

Formally, Inc.

Privacy Policy

Effective: November 20th, 2021

This Privacy Policy (the “**Privacy Policy**”) serves to inform you of our policies and procedures regarding the collection, use and disclosure of the information we receive when you access and use the website (the “**Site**”), services, software, content, and all other products and services (all of the foregoing collectively, the “**Services**”) owned, controlled or offered, directly or indirectly, by Formally (together with its subsidiaries and affiliates, “**Formally**”, “**we**,” “**our**” or “**us**”). Formally believes that the privacy of its users is paramount and strives to use Personal Information (as defined below) only in ways outlined in this Privacy Policy. The Privacy Policy is incorporated by reference into our Terms of Service, currently available at <http://formally.us/home> (the “**Terms of Service**”). Any terms used herein and not defined will have the meanings given to them in the Terms of Service. By using the Services, you hereby warrant and represent that you have read, understand, and agree to this Privacy Policy and the Terms of Service, that you are a resident of the United States and that you are over 18 years of age. PLEASE DO NOT USE, INSTALL OR ACCESS THE SERVICES IF YOU DO NOT AGREE TO THIS PRIVACY POLICY.

1. What We Mean by Personal Information

For purposes of this Privacy Policy, “**Personal Information**” means any information from or about a person that either identifies that person directly or that makes that person identifiable when it is combined with other information from or about that person from any source.

2. Information We Collect

Information You Provide To Us

When you use the Services or otherwise communicate with us, we collect information that you provide to us directly. For example, we collect information in the following circumstances: you (i) visit the Site; (ii) register for the Services or create an Account or accept the creation of an Account on your behalf; (iii) add Authorized Users to your Account; (iv) request technical support; (v) otherwise use our online Services where Personal Information is required for such use and/or participation; and (vi) when you contact us via the Site or when you otherwise communicate with us. You can choose not to provide information that is requested of you by us; however, this may limit your ability to use or access the Services.

The information you provide to us directly may include, without limitation, the following information that may, alone or in combination with other data, constitute Personal Information:

- Information you provide in connection with completing a visa application using the Services, including your name, physical address, phone number, age, passport number, and any other necessary information you decide to provide for the completion of an application;
- Information you provide via email, through the “Contact Us” section on the Site or by using the contact details listed on various parts of the Site, including your name, company name, e-mail, phone number, inquiry, and any other information you decide to provide;

- If you are one of our customers or prospects, we may process limited Personal Information in the course of our business relation with you, for example when you request a demo. Such Personal Information may include your name, company, title, e-mail address, telephone number and address;
- Transaction and limited (non-PCI) payment data; and
- Any other information you may want to share with us, such as Personal Information related to the immigration process.

Moreover, if you contact us, a record of such correspondence may be kept.

Additionally, if another user refers you to us by providing us with your e-mail address, we may send you a message. However, we will use your e-mail address only to send such other user’s message unless you otherwise affirmatively provide your information to us.

Automatically Collected Information

Most of the data we collect in and through the Site and the Services is technical in nature and is collected and processed automatically through so-called application programming interfaces, software development kits, cookies and similar software-based technologies. Alone or in combination with other data, such automatically collected data may constitute Personal Information.

How We Use Cookies and Other Technologies

Some of the features on the Site and the Services require the use of “cookies” - small text files that are stored on your device’s hard drive. We use cookies to measure which pages are being accessed, and which features are most frequently used. We also use cookies to show user log in activity and to fold the selected website language. This enables us to continuously improve the Site to meet the needs of our visitors.

The following sets out how we may use different categories of cookies and your options for managing cookie settings:

Type of Cookies	Description	Managing Settings
Required cookies	Required cookies enable you to navigate the Site and use their features, such as accessing secure areas of the Site and using the Services. If you have chosen to identify yourself to us, we use cookies containing encrypted information to allow us to uniquely identify you. These cookies allow us to uniquely identify you when you are logged into the Site and to process your online transactions and requests.	Because required cookies are essential to operate the Site, there is no option to opt out of these cookies.
Functionality cookies	Functionality cookies allow our Sites to remember information you have entered or choices you make (such as your username,	To learn how to opt out of functionality cookies using your browser settings, click here. To

	<p>language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of the Site after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. We may use local shared objects, also known as Flash cookies, to store your preferences or display content based upon what you view on the Site to personalize your visit.</p>	<p>learn how to manage privacy and storage settings for Flash cookies, click here.</p>
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3. Use of Collected Information

We use the information you provide to us for the following purposes: (i) to further our legitimate interests in providing the Services, including without limitation to collect and remit payment for paid features; (ii) to administer your use of the Services and any Accounts you may have with us; (iii) to personalize your experience; (iv) to provide to you Service announcements or inform you of new releases and features; (v) to perform tasks on behalf of and according to instructions of a third party, such as payment processors or third party-service providers; (vi) to enforce our Terms of Service; (vii) to resolve any disputes between users of the Site or between such users and us; (viii) comply with a legal requirement or process, including, but not limited to, arbitration, civil and criminal subpoenas, court orders or other compulsory disclosures; (ix) to further our legitimate interest in protecting our rights, property, or safety and the rights, property and safety of the Services, our users or the public; and (x) to contact you to obtain feedback from you regarding the Site and the Services.

In addition to the purposes described above, we use the information collected automatically to (i) to further our legitimate interests in monitoring and analyzing the use of the Services and for the technical administration of the Site; (ii) improve the Site and the Services; (iii) generate and derive useful data and information concerning the interests, characteristics and website use behavior of our users; and (iv) verify that users of the Services meet the criteria required to process their requests.

4. Third Parties We Share Personal Information With

We may disclose Personal Information you provide to us or that we collect automatically on the Site and in and through the Services with the following categories of third parties:

- Authorized Users in the same Account (for example, information uploaded for a particular Visa Applicant by one attorney may be visible to other attorneys under the same law firm Account);
- Designated attorney, law firm or organization specified in your Account (for example, information provided by a Visa Applicant may be shared with the attorneys or organizations associated with such Visa Applicant’s Account);
- Account Owners, who will be able to access, view, modify, or restrict access to information provided or uploaded by all Authorized Users under their Account;

- Service providers, such as payment processors, web hosting and data storage service providers, and helping us deliver and develop the Services (e.g. Stripe);
- Public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third parties;
- Our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of the Site and/or the Services and their advisors in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our stock and/or assets, or in connection with bankruptcy proceedings, or other corporate reorganization, in accordance with this Privacy Policy; and
- Other third parties when we have consent to do so.

5. Security

We understand the importance of privacy and security of Personal Information to our users and have made them a priority. Formally uses a variety of industry-standard security technologies and procedures to help protect Personal Information about you from unauthorized access, use, or disclosure and trains Formally employees on privacy and security issues. However, we cannot guarantee that unauthorized third parties will never be able to overcome those measures or use your Personal Information for improper purposes, and we do not promise that Personal Information about you or private communications will be protected from unauthorized disclosure or use.

6. Do Not Track Signals and Similar Mechanisms

Formally does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

7. Managing Your Privacy

We keep your data on your behalf and for your benefit. You can correct or terminate and delete your Account information by following the instructions on the Services or by e-mail at support@formally.us, which you may also access for further assistance and questions regarding the Privacy Policy or for a copy of your Account data. If you cancel your Account or request us to delete your information, Formally will limit its access to Personal Information to perform what is requested by you and will delete information accessible to Formally within two years.

8. California Residents

California Civil Code Section 1798.83 requires certain businesses that share customer Personal Information with third parties for the third parties' direct marketing purposes to respond to requests from California customers asking about the businesses' practices related to such information-sharing. We currently do not share or disclose your Personal Information to third parties for the third parties' direct marketing purposes. If we change our practices in the future, we will implement an opt-out policy as required under California laws.

Furthermore, subject to certain exemptions, California residents have the following rights with respect to Personal Information we may have collected about them:

Requests to Know

You have the right to request that we disclose:

- The categories of Personal Information we have collected about you;
- The categories of Personal Information about you we have sold or disclosed for a business purpose;
- The categories of sources from which we have collected Personal Information about you;
- The business or commercial purposes for selling or collecting Personal Information about you;
- The categories of Personal Information sold or shared, if any, about you, as well as the categories of third parties to whom the Personal Information was sold, by category of Personal Information for each party to whom Personal Information was sold; and
- The specific pieces of Personal Information collected.

You may submit a request to know via support@formally.us. The delivery of our response may take place electronically or by mail. We are not required to respond to requests to know more than twice in a 12-month period.

We do not sell, and have not in the prior 12 months sold, Personal Information about California residents. Therefore, we have not included a “Do Not Sell My Personal Info” link on our Site. If our practices change, we will update this Privacy Policy and take any other necessary action to comply with applicable law. We do, however, disclose Personal Information for business purposes as described in the “Third Parties We Share Personal Information With” section above.

Requests to Delete

You have the right to request that we delete any Personal Information about you that we have collected. Upon receiving a verified request to delete Personal Information, we will do so unless otherwise required or authorized by law. You may submit a request to delete Personal Information via [support @formally.us](mailto:support@formally.us).

Authorized Agents

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and we may require that you verify your identity directly with us. Alternatively, an authorized agent that has been provided power of attorney pursuant to Probate Code sections 4000-4465 may submit a request on your behalf.

Methods for Submitting Consumer Requests and Our Response to Requests

You may submit a request for access and requests to delete Personal Information about you via:

- via email at [support @formally.us](mailto:support@formally.us)

Upon receipt of a request, we may ask you for additional information to verify your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose.

We will acknowledge the receipt of your request within 10 days of receipt. Subject to our ability to verify your identity, we will respond to your request within 45 days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. In order to protect your privacy and the security of Personal Information about you, we may request information to verify your request and identity.

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.

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.

The Right to Non-Discrimination

You have the right not to be discriminated against for the exercise of your California privacy rights described above. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- 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.

9. International Transfers of Personal Information

Formally is based in the United States. As a result, Personal Information that we collect in and through the Services and on the Site may be transferred to our U.S. offices. In addition, we may work with third-party service providers in the U.S. and in other countries to support our business activities. Thus, Personal Information may be transferred to, stored on servers in, and accessed from the United States and countries other than the country in which the Personal Information was initially collected. In all such instances, we use, transfer, and disclose Personal Information solely for the purposes described in this Privacy Notice and in compliance with applicable laws.

10. Data Retention

We keep Personal Information related to your Account for as long as it is needed to fulfill the purposes for which it was collected, to provide our services, to deal with possible legal claims, to comply with our business interests and/or to abide by all applicable laws. Thereafter, we either delete Personal Information about you or de-identify it. Please note that even if you request the deletion of Personal Information about you, we may be required (by law or otherwise) to retain the Personal Information and

not delete it. However, once those requirements are removed, we will delete Personal Information about you in accordance with your request.

11. Changes to the Privacy Policy

Our security and Privacy Policy are periodically reviewed and enhanced as necessary. This Privacy Policy might change as we update and expand the Services. You can tell when this Privacy Policy was last updated by reviewing the Last Updated-legend on top of this page. We will endeavor to notify you of these changes by email, but will not be liable for any failure to do so. We also encourage you to review this Privacy Policy periodically. If you do not understand any of the terms or conditions of any of our policies, you may inquire regarding the same via email at support@formally.us. Your continued use of the Services after any change in this Privacy Policy will constitute your acceptance of such change.

12. Contacting Us

If you have any concerns or questions about this Privacy Policy, please contact us at support@formally.us.