

# 5vet.com Privacy Policy

Effective July 1, 2023

At 5vet.com, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your Personal Data. By using or accessing our services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

Remember that your use of the 5vet.com Services is at all times subject to our Terms of Service, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Service.

## Privacy Principles

Our commitment to you and those you invite into the 5vet.com Network regarding the data we collect is governed by the following principles, as outlined below and in our Privacy Principles.

- We only collect data that has a purpose.** Every piece of data we collect has a purpose. Some enriches your user experience; some helps your customers assess you quicker and more effectively; some helps improve our products and offerings. We regularly review our processes to ensure that we do not collect data we do not need.
- We don't sell your data.** It's as simple as it sounds: we will never sell your data.
- We respect your right to control who has access to your data.** Data sharing is fundamental to the success of the 5vet.com Network and as a result, we believe in giving you the ability to control how and to whom your data is shared.

## The 5vet.com Services

The 5vet.com Services include a platform for assessing, publishing, and sharing information relating to the security and compliance of a company, such as information regarding a company's security controls and procedures, audits, certifications, security assessment questionnaires, answers to such questionnaires, and other documents, information and materials uploaded, posted, imported or stored through Customers' use of the Services. You can learn more about how we treat your Content and Customer Data in our Terms of Service.

## What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we collect when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations. Please note that this privacy policy does not cover Personal Data that we process as a service provider or processor to provide services to our customers. If we are processing your Personal Data as a service provider or a processor, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage. **What data do we collect?**

We collect the following Personal Data, including when you access or use our Services:

- First and last name
- Email
- Phone number
- Unique identifiers such as passwords
- IP address
- Type of device/operating system/browser used to access the Services
- Web page interactions
- Referring web page/source through which you accessed the Services
- Non-identifiable request IDs
- Statistics associated with the interaction between device or browser and the Services
- Professional experience and title
- IP-address-based location information
- Recordings of customer service calls and videos
- Identifying information in emails or letters you send us

For additional information, please see Annex A.

## How do we collect your data?

It is important for you to understand how we obtained your data. The following outlines the different ways we collect data from you:

- When you provide your information directly to us:**
  1. When you use our interactive tools and Services.
  2. When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
  3. When you send us an email or otherwise contact us.
  4. When you register to complete an assessment sent to you by one of our customers.
  5. When you register to view a Profile shared with you by one of our customers.
- When you use the Services some of your information is collected automatically:**
- Through Cookies (defined in the "Tracking Tools, Advertising and Opt-Out" section below).
  1. If you use a location-enabled browser, we may receive information about your location.
- When your information is provided to us by a third party:**
  1. We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
  2. We may use vendors to obtain information to generate leads and create user profiles.
  3. We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
  4. We receive your information from one of our partners after you registered interest in 5vet.com products and services through them.

## How do we process your data?

5vet.com uses cloud infrastructure based in the USA to provide and support its products and services. As such, your Personal Data will be stored/processed within the USA throughout your time with 5vet.com.

If you are an EU or UK resident, we process your Personal Data pursuant to the processing grounds defined by the GDPR:

- Legitimate Business Interests** - We process Personal Data when we believe it furthers the legitimate interest of us or third parties.
- Contractual Necessity** - We process Personal Data in order to fulfill our Terms of Service with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
- Consent** - We process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- Other Processing Grounds** - We process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest. In these instances it will be clearly defined and communicated.

## Why is 5vet.com emailing me?

It is important for you to understand why you may be receiving communication from 5vet.com. Following are the primary reasons we would contact you:

- You are a paid user:** If you are an active 5vet.com customer, we will reach out to you with updates, offers or other information that we feel might be of interest to you.
- You are a free user:**
  - One of our customers shared their 5vet.com Profile with you or requested that you complete an assessment in 5vet.com, and you created a 5vet.com account in order to complete this action.
  - We are working on behalf of one of our customers and they asked us to reach out to you in order to streamline the assessment process and expand the Network.
- Newsletter subscribers:** You have subscribed and are receiving updates from 5vet.com about our company, our vision, and our products and services.
- Target customers:** You are a great fit for 5vet.com and so our team is reaching out to you to determine your interest in our products and services. If you are a target customer and also a free user, we will not use your account information to market to you unless you indicate your interest in being marketed or sold to.

If you want to stop hearing from us, there is an unsubscribe link on *all* emails we send or you can contact [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou) if you need additional help. You can also learn more about our approach to communication and engagement here.

## Do we share your data?

We may share your Personal Data with your permission or as described below:

- Vendors and Service Providers** - We share Personal Data with vendors and service providers in order to provide the Services or perform business functions on our behalf. We only use vendors and service providers that meet our privacy and security standards. We require them to annually attest to certain privacy compliance and security controls.
- Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include ad networks and marketing providers.
- Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
  - Companies that track how users found or were referred to the Services.
  - Companies that track how users interact with the Services.
- Legal Authorities and disclosures required by law** - Personal Data may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of unauthorized activities. We may also share Personal Data with third parties in order to meet legal requirements or enforce legal terms.
- Merger, Sale, or Other Asset Transfers** - If we are involved in a merger, acquisition, or other financial restructuring, your Personal Data may be transferred as part of the transaction as permitted by law and/or contract.
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If you wish for your data not to be disclosed as described above, please contact [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou) to resolve your concern.

## What are your data rights?

**Right to Opt Out or Object to the Processing** - You have the right to opt out of certain uses and disclosures of your Personal Data. Where you have consented to our processing of your Personal Data, you may withdraw that consent at any time and opt-out to further processing by contacting [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou).

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt-out of receiving future emails. We will process your request within 30 days or within the period permitted by law. We may continue to send you messages pertaining to contractual necessity and certain non-promotional communications regarding 5vet.com products and services and you will not be able to opt out of those communications.

We maintain "do-not-mail" lists as mandated by law. We process requests to be placed on do-not-mail, do-not-phone and do-not-contact lists within 30 days after receipt, or shorter time as may be required by law.

**Rights of Access, Rectification and Restriction** - You can request access to your Personal Data, and ask that we correct or amend your Personal Data where it is inaccurate. To do this, send an email to [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou). Please include your full name, the account details, and a detailed description of your data request. Such requests will be processed within 30 days. You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

If you are an employee of one of our customers and would like to access, correct, amend, or delete your Personal Information from our service, please contact your employer directly.

To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Data. There may be instances where we are unable to fulfill your request for legal or technological reasons and in these instances we will fully explain the circumstances.

**Rights of Erasure** - You can request your Personal Data, and all associated accounts, be deleted after you leave us or as no longer required. To do this, send an email to [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou). Please include your full name, the account details, and a detailed description of your data request. Such requests will be processed within 30 days.

To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Data. There may be instances where we are unable to fulfill your request for legal or technological reasons and in these instances we will fully explain the circumstances and take steps to ensure, where appropriate, that the Personal Data is "beyond use" in line with privacy best practices.

We may not be able to delete information you have shared with a vendor or customer as part of an assessment process as detailed in Section 4.2 of our Terms of Service as this would invalidate the assessments completed and lead to a non-compliance status for the aforementioned vendor or customer.

**Withdrawal of Consent** - If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.

**Right to File Complaint** - You have the right to lodge a complaint about 5vet.com's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## How do we use your Personal Data?

We may use your Personal Data for purposes of:

### Providing, Customizing and Improving the Services

- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Services.
- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws.

### Marketing the Services

- Marketing and selling the Services.
- Showing you advertisements, including interest-based or online behavioral advertising.

### Corresponding with You

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about 5vet.com or the Services.
- Sending emails and other communications according to your preferences or that display content that we think will interest you.

### Meeting Legal Requirements and Enforcing Legal Terms

- Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
- Protecting the rights, property or safety of you, 5vet.com or another party.
- Enforcing any agreements with you.
- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

## How is your Personal Data protected?

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally. Where data is retained longer it is done so in accordance with Section 4.2 of 5vet.com's Terms of Service

## Personal Data of Children

As noted in the Terms of Service, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou).

## Privacy Policy Changes

This Privacy Policy is subject to the terms in our Terms of Service. Where a commercial agreement is signed by a customer with terms that conflict with this document then the signed agreement takes precedence.

Our Privacy Policy, and associated documentation, is reviewed annually and we reserve the right to make changes. All changes are effective immediately when made available on this website and will apply to all access to and use of the Services thereafter. Customer's continued use of the Services following the posting of a revised Privacy Policy means that Customer accepts and agrees to the changes. Customers are encouraged to check this page from time to time so that Customer is aware of any changes, as such changes are binding on Customer. All changes will be published to this page.

## Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at: [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou)

## ANNEX A - PII Types

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties with Which We Share this Personal Data
<b>Profile or Contacting Data</b>	<ul style="list-style-type: none"><li>• First and last name</li><li>• Email</li><li>• Phone number</li><li>• Unique identifiers such as passwords</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Parties Users Authorize, Access or Authenticate</li><li>• Advertising Partners</li><li>• Analytics Partners</li><li>• Service Providers</li><li>• Analytics Partners</li></ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"><li>• IP address</li><li>• Type of device/operating system/browser used to access the Services</li><li>• Web page interactions</li><li>• Referring webpage/source through which you accessed the Services</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Advertising Partners</li><li>• Analytics Partners</li></ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"><li>• Non-identifiable request IDs</li><li>• Statistics associated with the interaction between device or browser and the Services</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Analytics Partners</li></ul>
<b>Employment Information</b>	<ul style="list-style-type: none"><li>• Email</li><li>• Phone number</li><li>• Professional experience and title</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Analytics Partners</li></ul>
<b>Geolocation Data</b>	<ul style="list-style-type: none"><li>• IP-address-based location information</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Advertising Partners</li><li>• Analytics Partners</li><li>• Service Providers</li></ul>
<b>Audio and Video Recordings</b>	<ul style="list-style-type: none"><li>• Recordings of customer service calls and videos</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li></ul>
<b>Other Identifying Information that You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"><li>• Identifying information in emails or letters you send us</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li></ul>

## ANNEX B - Tracking Tools and Cookies

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "Cookies") to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support "Do Not Track" requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout>.
- **Retargeting/Advertising Cookies.** Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled "Information about Interest-Based Advertisements." For example, we use Retargeting/Advertising Cookies offered by LinkedIn and Google.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

### *Information about Interest-Based Advertisements:*

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors ("Interest-Based Ads"). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a "web beacon") from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

## ANNEX C - Geography Specific Privacy Requirements

### **Other State Law Privacy Rights**

#### *California Resident Rights*

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou).

#### *Nevada Resident Rights*

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at [talktoaveteran@onlyemail.cyou](mailto:talktoaveteran@onlyemail.cyou) with the subject line "Nevada Do Not Sell Request" and providing us with your name. However, note that we do not sell Personal Data.

### **European Union and United Kingdom Data Subject Rights**

#### *EU and UK Residents*

If you are a resident of the European Union ("EU"), United Kingdom ("UK"), Lichtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the "GDPR") with respect to your Personal Data, which are outlined in the section above titled "What are your data rights?"

For purposes of that section, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. 5vet.com will be the Controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about how this section applies to you, please contact us at [Italktoaveteran@onlyemail.cyou](mailto:Italktoaveteran@onlyemail.cyou). Note that we may also process Personal Data of our customers' end users or employees in connection with our provision of certain services to customers, in which case we are the Processor of Personal Data. If we are the Processor of your Personal Data (i.e., not the Controller), please contact the Controller party in the first instance to address your rights with respect to such data.