

Privacy Policy

This privacy policy ("Policy") describes how Ourtowne, also doing business as Ourtowne Payroll transmits, uses, shares, and protects business, financial, and personal information ("Ourtowne" or "we" or "us"). This Policy applies to all information provided, transmitted, or submitted to Ourtowne in connection with the Services provided to or on behalf of You or our clients ("Services"), when You interact with us, and/or on this website("Site"). This Policy is available by link in the menu options on the top banner of the Site.

Data privacy, and the privacy of the information provided, is important to us. We use reasonable care to protect data provided to us by or on behalf of our clients or prospective clients ("Clients") and their workers or from visitors of our Site (collectively "You" or "Your") from loss, misuse, unauthorized access, disclosure, alteration, and untimely destruction. This Policy governs personal information collected, processed, or disclosed by us for our own purposes as well as information provided to us as a service provider for our Clients. It protects information collected online as well as offline. We may receive personal information from our Clients about their current and/or prospective workers, as well as workers' dependents and/or family members as needed to provide Services. We will collect and process Your personal information as instructed or permitted by our Clients or in accordance with this Policy.

We do not grant access to personal information except as set forth herein. We do not share or sell personal information provided or transmitted to our Site with any third parties for their own marketing purposes. At times, we will provide links to other websites not affiliated with Ourtowne. We encourage You to be aware when You leave our Site, and to read privacy policies regarding how third parties may use or process Your information.

What Information is Collected

We collect information that we need to provide our Services, when You interact with us, to administer and improve the Site or our Services or to create and offer new products, for research purposes, and to fulfill any legal and regulatory requirements.

The categories of personal information that we may collect include the following:

1. Contact information to allow us to communicate with You or to provide the Services
2. Account information necessary for processing payroll and other Services
3. Financial and bank account information as needed to provide the Services
4. Social Security number, date of birth, name, address, email address, phone number, including mobile phone number, and other details as needed to provide the Services
5. Credit, debit, or payment card information if used
6. Other information as needed to provide specific Services, enhance our Services, or to create and offer additional products or services, including with business partners
7. Certain pages of our Site may contain forms that allow You to request information about our products or Services or to gain access to valuable resources (like white papers and research documents) in exchange for contact information. In completing one of these forms, You may be required to provide contact information, such as Your name, phone number, and/or email address. This information is for our use only. By providing Your contact information, You consent to receive periodic emails about our products and Services. You may unsubscribe from our marketing emails at any time

How Personal Information is Collected or Transmitted

To access or use certain information, features, or Services, You may be required to provide personal information. Personal information is primarily collected, submitted, and/or transmitted:

1. When a Client provides it to us to facilitate the processing of the Services
2. From You when You utilize the Site or Services
3. From applications, forms, webinars, surveys, and other information You provide us
4. If You provide us with comments or suggestions, interact with us, request information about our Services, or contact our customer service or support departments via phone, email, chat or other forms of communication
5. From consumer and business reporting agencies regarding Your creditworthiness or credit history
6. Between us, our business partners and third-party vendors

How Personal Information is Used

We may process personal information to:

1. Facilitate current, prospective, or former employer requested Services, transactions, investments, rewards, distributions and/or benefits
2. Administer and improve our Site
3. Facilitate billing and collections
4. Contact Clients and consumers with information on Services, new Services or products, or upcoming events, including via SMS or MMS text messaging if mobile phone number is provided for that purpose
5. Market services to Clients and current and prospective consumers, and for auditing those interactions
6. Detect fraud or theft or for other security purposes
7. Comply with legal, reporting, and regulatory requirements
8. Maintain, manage, or service accounts
9. Provide customer service or support
10. Verify consumer identity as well as eligibility to receive services, information, and products
11. Conduct research, assessments, and analytics relating to our services and develop new products and technological improvements
12. Send transactional communications as part of our Services
13. Improve, upgrade, or enhance our services or business operations
14. Administer quality and safety maintenance for our Site or services
15. For other purposes that are compatible with this Privacy Policy or where permitted by applicable law
16. In any other way we may describe when You provide the information, or for which You provide authorization

Parties With Whom Information May Be Shared

Information is shared to facilitate the Services requested by or on behalf of our Clients or for our business operations. We may share information with:

1. Our affiliates, partners, or subsidiary organizations
2. Government agencies to fulfill legal, reporting, and regulatory requirements
3. Attorneys, accountants, and auditors

4. Our employees, affiliated companies, subsidiaries, contractors, agents and third-party partners and vendors to perform Services related to Your account, to offer additional services, perform analysis to determine qualification to receive other services, collect amounts due, or for our business operations
5. Third-party providers for services that You may sign-up for via our Site or Services or other business partners with whom we work with to develop or market certain products or services
6. Banking and brokerage firms to process payroll-related and/or securities transactions
7. To a buyer or successor in the event of 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 bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred
8. Credit bureaus and similar organizations, law enforcement or government officials. We reserve the right to release information if we are required to do so by law or if, in our business judgment, such disclosure is reasonably necessary to comply with any court order, law, or legal process, in a fraud investigation, an audit or examination
9. Health and welfare providers in support of benefit Services
10. Cloud providers, customer management platforms, security providers, and similar services in connection with providing products, Services and in the support of daily operations
11. Any other entity disclosed by us when You provide the information, or for which You provide authorization

Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, including but not limited to the provision of Services, transactions requested by, or on behalf of, Clients, and necessary and essential business purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, developing products and services, detecting and preventing fraud and abuse, and enforcing our agreements.

Artificial Intelligence

We may utilize and/or offer access to artificial intelligence tools, products, and/or services (“AI”) for various purposes including to provide our Services, interact with You, improve efficiency and our business operations, and/or for the business purposes detailed in this Policy. Your interactions with us, information provided during the course of Services, and any information You provide to our AI technology may be collected and used as set forth in this Policy. Where permitted by applicable law, we may combine personal information from You with data we obtain from our Clients and external sources. When training, testing, validating and/or aligning our own AI models and our third-party AI models, we take appropriate steps to mitigate potential privacy impacts in compliance with applicable law. We will not use Your personal information to train models (via generative artificial intelligence) unless we obtain Your consent. To the extent that we use such information to fine-tune or train AI, we will do so just to provide services to You. We do not use Your personal information for automated decision-making or profiling.

Your use of AI tools is dependent upon the information that You and/or our Clients submit for the Services. You are responsible for ensuring the accuracy of all data input into such tools and for confirming the accuracy and validity of any output. You acknowledge that our tools are not intended or designed to replace or override human decision-making and You may not use our tools to make or substantially assist with any legal, financial, or employment decisions. Once authorized, such tools may capture, record and transcribe Your information, comments, and/or voice. We will treat all voice interactions and transactions as though You authorized them, and as though they are authorized

interactions and transactions, even if another voice or person initiated or completed them. Furthermore, Ourtowne does not guarantee the accuracy of content produced via AI.

How Cookies and Other Related Technologies Are Used

Our Site uses cookies and similar technologies. A "cookie" is a piece of data that our Site may provide to Your browser when You visit our Site. The information stored in a cookie may be used for user convenience purposes and/or Site functionality, such as reducing repetitive messages, tracking helper tool versions, and retaining user display preferences. If a user rejects a cookie, they may be unable to use certain features of our Site.

We use session cookies to limit popup windows to a single browser instance. We may also use Java scripting in cooperation with cookies and "spotlight images," "pixel tag," or "web beacons" to track Site traffic and email responses. A "spotlight image," "pixel tag," or "web beacon" is an electronic image, called a 1-by-1 pixel or clear GIF, that can recognize certain types of information on Your computer, or device, such as Your cookie number, time and date of page view or location.

During Your interaction, a Service may automatically collect information from Your activity or device including:

1. Computer, device, and connection information, such as browser type and version, operating system and other software installed on Your device, mobile platform and unique device identifier and other technical identifiers, including IP addresses, error reports and performance data
2. Usage data such as user preferences including features, settings, date and time stamps, and pages visited
3. In addition, we may use or allow third parties, such as Google Analytics to serve cookies on our Site to help us monitor our Site traffic, understand visitor behavior, and to target ads. For more information, regarding how these third parties use information from sites that use its service, please visit their privacy policies.

If You are simply browsing or navigating through our Sites, information about Your computer and the pages You visit on our Site is transmitted and may be collected by Ourtowne. This data is often referred to as clickstream or navigation data. We use this information for research, analysis, and reporting so that we can improve our navigation, page structure, and page content to help visitors find information more quickly and provide more value when they find what they are looking for on our Sites. Additionally, as You interact with different pages and content on our Site, this behavioral data may be tracked and used to provide targeted content and Site recommendations. We may share this information with third parties as necessary for our business purposes. You consent to our use of this technology when You access our Site.

The following are things You can do while visiting our Site to limit the sharing of Your information:

1. Disable cookies within Your browser before visiting our Site;
2. Choose not to submit information via web forms located within our Site;
3. Choose not to enroll in or purchase our products or Services;
4. Choose not to "opt-in" to certain programs that are available on our Sites;
5. Choose not to complete any surveys available on our Site.

Aggregated, Non-Personal Information or Non-Identifiable

We may collect or process general, non-personal, or statistical information about the users of the Site, our Services, and our related products and services. We may also deidentify, anonymize, and/or aggregate certain personal information collected from or about users of our Site, our Services, or when You interact with us. We may process and disclose this information without restriction (so long as no attempt to re-identify the data is made).

Do Not Track

Some browsers support a “Do Not Track” (“DNT”) feature, a privacy preference that You can set in certain web browsers, which is intended to be a signal to websites and services that You do not wish to be tracked across different websites or online services You visit. You may also opt out using the Digital Advertising Alliance Consumer Choice Page. Our Site does not operate any differently when it receives DNT signals from Your internet web browser.

Children Under 13 Years of Age

This Site is not intended for children under 13 years of age. We do not knowingly collect and/or transmit any personal information from children under 13 years of age. All dependent data needed for benefits enrollment shall be provided by the employee/guardian and kept secure as indicated in this Policy. If You are under 13 years old, You should not use our Site.

Security

Ourtowne uses reasonable care to protect the confidentiality, integrity, and availability of Your information. We continue to invest in our security capabilities, including personnel security and physical security; system security, access control, and monitoring; data backup and business continuity management; and vulnerability and intrusion detection. Specifically, we:

1. Maintain policies and procedures covering physical and logical access to our workplaces, systems, and records
2. Apply physical, electronic, and procedural safeguards aligned with industry-standard practices
3. Utilize virus detection and prevention, firewalls, and other computer hardware and software to protect against unauthorized access to or alteration of Your information
4. Encrypt sensitive information transmitted over the internet
5. Ensure that only employees with a legitimate business reason have access to Client information, through formal approval processes, access controls, and internal auditing
6. Require information security awareness training for employees to apply this training to their jobs every day
7. Provide ongoing training and awareness to our employees about security best practices
8. Employ technologies for the backup and recovery of Your information
9. Monitor compliance with established policies through ongoing security risk assessments and internal audits

While we help protect the security and integrity of Your information through procedures and technologies designed for this purpose, the safety and security of Your information also depends on You. We may give You, or You may choose, account credentials to access certain parts of our Site or Services. It is solely Your responsibility to maintain the security and confidentiality of Your account credentials and the information and Services accessible through Your account and the Site. You are not permitted to share or sell Your account credentials to any third-party, unless authorized. If You suspect fraudulent or abusive activity relating to Your account, or if Your credentials have been lost, stolen or

compromised in any way, You should immediately change Your potentially compromised credentials and notify Ourtowne and Your employer.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect Your personal information, Ourtowne cannot guarantee the security of any information transmitted to us. Any transmission of information is at Your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

Communication Preferences

If You have provided us with contact details and no longer wish to receive our marketing emails You can let us know by replying unsubscribe to any email or STOP to any text. Also, in compliance with the CAN-SPAM Act, we provide our physical mailing address in all marketing email communications for general correspondence and opt-out communications.

If we lack sufficient information to process Your request, we may contact You to request further information or clarification.

Accessibility

Meaningful inclusion is very important to us, including providing reasonable accommodations for persons with disabilities. If You need assistance or have any questions, please send them to payroll@ourtowne.org.

How to Access and Correct Your Information

Keeping Your information accurate and up-to-date is very important. Clients can review and correct account information by contacting a customer service representative. Changes to information regarding a worker's dependent(s) or family member(s) must be completed by the worker and/or the worker's employer.

Changes to This Privacy Policy

This Policy may be revised from time to time due to legislative changes, changes in technology, our privacy practices, or new uses of Your information not previously disclosed in this Policy. We reserve the right to update this Privacy Policy in our sole discretion at any time, with or without advance notice, unless otherwise required by law. Revisions are effective upon posting and Your continued use of this Site or our Services will indicate Your acceptance of those changes. Please refer to this Policy regularly.

Contact Information

If You have any comments, concerns or questions about this Privacy Policy, please contact Ourtowne at: payroll@ourtowne.org

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Ourtowne

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