

REMOTELY PRIVACY POLICY

Last updated: November 30, 2020

Remotely Works, Inc. (“**Remotely**”, “**we**”, “**us**”, or “**our**”), a Delaware corporation has adopted this Privacy Policy to make it easy for you to understand what sorts of information we collect and how we use that information. Please read this Privacy Policy carefully. If you do not consent to the practices detailed in this Privacy Policy, you should not use this Site.

We may update this Privacy Policy from time to time. All changes are effective immediately when we post them and we will use reasonable efforts to alert you about any changes by updating the “Last updated” date of this Privacy Policy. By continuing to use this Site (as defined below) after the date such revised Privacy Policy is posted, you will be subject to, and be deemed to have accepted, the changes therein.

I. Scope

Remotely recruits high-performing, remote engineering teams to help companies grow their business. This Privacy Policy discloses information that we collect, process, and use when you use our website (at <https://www.remotely.works>) (the “**Site**”). For purposes of this Privacy Policy, we refer to the following types of data:

“**Personal Data**” means information that can be used to identify you directly or indirectly; and

“**Aggregated Data**” means information in aggregated form that cannot, on its own, be used to identify you.

II. Legal Basis for Processing

We collect and use the Personal Data and Aggregated Data described in this Privacy Policy on the following legal bases:

- With your consent, for the purposes outlined in this Privacy Policy;
- For our legitimate business needs;
- To fulfill our contractual obligations to you and our clients; and
- To comply with our other legal obligations including investigating, preventing, enforcing, or taking action regarding potential fraud and illegal conduct.

III. Information We Collect & How We Collect It

Personal Data provided by you when using our Site

We collect Personal Data that you voluntarily provide to us (i) by filling in forms on our Sites, or (ii) when you contact us by phone, email, or otherwise.

Your Personal Data may include:

- **Contact Information.** We may ask for your name, email address, company name, country of residence, and link(s) to your social media profile(s).
- **Contributions.** We collect your contributions, such as text, writings, comments, suggestions, responses, preferences, messages, graphics, and other materials that you voluntarily upload or otherwise provide to the Site.

Aggregated Data collected through our Site

When you use our Site our service providers automatically collect or log information about you, your device, and how you interact with our Site, which is delivered to us in aggregated form. In some instances, we use cookies to collect and receive this data, in compliance with our Cookie Policy. The Aggregated Data we collect includes:

- **Log Information.** Our service providers collect server log data that is automatically generated when you use our Sites, including your IP address, browser type, browser language, web request(s), and cookies that uniquely identify your browser, plugins, and time zone settings. Our service providers can use this information to derive your approximate location when you access our Site.
- **Usage Data.** Our service providers may provide us information about how users interact with our Sites, such as , length of visits to certain pages, search queries that led to our Site, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

IV. How We Use Your Information

Personal Data

We use your Personal Data to fulfill your requests, fulfill contractual obligations to our clients, market the Site to you and others, ensure security of the Site, comply with our

legal obligations, and to help us understand who is visiting our Sites. We may also use Personal Data to:

- Provide technical administration and customer support;
- Respond to your inquiries;
- Send important notices, such as communications about changes to our terms, conditions, and policies;
- Provide you with the information, products and services that you request from us;
- Ensure that content from our Site is presented in the most effective manner for you and for your device.

We may combine information we've received from our service providers with information you give to us. We may use this information and the combined information for any of the purposes set out above (depending on the types of information we receive).

Aggregated Data

We collect, analyze and use Aggregated Data in an aggregated form to help us understand who is using our Site and provide you with a better user experience on our Site. When we use Aggregated Data, we do so in a way that keeps your Personal Data anonymous.

V. Disclosure of Your Information

Remotely does not sell your Personal Data. We consider this information to be a vital part of our relationship with you. However, we may share your Personal Data and Aggregated Data as set forth below:

- **Consent.** We may share or process your data if you have given us specific consent to use your Personal Data for a specific purpose.
- **Legitimate Business Interests.** We may share or process your data when it is reasonably necessary to achieve our legitimate business interests or we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of Remotely or others against fraud.
- **Business Transfers.** As we develop our business, we may buy, sell or reorganize businesses or assets. In the event of such sale, merger, reorganization, dissolution or similar event, data may be part of the transferred assets.

- **Affiliated Companies.** We may also share data with our subsidiaries, affiliates and other related companies for purposes consistent with this Privacy Policy and providing you with our Site.
- **Targeted Advertising.** We may use a “remarketing” service to target our ads to you based on your prior use of the Site. You may see Remotely banners or ads when you are on other websites. These websites may use information about your visits to our Site and other websites that are contained in web cookies and other tracking technologies in order to provide you advertisements about goods and services of interest to you. We also may share your Personal Data with third parties to generate a “custom audience” or “lookalike audience” of prospective customers through third party advertising platforms. This allows us to target advertisements on their networks to potential customers who appear to have shared interests to our existing customers.
- **Site Optimization.** We use analytics and search engine providers to assist us in the improvement and optimization of our Site and provide information to providers such as Google for these purposes.
- **Legal Requirements.** We may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation; (ii) enforce, protect or defend the rights or property of Remotely, our clients, or others; (iii) act in urgent circumstances to protect the personal safety of users of our Site or the public; or (iv) protect against legal liability; or (vi) for fraud prevention.

VI. Your Privacy Rights

EU & Swiss Residents

If you are a resident of a country in the European Economic Area (“**EEA**”) or Switzerland (“**European Resident**”), you have additional rights regarding your Personal Data, including:

- The right to access a copy of your Personal Data and/or to have inaccuracies corrected;
- The right to erase your Personal Data;
- The right to restrict, object or stop processing of your Personal Data;

- The right to request transfer of your data to another organization or directly to you;
- The right to request a machine-readable copy of your Personal Data; and
- The right to make a complaint to a data protection regulator. If you are a resident of the EEA, you can find your local regulator's contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

You can withdraw your consent to our collection or processing of your Personal Data or your personal information at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to such withdrawal, nor will it affect processing of your Personal Data or your personal information conducted in reliance on lawful processing grounds other than consent. To exercise any of the above rights, you must submit a request to us by email at: contact@remotely.works

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. Your request must include your name and email address and describe your request with specificity. We cannot respond to your request if we are unable to verify that you are the person whose Personal Information we have collected.

We strive to respond to verifiable consumer requests within 28 days; however, we may extend our response time for up to 56 days, in our sole discretion, by informing you of the extension and the reason(s) therefore in writing.

The Site generally provides you with a reasonable means to view and change your profile information and you can opt-out of marketing communications at any time by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you.

If you have any questions or comments about the processing of your personal information, you may contact us at the details below.

California & Nevada Residents

Under the California Consumer Privacy Act of 2018 ("**CCPA**"), California residents have certain rights regarding Remotely's collection, use, and sharing of their personal information. This Privacy Policy applies to "Consumers" as defined by the CCPA. In the event of a conflict between any of our policies, statements, or notices, including but not limited to this Privacy Policy, this section will prevail as to California Consumers and their rights under the CCPA. For purposes of this section only, "**Personal Information**" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you, as defined

under the CCPA. Personal Information does not include information that is aggregated or information that cannot be reasonably linked to you. Consistent with the CCPA, job applicants, current and former employees and independent contractors (“**Personnel**”), and subjects of certain business-to-business communications acting solely in their capacity as representatives of another business, are not considered consumers for purposes of this notice or the rights described herein.

Remotely does not sell your Personal Information and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. We may disclose your Personal Information for the following purposes, which are not a sale: (i) if you direct us to share your Personal Information, (ii) to comply with your requests under the CCPA, (iii) disclosures as part of a merger or asset sale, and (iv) as otherwise required or permitted by applicable law. Similarly, we do not offer financial incentives associated with our collection, use, or disclosure of your Personal Information.

We collect various categories of Personal Information when you use the Site, including identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information. A more detailed description of the information we collect and how we use it is provided above.

Under the CCPA, you have the following rights:

- **Right to Know.** You have the right to access and request that we inform you of the Personal Information we collect, use, sell, or disclose to third parties;
- **Right to Obtain a Copy.** You have the right to make or obtain a transportable copy of your Personal Information that we have collected in the period that is 12 months prior to the request date and are maintaining.
- **Right to Request Deletion.** You have the right to request that we delete your Personal Information that we have collected from you and are maintaining. Please be advised, however, that exceptions under the CCPA may allow us to retain and use certain Personal Information notwithstanding your deletion request; and
- **Right to Non-Discrimination.** We will not discriminate against you in a manner prohibited by the CCPA for exercising any of your CCPA rights.
- **Right to Opt-Out of Sale.** You have the right to opt-out of any sale of your Personal Information.

Please note that to protect your information and the integrity of our Site, we will need to verify your identity before processing your request. An agent may submit a request on your behalf, but you must verify that your agent is authorized to do so.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Site, you have the right to request removal of unwanted data that you publicly post on the Site. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Site, but please be aware that the data may not be completely or comprehensively removed from our systems.

Additionally, Nevada law (SB §220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. Remotely does not sell your personal information to third parties as defined in Nevada law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law.

Individuals who are residents of California or Nevada and have provided their Personal Data to us may request a hard copy of their Personal Information including, information regarding our disclosures, if any, of their Personal Data to third parties for direct marketing purposes. Such requests must be submitted to us in writing at the contact information listed below.

Such requests must include the reference “Request for California Privacy Information” or “Request for Nevada Privacy Information” in the subject line and in the body of the message and must include your name, a description of your request, so that we can verify that you are the person whose Personal Information we have collected, and an e-mail address or mailing address, as applicable, for us to send our response. This request may be made no more than once per calendar year. We reserve the right not to respond to requests submitted to us if not submitted pursuant to the terms set forth above. We strive to respond to verifiable consumer requests of California consumers

within 45 days; however, in our discretion, if we require an extension (up to an additional 45 days) we will inform you of this extension and the reason therefore in writing.

VII. Storage of Personal Data

Our services are global and your information (including Personal Data) may be stored and processed in any country where we have operations or where we engage service providers, and we may transfer your information to countries outside of your country of residence, which may have data protection rules that are different from those of your country of residence. By submitting your Personal Data to us via our Site, you acknowledge that you will be voluntarily transferring your Personal Data to a jurisdiction which may not provide the same privacy framework as other regions. If you live in the EEA, the Personal Data that we collect from you may therefore be transferred to, and stored at, a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or partners. By submitting your Personal Data, you agree to this transfer, storing or processing outside of the EEA. We take steps to ensure that the data we collect under this Privacy Policy is stored and processed in accordance with this Privacy Policy regardless of where the data is located.

VIII. Protection of Your Information

All information you provide to us is stored on our secure servers. Any credit card information or payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share any password with anyone. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavor to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Sites. Please be advised that no communication over the Internet is 100% secure, and any data transmission over the Internet is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

IX. Links to Other Websites

Our Sites may, from time to time, contain links to and from the websites of our partner networks, clients, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that submitting any

personal data is done at your own risk. We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

X. Data Retention

We retain Personal Data for as long as necessary for the relevant activity for which it was provided or collected, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). This will be for as long as we provide access to the Sites to you. However, we may keep some data after your account is closed or you cease using our Sites for the purposes set out below. After you have closed your account or ceased using our Sites we usually delete Personal Data, however we may retain Personal Data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our contracts, or fulfil your request to “unsubscribe” from further messages from us. We may retain Anonymous Data indefinitely.

XI. Children

We do not knowingly solicit data from or market to children under 18 years of age. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at: contact@remotely.works

XII. Customer Support

If you have questions, comments or concerns about our Privacy Policy, please contact Remotely at:

Remotely Works, Inc.
90 Furman, Apt N218. 11201, Brooklyn, NY, USA.
E-mail: contact@remotely.works

REMOTELY COOKIE POLICY

Last updated: November 30, 2020

This cookie policy (“**Cookie Policy**”) applies to all information collected through our Site, including the technologies we and third parties with whom we partner, use for automatic data collection.

As used in this Cookie Policy, the term “**Cookies**” includes persistent cookies, session cookies, pixel tags, beacons, or other technology that tracks user behavior. We may use Cookies to, among other things, protect, access, or store your personal data and anonymous data, monitor activity on the Site, improve the Site’s functionality, improve your user experience, keep our Site secure, and provide targeted advertising.

What is a Cookie?

This website uses Cookies to allow us to optimize our services we provide to you. A cookie is a small amount of data generated by a website and saved by your web browser. Its purpose is to remember information about you, commonly login information for a specific site or search settings on a search website. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.

Approved third parties may also set cookies when you interact with our Site. Third parties include search engines, providers of measurement and analytics services, social media networks, and advertising companies. Third parties use cookies in the process of delivering content, including ads relevant to your interests, to measure the effectiveness of their ads, and to perform services on behalf of Remotely.

You can manage browser cookies through your browser settings. The 'Help' feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to block cookies, and when cookies will expire. If you block all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some features and services may not work.

Where applicable, we provide you with the option to opt out of the use of cookies by activating the appropriate setting on your device. You can set up your browser options to stop your device accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use certain functionalities of our Site.

What Cookies We Use and How We Use Them

| TYPE OF COOKIE | USE OF COOKIE |
|---|--|
| Analytical/Performance Cookies _ga, _gid | These cookies collect information about how you use the website. These cookies don't gather information that identifies you, but they might provide us insight into where visitors originate, device/OS information, and usage data. |
| Advertising Cookies _fbp | These cookies collect information from you in order to display advertisements to you based on relevant topics that interest you. |