

ProjectReady LLC. Privacy Policy

Last Updated: July 17, 2020

ProjectReady Central LLC (“**ProjectReady**,” “**we**,” “**our**” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this privacy policy. This privacy policy explains our policies and procedures regarding the collection, use, disclosure, and security of certain information that we receive, with a focus on information that would be considered “personal data” within the meaning of the EU General Data Protection Regulation (“**GDPR**”). As used in this privacy policy, “personal data” refers information about an identified or identifiable individual, such as their name or email address.

ProjectReady offers an end-to-end project management and document control solution platform (the “**ProjectReady Service**”).

For the purposes of the GDPR, ProjectReady is considered the data controller. This means that we are responsible for deciding how we use the information that we hold. We are a Delaware limited liability company registered in the United States with an office at ProjectReady Central LLC, 92 Main St #321, Yonkers, NY 10701.

The GDPR applies to you if you are located in the European Economic Area, the United Kingdom or Switzerland (an “**EEA Individual**”).

Please note that by accessing and using the ProjectReady Service, visiting or using www.project-ready.com (the “**Site**”) and the various related services, features, functions, software, applications, websites and networks associated with the ProjectReady Service (the ProjectReady Service, together with the Site, collectively, the “**ProjectReady Services**”), you are accepting the practices described in this privacy policy, subject to any rights or restrictions that might apply under the GDPR if you are an EEA Individual, including the rights described in the European Privacy Rights for EEA Individuals provisions below. This privacy policy is incorporated by reference into the Subscription Agreement that governs your use of the ProjectReady Service and the other ProjectReady Services (the “**Subscription Agreement**”).

This policy describes the types of information we may collect from you or that you may provide when you access or use the ProjectReady Service, the Site, the other ProjectReady Services or any of the other features, functions, services, and products, and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect or may collect:

- In accessing and using the Site.
- In registering to use and to create an account for the ProjectReady Service.
- In accessing and using the ProjectReady Service and the other ProjectReady Services.
- In e-mail, text and other electronic messages sent through or use of the Site, the ProjectReady Service and the other ProjectReady Services.
- When you send any content through the Site, the ProjectReady Service or any of the other ProjectReady Services.
- Through services provided to us or to you by third-party companies, agents or contractors.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by ProjectReady or any third party; or
- Any third party.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your only choice is not to use the ProjectReady Service or any of the other ProjectReady Services. By accessing or using any of the ProjectReady Services, you agree to this privacy policy. This policy may change from time to time. Your continued use of the ProjectReady Service, the Site, and/or any of the other ProjectReady Services, after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Minors under the Age of 18

None of the ProjectReady Services are intended for minors under 18 years of age. No one under age 13 may provide any information on or through the Site, the ProjectReady Service or the other ProjectReady Services. We do not knowingly collect personal data from children under 13. If you are under 13, do not use or provide any information on or through any of the ProjectReady Services or any of its features or register on the Site, use any of the interactive or public comment features of any of the ProjectReady Services or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name, username you may use or any pictures of you. If we learn we have collected or received personal data from a child under 13 without verification of parental consent, we will delete that information. If you believe that we might have any information from or about a child under 13, please contact us at support@projectready.com.

Information We Collect About You and How We Collect It

We collect or may collect several types of information from and about users of the ProjectReady Service, the Site and the other ProjectReady Services, including:

- Information by which you may be personally identified, including personal data such as name, telephone number, address and e-mail address;
- Your IP address, including when you create an account;
- Information that you provide by registering or creating an account or filling in forms or applications in connection with the ProjectReady Service and the other ProjectReady Services, including information provided in connection with registering to access and use the ProjectReady Service;
- Information that is about you but individually does not identify you, such as the date and time of visit and areas of the Site visited or features of the ProjectReady Service that are accessed;
- Device, internet and mobile information such as the hardware model, operating system version, unique device identifiers, browser type and language. When you report a problem with any of the ProjectReady Services; and/or

Records and copies of your correspondence (including e-mail addresses), if you contact us.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through or use the ProjectReady Service, the Site or any of the other ProjectReady Services.

- From third parties, such as our customers, business partners and other third parties that provide us or you with certain services.

Certain transactions may also involve you calling us or our calling you. Please be aware that we may monitor, and in some cases, record such calls for staff training or quality assurance purposes.

Data Minimization

We take every reasonable step to limit the volume of your personal data that we process to what is reasonably necessary.

We do not Engage in Automated Decision-making without Human Intervention

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

Consequences of not providing Personal Data

You are not required to provide all personal data identified in this privacy policy to interact with us offline, but if you do not provide the personal data, we may not be able to respond to your requests, provide the ProjectReady Services or access to the ProjectReady Service, or provide you with marketing that we believe you would find valuable.

Use of Cookies and Other Tracking Technologies.

We use various technologies to manage the Site and track use of the content we provide. These technologies include: standard web analytics information; aggregated data about email click-through rates and video viewing; data collected through HTML cookies, flash cookies, web beacons and similar technologies; demographics and other details to help us customize our sites based on your preferences; and data on view counts and video search functionality. Cookies provide a mechanism for us to understand how you use the site over time so that we can provide you the best user experience according to your expressed preferences. We do not sell this information to any third party but may provide information to partners that assist us in updating, managing or maintaining our websites.

Do Not Track Policy

Your web browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. We do not honor any web browser “Do Not Track” signals or other mechanisms that provide you with the ability to exercise choice regarding the collection of personally identifiable information about your online activities over time and across third-party websites or online services. At present, no universally accepted standards exist on how companies should respond to do-not-track signals. In the event a final universally accepted standard is established, we will assess and provide an appropriate response to these signals.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal data:

- To provide you the ProjectReady Service and the other ProjectReady Services and the content and the other products and services that you request from us.
- To provide the Site and the content that is on it to you.
- To process and complete transactions, including registration for the use of the ProjectReady Service and the other ProjectReady Services and send you related information.
- To provide technical and other support to you.
- To send you promotional communications, such as providing you with information about services, features, surveys, newsletters, offers and events; and providing other news or information about us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to the ProjectReady Service, the Site and the other ProjectReady Services.
- To enhance the safety and security of all of the ProjectReady Services.

To verify your identity and prevent fraud or other unauthorized or illegal activity.

- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Some of the information that we collect automatically is statistical data and does not include personal data, but we may maintain it or associate it with personal data we collect in other ways or receive from third parties or you provide to us. It helps us to improve the Site, the ProjectReady Service and the other ProjectReady Services, and to deliver a better and more personalized service, including enabling us to:

- Estimate our audience size and better understand usage patterns.
- Store information about your preferences, enabling us to customize the Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Site.

Storage and Transfer of Your Information

We may store any data or other information that we collect (personal or otherwise) ourselves or in databases and servers owned and maintained by us, our affiliates, agents or Service Providers. If you access or use the Site outside of the United States, information that we collect about you may be transferred to servers inside the United States and maintained indefinitely, which may involve the transfer of information out of countries located in the European Economic Area and other parts of the world unless otherwise prohibited by applicable law or agreed by ProjectReady and you. By allowing ProjectReady to collect information about you from the Site, you consent to such transfer and processing of such information without restriction. We may also store some information locally on your computer or other devices. For example, we may store information as local cache so that you can open the Site and view content faster.

Although users from all over the world may access the Site, keep in mind that no matter where you live or where you happen to use our services, you consent to us processing and transferring information collected on the Site in and to the United States and other countries whose data-protection and privacy laws may offer fewer protections than those in your home country.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not include any personal data, without restriction.

We may disclose personal data that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To other users in your organization in connection with the ProjectReady Service or any of the other ProjectReady Services.
- To a potential or actual buyer, assignee or other successor (including its related advisors and agents) in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of ProjectReady' assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal data held by ProjectReady about users of the Site is among the assets that may be or are actually transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your data information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply the Subscription Agreement and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ProjectReady, our customers or others.

We may share information that is anonymized or in an aggregated form that does not include any personal data about you and we may use and share any such information for any purpose without restriction so long as it does not violate the terms of this privacy policy or any applicable law. We may use, disclose or sell that anonymized or aggregated information without restriction so long as we do not disclose any of your personal data or violate the terms of this privacy policy or any applicable law.

Choices About How We Use and Disclose Your Personal Data

We strive to provide you with choices regarding the personal data you provide to us. We have created mechanisms to provide you with the following control over your personal data:

- **Promotional Offers from ProjectReady.** If you do not wish to have your e-mail address/contact information used by ProjectReady to market or otherwise promote our own or third parties' products or services, you can opt-out through the unsubscribe mechanism at the bottom of the applicable email. This opt out does not apply to information provided to ProjectReady as a result of a service or product purchase, product service experience or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. You may be able to opt out of receiving personalized advertisements from companies who are members of the Network Advertising Initiative or who subscribe to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising. For more information about this practice and to understand your options, please visit: <http://www.aboutads.info> and <http://www.networkadvertising.org/choices/>. You may also use TRUSTe's Preference Manager at <http://preferences-mgr.truste.com>.

Our Legal Bases for Handling Your Personal Data

GDPR and the laws in some other jurisdictions require companies to tell you about the legal bases that they rely on to use or disclose your personal data. To the extent that those laws apply, we rely on the following legal grounds to process your personal data:

- **Performance of a contract:** In most cases, we collect and use your personal data and other information to meet our obligations under a contract to which you are a party or pursuant to which we are providing services to you. For example, when you use the ProjectReady Service or the other ProjectReady Services, we will use your personal data to respond to your requests and to provide you with these services.
- **Legitimate interests:** We may use your personal data information for our legitimate interests on the grounds that it furthers our legitimate interests in commercial activities (but only to the extent that such interests are overridden by the interests or fundamental rights and freedoms of the affected individuals) including:
 - Analyzing and improving the ProjectReady Service, the other ProjectReady Services and our business
 - Providing the services pursuant to our contracts with our clients
 - Marketing
- **Legal compliance:** We may use and disclose personal data in certain ways to comply with our legal obligations under European or Member State law or other applicable law.
- **Consent:** To the extent required by law, and in certain other cases, we handle personal data on the basis of implied or express consent.

Accessing and Correcting Your Personal Data

You may change, correct or delete any personal data that you have provided to us by emailing us at support@project-ready.com.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of the Site that are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please send an e-mail to support@project-ready.com or write to us at: ProjectReady Central LLC, 92 Main St #321, Yonkers, NY 10701, USA.

European Privacy Rights for EEA Individuals.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your personal data) if we intend to use your personal data for such purposes or if we intend to disclose your personal data to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal data. You can also exercise the right by contacting us directly.

If you are an EEA Individual and GDPR applies and we hold your personal data in our capacity as a controller, you may request that we:

- Provide access to and/or a copy of certain personal data (including, in some cases, in portable form);

- Prevent the processing of your personal data for direct-marketing purposes (including any direct marketing processing based on profiling);
- Update personal data that is out of date or incorrect;
- Delete certain personal data which we are holding about you; provided that the personal data is not required by us for (i) compliance with a legal obligation under European or Member State law or other applicable law or (ii) the establishment, exercise or defense of a legal claim;
- Object to our processing of personal data;
- Restrict the way that we process and disclose certain of your information except to the extent that processing is required (i) to comply with a legal obligation under European Member State law or applicable law or (ii) for the establishment, exercise or defense of legal claims;
- Transfer your personal data to a third party to the extent that this is technically feasible; and
- Honor a revocation of your consent for the processing of your personal data (without retroactive effect).

We will consider all requests and provide our response within the time period required by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation. We may request you provide us with additional information to confirm your identity before responding to your request. You have the right to lodge a complaint with the authorities applicable to your situation, though we invite you to contact us with any concern, as we would be happy to try to resolve it directly. You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

If you are an EEA Individual in France, you also have the right to set guidelines for the retention and communication of your personal data after your death.

If you reside in a jurisdiction other than the European Economic Area, you may also have similar rights to the above. Please contact us at support@projectready.com if you would like to exercise one of these rights, and we will comply with any request to the extent required under applicable law.

In addition, where you believe that we have not complied with its obligation under this Privacy Policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office. [Here is a list of local data protection authorities in EEA countries.](#)

You can exercise any of these rights by contacting us at support@projectready.com or write to us at: ProjectReady Central LLC, 92 Main St #321, Yonkers, NY 10701.

How Long We Store Your Personal Data

We will only retain your personal data, in a form which permits us to identify you, for as long as necessary to fulfill the purposes we collected it for. We will retain and use your personal data as necessary to satisfy any legal, accounting or reporting requirements, to resolve disputes or to enforce our agreements and rights. To dispose of personal data, we may anonymize it, delete it or take other appropriate steps. Data may persist in copies made for backup and business continuity purposes for additional time.

Data Security

We understand that the security of your personal data is important. We provide reasonable administrative, technical, and physical security controls to protect your personal data. However, despite our efforts, no

security controls are 100% effective. ProjectReady cannot ensure or warrant the security of your personal data. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

The safety and security of your data also depends on you. Where you have chosen (or we have given you) a password for access to and use of certain parts of the Site, the ProjectReady Service and/or the other ProjectReady Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of any of the ProjectReady Services. The information you share in public areas may be viewed by any other user of the ProjectReady Services.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the home pages of the Site for at least 30 days. If we make material changes to how we treat our users' personal data that are materially less protective than provided in this policy, we will use reasonable efforts to notify you by e-mail to the e-mail address specified in your account and/or through a notice on the home pages of the Site and to attempt to get your consent to the changes. The date the privacy policy was last updated is identified above. You are responsible for ensuring that we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting the Site and this privacy policy to check for any changes. Like our Subscription Agreement, of which this privacy policy is a part, your use, and/or continued use after our efforts to contact you, of the Site, the ProjectReady Service or any of the other ProjectReady Services, means that you agree to be bound by such changes.

Survival

The policies indicated in this privacy policy will remain effective, even if the Subscription Agreement and the other agreements between us are terminated and you are no longer using the Site, the ProjectReady Service or any of the other ProjectReady Services.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices or need to reach us for any other reason, you may contact us by e-mail at support@projectready.com or by mail at ProjectReady Central LLC, 92 Main St #321, Yonkers, NY 10701.