

Our Policy:

Welcome to the web sites (collectively, the "site") of Focus Forward, including its subsidiaries and affiliates ("related companies") (collectively, "we", "us" and/or "our"). This site is operated by Focus Forward and has been created to provide information about our company and transcription, video caption, translation and document related services (the "services") to you. This privacy policy sets forth Focus Forward's policy with respect to its processing of two types of data:

1. Personal data that users of our services ("**Customers**") ask us to process on their behalf ("**Processor data**"), which will include any personal data that customers provide to us to transcribe, caption, translate, or otherwise process for them. When Focus Forward processes personal data on behalf of a customer, Focus Forward is the "processor" of the data under applicable law, and the customer is the "controller".
2. Data, including personal data, that we process for our own business ("controller data"), other than for our human resources and recruiting operations. This includes, for example, the information we collect through the site and the names and contact information of our customers and vendors. Under applicable law, Focus Forward is the "controller" of such data.

Our collection, use, and disclosure of processor data:

We receive information from or on behalf of our customers and their users. Because of the nature of the services, this information may contain any type of personal data, including names, contact information, and other identifying information.

Subject to our contractual obligations with our customers, and depending on the particular services, we use and disclose processor data as follows:

- **Providing Services:** to provide, maintain, and improve the services, including by analyzing the services and addressing security and business continuity issues.
- **Protecting Us and Others:** to enforce the legal terms that govern the services.
- **Compliance with Laws:** to comply with law, and where we deem disclosure appropriate to protect rights, safety and property (for example, for national security or law enforcement).
- **Business Transfers:** as part of an actual or contemplated business sale, merger, consolidation, change in control, transfer of substantial assets or reorganization.

- **Consistent with Customer Requirements:** for other purposes requested or permitted by our customers or their users, or as reasonably required to perform our business.

Subject to our contractual obligations with our customers, and depending on the particular services, we share processor data as follows:

- **Business Transfers:** as we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, including during negotiations of such an event, processor data may be part of the transferred assets.
- **Related Companies:** we may also share processor data with our related companies for purposes consistent with this privacy policy.
- **Agents, Consultants and Related Third Parties:** Focus Forward, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include maintaining databases.
- **Legal Requirements:** Focus Forward may disclose processor data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Focus Forward, (iii) act in urgent circumstances to protect the personal safety of the general public, or (iv) protect against legal liability.
- **Consistent with customer requirements:** Focus Forward will disclose processor data for other purposes requested or permitted by our customers or users, or as reasonably required to perform our business.

Our collection, use, and disclosure of controller data:

When you interact with us through the site or the services, or become a customer or are a vendor, we may collect personal data and other information from you. As further described below, and depending on how you interact with us, we may collect the following categories of personal information:

- Identifiers (such as name and email address);
- Commercial information (such as transaction data);
- Internet or other network or device activity (such as browsing history and log data);
- Location information (such as general location information inferred from an ip address);
- Financial data (such as credit card information);

- Sensory information (such as audio or visual information);
- Professional or employment related data;
- Legally protected classifications (such as gender and marital status if you disclose such information to us); and
- Other information that identifies or can be reasonably associated with you.

Personal Data that You Provide Directly to Us: We collect personal data from you when you voluntarily provide such information, such as when you register for access to the services (for example, your name and mailing address), use certain services, contact us with inquiries, respond to one of our surveys, or contract with us. Wherever Focus Forward collects personal data we make an effort to provide a link to this privacy policy.

Personal Data that We Collect from Third Parties: we collect personal data from third parties, such as lead generation firms.

By voluntarily providing us with personal data, you acknowledge that you have read this Privacy Policy and understand that such personal data may be transferred from your current location to the offices and servers of Focus Forward and the authorized third parties referred to herein located in the United States, which may not offer the same level of protection as the country in which you are located.

Automatically Collected Data: When you interact with Focus Forward through the Site or Services, we receive and store certain automatically collected information collected passively using various technologies. Focus Forward may store such information itself or such information may be included in databases owned and maintained by Focus Forward affiliates, agents or service providers. This Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, the domain names of our visitors' Internet service providers, and how our users use and interact with the Services. Also, in an ongoing effort to better understand and serve the users of the Services, Focus Forward often conducts research on its customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis. Focus Forward may share this data with its affiliates, agents and business partners. Focus Forward may also disclose aggregated user statistics in order to describe our Services to current and prospective business partners, and to other third parties for other lawful purposes.

In operating our Site, we may also use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide

additional functionality to the Site and help us analyze Site usage more accurately. For instance, our Site may set a cookie on your browser that allows you to access the Site without needing to remember and then enter a password more than once during a visit to the Site. You can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information. (e.g., [Internet Explorer](#); [Microsoft Edge](#); [Google Chrome](#); [Mozilla Firefox](#); or [Apple Safari](#)). Please note that by blocking any or all cookies, you may not have access to certain features or offerings of the Services.

Online Analytics: We may use third-party web analytics services (such as those of Google Analytics) on our Services to collect and analyze the information discussed above, and to engage in auditing, research or reporting. The information (including your IP address) collected by various analytics technologies described in above may be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services, including by noting the third-party website from which you arrive, analyzing usage trends, assisting with fraud prevention, providing certain features to you, and other purposes. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#). If you receive email from us, we may use certain analytics tools, such as clear GIFs, to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

Tailored Online Advertising: Third parties whose products or services are accessible or marketed via the Services may also place cookies or other tracking technologies on your computer or other device to collect information about your use of the Services, in order to (i) inform, optimize, and serve advertising content based on past visits to our Services and other sites and (ii) report how our advertising content impressions, other uses of advertising services, and interactions with these advertising impressions and services are related to visits to our Services. We also may allow other third parties (e.g., ad networks, servers and platform) to serve tailored advertising to you on the Services or on other websites or in other mobile applications, and to access their own cookies or other tracking technologies on your computer or other device you use to access the Services. We neither have access to, nor does this Privacy Policy does not govern, the use of cookies or other tracking technologies that may be placed by such third parties. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer or mobile browser to deliver tailored advertising (i.e., not just for the Services), you may visit the Network Advertising Initiative's Consumer [Opt-Out Link](#) and/or the Digital Advertising Alliance's [Web Choices Tool](#) to opt-out of receiving tailored advertising from companies that participate in those programs. Please note that to the extent advertising technology is integrated into the Services, you may still receive advertising content even if you opt out of tailored advertising. In that case, the advertising content will just not be tailored to your interests. Also, we do not control any of the above

opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

We use controller data for business and commercial purposes as follows:

- **Providing Services:** To provide, maintain, and improve the Services, including by analyzing the Services and addressing security and business continuity issues. For instance, if you contact us by email, we will use the personal data you provide to answer your question or resolve your problem. Also, if you provide personal data in order to obtain access to the Services, we will use your personal data to provide you with access to such services and to monitor your use of such services.
- **Communications:** To communicate with you regarding the Services or to tell you about services we believe will be of interest to you. If we do so, each marketing communication we send you will contain instructions permitting you to "opt-out" of receiving future marketing communications. Note however that as user of the Service you cannot opt-out of some administrative communications that are reasonably necessary to the Service, such as billing or service notifications. In addition, if at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below.
- **Protecting Us and Others:** To enforce the legal terms that govern the Services.
- **Compliance with Laws:** To comply with law, and where we deem disclosure appropriate to protect rights, safety and property (for example, for national security or law enforcement).
- **Business Transfers:** As part of an actual or contemplated business sale, merger, consolidation, change in control, transfer of substantial assets or reorganization.
- **Consistent with Customer Requirements:** For other purposes requested or permitted by our Customers or their users, or as reasonably required to perform our business.

If Focus Forward intends on using any personal data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the personal data is collected, consistent with applicable laws.

The laws in some jurisdictions require companies to tell you about the legal ground they rely on to use or disclose personal data. To the extent those laws apply, our legal grounds for processing Controller Data are as follows:

- **Legitimate interests:** In most cases, we handle Controller Data on the ground that it furthers our legitimate interests in commercial activities such as the following in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals:

- Protecting our Services, business, personnel and property
 - Customer service
 - Marketing
 - Analyzing and improving our business
 - Managing legal issues
 - We may also process Controller Data for the same legitimate interests of our customers and business partners
- **To honor our contractual commitments to the individual:** Some of our processing of Controller Data is to meet our contractual obligations to individuals, or to take steps at customers' request in anticipation of entering into a contract with them.
 - **Consent:** Where required by law, and in some other cases, we handle Controller Data on the basis of consent. Where legally required (e.g., for the use of fingerprints for security purposes in certain jurisdictions), this is explicit consent.
 - **Legal compliance:** We need to use and disclose Controller Data in certain ways to comply with our legal obligations.
 - **Business Transfers:** As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, including during negotiations of such an event, Controller Data may be part of the transferred assets.
 - **Related Companies:** We may also share Controller Data with our Related Companies for purposes consistent with this Privacy Policy.
 - **Agents, Consultants and Related Third Parties:** Focus Forward, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases, shipping and fulfillment and processing payments.
 - **Legal Requirements:** Focus Forward may disclose Controller Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Focus Forward, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

Focus Forward is not in the business of selling Controller Data. There are, however, certain circumstances in which we share the categories of personal information identified as Controller Data with certain categories of third parties without further notice to you, as follows:

Your EU Rights and Choices:

We offer the options described below for exercising rights and choices under applicable law, which are subject to important limits or exceptions under applicable law.

- **For Processor Data:** To exercise rights or choices with respect to Processor Data, please make your request directly to the Customer for whom we process the personal data.
- **For Controller Data:**
 - To keep your personal data accurate, current, and complete, please contact us as specified below. We will take reasonable steps to update or correct personal data in our possession that you have previously submitted via this Site or Services.
 - The law of your jurisdiction (for example, within the European Economic Area) may give you additional rights to request access to and rectification or erasure of certain of your personal data we hold. In some cases, you may be entitled to receive a copy of the personal data you provided to us in portable form or to request that we transmit it to a third party. The law may also give you the right to request restrictions on the processing of your personal data, to object to processing of your personal data, or to withdraw consent for the processing of your personal data (which will not affect the legality of any processing that happened before your request takes effect). You may contact us as described below to make these requests.
 - For example, residents of the European Economic Area and certain other jurisdictions may have a right to opt out of our processing of Controller Data for direct marketing purposes. You can exercise this right by contacting us as described below. Our marketing emails and certain other communications include unsubscribe instructions, which you can use to limit or stop the relevant communications. Opt-out processes may take some time to complete, consistent with applicable law. Certain communications (such as certain billing-related communications or emergency service messages) are not subject to opt-out.
 - You may contact us with any concern or complaint regarding our privacy practices, and you also may lodge a complaint with the relevant governmental authority.

Additional California Privacy Notice

This Additional California Privacy Notice applies solely to California residents. It applies to personal information we collect on or through the Services and through other means (such as information collected offline, in person, and over the telephone). It does not apply to personal information we collect from our employees and job applicants in their capacity as employees and job applicants. It also does not apply to personal information we collect from employees, owners, directors, officers, or contractors of businesses in the course of our provision or receipt of business-related services.

As described above, in the preceding twelve months, we or our service providers may have collected the following categories of personal information for business or commercial purposes: (1) identifiers (such as name and email address); (2) commercial information (such as transaction data); (3) Internet or other network or device activity (such as browsing history and log data); (4) location information (such as general location information inferred from an IP address); (5) financial data (such as credit card information); (6) sensory information (such as customer service recordings); (7) professional or employment related data; (8) legally protected classifications (such as gender and marital status if you disclose such information to us); and (9) other information that identifies or can be reasonably associated with you.

We collect the categories of personal information identified above from the following sources: (1) directly from you; (2) through your use of the Services; and (3) third parties such as lead generation firms.

As further described above, we collect the categories of personal information identified above for the following business and commercial purposes: (1) to provide the Services; (2) to communicate with you regarding the Services or to tell you about services we believe will be of interest to you; (3) to protect us and others, including enforcing the legal terms that govern the Services; (4) to comply with laws; (5) to facilitate any business transfers for an actual or contemplated sale involving our assets; and (6) as consistent with customer requirements.

California law may permit California residents to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.

You may have the right to receive information about the financial incentives that we offer to you, if any. You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Certain information (such as information we collect about our employees or job applicants,

or information we collect from employees, owners, directors, officers, or contractors of businesses in the course of our provision or receipt of business-related services) may be exempt from such requests under applicable law. We need certain types of information so that we can provide the Services. If you ask us to delete it, you may no longer be able to access or use the Services.

If you would like to exercise any of these rights, please submit a request through this form or at transcripthelp@focusfwd.com. You will be required to verify your identity before we fulfill your request. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us.

California residents may opt out of the "sale" of their personal information. Focus Forward does not "sell" your personal information as we understand that term to be defined by the California Consumer Privacy Act ("CCPA") and its implementing regulations. However, some people have taken the position that when a website uses third parties' cookies or similar technology for its own analytics or advertising purposes, the website is engaged in a "sale" under the CCPA if the third parties have some ability to use, disclose or retain the data to improve their service or to take steps beyond the most narrowly drawn bounds of merely providing their service to the website/app. Some take this position even when the website pays the third party (not vice versa), and in most cases merely provides the third party with an opportunity to collect data directly, instead of providing personal information to the third party. If you take the position that any of those relationships involve a "sale" within the meaning of the CCPA, then you may consider Focus Forward to have "sold" what the CCPA calls "identifiers" (like IP addresses), "internet or other electronic network activity information" (like information regarding an individual's browsing interactions on the Focus Forward site), and "commercial information" (like the fact that a browser visited a page directed to people who are considering obtaining services from us) to those sorts of companies. While Focus Forward does not believe these are "sales" as that term is defined under the CCPA, you can opt out of this activity by following the directions in the Tailored Online Advertising section above.

Nevada Rights

Under Nevada law, certain Nevada consumers may opt out of the sale of "personally identifiable information" for monetary consideration to a person for that person to license or sell such information to additional persons. "Personally identifiable information" includes first and last name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online. We do not engage in such activity; however, if you are a Nevada resident who has purchased or leased goods or services from us, you may submit a request to opt out of any potential future sales under Nevada law by transcripthelp@focusfwd.com. Please note we will take

reasonable steps to verify your identity and the authenticity of the request. Once verified, we will maintain your request in the event our practices change.

Children:

Focus Forward does not knowingly collect personal information (as defined in the Children's Online Privacy Protection Act) from children under the age of 13. If you are under the age of 13, please do not submit any personal information through the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide personal information on our Services without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to Focus Forward through the Services, please contact us, and we will endeavor to delete that information from our databases.

Links to Other Web Sites / Services:

This Privacy Policy applies only to the Services. Our Services, in particular our Site, may contain links to other web sites or services not operated or controlled by Focus Forward (the "**Third Party Sites**"). The policies and procedures we described here do not apply to the Third Party Sites. The links from our Services do not imply that Focus Forward endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

Security:

Focus Forward takes steps to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet, email or other electronic transmission is ever fully secure or error free, so we cannot assure you that your personal data will never be used or disclosed in a manner that is inconsistent with this Privacy Policy, and you should take special care in deciding what information you provide to us.

Data Retention:

We will retain personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. To provide security and business continuity for the activities described in this Privacy Policy, we make backups of certain data, which we may retain for longer than the original personal data.

Other Terms and Conditions:

Your access to and use of this Site is subject to any other agreements in place between us, including our Terms of Service located at: .

Changes to Focus Forward's Privacy Policy:

Our Services may change from time to time. As a result, at times it may be necessary for Focus Forward to make changes to this Privacy Policy. Focus Forward reserves the right to update or modify this Privacy Policy at any time and will notify you of such changes in compliance with applicable laws. Please review this Privacy Policy periodically. This Privacy Policy was last updated on the date indicated above.

Contacting Focus Forward:

Please also feel free to contact us if you have any questions about Focus Forward's Privacy Policy or the information practices of our Services.

You may contact us as follows:

- mailing us at 950 West Valley Road, Suite 2700, Wayne, PA 19087
- calling us at 215-367-4000
- emailing us at transcripthelp@focusfwd.com