

KeyPort Operations, Inc.

Privacy Policy

Last Modified Date: October 9, 2025

This Privacy Policy ("**Privacy Policy**") describes how KeyPort Operations, Inc. and its subsidiaries and affiliates (collectively, "**KeyPort**", "**we**", "**our**", or "**us**"), collect, store, use, disclose and otherwise process information in the course of our business, including through our websites that link to this Privacy Policy (such as, www.KPOWorldwideKeyPort.com) (the "**Site**"), our online Software Services (as defined below) and through other means such as our and our partner's events, sales and marketing activities. It also sets out more information about your privacy rights applicable to personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, as defined by applicable privacy laws ("**Personal Information**").

By accessing and using the Site containing a link to this Privacy Policy, or by using our Service where a link to this Privacy Policy is provided, you agree to the terms and conditions of this Privacy Policy and any updates we make to it. If you do not agree to the terms and conditions of this Privacy Policy, then please do not provide us with your information. Please note, however, that if you choose to limit the information that you provide to us while using the Site, you may not be able to use or participate in certain features of the Site.

KeyPort processes two categories of Personal Information:

- Personal Information that our partners and customers ask us to process on their behalf ("**Processor Data**"). KeyPort offers cutting-edge safety software that helps companies reduce risks, enhance operational efficiency, and drive cost savings (the "**Software Services**"). Under applicable law, in certain contexts KeyPort is considered the "processor" of Personal Information we receive through the Software Services, and our customer is (or acts on behalf of) the "controller" of the data (i.e., the company with the right to decide how the data is used).
- Personal Information that we collect or process for our own business ("**Controller Data**"). Under applicable law, KeyPort is a "controller" of Controller Data.

This Privacy Policy applies to our handling of Controller Data. Our obligations with respect to Processor Data are covered under the agreement we enter into between us and each of our business partners and customers.

Changes and Updates to this Privacy Policy

We reserve the right to revise or update this Privacy Policy at any time, and you should periodically read the Privacy Policy to learn of any revisions or updates. If the revision or update is material, we will provide you notification via email or a pop-up banner; however, for non-material revisions or updates, we will notify you by posting the revised or updated Privacy Policy and its "Last Modified Date" on the Site and Software Services, if applicable. Using the Site or Software Services thereafter constitutes your agreement to and acceptance of the Privacy Policy and its revisions or updates.

1. The Types of Personal Information That We Collect

KeyPort may collect Personal Information directly from you when you use the Site or Software Services (for example, when you contact us by e-mail or through a contact form, when you access or use of the products or services offered in connection with our Software Services, or when you establish a SafePort account with us).

1.1. Personal Information collected directly from you through the Software Services.

- **Identifiers**, including name, telephone number, postal address, email address; and
- **Information Listed in the California Customer Records Statute**, including name, postal address, telephone number.
- [_____]

1.2. Personal Information collected directly from you through the Site.

- **Identifiers**, including name, telephone number, postal address, email address; and
- **Information Listed in the California Customer Records Statute**, including name, postal address, telephone number.
- [_____]

1.3. Personal Information automatically collected when you use the Site.

KeyPort and third-party service providers may automatically collect data about you when you use the Site. This information is primarily needed to maintain the security and operation of the Site, and for our internal analytics so that we can improve our Safeport Services and Site. This information includes:

- **Identifiers**, including IP address and cookies
- **Internet or Other Electronic Network Activity Information**, including browsing history, browser and device information, hardware model, software, preferred language, unique device identifiers, advertising identifiers, network information, clickstreams, search history, information regarding your interaction with our Site, IP address, cookies, pixel tags, browser version, operating system
- **Location information**, Certain features of the Services may collect your precise location information, device motion information, or both, if you grant permission to do so in your device settings. KeyPort does not collect, store or use location information, but our third-party partners may collect and store this information to provide the Services or feature. When you opt-in to any such service, you authorize the relevant third party to collect and use your location information for the purpose for which it was collected. This location information may be used to operate and enhance the third party's service as well as customize the content we provide to you from our partners.

KeyPort may use standard technology called cookies on this site. Cookies are small data files that are downloaded onto your computer when you visit a particular web site. You can disable cookies by turning them off in your browser, however, some areas of this site may not function properly if you do so. We use cookies to recognize you as a customer, to help track usage to help us understand which parts of the Site are the most popular, where our visitors are going, and how much time they spend there, to make usage of the Site even more rewarding as well as to study the effectiveness of our customer communications and to customize each visitor's experience and provide greater convenience. We may transfer your Personal Information to third-party service providers in order to help us analyze usage, as discussed in further detail below.

Google Analytics

We use Google Analytics on the Site to help us analyze the traffic on the Site. For more information on Google Analytics' processing of Personal Information, please see <http://www.google.com/policies/privacy/partners/> You may opt out of the use of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

Do-Not-Track

Many web browsers include a Do Not Track ("DNT") feature or setting that signals your preference not to have data about your online browsing activities monitored and collected. However, there is currently no uniform standard for recognizing and implementing the DNT signals. As such, the KeyPort does not monitor or respond to DNT browser requests. If a standard is adopted that we must follow in the future, then we will inform you about that practice in a revised version of this Privacy Policy.

1.4.Information We Receive from Third Parties

In addition to collecting some Personal Information directly from you, we may collect Personal Information from third parties including our Affiliates and Subsidiaries, data providers, and credit bureaus where permitted by law. You agree that the third-party providers of data, not KeyPort, are responsible for maintaining your information with proper and sufficient accuracy and authority in accordance with all governing laws and regulations. We make no effort to verify any information for any purpose, including accuracy, legality, or non-infringement that we properly receive from third parties. We also collect personal information automatically when you use visit our Site and while receiving our services.

We may also receive information about you from social media platforms, such as when you interact with us on those platforms or access our social media content. Please note that the information we may receive from those third-party sites (such as Facebook, Instagram, Twitter and YouTube) is governed by the privacy settings, policies and/or procedures of the applicable platform, and we strongly encourage you to review them before submitting any information using a social media platform.

2. Purpose of Collection

KeyPort processes Personal Information for the purposes of:

- Communicating with corporate business partners and customers pursuant to contract about business matters or possible contracts for the operation of the business, including the process of requested payments (services) and providing aggregated, anonymized data about the use of our services;

- Monitoring and analyzing transactions by reviewing customer and user behavior to improve services and prevent fraud;
- Conducting relevant tasks for legitimate business purposes including marketing and advertising;
- Profiling prospective customers or building mailing lists for product information distribution;
- Internal communications;
- Meeting legal or regulatory requirements and KeyPort's internal policies;
- Management of travel, lodging, and related expenses; and
- Other purposes disclosed at the time of collection.

3. Disclosure of Personal Information

We do not sell, share, rent, or otherwise disclose the Personal Information collected on the Site or through the Services to third parties for monetary or other valuable consideration, unless otherwise stated below or with your consent:

- **Service Providers & Contractors.** We may share your Personal Information with service providers and contractors to perform tasks on our behalf and to assist us in providing our Services, including but not limited to internal and business operations, security, payment processing, identity verification, and related services. Service providers and contractors may use the information only as necessary to provide the services to us and are contractually required to keep your information confidential and secure.
- **Live Chat and Interactive Support.** The Site or Service may include "live chat" or other live interactive features. We may provide these features through technology provided by third parties and you consent to the transfer of your Personal Information to these providers by using these features.
- **Advertising Partners.** We may share your personal information with third-party advertising partners, such as LinkedIn, Instagram, Twitter, TikTok, YouTube, and Google Display Advertising and Remarketing services. These advertising partners may use first- and third-party cookies together to inform, optimize, and serve ads based on your past visits to this website. You can opt out of these services using the Ads Preferences Manager or you can use the Google Analytics opt-out browser add-on. These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks, commonly referred to as "interest-based advertising."
- **Authorized Representatives.** If another individual is managing your account on your behalf (for example, a wife managing the account of her husband), as authorized by you or as a personal representative under applicable law, that person can view all Personal Information about you in our Services.
- **In the Event of Merger, Sale, Divestitures or Change of Control.** We may transfer or assign Personal Information to an entity that acquires or is merged with us as part of a merger, acquisition, sale of ownership or assets, or other change of control.
- **Other Disclosures.** We may disclose your Personal Information if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to:

- (i) comply with any applicable law, regulation, legal process or governmental request;
- (ii) enforce our Terms of Use or Terms of Sale, including investigations of potential violations thereof;
- (iii) detect, prevent, or otherwise address fraud or security issues;
- or (iv) protect against harm to our, your, or third parties' rights, property, or safety.

We may share de-identified and/or aggregate analytics with third-party partners about how users interact with our Services, including usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Service.

4. Contest/Sweepstakes Entries

We occasionally offer sweepstakes and contests. To participate in these online sweepstakes, we may require you to register and provide us with Personal Information, such as your name and email address. This Privacy Policy applies to sweepstakes we may administer online through the Site or other social media or digital platforms. Some sweepstakes we advertise may be administered by third parties who would collect your information, and you should review the privacy policies of the administering party to understand how your data is used and protected by them. In sweepstakes we offer, we will use the information you provide us for purposes including administering the sweepstakes, subscription to our newsletter, and other purposes disclosed at the time of registration. You should carefully review the Official Rules of any sweepstakes or contest in which you participate, including any option to opt-out of receiving special offers and marketing material by unchecking the appropriate box when registering for sweepstakes. If you have any questions or concerns, please contact us via the Contact Us section below.

5. Transfer of Personal Information to a Third Country

Our services are hosted in the United States and are intended solely for visitors located within the United States. If you do not reside in the United States and provide Personal Information to us, please note that your Personal Information will be transferred, processed, collected, used, accessed and/or stored in the United States and subject to U.S. laws. The laws in the United States may not provide the same protections for your Personal Information as the jurisdiction in which you are located. Do not provide your Personal Information to us if you do not want this information to be transferred or processed outside of your country, or if the laws in your country restrict such transfers.

6. Retention Period

Personal Information is retained by KeyPort no longer than necessary to fulfill the purposes set out in this Privacy Policy, unless a longer retention period is required (such as under applicable contracts with clients or business partners) or permitted by law (such as tax, accounting, or other legal requirements).

7. Third-Party Sites

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or websites that may be displayed to you in search results, websites that may include KeyPort Services, or other websites linked from our Site. This Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

8. Confidentiality and Security

We maintain reasonable safeguards using industry standard technology to heighten the security, accuracy and privacy of any Personal Information we have collected, and we have put in place reasonable precautions to protect information from loss and misuse. While we implement these measures, please note that 100% security is not possible, and we cannot guarantee that the security measures we have in place to safeguard Personal Information will never be defeated or fail, or that those measures will always be sufficient or effective.

KeyPort may assign you a user ID and a password when you as part of your participation and access to the Site and your account. Only you may use your user ID and password. You may not share your user ID and password with anyone else, and you are solely responsible for maintaining and protecting the confidentiality of your user ID and password. You are fully responsible for all activities that occur under your user ID. You play a role in protecting your information as well.

9. Minors

Our Services are not directed to minors, including children under the age of 16. We do not knowingly collect or solicit personal information from children under the age of 16. By using the Site or Services, you represent that you are at least 16 years old. If you are under 16, please do not attempt to register for an account or send any Personal Information about yourself to us. If we become aware that we have inadvertently received or collected Personal Information from a user of the Site who is under the age of 16, we will attempt to immediately delete that information from our files and records. Furthermore, we encourage users of the Site that are minors that are 16 years of age or older to ask their parents or guardians for permission before sending any information about themselves over the Internet.

If you believe a child who is under the age of 16 has provided us with Personal Information, please contact us using the information below.

10.Choices About Your Personal Information

You have choices about how we use your information. Please understand that if you choose not to disclose information to us, it may affect your ability to use some features of our Services.

10.1. Marketing. From time to time if you have supplied your email address, KeyPort and its affiliates may send you marketing or informational emails. If you prefer not to receive any or all of our marketing and promotional communications, you may opt-out of these communications by following the opt-out prompts on these communications. You also may ask us not to send you other marketing or informational communications by contacting us as specified in the Contact Us section below, and we will honor your request. Please note that even after you are removed from our marketing lists, we may still send you non-promotional communications, such as responding to your support requests.

10.2. Advertisements. Advertisements appearing on the Site may be delivered by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by us and does not cover the use of cookies by any advertisers.

We and our service providers may use information about your interactions with the Site to predict your interests and select the ads you see on and off the Site. This is known as interest-based advertising. In providing interest-based ads, we follow the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital Advertising Alliance ("**DAA**"). For more information about interest-based advertising and how you can opt out, visit:

- Digital Advertising Alliance: <http://www.aboutads.info/choices>
- Network Advertising Initiative: <http://www.networkadvertising.org/choices/>

11. California Residents' Privacy Rights

This section explains how we collect, use, and disclose personal information about users, customers, and visitors who reside in California ("**consumers**" or "**you**"). It also explains certain rights afforded to consumers under California's Shine the Light law and the California Consumer Privacy Act of 2018 ("**CCPA**"), as revised and updated by the California Privacy Rights Act ("**CPRA**"). This section uses certain terms that have the meaning given to them in the CCPA including personal information. "Personal Information" for purposes of this Privacy Policy is as defined by applicable laws.

The following section does not apply to individuals who do not live in California on a permanent basis, individuals who do not collect personal information about, or individuals for whom all of the information we collect is exempt from California laws.

11.1. Categories of Personal Information Collected

We may collect (and have collected during the 12-month period prior to the effective date of this Privacy Policy) the above categories of Personal Information about you in the Collection of Personal Information Section 1 section.

11.2. Purpose of Collection

We may use (and may have used during the 12-month period prior to the effective date of this Privacy Policy) your Personal Information for the business or commercial purposes described in the Purpose of Collection Section 2 above.

11.3. Sources of Personal Information

During the 12-month period prior to the effective date of this Privacy Policy, we may obtain (and may have obtained) Personal Information about you from the sources identified in the Collection of Personal Information Section 1 above.

11.4. Selling and Sharing of Personal Information

We do not sell or share your Personal Information in exchange for monetary consideration. However, the definitions of Personal Information, 'share,' and 'sale' under CCPA are broad.

Like many companies, we use services that help deliver interest-based ads and personalization to you, which may involve transfer Personal Information to business partners for their use, such as Google Analytics. Please see Section 1.2 above on how to opt-out of Google Analytics.

During the 12-month period prior to the effective date of this Privacy Policy, we may have shared or disclosed the following categories of Personal Information about you for a business or commercial purpose with certain categories of third parties, as described below:

Categories of Personal Information that May Be Sold, Shared, or Disclosed	Categories of Third Parties to whom Personal Information May Be Sold, Shared, or Disclosed	Business or Commercial Purpose of Selling, Sharing, or Disclosing Personal Information
Identifiers	• Service Providers • Contractors • Affiliates	• Create, maintain, customize, and secure your account • Provide Services • Provide customer service, feedback or support • Provide, administer, expand, support, personalize, improve, and develop our Site, products, and services • Remember user settings and items added to our service selection • Monitor and analyze transactions
Personal Information Categories Listed in The California Customer Records Statute (Cal. Civ. Code §1798.80(e))	• Service Providers • Contractors • Affiliates	• Create, maintain, customize, and secure your account • Provide, administer, expand, support, personalize, improve, and develop our Site, products, and services • Support our internal and business operations • HR administration and internal communications
Internet or Other Similar Network Activity	• Service Providers • Contractors • Affiliates	• Recognize your location • Present you with a more personal and interactive user experience to better match your interests and preferences • Ability to fully use our services • Manage, improve, develop, and optimize our business, Site, and services
Geolocation Data	• Service Providers • Contractors • Affiliates	• Recognize your location • Present you with a more personal and interactive user experience to better match your interests and preferences

		• Ability to fully use our services. • Manage, improve, develop, and optimize our business, Site, and services
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11.5. California Consumer Privacy Rights

Under California's "Shine the Light" law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of Personal Information, such as name, e-mail and mailing address and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes; and (b) the names and addresses of all such third parties. To request the above information, please contact us as directed in the Contact Us section below with a reference to California Disclosure Information.

Under CCPA, consumers have certain rights regarding their Personal Information, as described below.

- *Right of Access:* You have the right to request, twice in a 12-month period, that we disclose to you the following information about you, limited to the preceding twelve (12) months:
 - The categories of Personal Information that we collected about you;
 - The categories of sources from which the Personal Information is collected;
 - The business or commercial purpose for collecting or selling Personal Information;
 - The categories of third parties with whom we share Personal Information;
 - The specific pieces of Personal Information that we have collected about you;
 - The categories of Personal Information that we disclosed about you for a business purpose or sold to third-parties; and
 - For each category of Personal Information identified, the categories of third parties to whom the information was disclosed or sold.
- *Right of Deletion:* You have the right to request that we delete any Personal Information about you which we have collected from you, subject to exceptions within the law.
- *Right to Opt-Out:* You have the right to opt-out of the disclosure of Personal Information about you for monetary or other valuable consideration. However, we do not sell any Personal Information.
- *Right to Opt-In:* We do not have actual knowledge that we collect, share, or sell the Personal Information of minors under the age of 16.

- *Right to Limit Use and Disclosure of Sensitive Personal Information:* You may request specific limitations on further sharing, use, or disclosure of your Sensitive Personal Information that is collected or processed for “the purpose of inferring characteristics about a consumer.” However, we do not collect or process Sensitive Data for this purpose.
- *Right to Correction:* You have the right to request that we maintain accurate Personal Information about you and correct any Personal Information about you which we have collected from you, subject to exceptions within the law.

If you would like to exercise your California rights, please refer to the Consumer Requests and Verification section below.

11.6. Consumer Requests and Verification

Right to Non-Discrimination

We may not discriminate against you because you exercise any of your rights under applicable law, including, but not limited to:

- Denying goods or services to you;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Providing a different level or quality of goods or services to you; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Verifying Requests

You may request to exercise your rights of access, deletion, or correction, or Limited Use under this Privacy Policy by contacting us as described in the Contact Us section below. To help protect your privacy and maintain security, we will take steps to verify your identity before processing your request. If you request access to or deletion of your Personal Information, we may require you to provide any of the following information: name, date of birth, email address, telephone number, or postal address. When you make such a request, you can expect the following:

- As required under applicable law, we will verify your identity. You will need to provide us with your email address and full name. We may ask for additional information if needed.
- We will confirm that you want your information accessed, corrected, and/or deleted.
- We will confirm our receipt of your request within 10 days. If you have not received a response within a few days after that, please let us know by contacting us at the webpage or phone number listed below.

- We will respond to your request within 45 days upon receipt of your request. If necessary, we may need an additional period of time, up to another 45 days, but we will reply either way within the first 45-day period and, if we need an extension, we will explain why.
- In certain cases, a request for access, correction, or deletion may be denied. For example, if we cannot verify your identity, the law requires that we maintain the information, or if we need the information for internal purposes such as providing Services or completing an order. If we deny your request, we will explain why we denied it and delete any other information that is not protected and subject to denial.

Authorized Agents

You may designate an authorized agent to request any of the above rights on your behalf. You may make such a designation by providing the agent with written permission, signed by you, to act on your behalf. Your agent may contact us as described in the Contact Us section below to make a request on your behalf. Even if you choose to use an agent, we may, as permitted by law, require:

- The authorized agent to provide proof that you provided signed permission to the authorized agent to submit the request;
- You to verify your identity directly with us; or
- You to directly confirm with us that you provided the authorized agent permission to submit the request.

12. Virginia Resident Privacy Rights

12.1. Virginia provides residents with specific rights regarding Personal Information, including:

- 12.1.1. To confirm whether or not we are processing your Personal Information and to access such Personal Information.
- 12.1.2. To correct inaccuracies in your Personal Information which we have collected, taking into account the nature of the Personal Information and the purposes of processing the Personal Information.
- 12.1.3. To request deletion of Personal Information for which we have collected, subject to legal exemptions.
- 12.1.4. To obtain a copy of your Personal Information.

12.2. Virginia residents also have the right to opt out of the processing of Personal Information for purposes of targeted advertising, the sale of Personal Information, or profiling in furtherance of decisions that produce legal or similarly significant effects.

12.3. If you are a resident of Virginia, you have the right to appeal a denial of a request for access, correction, or deletion.

13. Nevada Resident Privacy Rights

13.1. You have the right to request that we not sell the Personal Information we currently have about you or that we might collect about you in the future.

13.2. If you use the Services, you may review and request changes to any of your personal information that is collected.

14.Connecticut Resident Privacy Right. If collected, we will take reasonable measures to protect the confidentiality of Social Security numbers and limit access to those with a need for such information. We prohibit the unlawful disclosure of Social Security numbers.

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15.Correcting & Updating Your Information

Please help us keep your data accurate by informing us of any personal information change promptly. To update your information or discontinue the Services, please use one of the methods in our Contact Us section below.

KeyPort will respond to your correction or update request within at most 30 days from the date of your request. You also may be able to update your information by logging into your account.

16.Contact Us

If you have any questions or concerns in connection with KeyPort's information collection practice summarized in this Privacy Policy, please send an email, with the subject heading "Privacy Policy Question," to [email]. In the email, please state your questions or concerns.

Our postal address is: KeyPort Operations, Inc., [Address], ATTN: Privacy

You may also reach us via our toll-free phone number at: [Phone Number]