## **General Information**

Expected Behavior LLC, (referred to hereinafter as "Expected Behavior", "we", "us" or "our") maker of certain software products (namely "DocRaptor" and "Burndown"), is committed to protecting the privacy of those individuals who visit our websites and register to use our products and services. This policy describes our privacy practices and how we use and collect the personal information that you share with us when browsing our websites and/or registering for our products.

## Information Gathering and Usage

We collect the e-mail addresses of those who communicate with us via e-mail, aggregate information on what pages consumers access or visit, and information volunteered by the consumer (such as survey information and/or site registrations). The information we collect is used to improve the content of our Web pages and the quality of our service. We seek to provide you with choices in how and when your personal information is shared, and as such, we will not share or sell your personal information to other organizations for commercial purposes, except to provide products or services you've requested, or when we have your permission. You may exercise your choice to have disclosure of personal data limited by contacting us at support@expectedbehavior.com.

Notwithstanding anything to the contrary, we may disclose your personal information under the following circumstances:

- Expected Behavior may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements or when your actions violate the Terms of Service.
- We may transfer information about you if Expected Behavior or one of our products is acquired by or merged with another company. In this event, Expected Behavior will notify you before information about you is transferred and becomes subject to a different privacy policy.

When you register for our products, DocRaptor and/or Burndown, we ask for information such as your name, email address, billing address, and credit card information. We use the collected information for the following general purposes: products and services provision, billing, identification and authentication, services improvement, contact, marketing (as described below) and research. This information can be modified under the Account Settings menu within all of our products. Any of the accounts you create with us may be deleted by contacting us at support@expectedbehavior.com.

### **Changes To Your Personal Data**

If you are a user of our websites or products, we retain your information for as long as your account is active or as needed to provide you services, subject to our storage requirements. We will retain and use your information as necessary to offer services, comply with our legal obligations, resolve disputes, and enforce our agreements. If you are a user of our products and would like an opportunity to update, correct or delete, your personal data, please contact us at . We will respond to your request to access and/or removal within 30 days. If you are a resident of the European Union, Switzerland or the United Kingdom, and your personal information was submitted to us by another party, you may request access to, and the opportunity to update, correct or delete, such personal information, by contacting the business that provided your personal data to us. We reserve the right to take appropriate steps to authenticate an applicant's identity, to charge an adequate fee before providing access and to deny requests, except as required by the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework.

## Cookies

A cookie is a small amount of data, which often includes an anonymous unique identifier, that is sent to your browser from a web site's computers and stored on your computer's hard drive. Cookies are required to use many of our products and services. We use cookies to record current session information and to trigger automated account sign outs after a certain period of time has elapsed to protect you against others accidentally accessing your account contents. You may set your browser to notify you when cookies are sent or opt-out of cookies altogether, but note that some features of our products may not function correctly if cookies are disabled.

## Remarketing

Expected Behavior also uses 3rd party vendor re-marketing tracking cookies. This means we may continue to show ads to you across the internet if you've visited our website. As always we respect your privacy and are not collecting any identifiable information through the use of 3rd party remarketing systems. The third-party vendors we use will place cookies on web browsers in order to serve ads based on past visits to our website. Third party vendors use cookies to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

You may opt out of cookies by visiting the sites of third-party remarketers. To obtain a list of third-party remarketers used by us, you may contact us at support@expectedbehavior.com. You may also be able to turn-off cookies by adjusting the appropriate settings in the browsers you use. In addition, you may be able to opt out of certain third-party vendor's use of cookies by visiting the Network Advertising Initiative opt out page.

### Use Of Your Identity For Marketing Purposes

You hereby grant to Expected Behavior permission to identify you as a customer, to use your identity in connection with proposals to prospective customers, to hyperlink to your website's home page, to display your logo on our websites, and to otherwise refer to you in print or electronic form for marketing or reference purposes.

# EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework Compliance

Expected Behavior complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Expected Behavior has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Expected Behavior has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about

the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

In compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF), Expected Behavior commits to resolve complaints about our collection or use of your personal information transferred to the U.S. pursuant to the EU-U.S. DPF, the UK extension to the EU-U.S. DPF, and the Swiss-U.S. DPF. EU, UK, and Swiss individuals with inquiries or complaints should first contact Expected Behavior at: support@expectedbehavior.com.

Expected Behavior has further committed to refer unresolved DPF Principles-related complaints to a U.S.-based independent dispute resolution mechanism, BBB NATIONAL PROGRAMS. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit https://www.bbbprograms.org/dpf-complaints for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <a href="https://www.dataprivacyframework.gov/s/article/ANNEX-l-introduction-dpf">https://www.dataprivacyframework.gov/s/article/ANNEX-l-introduction-dpf</a>

## Data Storage

Expected Behavior uses third party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to run our products. Although Expected Behavior owns the code, databases, and all rights to our applications, you retain all rights to your data. In cases of onward transfer to third parties of data from residents of the EU or Switzerland received pursuant to the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Expected Behavior is potentially liable.

DocRaptor lets you set how long we retain your data or any hosted documents. For users of the DocRaptor product, when you send document data to DocRaptor, we retain a copy of your input and output documents only until you have downloaded the document and the time you specify for data retention has expired. DocRaptor does NOT retain your original input or the generated document past the data retention period unless you explicitly use DocRaptor's document debugging or document hosting services. While your document is on our servers, both the input and output are protected by strong encryption. For more details on this, please ask us or visit our DocRaptor Security and Privacy page.

# **Regulatory Body**

Expected Behavior is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

# Changes To The Privacy Policy

Expected Behavior may periodically update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your product account or by placing a prominent notice on our site.

# **Questions?**

Any questions about this Privacy Policy should be sent to support@expectedbehavior.com