accordance with legal obligations, resolve disputes, and enforce our agreements.

Material Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. If we make a material change to the Privacy Policy, we will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “Last Updated” date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. By continuing to use our Service you are agreeing to be bound by any changes or revisions made to this Privacy Policy.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

Please address to: Genuity, LLC

By email: legal@genuity.com

By mail: 142 North Rd., Sudbury, MA 01776, US

By phone: (978) 202-4108