



Privacy Policy

Table of Contents

Table of Contents	ii
1 Introduction.....	1
3 Types of Data and Collection Methods.....	2
3.1 Data you submit	2
3.2 Data we automatically collect from our websites.....	2
3.3 Cookies.	2
3.4 Software.	2
3.5 Third Party Sources.	2
4 Collection Purposes, Use of Data.....	2
5 Where We Store and Process Data.....	3
6 Disclosures of Personal Data	3
7 Your Choices.....	3
7.1 Opt-In/Out.	3
7.2 Data Subject Rights	4
7.3 Do Not Track.....	4
7.4 Non-Discrimination/Financial Incentives.	4
7.5 Retention.....	4
7.6 Security.....	4
7.7 Children's Privacy.....	4
8 Amendments	4
9 Contact Us.....	5

1 Introduction

In this Privacy Policy (“Policy”), we, Helm360, a division of California Creative Solutions, Inc. (collectively “we”, “us”, or “our”), provide information about how we collect, use, process, and transfer personal data. We are a global organization sharing the data we manage across businesses (legal entities), business processes, and information systems around the world. Therefore, for this Policy, we use the term “personal data” broadly to cover the many privacy and data protection laws applicable to us; generally “personal data” means information related to an identified natural person or that could reasonably be used (by itself or in combination with other data available) to identify a natural person.

2 Scope.

This Policy applies to our websites, products, services, software, or apps on which we post a direct link to this Policy or refer to within this Policy (collectively the "Services"). This Policy covers data collected through the Services and not any data collection or processing practices of other services that maintain their own, separate privacy policies. Occasionally, we refer to this Policy in relation to surveys and special-purpose web pages, for example, our Careers web pages; under such circumstances, this Policy applies as modified in the particular notice or consent request (e.g., with respect to types of data collected or purposes of collection).

3 Types of Data and Collection Methods

3.1 Data you submit

We collect your name, email address(es), mailing address(es), telephone number(s), and data related to the business you represent when you request information from us, register, order a product or service, or otherwise intentionally send us such information.

3.2 Data we automatically collect from our websites.

When you visit one of our websites, we collect general data from your computer or mobile device such as your browser type, operating system, IP address and the domain name from which you accessed the site, and if you are accessing our site with your mobile device, type of mobile device. In addition, we collect data about how you use our websites, such as the date and time you visit the site, the areas or pages of the site that you visit, the amount of time you spend viewing the site, the number of times you return to the site and other click-stream data.

3.3 Cookies.

We use cookies, web beacons, or similar technologies to collect data about your use of our websites or web apps. A cookie is a small text file that is stored on the hard drive of your computer or device when you access the site. We use cookies to help operate our sites and services, including to: (1) remember you so you don't have to enter the same information when you return to the site, (2) provide you with customized content or offers on the site; (3) develop aggregate statistics to help monitor site performance, conduct research, improve our content and services, and (4) help protect the security of our sites and services. We also allow other companies such as web analytics partners, advertisers, or ad networks to set or access their cookies or web beacons (also referred to as 1x1 pixel.gifs or action tags) on the site. For example, we use third party advertising companies to serve ads on our behalf across the Internet. These third-party advertising companies employ cookies and web beacons to measure and improve the effectiveness of ads for their clients, including us. To do so, these companies use data about your visits to our site and other websites over time. This data may include: date/time of banner ad shown, a unique identifier contained in their cookie, and the IP address of your device.

3.4 Software.

Helm360 creates a variety of software, and we may collect location data, unique identifiers, data about the applications installed and/or running, configuration data.

3.5 Third Party Sources.

We may also obtain personal data from third party sources such as data brokers, social networks, other partners, or public sources.

4 Collection Purposes, Use of Data

We collect and process personal data about you with your consent and/or as necessary to provide the products you use, operate our business, meet our contractual and legal obligations, protect the security

of our systems and our customers, or fulfil other legitimate interests. The purposes for which we collect and use data include:

- To respond to the request that you sent us such as your request for information, or your request to subscribe to a service or purchase a product;
- To provide, manage, maintain, and secure the Service(s) you request;
- To operate and improve our business, including to administer, protect, and improve our services and our systems, to develop new products and services, and for other internal business purposes;
- To better understand the preferences of the users of our Services, compile aggregated statistics about usage of our Services, and help personalize your experience of our website and Services;
- To provide you with information about our technologies, product or service releases, news, and other communications; and
- Any other use we describe in this Policy or at the point where we collect the data.

To achieve these purposes, and to the extent permitted by applicable law, we may combine the various types of data that we collect from different on and offline sources.

5 Where We Store and Process Data

We store and process data in the United States and on servers around in the world, including, without limitation, Asia and the European Union. Wherever we store or process personal data pursuant to this Policy, we take measures designed to ensure that the data is processed in accordance with this Policy and in compliance with applicable law. We transfer personal data from the European Union to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. When we do so, we use a variety of legal mechanisms to effectuate the transfer (such as your consent or legal contracts).

6 Disclosures of Personal Data

We do not sell your personal data. We do, however, share your data with Helm360 subsidiaries. For example, we may share your request to subscribe to newsletter regarding certain products or services with the applicable Helm360 subsidiary. We may also share your personal data with service providers who process the data on our behalf for the purposes set forth in this Policy. We may also offer training or other services to the employees and workers of our business customers. In such cases, we may share data relating to the use of our training and other services with the identified business customers for their business use. We may also share your data as required by law or in the interest of protecting or exercising our or others' legal rights, e.g., without limitation, in connection with requests from law enforcement officials and in connection with court proceedings. We may share or transfer your data in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business, including related negotiations. Finally, we may also share your personal data where you have granted us permission.

7 Your Choices

7.1 Opt-In/Out.

In some circumstances, such as email marketing, we offer you the ability to opt-in or opt-out of some kinds of data collection, use, or sharing. In such circumstances, we will respect your choice.

7.2 Data Subject Rights.

The laws of some countries or states allow you to request access, correction, deletion, restriction, or other rights with respect to your personal data. We will always respect your rights.

7.3 Do Not Track.

We do not currently respond to “Do Not Track” (“DNT”) signals sent by web browsers. A uniform standard has not yet been adopted to determine how DNT signals should be interpreted and what actions should be taken by websites and third parties that receive them. However, you may use a variety of other means of controlling data collection and use, including cookie controls in your browser settings and the personalized advertising controls described in the Cookies section above.

7.4 Non-Discrimination/Financial Incentives.

The laws of some countries or states prohibit us from discriminating against you for exercising your rights described above and imposes requirements on any financial incentives offered to you related to your information. If we offer any such financial incentives, we will describe them in more detail here.

7.5 Retention.

We retain personal data while your account is active, or as needed to provide you services. We will delete or de-identify personal data within a reasonable time after the data is no longer necessary for the business purpose for which it was collected. We will, however, retain and use personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

7.6 Security.

Transmissions over the Internet are never 100% secure or error-free. However, we take reasonable steps to protect your data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. It is your responsibility to safeguard your passwords and User IDs and to notify us using one of the contact methods listed below if you ever suspect that your password or User ID for one of our Services has been compromised. You are solely responsible for any unauthorized use of our Services conducted via your password and User ID.

7.7 Children's Privacy.

Our Services are intended for adults. We do not intentionally or knowingly collect personally-identifiable information from children as defined by applicable law and we request that children not submit any personal data to us.

8 Amendments

We reserve the right to change, modify, add, or remove portions of this Policy at any time, but will alert you that changes have been made by indicating on the Policy the date it was last updated. If we change the Policy in a material way, we will provide appropriate online notice to you at least thirty days in advance and/or obtain your express consent as required by law. When you visit our websites or use our Services,

you are accepting the current version of this Policy. We recommend that users revisit this Policy on occasion to learn of any changes.

9 Contact Us

To contact us, send us an email at legalsupport@ccsglobaltech.com, or write to us at 13475 Danielson Street, Suite 220, Poway, CA 92064.

Effective Date: January 1, 2020