



Passport Corp Data Privacy Notice

Scope

This privacy statement applies to www.PassportCorp.com and Passport Corporation ["Passport"] websites, services, applications and products that store, process, and/or transmit personal data as defined below.

Choice and Consent

As the owner of your own personal information, you have choices, specifically, the following: You have several choices available when it comes to information about you:

- **Limit the amount of Personal Data provided to Passport Corp:** If you have a personal or business relationship with Passport Corp, you have the right to limit the types of personal data we store, process, and/or transmit. Please be advised if you limit the types of personal data, then this may result in the inability to fully process your data and provide the services we offer. Certain rights relating to erasure, rectification, and portability of data in regards to the GDPR are thus deemed in-scope for this privacy policy.
- **Opt-Out of Electronic Communications:** You have the right opt out of receiving promotional messages from Passport Corp. Please note that even if you opt out of promotional messages, Passport Corp may still send you additional messages relating to your account and other important information.

Privacy Policy: A Privacy Policy, and other affiliated initiatives and documentation, is an essential element of Passport Corp's commitment to ensuring the safety and security of customer data at all times. Protecting confidential data is paramount to our organization, and as such, we take security seriously, which means protecting the data provided to us from customers. You, as a customer, have certain rights that we, as a business, must adhere to, for which these rights are discussed within this Privacy Notice. Data security and privacy is not an option, rather, a strict requirement for many of today's global laws and regulations, but also a best practice we employ throughout our entire organization. Simply stated, Passport Corp takes data security and privacy seriously.

Scope of Laws

This Privacy Policy has been developed in accordance with the following rules, regulations, and/or legislative laws for which Passport Corp is obligated to comply with.

- The EU General Data Protection Regulation (GDPR).
- The Health Insurance Portability and Accountability Act (HIPAA).

Introduction

Passport Corp needs to obtain, collect, and use certain types of information about individuals. Such information is often referred to as Personally Identifiable Information, a phrase which encompasses a wide-range of personal data types. For purposes of this policy, the term "personal data" is used to describe any type of data obtained, collected, and used by Passport Corp. As to whom the "personal data" is obtained from, this is often referred to as customers, clients, users, data subjects – phrases which encompass a wide-range of individuals. For purposes of this policy, the term "individual(s)" is used to describe any type of person for which "personal data" is obtained and collected from, and then subsequently used by Passport Corp.



Passport Corp is deeply committed to maintaining your trust and confidence, values your privacy and recognizes the sensitivity of your personal information, and thus will always strive to protect the privacy of individuals. We have carefully crafted this Privacy Policy to address concerns you might have, and to assure you that if you give us personal information, we will treat it carefully and appropriately. This Privacy Policy applies to the websites, services, applications and products that store, process, and/or transmit personal data (collectively, the “Sites”). This Privacy Policy does not pertain to information that is collected offline.

When you submit Personal Information to the Passport Mobile Application (“Mobile App”) you represent that you have received consent from your company to submit such information through the Passport Mobile App.

The Mobile App contains Global Positioning System (GPS) tracking and navigation features and relies upon device-based location information.

Purpose of Data Privacy Policy

The purpose of the Data Privacy Policy is to provide clarity, transparency, and accuracy regarding the collection and use of an individual’s personal data for which Passport Corp may collect and use for processing.

Information Collected and Stored Automatically (Web Analytics Data)

When you utilize the Sites, we may store some or all of the following: The Internet address from which you access [website URL, date and time, the Internet address of the website from which you linked to the Sites, the name of the file or words you searched, items clicked on a page, and the browser and operating system used, and any other related information.

This information is not used for associating search terms or patterns of site navigation with individual users. PassportCorp.com periodically deletes its Web logs. On occasion, Passport may provide this information to third party entities it contracts with for the purposes of supplying contracted services to you.

Cookies

When you visit some websites, their web servers generate pieces of information known as cookies. Cookies are commonly used to recognize your computer in the future. The Sites may use session cookies to serve technical purposes, such as providing seamless navigation through our site, allowing you to carry information across pages of our site and to avoid having to re-enter information. These cookies do not permanently record data.

The Sites may also use persistent cookies to be able to track the number of unique visitors to the site. More specifically, Persistent Cookies are utilized for helping Passport Corp recognize you as a unique visitor (using a number, you cannot be identified personally) when you return.

Users can choose to disable cookies using their web browsers, which may affect their ability to search for, review and retrieve data.

Information Collected and Stored Automatically (Personal Information)

Users may be required to provide personal information into various form fields, and/or for purposes of searching, retrieving, and downloading data. If you choose to provide us with personal information, Passport Corp will use appropriate security controls for ensuring the protection of your personal data.

Passport may collect information about you and your devices automatically when you visit our Mobile App, including information such as:



- your IP address which may reveal a user’s general location;
- location information, such as the geo-location of your device (GPS information). When you use the Mobile App, Passport may collect information about your precise geolocation information (i.e., your real-time geographic location)
- the type of browser, device and operating system you use;
- identifiers associated with the device you use to access our Mobile App;
- the pages you visit and the features you use, including dates and times;
- if you navigated from or navigate to another Mobile App, the address of that Mobile App;
- information regarding your internet service provider; and
- information regarding the effectiveness of our email and other communications with you

In addition, Passport may collect information about your activities on its Mobile App through the use of cookies, or web beacons, or through other identifiers or technologies, including similar technologies as they may evolve over time. Those technologies are referred to collectively as “Data Technologies.”

Passport may allow third parties to use Data Technologies on our Mobile App. The information collected by Data Technologies may be shared with and used by your employer, Passport and by others acting on behalf of your employer or Passport (including UKG, Inc.), or by third parties subject to their own privacy policies. Information collected by Data Technologies may be used on this Mobile App or on other Mobile Apps or services, including those that may not be operated by us.

Information from Other Sources

Passport may obtain information about you or users from third parties. This information may include information about your use of this Mobile App, use of the Passport Mobile App or data from other systems, in connection with your employer’s electronic time capture program. Passport may combine the information obtained from third parties with information that it has collected in order to provide the electronic time capture functionality to your employer.

How We Use Information We Gather

Your IP address is used to help identify you and to gather broad demographic information. Passport may use your IP address to help protect companies and their partners from fraud. For system administration purposes, Passport also logs IP server addresses and catalogues traffic patterns through the Mobile App. However, Passport does not link this information to users' Personal Information.

Browser Information Collected on the Website

Various elements of data sets may be collected to track the usefulness of certain actions and to ultimately improve the value of PassportCorp.com. Please note that at no time does Passport Corp gather, request, record, require, collect or track any type of Internet users’ personal information (as listed above) through these processes.

Site Security

For site security purposes and to ensure that this service remains available to all users, the platform on which the Sites resides – commonly known as a “production environment”, utilizes a wide-range of software tools and programs to for the ultimate goal of ensuring its confidentiality, integrity, and availability (CIA) – a concept known as the CIA triad of information security. Tools which are currently in use, or are to be deployed if necessary for the security of the production environment include, but are not limited to, the following:



- Network Security and Network Monitoring: Tools that assist in securing the network. Such tools include network and perimeter firewalls, web application firewalls, routers, switches, intrusion detection systems, and other related tools.
- Network Performance: Tools that assist in monitoring all aspects of the environment, such as performance monitoring for website uptime, etc.
- Other: Additionally, A variety of physical, electronic and procedural safeguards are implemented for helping ensure the safety and security of the environment.

Except for authorized law enforcement investigations by local, state, and/or federal agencies, no other attempts are made by Passport Corp to identify individual users and/or their usage habits on PassportCorp.com.

External Links

PassportCorp.com may contain links to websites created and maintained by other public and/or private organizations. PassportCorp.com therefore provides these links as a service to our users, and when users click on a link to an external website, they are leaving PassportCorp.com and are thus subject to the privacy and security policies/related terms and conditions of these external websites.

Children's Privacy

PassportCorp.com and the Sites comply with the Children's Online Privacy Protection Act of 1998 (COPPA). Specifically, COPPA imposes certain requirements on operators of websites or online services directed to children under 13 years of age, and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age. Therefore, Personal information from children under 13 is not knowingly collected, nor are children under 13 knowingly contacted by Passport. To be clear, Passport does not intend to solicit information of any kind from children under 13. It is possible that Passport may receive emails pertaining to children under 13. If this is the case and Passport is notified of this, as soon as the information is verified, parental consent will be immediately obtained or the email will be deleted from any services being offered and/or performed by Passport.

If you are under the age of thirteen (13), do not use or provide any information on the Sites or on or through any of the Site's features, register, make any service requests, use any of the interactive or public comment features or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use.

PassportCorp.com complies with the [General Data Protection Regulation](#) (GDPR). Specifically, the GDPR states the following, per [Article 8](#):

Where point (a) of Article 6(1) applies, in relation to the offer of information society services directly to a child, the processing of the personal data of a child shall be lawful where the child is at least 16 years old. Where the child is below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorized by the holder of parental responsibility over the child.

Member States may provide by law for a lower age for those purposes provided that such lower age is not below 13 years.

The controller shall make reasonable efforts to verify in such cases that consent is given or authorized by the holder of parental responsibility over the child, taking into consideration available technology.



Paragraph 1 shall not affect the general contract law of Member States such as the rules on the validity, formation or effect of a contract in relation to a child.

Prohibitions

PassportCorp.com will not create any type of reference or hyperlink to any other website that displays, promotes and/or exhibits any type of hate, bias, or discrimination. PassportCorp.com thus reserves the right to deny or remove any reference or hyperlink that contains misleading information or unsubstantiated claims, or is determined to be in conflict with Passport Corp's policies, procedures, and practices.

Changes to this Policy

The PassportCorp.com privacy policy is to be revised and updated as necessary for ensuring its adequacy and sufficiency. You are encouraged to visit this page often for the latest information and the effective date of any changes to such policy. If changes are made to this policy, a new PassportCorp.com policy will be posted on our site, along with a corresponding data of change.

Use of Logo: The logo displayed on the Sites is the official logo of Passport Corp and is not to be used by any other organization for any purpose, unless such rights are granted by Passport Corp.

Public Information: All datasets accessed through PassportCorp.com are confined to public information and must not contain personal data as defined by statute and/or Executive Order, or other information/data that is protected by other statute, practice, or legal precedent.

Security: All information accessed through the Sites is in compliance with the required information security mandates of Article 32 of the GDPR. Specifically, Article 32 mandates the following:

- Implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:
 - The pseudonymisation and encryption of personal data.
 - The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.
 - The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.
 - A process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

Privacy: All information accessed through PassportCorp.com must be in compliance with current privacy requirements set forth in the GDPR. Specifically, Passport Corp is responsible for ensuring that personal data accessed through PassportCorp.com have required Privacy Impact Assessments available for review.

Data Quality and Retention: All information accessed through the Sites is subject to Passport Corp quality control and related information security best practices.

Passport retains information you provide, including without limitation Personal Information, for as long as necessary to: (a) permit Passport to use it for purposes described in this Notice, and (b) comply with applicable laws or regulations. Passport uses physical, logical, and procedural security measures to protect the information you provide to Passport.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Mobile App, you are responsible for keeping this password confidential.



While Passport uses commercially reasonable steps to protect the Personal Information you provide to us from unauthorized access, use or disclosure, unfortunately, no Internet data transmission can be guaranteed to be secure from access by unintended recipients. We are not responsible for circumvention of any privacy settings or security measures contained on the Mobile App. If you have any questions about security on our Mobile App, please direct all questions to compliance@passportcorp.com

Disclaimer and Endorsement: The PassportCorp.com website may include hypertext links, or pointers, to information created and maintained by other public and/or private organizations. As such, PassportCorp.com only provides these links for your information and convenience, thus, when you select a link to an outside website, you are leaving the PassportCorp.com and therefore subject to the privacy and security policies of these external websites. Additionally, please note the following:

- PassportCorp.com does not control or guarantee the accuracy, relevance, timeliness, or completeness of information contained on a linked website.
- PassportCorp.com does not endorse the organizations sponsoring linked websites and we do not endorse the views they express or the products/services they offer.
- PassportCorp.com therefore cannot authorize the use of copyrighted materials contained in linked websites. Users must request such authorization from the sponsor of the linked website.
- PassportCorp.com is not responsible for transmissions users receive from linked websites.
- PassportCorp.com does not guarantee that outside websites comply with Section 508 (accessibility requirements) of the Rehabilitation Act.

BY USING THE SITES, YOU CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND TO OUR PROCESSING OF PERSONAL INFORMATION FOR THE PURPOSES STATED BELOW. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, PLEASE DO NOT USE THE SITES.