

MM Inclusion Solutions Website Online Privacy Notice

1. Introduction.

(a) **Web Site Owner.** MM Inclusion Solutions (“MMIS”) is the owner of this web site (“MMIS Web Site”). MMIS can be contacted by mail at 24 N. Main Street, Ste. 7, Fairport, NY 14450, by phone at 585-678-1160, or by e-mail at info@inclusionsolutionsllc.com. This online privacy notice discloses MMIS information practices for this MMIS Web Site, including what type of personal identifiable information is requested to make a purchase, how the information is used, and with whom the information is shared. *[Note that other MMIS web sites may be governed by privacy notices containing different information practices applicable to those sites.]*

(b) **Web Site Visits.** In general, you can visit on the MMIS Web Site without disclosing any personal information. MMIS does analyzes the data gathered from Web Site visits for trends and statistics, and then discards the gathered data.

(c) **Web Site Transactions.** At times, MMIS will need personal information regarding a customer or a prospect. For example, to process an order or provide a subscription, MMIS may need to know a customer's name, mailing address, e-mail address and credit card details. It is MMIS's intent to inform you before MMIS collects personal information, such as user's name and/or address on the Internet.

2. Personal Information That May Be Collected.

(a) **Identifying Information.** In order to make a purchase or access designated subscriber services and /or restricted areas within the MMIS Web site, MMIS will request a user to provide certain personal identifying information, which may include: legal name, postal address, e-mail address, user name, password, telephone number, facsimile number, method of payment, and, if applicable, credit card number. MMIS may request additional information necessary to establish and maintain customer's account.

(b) **Service Quality Monitoring.** Some Web site transactions may require a customer to telephone MMIS, or MMIS to call the customer. MMIS will not contact you by telephone without your prior consent, except to confirm an order placed online and/or to inform a customer of the status of such order. Customer should be aware that it is MMIS's practice to monitor, and in some cases record such calls for staff training or quality assurance purposes.

(c) **Information from Children.** MMIS does not sell products or services for purchase by children and will not collect or post information from a child under the age of 18 without the involvement of a parent or guardian. MMIS will notify the child's parent or guardian at the e-mail address provided by the prospective customer, alerting the parent or guardian to the child's use of the Web site and providing instructions as to how the parent or guardian can delete the child's registration from the Web site. *[MMIS does not use personally identifying information collected from children for marketing or promotional purposes and does not disclose such information to any third party for any purpose whatsoever.]*

(d) **Lost or Stolen Information.** If a customer's credit card and/or password is lost or stolen, the customer should promptly notify MMIS to enable MMIS to cancel the lost or stolen information and to update its records with a changed credit card and/or password.

(e) **Chat Rooms, Forums and Bulletin Boards.** If customer participates in an MMIS chat room, discussion forum, or posts messages to an MMIS bulletin board, customer should be aware that the information disclosed and shared will be broadly available to other persons, both inside of and/or outside MMIS, who have access to that chat room, forum, or bulletin board. Some individual MMIS chat rooms, forums or bulletin boards have additional rules and conditions regarding participation. Also, participant's expressed opinion is his or her own and should not be considered as reflecting the opinion of MMIS.

(f) **Links to Other Web Sites.** An MMIS Web site may contain links to other web sites. MMIS is not responsible for the privacy practices or the content of those other Web sites.

3. **Uses Made of the Information.**

(a) **Limited Uses Identified.** Without customer's prior consent, MMIS will not use your personal identifiable information for any purpose other than that for which it is submitted. MMIS uses personal identifiable information to reply to inquiries, handle complaints, provide operational notices and in program record-keeping. MMIS also processes billing and business requests related to MMIS Web Site participation.

(b) **Marketing Uses.** Unless customer marks an "x" on the opt-out option box herein provided, MMIS reserves the right to provide customer with information about MMIS's Web site, MMIS products and services, and related information in which customer has indicated an interest.

(c) **Stored Information Uses.** MMIS stores and retains the information entered on the ABC Web site. Stored information is used by MMIS and/or MMIS's agents: to support customer interaction with the MMIS Web site; to deliver customer purchases; and/or to contact customer again about other MMIS services and products.]

(d) **Online Advertising.** Some companies that help MMIS deliver interactive on-line advertising, such as banner ads, may collect and use information about MMIS's customers to help MMIS better understand the types of advertising or promotions that are most appealing to MMIS's customers. After it is collected the information is aggregated so it is not identifiable to a specific individual. If, however, customer would prefer that these companies not collect such information, please mark an "x" on the opt-out option box herein provided.

4. **Disclosure of the Information.**

(a) **Within Corporate Organization.** MMIS is a multinational organization, with legal entities, business processes, management structures, and technical systems that cross borders. MMIS may share your personal information within the MMIS corporate organization and may transfer the information to countries in the world where MMIS conducts business. Some countries may provide less legal protection for customer personal information. *[In such countries MMIS will still handle customer personal information in the manner describe herein.]*

(b) **Mergers and Acquisitions.** Circumstances may arise where for business reasons, MMIS decides to sell, buy, merge, or otherwise reorganize its businesses in the United States or some other country. Such a transaction may involve the disclosure of personal identifying information to prospective or actual purchasers, and/or receiving such information from sellers. It is MMIS's practice to seek appropriate protection for information in these types of transactions.

(c) **Agents.** MMIS employs or engages other companies and individuals to perform business functions on behalf of MMIS. These persons are provided with personal identifying information required to perform their functions, but are prohibited by contract from using the information for other purposes. These persons engage in a variety of functions which include, but are not limited to, fulfilling orders, delivering packages, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments and providing customer services.

(d) **Affiliated Businesses.** MMIS works closely with affiliated businesses operating web site stores, providing services or selling products on each other's Web sites. These businesses identify themselves to customers. Customer information related to a transaction with an affiliated business is shared with that affiliated business.

(e) **Marketing Analysis by Third Parties.** MMIS reserves the right to disclose to third parties personal information about customers for marketing analysis; however, any information disclosed will be in the form of aggregate data that does not describe or identify an individual customer.

(f) **Disclosure to Governmental Authorities.** MMIS releases personal identifying information when MMIS believes release is appropriate to comply with law, to enforce MMIS agreements, or to protect the rights, property or safety of MMIS customers. MMIS may also release such information in an exchange of information with other companies and/or organizations for the purposes of fraud protection and credit risk reduction.

5. Use of Computer Tracking Technologies.

(a) **No Tracking of Personal Information.** MMIS's Web Site(s) are not set up to track, collect or distribute personal information not entered by visitors. Through web site access logs MMIS does collect clickstream data and HTTP protocol elements, which generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our sites. This information is used for internal purposes by technical support staff for research and development, user analysis and business decision making, all of which provides better services to the public. The statistics garnered, which contain no personal information and cannot be used to gather such information, may also be provided to third parties.

(b) **Use of Cookies.** MMIS, or its third party vendors, collects non-identifiable and personal information through the use of various technologies, including "cookies". A cookie is an alphanumeric identifier that a Web site can transfer to customer's hard drive through customer's browser. The cookie is then stored on customer's computer as an anonymous tag that identifies the customer's computer, but not the customer. Cookies may be sent by MMIS or its third party vendors. Customer can set its browser to notify customer before a cookie is received, giving an opportunity to decide whether to accept the cookie. Customer

may also set its browser to turn off cookies; however, some Web sites may not then work properly.

(c) **Use of Web Beacon Technologies.** MMIS may also use Web beacon or other technologies to better tailor its Web site(s) to provide better customer service. If these technologies are in use, when a visitor accesses these pages of the Web site, a non-identifiable notice of that visit is generated which may be processed by MMIS or by its suppliers. Web beacons usually work in conjunction with cookies. If customer does not want cookie information to be associated with customer's visits to these pages, customer can set its browser to turn off cookies; however, Web beacon and other technologies will still detect visits to these pages, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.

(d) **Collection of Non-Identifiable Information.** MMIS may collect non-identifiable information from user visits to the MMIS Web site(s) to provide better customer service. Examples of such collecting include traffic analysis, such as tracking of the domains from which users visit or tracking numbers of visitors; measuring visitor activity on MMIS Web site(s); Web site and system administration; user analysis; and business decision making. Such information is sometimes known as "clickstream data." MMIS or its contractors may use this data to analyze trends and statistics.

(e) **Collection of Personal Information.** MMIS collects personal identifying information from customer during a transaction. MMIS may extract some personally identifying information about that transaction in a non-identifiable format and combine it with other non-identifiable information, such as clickstream data. This information is used and analyzed only at an aggregate level (not at an individual level) to help MMIS understand trends and patterns. This information is not reviewed at an individual level.

6. Information Security.

(a) **Commitment to Online Security.** MMIS employs physical, electronic, and managerial procedures to safeguard the security and integrity of personal information. Billing and payment data is encrypted whenever transmitted or received online. Personal information is accessible only by staff designated to handle online requests or complaints. *[All MMIS agents and contractors with access to personal information on the MMIS web site(s) are also bound to adhere to MMIS security standards.]*

(b) **No Liability for Acts of Third Parties.** MMIS will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, MMIS shall not be liable for unauthorized disclosure of personal information due to no fault of MMIS including, but not limited to, errors in transmission and unauthorized acts of MMIS staff and/or third parties].

7. Privacy Policy Changes and Opt-Out Rights.

(a) **Changes to Privacy Policy.** This privacy notice was last updated on March 3, 2023 MMIS reserves the right to change its privacy policy statement at any time. A notice of any material change will be posted on the MMIS Web site home page for thirty (30) days prior to the implementation of such change. *There are two boxes at the end of MMIS's notice of*

change (1) an "I accept" box, and (2) an "I do not accept" box. If customer does not mark the "I do not accept" box customer will be deemed to have accepted MMIS's privacy policy updates.

(b) **Opt-Out Right.** Customer and/or prospective customer has the right at any time to cease permitting personal information to be collected, used, or disclosed by MMIS and/or by any third parties with whom MMIS has shared and/or transferred such personal information. Right of cancellation may be exercised by contacting MMIS via e-mail infor@inclusionsolutionsllc.com, telephone or postal mail. After processing the cancellation, MMIS will delete customer or prospective customer's personal information from its data base.

8. Access Rights to Data.

(a) **Information Maintained by MMIS.** Upon customer's request, MMIS will provide a reasonable description of customer's personally identifiable information that ABC maintains in its data bank. MMIS can be contacted by e-mail at info@inclusionsolutionsllc.com, telephone 585-678-1160, or postal mail 24 N. Main Street, Ste. 7, Fairport, NY 14450.

(b) **Corrections and Changes to Personal Information.** Help MMIS to keep customer personal information accurate. If customer's personal information changes, or if customer notes an error upon review of customer information that MMIS has on file, please promptly e-mail MMIS info@inclusionsolutionsllc.com and provide the new or correct information.

(c) **Your California Privacy Rights.** Beginning on January 1, 2005, California Civil Code Section 1798.83 permits customers of MMIS who are California residents to request certain information regarding MMIS's disclosure of personal information for their direct marketing purposes. To make such a request, please write to: Morgan Levy at morgan@inclusionsolutionsllc.com. Within 30 days of receiving such a request, MMIS will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. MMIS reserves its right not to respond to requests submitted other than to the address specified in this paragraph.

California's privacy laws require a company to provide notice to California users of their rights to receive information on to which entities their information was shared for marketing purposes.

9. Accountability.

(a) **Terms of Use.** If customer chooses to enter into a purchase order or to subscribe to MMIS's services, customer's action is hereby deemed acceptance of MMIS practices described in this policy statement. Any dispute over privacy between customer and MMIS is subject to the provisions of this notice and to MMIS's Terms of Use Agreement which is hereby incorporated herein and which can be read at <https://inclusionsolutionsllc.com/s/MM-Inclusions-Solutions-Website-TOU.pdf>.