

## Privacy Policy

# Shorey IT, LLC PRIVACY POLICY

Shorey IT, LLC D/B/A Shorey IT (the “Company”) is committed to maintaining robust privacy protections for its users. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Service. We recommend you carefully read this Privacy Policy. In our processing we comply with the requirements of privacy legislation. That means, among other things, that:

- we clearly state the purposes for which we process personal information. We do this by means of this Privacy Policy;
- we aim to limit our collection of personal information to only the personal information required for legitimate purposes;
- we first request you explicit consent to process your personal information in cases requiring your consent;
- we take appropriate security measures to protect your personal information and also require this from parties that process personal information on our behalf;
- we respect your right to access your personal information or have it corrected or deleted, at your request. If you have any questions, or want to know exactly what data we keep of you, please send an email to [contact@shoreyit.com](mailto:contact@shoreyit.com).

For purposes of this Agreement, “Site” refers to the Company’s website, which can be accessed at <https://shoreyit.com> or <https://sho.directory> or <https://helpdesk.shoreyit.com> or other websites hosted under the shoreyit.com domain name, such as (but not limited to) <https://tools.shoreyit.com> and <https://dsp.shoreyit.com>.

“Service” refers to the Company’s services accessed via the Site, in which users can contact representatives of the Company, request IT services from the Company, manage billing and subscriptions, and manage purchased services.

The terms “we,” “us,” and “our” refer to the Company.

“You” refers to you, as a user of our Site or our Service.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use (found here: <https://shoreyit.com/terms-conditions>), and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

## I. INFORMATION WE COLLECT

We collect “Non-Personal Information” and “Personal Information.” **Non-Personal Information** includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. **Personal Information** includes your email, address, date of

birth (“DOB”), phone number, contact information, social media profiles you link, and other relevant Personal Information, which you submit to us through the registration process at the Site.

## *1. Information collected via Technology*

To activate the Service you do not need to submit any Personal Information. To use the Service thereafter, you do not need to submit further Personal Information unless you make a purchase using the Service, in which case we may collect additional Personal Information such as a billing and/or shipping address and credit card number. However, in an effort to improve the quality of the Service, we track information provided to us by your browser or by our software application when you view or use the Service, such as the website you came from (known as the “referring URL”), the type of browser you use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you. This information is anonymized and does not involve the use of cookies. We also make use of security services from third-party providers such as Cloudflare, which require the limited use of cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user’s browser from our servers and are stored on the user’s computer hard drive. Sending a cookie to a user’s browser enables us to collect Non-Personal information about that user and keep a record of the user’s behavior when utilizing our services, both on an individual and aggregate basis. For example, the Company may use cookies to collect the following information:

- Time(s) you accessed the Service
- Device information (like screen size and operating system)
- Web browser information
- Your obfuscated IP Address (the last six digits are removed, such as: 127.0.XXX.XXX)

The Company may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser.

- A. To support services or products that a customer wants to buy or has purchased, we collect a first and last name, account name or alias, a home or other physical address, an email address, a telephone number, your IP address and your Geolocation data. We retain this information until the service is terminated or you request we delete your information.

The Company uses Stripe for payment, analytics, and other business services. Stripe collects identifying information about the devices that connect to its services. The Company may include JavaScript code on the Site to help with collection of this information. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection. You can learn more about Stripe and read its privacy policy at <https://stripe.com/privacy>.

## *2. Information you provide us by registering for an account*

In addition to the information provided automatically by your browser when you visit the Site, to become a subscriber to the Service you will need to create a personal profile. You can create a profile by registering with the Service and entering your email address, and

creating a username and a password. By registering, you are authorizing us to collect, store and use your email address in accordance with this Privacy Policy.

### *3. Children's Privacy*

The Site and the Service are not directed to anyone under the age of 13. The Site does not knowingly collect or solicit information from anyone under the age of 13, or allow anyone under the age of 13 to sign up for the Service. In the event that we learn that we have gathered personal information from anyone under the age of 13 without the consent of a parent or guardian, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at [contact@shoreyit.com](mailto:contact@shoreyit.com).

## II. HOW WE USE AND SHARE INFORMATION

### *Personal Information:*

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to user's email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy. In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers.

We may share Personal Information with outside parties if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable legal process or enforceable governmental request; to enforce applicable Terms of Service, including investigation of potential violations; address fraud, security or technical concerns; or to protect against harm to the rights, property, or safety of our users or the public as required or permitted by law.

We may share Personal Information to other recipients only for the following purposes:

- Payment Processing;
- Cloud-based solutions used to increase the performance, security and availability of Internet properties, applications and networks, along with any software, software development kits and application programming interfaces ("APIs");
- Compute Services and Security Services;
- Transmission and delivery of email communications, analytic reports regarding the email communications sent of Shorey IT's behalf, provision of products and services which allows Shorey IT to integrate, manage and control its data relating to end users, and the provision of programmable communication products and services, primarily offered in the form of APIs, to Shorey IT, including transmittal to or from Shorey IT's software applications or; services and designated third parties as

directed by Shorey IT, from or to the publicly-switched telephone network or by way of other communications networks.

### *Non-Personal Information:*

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes to the Site so that you may opt out of the new information practices. We suggest that you check the Site periodically if you are concerned about how your information is used.

### *Purpose and categories of data:*

We may collect or receive Personal and/or Non-Personal information for a number of purposes connected with our business operations which may include the following:

#### **1. Contact - Through phone, mail, email and/or webforms.**

1. The following categories of data are collected:

- A first and last name
- An email address
- IP address

2. We retain this data until the service is terminated.

#### **2. Registering an account.**

1. The following categories of data are collected:

- A first and last name
- An email address
- IP address
- Account name or alias
- Geolocation data
- Date of birth ("DOB")
- Photos
- Social media accounts

2. We retain this data until the service is terminated or you request your account to be deleted.

#### **3. Newsletters.**

1. The following categories of data are collected:

- A first and last name
- An email address

2. We retain this data until the service is terminated or you unsubscribe from the mailing list.
4. **To support services or products that a customer wants to buy or has purchased.**
  1. The following categories of data are collected:
    - A first and last name
    - An email address
    - IP address
    - Account name or alias
    - Geolocation data
    - A telephone number
    - A home or other physical address, including street name and name of a city or town
  2. We retain this data until the service is terminated.
5. **To be able to comply with legal obligations.**
  1. The following categories of data are collected:
    - A first and last name
    - A home or other physical address, including street name and name of a city or town
    - An email address
    - A telephone number
    - Date of birth
  2. We retain this data for a minimum of 5 years.

### III. HOW WE PROTECT INFORMATION

We implement security measures designed to protect your information from unauthorized access. Your account is protected by your account password and we urge you to take steps to keep your personal information safe by not disclosing your password and by logging out of your account after each use. We further protect your information from potential security breaches by implementing certain technological security measures including, but not limited to:

- Encryption;
- Firewalls;
- Security software;
- SSL/TLS;
- DKIM, SPF en DMARC;
- HTTP Strict Transport Security;
- X-Content-Type-Options;
- X-XSS-Protection;
- X-Frame-Options;
- Content Security Policy;
- Permissions Policy;
- Physical security measures of systems which contain personal information.

However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using our Service, you acknowledge that you understand and agree to assume these risks.

## IV. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional e-mail. You can also indicate that you do not wish to receive marketing communications from us by [Opting-Out](#). Please note that notwithstanding the promotional preferences you indicate by either unsubscribing or [Opting-Out](#), we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy. For more information on how you may [Opt-Out](#), please read the [Opt-Out section](#) at the end of this page.

### 1. You have the following rights with respect to your personal information:

- You may submit a request for access to the data we process about you;
- You may object to the processing;
- You may request an overview, in a commonly used format, of the data we process about you;
- You may request correction or deletion of the data if it is incorrect or not or no longer relevant, or to ask to restrict the processing of the data.

### 2. Supplements

- This section, which supplements the rest of this Privacy Policy, applies to citizens and legal permanent residents of California (DNSMPI, CRPA), Colorado (CPA), Connecticut (CTDPA), Nevada (NRS 603A), Utah (UCPA) and Virginia (CDPA)
  - i. *California*
    - Right to know what personal information is being collected about you. A consumer shall have the right to request that a business that collects perusal information about the consumer disclose to the consumer the following:
      1. The categories of personal information it has collected about that consumer.
      2. The categories of sources from which the personal information is collected.
      3. The business or commercial purpose for collecting or selling personal information.
      4. The categories of third parties with whom the business shares personal information.
      5. The specific pieces of personal information it has collected about that consumer.
    - Right to know whether personal information is sold or disclosed and to whom. A consumer shall have the right to

request that a business that sells the consumer's personal information, or that discloses it for a business purpose, disclose to that consumer:

1. The categories of personal information that the business collected about the consumer.
2. The categories of personal information that the business sells or discloses.

ii. *Colorado*

- Right to data portability. When exercising the right to Access personal data, you have the right to obtain the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. You may exercise this right no more than two times per calendar year.
- Right to opt out. You may submit a request directing us not to make certain disclosures of personal information we maintain about you.
- Under Colorado law this concerns the following purposes:
  1. targeted advertising;
  2. the sale of personal data; or
  3. profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.
- For more information about the possibility of submitting an opt-out request, please read the [Opt-Out section](#) of this policy.

iii. *Connecticut*

- Right to data portability. When exercising the right to Access personal data, you have the right to obtain the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- We are not required to reveal any trade secret(s).
- Right to opt-out. You may submit a request directing us not to make certain disclosures of personal information we maintain about you.
- Under the CTDPA this concerns the following purposes:
  1. targeted advertising; or
  2. the sale of personal information; or
  3. profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.
  4. For more information about the possibility of submitting an opt-out request, please read the [Opt-Out section](#) of this policy.

iv. *Nevada*

- Right to opt-out.
- You may submit a request directing us not to make certain disclosures of personal information we maintain about you.
- For more information about the possibility of submitting an opt-out request, please read the [Opt-Out section](#) of this policy.

v. *Utah*

- Right to data portability. When exercising the right to Access personal information, you have the right to obtain the personal information that you previously provided to us as a controller in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- Right to opt-out. You may submit a request directing us not to make certain disclosures of personal information we maintain about you.
- Under the UCPA this concerns the following purposes:
  1. targeted advertising; or
  2. the sale of personal data.
- For more information about the possibility of submitting an opt-out request, please read the [Opt-Out section](#) of this policy.

vi. *Virginia*

- Right to data portability. When exercising the right to Access personal information, you have the right to obtain the personal information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. You may exercise this right no more than two times per calendar year.
- Right to opt-out. You may submit a request directing us not to make certain disclosures of personal information we maintain about you.
- Under the CDPA this concerns the following purposes:
  1. targeted advertising;
  2. the sale of personal information; or
  3. profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.
- For more information about the possibility of submitting an opt-out request, please read the [Opt-Out section](#) of this policy.

## V. LINKS TO OTHER WEBSITES

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.



## VI. CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site. Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.

## VII. CONTACT US

If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to [contact@shoreyit.com](mailto:contact@shoreyit.com) or by calling +1 (888) 668-7607.

You may also may contact us by mailing:

- Shorey IT, LLC  
PO Box 111  
Caribou, ME 04736  
United States of America

or by visiting:

- <https://helpdesk.shoreyit.com/>

## VIII. ANNEX

- A. When visitors or users submit a form, we may capture the IP Address for spam protection. We also capture the email address and might capture other personal information included in the Form fields. All data submitted in a form will be sent securely to our employees or contractors to perform necessary actions based on the form submission.
- B. When visitors or users submit a quiz's answer, we capture NO Personally Identifiable Information.
- C. When visitors or users submit a poll, we capture the IP Address for spam protection and to set voter limitations.
- D. User information provided during account registration can be modified or removed on the Profile > Edit panel. In most cases, users also have control over who is able to view a particular piece of profile content, limiting visibility on a filed-by-filed basis to friends, logged-in users, or administrators only. Site administrators can read and edit all profile data for all users. The content of private messages is visible only to the sender and the recipients of the message. With the exception of site administrators, who can read all private messages, private message content is never visible to other users or site visitors. Site administrators may delete the content of any message.

E. We do not share or sell "SMS opt-in" or phone numbers for the purpose of SMS.

## Opt-Out

To opt-out of SMS and/or text messages, text STOP to (888) 668-7607.

To opt-out of the use of non-functional cookies and JavaScript technology to collect analytical data about how you use this Site, please visit our Cookie Policy (<https://shoreit.com/cookie-policy>).

If you have any issues with opting out, please contact us or visit the Helpdesk (<https://helpdesk.shoreit.com>).

**Last Updated: This Privacy Policy was last updated on June 1, 2024.**