# **Privacy Policy**

Effective Date: June 25, 2021

This Privacy Policy covers Built Data, LLC's ("Built Data") policies on the collection, use, and disclosure of personal data/personally identifiable and other personal information (as defined by applicable law, including, but not limited to, the California Consumer Privacy Act of 2018, Civil Code sections 1798.100 et seq ("CCPA")) (collectively referred to as "Personal Information") in connection with visitors and authorized user's use and/or access of <a href="https://www.builtdata.io">https://www.builtdata.io</a> (the "Site") and the construction communications platform made available through the progressive web application located at app.builtdata.io. (the "Platform") and the software and services made available through the Platform (collectively the "Services").

Built Data is a Minnesota corporation with offices in the United States. Built Data collects Personal Data and processes, transfers and stores data within the United States. By optionally providing your Personal Information within the Platform, you consent to the collection, use and disclosure practices identified in this Privacy Policy.

#### 1. What Personal Information Is Collected?

Personal Information that you may provide to us through the Platform or otherwise includes:

**Log-In Credentials/Account Data**. To utilize the Platform, authorized users will be prompted to input a username and password.

**Dashboard/Profile Information**. The Platform and Services will enable authorized users to input their name and cell phone number to create a profile and to facilitate communicate with other users of the Platform.

Contact Information. To the extent you opt to request information from Built Data through the Site, such as name, phone, email, company information, etc., such information about you will be used to facilitate requested communications and to provide information to you about the Services. Your email may also be utilized to (i) provide information regarding our Services; and/or (ii) to communicate material changes to our Terms of Service and Privacy Policy.

**Location.** With your consent, location data is collected and used to determine an authorized user's position relative to the geo-location of projects which the user in question is part of and to determine the geo-location of a user when submitting a post on the Platform.

**Payment Information**. To make payments for the Services, Built Data may collect debit or credit card account information, email and other information to verify the customer's identity, such as name, address, telephone number, and/or date of birth. Built Data does not itself store debit or credit card information on its servers, but utilizes a third party payment processors to manage and process payments in order to guarantee the security of personal payment information.

**IP** Address. A user's "IP Address" is identified and logged automatically in our server log files whenever you visit the Site, along with the time of the visit and the page(s) that were visited. Built Data uses IP Addresses for calculating usage levels of the Site, helping diagnose server problems, and administering the Site and Services.

Cookies: A cookie is a small data file that a website transfers to your computer's hard drive. We may place cookies when you visit our website or websites where our ads appear or when you make purchases, request or personalize information, or register for certain services. If you accept the cookies used on our website, websites that are "powered by" another company on our behalf, or websites where our ads appear, you may give us access to information about your interests. We may use that information to personalize your experience. Similar technologies such as web beacons, pixels, gifs, tags, and device ID technology also do the same thing. Users can set their browser to remove or reject cookies and/or accept or refuse cookies on the cookie consent banner on the Site itself; however, some Platform features or Services may not work properly without cookies.

#### 2. Use of Personal Information

Built Data uses Personal Information for the following purposes or as otherwise disclosed at the time of collection:

**Provide Services.** Personal Information is used to:

- Provide, operate and improve the Platform, Site and Services;
- Process payments and complete transactions;
- Update you and provide marketing communications about new features and services;
- Respond to inquiries and provide customer support and feedback;
- Analyze data to assess, understand and improve the services and personalize user experiences, including creation of anonymized aggregated, statistical and benchmark data. Aggregated data is utilized to help develop and market products or services and present targeted content and advertising
- Enable functionality of the services to authenticate a user, prevent fraud, and implement security measures

**Service Providers.** Built Data has engaged with third party service providers to facilitate the Built Data services and operate our business, including without limitation, data base management hosting, information technology, email/SMS delivery, customer support, analytics, data security and compliance services necessary to provide the Built Data Platform services.

**Analytics**: Built Data uses Google Analytics for data analytics to generate insights and recommendations regarding its products and services. If you do not want your Personal Information to be used by Google Analytics, you may opt-out by installing Google Analytics Opt-out Browser Add-on.

Compliance and Protection. Personal Information may be disclosed to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or

similar legal process, (2) if Built Data is involved in a merger, acquisition, or sale of all or a portion of its assets, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify you about law enforcement or court ordered requests for data unless otherwise prohibited by law.

Please see Section 5 for a more specific disclosure of the applicable categories of personal information collected and processed under the CCPA.

# 3. Compliance with the Children's Online Privacy Protection Act, CCPA and Other Privacy Regulations Relating to Children

Built Data does not knowingly collect Personal Information from anyone under the age of 16. If a parent or guardian becomes aware that his or her minor child as defined by applicable privacy laws has provided Personal Information without their consent, he or she should contact Built Data at <a href="mailto:support@builtdata.io">support@builtdata.io</a>. We will delete such Personal Data from our files within a commercially reasonable time, but no later than required under the applicable law relating the child's state and/or country of residence.

#### 4. Retention of Personal Information

Unless erasure is otherwise requested under applicable law or as otherwise stated in this Privacy Policy, Built Data will retain account data as long as it is necessary to provide services to our customers. Personal Information obtained from Site visitors will be maintained as long as it is necessary to provide requested communications and information-based services or until a visitor exercises the right to opt-out of requested communications or information-based services. Anonymized and pseudo-anonymized data will be retained as long as Built Data determines such data is commercially necessary for its legitimate business interests.

#### 5. YOUR CALIFORNIA PRIVACY RIGHTS

California Consumer's Request to Know, Right to Delete, Right to Opt-Out of Sale Notices. For Information on your California Consumer Rights, please see: "Your California Rights - California Consumer Privacy Rights Notice ("Notice")

Built Data does not sell your Personal Information. However, a verifiable Consumer Request under this Section to exercise your right to know and right to delete may be submitted to Built Data by email at <a href="mailto:support@builtdata.io">support@builtdata.io</a> or as otherwise designated in the Notice.

For each request, Built Data will initially verify the email address on file with the email address submitted in the applicable request. Further verification will be based upon confirmation of data correlating to information maintained by Built Data, as applicable. Consumers may designate an authorized agent to make a request on the Consumer's behalf at <a href="mailto:support@builtdata.io">support@builtdata.io</a>. Requests by authorized agents are subject to additional verification requirements pursuant to the rules and regulations set forth in the CCPA.

# 6. Built Data's Security Policy

We have implemented reasonable administrative, technical and physical security measures to protect Personal Information against unauthorized access, destruction or alteration.

# 7. Response To "Do Not Track" Signals

"Do Not Track" is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-website user tracking.

Built Data shall treat any user-enabled global privacy controls, such as a browser plug-in or privacy setting, device setting, or other mechanism, that communicate or signal the consumer's choice to opt-out of the sale of their Personal Information as a valid request submitted pursuant to the CCPA for that browser or device, or, if known, for the consumer.

### 8. Notification of Changes to Privacy Policy

If we make material changes to our Privacy Policy, we will notify you by either (1) changing the Effective Date at the top of the Privacy Policy, or (ii) sending an electronic notification to all active account holders, or (iii) adding a banner/notification to the Site itself. Express consent will be obtained when required for any material changes in Built Data's collection and use practices as required by applicable law.

# 9. Contact Us

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: Built Data, LLC Attention: Privacy Department Built Data, LLC at 7101 York Avenue South, Suite 260, Minneapolis, MN 55435 or at support@builtdata.io

This Privacy Policy was last updated on June 25, 2021