



Thank you for your interest in Definition Echelon and the Definition Echelon application (including but not limited to the Definition Echelon Customer application, for your mobile device (Definition Echelon Mobile Application”) provided to you by Wix Technologies, Inc. (“Definition Echelon”, “us” or “we”). This page explains the terms by which you may use our mobile applications, mobile services, web applications, web services, and software provided on or in connection with the service (“collectively the Services”, “Definition Echelon Services”, “Services”). These Terms of Service (“Terms”) including the Privacy Policy incorporated in these Terms by reference and other policy may be updated periodically. Your continued use of the Site constitutes that you have read and understood the changes. These terms constitute a legal agreement between you and Definition Echelon, and for you to avail of the Service, you must agree to these Terms. These terms govern your use, access, affiliation, and operation from within the United States and its territories. PLEASE READ THESE TERMS AS THEY CONSTITUTE A LEGAL AGREEMENT BY WHICH YOU ARE SUBJECT TO. Throughout the terms, assertions, claims, and statements indicating or containing the word “including” can mean “including but not limited to.” Note: These terms of service and all referenced documents and policies constitute a legally binding agreement. By accessing, downloading, installing, or using the Service, you signify that you have read, understood, and agree to be bound by the terms of this agreement and inherently this Terms of Agreement form.

Privacy Policy

Thank you for your interest in Definition Echelon and the Definition Echelon application for your mobile device (the “Application”) provided to you by Wix Technologies, Inc. (“Definition Echelon,” “us,” “our,” or “we”). At Definition Echelon, we want to connect people through the execution of everyday tasks and bring communities together using the Application, any other mobile applications offered by us, and our mobile services, web applications, web services, and software provided on or in connection with such applications or services (all such applications, services, and software collectively, the “Services”).

Definition Echelon values the privacy of individuals who use our Services. In this privacy policy (this “Privacy Policy”), we tell you what information we receive from users of the Services (“Users”) and Fulfillers (defined below), how we use it, how we share it, and how we protect it. This Privacy Policy has also been compiled to better serve those who are concerned with how their personally identifiable information (“PII”) is being used online. PII, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person or to identify an individual in context.

Beyond this Privacy Policy, your use of the Services is also subject to our Terms of Service (the “Terms of Service”) and Zero Tolerance Policy (the “Zero Tolerance Policy”). This Privacy Policy, the Terms of Service, and the Zero Tolerance Policy may be updated periodically. Your continued use of the Services signifies that you have read and understood the changes.

In order to avail yourself of the Services, you must agree to the terms of this Privacy Policy. Throughout this Privacy Policy, the word “including” can mean “including but not limited to.” By accessing, downloading, installing, or using the Services, you signify that you have read, understood, and agreed to be bound by the terms of this Privacy Policy.

1. Information We Collect

Information we collect includes information you provide to us as well as information we collect while you use the Services and information we collect from third-parties.

1. a) Information You Provide to Us

Registration Information – When you sign up for a Definition Echelon account, you give us your name, email address, home address, and phone number. If you decide to sign up for Definition Echelon using your Facebook account, we will also get basic information from your Facebook profile like your name, gender, profile photo, and Facebook friends.

User Profile Information – When you join the Definition Echelon community, you can create a Definition Echelon profile (“Profile”) to share fun facts about yourself and discover mutual friends and interests. Filling out a Profile is optional, and you can share

as little or as much information as you want. Your Profile always includes your name (and for Fulfillers, your Profile photos). Read more below about how you can control who sees your Profile. You can also add a Profile for a business organization or entity (“Business Profile”) to your account, which requires a designated business email address and payment method.

Payment Method – When you add a credit card or payment method to your Definition Echelon account, a third-party that handles payments for us will receive your credit card information. To keep your financial data secure, we do not store full credit card information on our servers.

Fulfiller Application Information – The Services serve as a marketplace where people who seek to get tasks done are matched with independent contractors and businesses (“Fulfillers”) who are reasonably capable of executing these jobs, tasks, or offers. If you decide to join our Fulfiller community, in addition to the basic registration information, we may ask you for your date of birth, physical address, Social Security Number, Fulfiller’s license information, and, in some jurisdictions, we may collect additional business license or permitting information. We may share this information with our partners who help us by running background checks on Fulfillers to help protect the Definition Echelon community.

Payment Information – To make sure Fulfillers get paid, we may keep information about Fulfillers’ bank routing numbers, tax information, and any other payment information provided by Fulfillers.

1. b) Information We Collect When You Use the Services

Location Information – Definition Echelon is all about connecting Fulfillers and Users. To do this, we need to know where you are. When you open the Application, we receive your location. We may also collect the precise location of your device when the Application is running in the foreground or background. If you label certain locations, such as “home” and “work,” we receive that information, too.

Your location information is necessary for things like matching Users with nearby Fulfillers. Also, if the need ever arises, our employees may use and share location information to help protect the safety of Users or a member of the public. If you give us

permission through your device settings or the Application, we may collect your location while the Application is off to identify promotions or service updates in your area.

Device Information – Definition Echelon receives information from Users' devices, including IP address, web browser type, mobile operating system version, phone carrier, and manufacturer, application installations, device identifiers, mobile advertising identifiers, push notification tokens, and, if you register with your Facebook account, your Facebook identifier. We may collect mobile sensor data from Fulfillers' devices (such as speed, direction, height, acceleration or deceleration) to improve location accuracy and analyze usage patterns.

Usage Information – To help us understand how you use the Services and to help us improve them, we automatically receive information about your interactions with the Services, such as the pages or other content you view, your actions within the Application, and the dates and times of your visits.

Call and Text Information – We may work with a third-party partner to facilitate phone calls and text messages between Users and Fulfillers who have been connected for a service. We might receive information about these communications including the date and time of the call or SMS message, the parties' phone numbers, and the content of any SMS messages. For security purposes, we may also monitor and/or record the contents of phone calls made on the Services, such as those between Users and Fulfillers. You will be given notice that your call may be recorded, and, by proceeding, you agree to allow Definition Echelon to monitor and/or record your call.

By continuing, you agree to receive communications by text message about my inquiry. You may opt-out by replying STOP or reply HELP for more information. Message and data rates may apply. You may review our Privacy Policy to learn how your data is used. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent.

User Feedback – Users and Fulfillers may rate and review each other, and we may receive information about ratings and reviews.

1. c) Information We Collect from Third-Parties

Third-Party Services – If you choose to register for Definition Echelon or otherwise link your Definition Echelon account with a third-party's service (such as Facebook), we may receive the same type of information we collect from you (described above) directly from those services.

Third-Party Partners – We may receive additional information about you, such as demographic data, payment information, or fraud detection information, from third-party partners and combine it with other information that we have about you.

Enterprise Programs – If your company, university, or organization participates in one of our enterprise programs, we may receive information about you, such as your email address, from your participating organization. We also may give your participating organization the opportunity to request a service on your behalf, in which case they may provide us with your name, phone number, and the kind of service you want.

Background Information on Fulfillers – Definition Echelon may work with third-party partners to check past records and perform criminal background checks on Fulfillers, and we may receive information from them, such as publicly available information about a Fulfiller's past record or criminal history.

We do not sell or trade your PII to outside parties.

2. How We Use the Information We Collect

1. a) We use the information we collect from Users to:

- Connect Users with Fulfillers;
- Provide, improve, expand, and promote the Services;
- Analyze how the Definition Echelon community uses the Services;
- Communicate with you, either directly or through one of our partners, including for marketing and promotional purposes;
- Personalize the Definition Echelon experience for you and your friends and contacts;
- Send you text messages and push notifications;
- Facilitate transactions and payments;
- Provide you with customer support;
- Find and prevent fraud; and
- Respond to trust and safety issues that may arise, disputes between Users and Fulfillers, and requests from government authorities.

1. b) Additionally, we may use the information we collect from Fulfillers for the following Definition Echelon purposes:
 - Sending emails and text messages to Fulfillers who have started the Fulfiller application process regarding the status of their application;
 - Determining a Fulfiller's eligibility to perform other services for Definition Echelon;
 - Notifying Fulfillers about service demands, pricing, and service updates; and
 - Calculating and providing Definition Echelon's policy and analyzing usage patterns for safety and insurance purposes.
3. How We Share the Information We Collect
 1. a) Sharing Between Users

Sharing between Users and Fulfillers – Users and Fulfillers that have been matched for a service or other services may be able to see basic information about each other, such as names, photos, ratings, and any information they have added to their Profiles. Users and Fulfillers who connect their Definition Echelon accounts to Facebook may also be able to see their mutual Facebook friends during the service or during the completion of a service request. Fulfillers may see the pick-up location that the User has provided. Users may see a Fulfiller's profile information. Users' ratings of Fulfillers may be shared with Fulfillers on a weekly basis. We de-identify the ratings and feedback, but we can't rule out that a Fulfiller may be able to identify the User that provided the rating or feedback.

Although we may help Users and Fulfillers communicate with one another to arrange a service, we do not share your actual phone number or other contact information with other Users. If you report a lost or found item to us, we will seek to connect you with the relevant assistant or Fulfiller, including sharing actual contact information with your permission.

1. b) Sharing Between Definition Echelon and Third-Parties

API and Integration Partners – If you connect to the Services through an integration with a third-party service, we may share information about your use of the Services with that third-party. We may share your information with our third-party partners in order to receive additional information about you. We may also share your information with third-party partners to create offers that may be of interest to you.

Third-Party Services – The Services may allow you to connect with other websites, products, or services that we don’t have control over. If you use these services, we will provide the third-party with information about you to allow them to provide the service to you (for example, we would give them your name, phone number, and address to drop off the service). We can’t speak to the privacy practices of these third-parties, and we encourage you to read their privacy policies before deciding whether to use their services.

1. Service Providers – We work with third-party service providers to perform services on our behalf, and we may share your information with such service providers to help us provide the Services, including all of the things described in Subsection C of the section entitled “Information We Collect” above.
2. Enterprise Partners – If you participate in an enterprise program and charge a service to your organization’s billing method or credits, we may provide your organization’s account holder with information about your use of the Services, including service delivery details such as date, time, charge, and type of services. If you create a Business Profile, at the end of each service you will have the option to designate the service as a business service. If you do so, and your organization has a corporate account with Definition Echelon, we may share information about your use of the Services with your organization including service details such as date, time, charge, and location. If you change organizations, it is your responsibility to update your Business Profile with the new information. (Please remember to check and set your designation settings accordingly.) If you integrate your account with an expense platform, such as Concur, we may share the service details to your expense account.
3. International Partners – We may partner with several service-sharing services around the globe so Users can continue to find services when they open the Application abroad, and Fulfillers can provide services to international travelers in the U.S. If we match a service with the partner, we may share the same information that is shared between matched Users and Fulfillers on the Services. In some cases, we may be unable to mask your phone number if you call an international Fulfiller, so please keep that in mind before using this feature.
1. c) Other Sharing. We may share your information with third-parties in the following Definition Echelon cases:
 - While negotiating or in relation to a change of corporate control, such as a restructuring, merger, or sale of our assets;
 - If a government authority requests information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process;

- With law enforcement officials, government authorities, or third-parties if we think doing so is necessary to protect the rights, property, or safety of the Definition Echelon community;
- To comply with a legal requirement or process, including but not limited to, civil and criminal subpoenas, court orders, or other compulsory disclosures;
- If you signed up for a promotion with another User's referral or promotion code, with your referrer to let them know about your redemption of or qualification for the promotion;
- With our insurance partners to help determine and provide relevant coverage in the event of an incident;
- To provide information about the use of the Services to potential business partners in aggregated or de-identified form that can't reasonably be used to identify you; and

4. How do we protect visitor information?

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular malware scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when Users enter, submit, or access their information to maintain the safety of their personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

5. User Choices

1. Email Subscriptions – You can always unsubscribe from our commercial or promotional emails, but we will still send you transactional and relational emails about your account use of the Services.

2. Push Notifications – You can opt out of receiving push notifications through your device settings. Please note that opting out of receiving push notifications may impact your use of the Services (such as receiving a notification that your service has started).
3. Definition Echelon Profile Information – Although your name may be shared with Fulfillers, you can delete any additional information that you added to your Profile at any time if you don't want Fulfillers to see it. Users may be able to see Fulfillers' names, ratings, profile photos, and vehicle information.
4. User Location Information – Although you can prevent your device from sharing location information at any time through your device's operating system settings, User and Fulfiller location is core to the Services, and without it we may not be able to provide our services to you.
5. User Facebook Friends – You can control whether to enable or disable the Facebook mutual friends feature through your profile settings.
6. Editing and Accessing Your Information – You can review and edit certain account information by logging in to your account settings and profile (Fulfillers may edit additional information through the Fulfiller portal).
 1. If You Would Like to Terminate Your Definition Echelon Account – If you choose to terminate your account, we will deactivate it for you, but we may retain information from your account for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy for accounts that are not closed. We also may retain information from your account to collect any fees owed, resolve disputes, troubleshoot problems, analyze usage of the Services, assist with any investigations, prevent fraud, enforce our Terms of Service, or take other actions as required or permitted by law.
 2. Data Security – We are committed to protecting the data of the Definition Echelon community. Even though we take reasonable precautions to protect your data, no security measure can be 100% secure, and we cannot guarantee the security of your data.
 3. Children's Privacy – Definition Echelon is not directed to children, and we don't knowingly collect personal information from children under the age of 13. If we find out that a child under the age of 13 has given us personal information, we will take steps to delete that information. If you believe that a child under the age of 13 has given us personal information, please send us a message.
 4. Changes to Our Privacy Policy – We may make changes to this Privacy Policy from time to time. If we make any material changes, we will let you know through the Services, by email, or other communication. We encourage you to read this Privacy Policy periodically to stay up-to-date

about our privacy practices. As long as you use the Services, you are agreeing to this Privacy Policy and any updates we make to it.

- Contact Information – Feel free to contact us at any time with any questions or comments about this Privacy Policy, your personal information, our use and sharing practices, or your consent. Please send us a message at info@definitionechelon.org
6. Do we use 'cookies'?

We do not use cookies for tracking purposes. However, we do use certain first-party cookies and third-party cookies (as more fully described below).

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's help menu to learn the correct way to modify your cookies.

If you disable cookies, some features will be disabled that make your site experience more efficient, and some of our services will not function properly. However, you can still place orders.

7. Google

Google's advertising requirements can be summed up by Google's Advertising Principles. Such principles are put in place to provide a positive experience for users and are located at: <https://support.google.com/adwordspolicy/answer/1316548?hl=en>.

We use Google AdSense Advertising on our website.

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on their visit to our site and other sites on the Internet. Users may opt out of the use of the DART cookie by visiting the Google ad and content network privacy policy.

We have implemented the folloDefinition Echelon:

- Google Display Network Impression Reporting; and
- Demographics and Interests Reporting.

We, along with third-party vendors, such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

Opting out:

Users can set preferences for how Google advertises to them using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising initiative opt out page or permanently using the Google Analytics Opt Out Browser add on.

8. California Online Privacy Protection Act

The California Online Privacy Protection Act (“CalOPPA”) is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law’s reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting PII from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared and to comply with this policy. – See more at:

<http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>.

According to CalOPPA we agree to the following Definition Echelon:

Users can visit our website anonymously.

Once this Privacy Policy is created, we will add a link to it on our home page, or, at a minimum, on the first significant page after entering our website.

Our Privacy Policy link includes the word ‘Privacy,’ and can be easily be found on the page specified above.

Users will be notified of any Privacy Policy changes on our Privacy Policy page, and

Users are able to change their PII by logging in to their account

How does our site handle track signals?

We honor do not track signals and do not track, plant cookies, or use advertising when a “do not track” browser mechanism is in place.

Does our site allow third-party behavioral tracking?

It’s also important to note that we allow third-party behavioral tracking.

9. COPPA (Children’s Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13, the Children’s Online Privacy Protection Act (“COPPA”) puts parents in control. The Federal Trade Commission, the nation’s consumer protection agency, enforces the COPPA, which spells out what operators of websites and online services must do to protect children’s privacy and safety online. We do not specifically market to children under the age of 13.

10. Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States, and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practices Principles and how they should be implemented is critical in order to comply with the various privacy laws that protect PII.

In order to be in line with the Fair Information Practices Principles, we will take the following responsive action, should a data breach occur:

- We will notify the users via email within 3 business days; and
- We will notify the users via in site notification within 2 business days.

We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users but also that individuals have recourse to courts or a government agency in order to investigate and/or prosecute non-compliance by data processors.

11. CAN SPAM Act

The CAN-SPAM Act is a law that sets forth the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send you additional information related to your product and/or service; and
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CAN SPAM we agree to:

- NOT use false or misleading subjects or email addresses;
- Identify a message that is an advertisement in some reasonable way;
- Include the physical address of our business or site headquarters;
- Monitor third-party email marketing services for compliance, if one is used;
- Allow users to unsubscribe by using the link at the bottom of each email.

Category	Examples	Collected?
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security Number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)).	A name, signature, Social Security Number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex, gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions, sexual orientation, veteran or military status, or genetic information (including familial genetic information).	YES

D. Commercial information.	Records of personal property, products, or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other electronic network activity information.	Browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

If at any time you would like to unsubscribe from receiving future emails, you can email us by following the instructions at the bottom of each email, and we will promptly remove you from ALL correspondence.

12. Special Notice for California Residents (CCPA)

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (this “notice”) supplements the information contained in the Privacy Policy and applies solely to visitors, users, and others who reside in the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

To learn more about the CCPA, please visit:

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB375.

1. a) Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). In particular, we have

collected the following Definition Echelon categories of personal information from consumers within the last twelve (12) months:

Personal information does not include:

- De-identified or aggregated consumer information; and
- Information excluded from the CCPA's scope, such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following Definition Echelon categories of sources:

- Directly from our clients or their agents (for example, from documents that our clients provide to us related to the services for which they engage us or our service partners);
 - Indirectly from our clients or their agents (for example, through information we collect from our clients in the course of us, or our service providers, providing services to them);
 - Directly and indirectly from activity on or through our website (www.getDefinitionEchelonapp.com) or the Services (for example, from submissions through the Services or website usage details collected automatically); and
 - From third-parties that interact with us in order to fulfill requests requested by
1. b) Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following Definition Echelon business purposes:

- To fulfill or meet the reason for which the information is provided (for example, if you provide us with personal information in order for us to deliver a service, we may use that information to prepare the request and submit it to the applicable service provider);
- To provide you with information, products, or services that you request from us;
- To provide you with email alerts, event registrations, and other notices concerning our products or services, or events or news, that may be of interest to you;

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections;
- To improve the Services and present their contents to you;
- For testing, research, analysis, and product development;
- As necessary or appropriate to protect the rights, property, or safety of us, our Users, our Fulfillers, our officers, directors, employees, independent contractors, or agents, or others;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA; and
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

1. c) Sharing Personal Information

We may disclose your personal information to a third-party for a business purpose. If and when we become obligated to do so by the CCPA, we will, when we disclose personal information for a business purpose, enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers;

Category B: California Customer Records personal information categories;

Category C: Protected classification characteristics under California or federal law;

Category D: Commercial information;

Category F: Internet or other similar network activity;

Category G: Geolocation data;

Category H: Sensory data;

Category I: Professional or employment-related information;

Category J: Non-public education information; and

Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following Definition Echelon categories of third-parties:

- Our affiliates;
- Our Fulfillers and service providers; and
- Other third-parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information. Going forward, Definition Echelon does not plan on or anticipate selling personal information to third-parties.

1. d) Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

1. i) Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third-parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request); and
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and

- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

1. ii) Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and, if and when required by the CCPA, direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
8. Comply with a legal obligation; and
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

iii) Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (855) 805-8057; or
- Visiting www.DefinitionEchelonassistant.com and using the chat service.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. We do not knowingly allow minors to use the Services, but, if a minor has created an unauthorized account (or otherwise disclosed personal information to us), a parent may make a verifiable consumer request on behalf of such minor.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request (and to complete the request).

1. iv) Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

1. e) Non-Discrimination

We will not discriminate against you or do any of the following in response to you exercising any of your rights under the CCPA:

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Questions?

If you have any questions regarding the Services or this Privacy Policy, please contact us at:

Phone: [646-902-1733](tel:646-902-1733)

Website: www.definitionechelon.org

Email: info@definitionechelon.org

Last updated on the Effective Date.