

PRIVACY NOTICE

OMNIA Partners, Inc. (“Company,” “we” or “us”) values our relationship with you and takes your privacy seriously. The purpose of this Privacy Notice is to identify how we may process, collect, store, disclose, share and use (collectively, “use”) the data that we collect from you in connection with your registration as a member or supplier, as applicable, and the use of our business services or our website (www.omniapartners.com) (collectively, our “Services”). This Privacy Notice also identifies your rights with respect to your personal information, all as described in more detail below.

We may update or modify this Privacy Notice at any time, by posting the amended version on this site and including the effective date of the updated version. We will announce any material changes to this Privacy Notice through an alert on our websites and/or via email. We may also provide other privacy notices on specific occasions when we are using your personal information in ways that differ from what we have described here, so that you are aware of how and why we are using such information and what your rights are with respect to such use. By accessing and/or using the Services, you accept and agree to the terms of this Privacy Notice and the use of your data and personal information as described in this Privacy Notice. You also agree to be bound by the Terms of Use set forth at www.omniapartners.com/termsfuse. If you do not agree to be bound by this Privacy Notice or any subsequent modifications, you should not access or use the Services or disclose any personal information through any of the Services.

This Privacy Notice was last updated August 7, 2018.

Your privacy and the security of your personal information is, and will always be, important to us. We want to transparently explain how and why we use your personal information, as well as outline the controls and choices you have around when and how you choose to share personal information. If we use your personal information, you will have certain important rights which you can exercise. The rights you will be able to exercise will depend on how and why we use your information.

This Privacy Notice contains the following information, which you can access by scrolling down:

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1. How to contact us.

How to contact us and update your communication preferences and/or information:

You can update your communication preferences and information in the following ways by: update your contact information by contacting us at the e-mail or postal address below.

Additionally, if you have any questions or concerns about our use of your personal information, please do not hesitate to contact us through any of the methods listed below.

Mail:

OMNIA Partners, Inc.
Attn: Chief Information Officer
840 Crescent Centre Drive, Suite 600
Franklin, TN 37067

Phone: 866-875-3299

Email: info@omniapartners.com

2. The information we collect about you.

Information we collect.

We obtain information about you and your use of our Services and conduct our business, to develop comprehensive statistics related to the use of our Services, to serve our customers better, and for other business-related purposes. The information we collect can include non-personally identifiable information or personal information as further described in this Privacy Notice. Please note that if you fail to provide us with such information, we may not be able to perform functions that would require our access to and use of the information.

Personal information is information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. We collect information through any correspondence that you provide to us whether through email, mail, phone calls, or through our Services and through Supplier relationships and occasionally through third parties and trade associations. Information that you provide might include, but is not limited to the following: (a) first and last names; (b) demographic information; (c) mailing address; (d) email address; (e) phone number; (f) purchasing history and related information; (g) job title; (h) company, agency or entity name; and (i) other information that may personally identify you.

We do not consider personal information to include information that can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

When and how do we collect your information?

We collect information from you both when you provide it voluntarily and also automatically when you use our Services, including purchasing history and related data. Most of the personal information we receive relates to Services that you have requested or content you have elected to receive.

In some instances, we automatically collect certain types of information when you use our Services or correspond with us. Automated technologies may include the use of web server logs to collect IP addresses, “cookies” and web beacons.

A “Cookie” is a small data file that is downloaded onto your computer or mobile device when you use our Services, used to tailor your use of our Services and your preferences, authenticate your access, and/or display relevant information. An “Anonymous Identifier” is a random string of characters that is used for similar reasons as Cookies. We may use Cookies and Anonymous Identifiers to become more familiar with you through the study of analytics.

Some portions of our Services require the use of Cookies for proper function. Anonymous Identifiers can be used where Cookie technology is not available. You may refuse to accept Cookies by activating the appropriate “do not track” setting on your web browser. These features are not yet uniform, so we do not currently respond to such features or signals. Therefore, if you select or turn on a “do not track” feature in your web browser or block or delete tracking Cookies, we, and our third-party providers, may continue collecting information about your online activities as described in this Privacy Notice. If you select this setting, you may be unable to access or use certain parts of our Services.

A “Web Beacon” is an object embedded into a web page or an email that collects various data. A Web Beacon functions similarly to a Cookie and can allow us to learn more about your behavior, actions, and preferences.

For more information about the information we collect, read on below.

What information do we collect from you?

<i>Information collected when you elect to receive content through our website (such as by signing up for email updates or requesting information related to our Services)</i>	
Categories of Information	Description of category
Content Registration Information	This is the personal information that is provided by you or collected by us to enable you to sign up to access our services and receive information through our website. This may include your name, email address, address, job title and company, phone number, and any personal information and any company, agency or entity information that you choose to enter into a blank message box.

Information collected through use of our Services	
Categories of Information	Description of category
Services Registration Information	<p>This is the personal information that is provided by you or collected by us to enable you to login and access your account and our Services. This may include your name, email address, address, job title and company, phone number</p> <p>Some of the personal information we will ask you to provide is required in order to create your account. You also have the option to provide us with some additional personal information in order to make your account more personalized.</p>
Services Usage Information	<p>This can be personal information and non-personal information that is collected about you when you are using our Services, and this may include:</p> <ul style="list-style-type: none"> ○ Information about the Services you have elected. ○ Information about your interactions with our Services which includes the data and time of any information you enter into our Services, and your interactions with other users of our Services. ○ Technical data which may include URL information, Cookie data, Web Beacons, your IP address, the types of devices you are using to access or connect to our Services, unique device IDs, device attributes, network connection type (e.g., WiFi, 3G, LTE, Bluetooth) and provider, network and device performance, browser type, language, and operating system. Further details about the technical data that is processed by us can be found below. ○ Information from your access or use of any of our pages on social media platforms, such as our blogs, Facebook, Twitter, or LinkedIn (“Social Media Platforms”). We may receive aggregate information and analysis about your usage of our pages on such Social Media Platforms.
Anonymized Information	<p>We use anonymized and aggregated information that may be created or derived from your personal information or usage of the Services for purposes that include data analysis, improving our Services, advertising, and developing new features and functionality within our Services.</p>

Generally, we do not collect any information relating to race or ethnic origin, political opinions, religious or other similar beliefs, union membership, physical or mental health, sexual life or criminal record. Before collecting and/or using any such special categories of data, we will obtain your consent or establish a lawful exemption which will allow us to use that information.

3. How we may use your information.

We will only use your information for the purposes identified below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose described here.

In the table below, we have set out the reasons why we process your information, the associated legal basis we rely upon to legally permit us to process your information, and the categories of information (identified in Section 2) used for these purposes:

Why Company processes your information	Lawful basis for the processing purpose	Categories of information used by Company for the processing purpose
To provide, personalize, and improve your experience with our Services and other services and offerings provided by us (for example, by providing customized or localized content, recommendations, support, and features through our Services).	<ul style="list-style-type: none"> ○ Performance of a contract ○ Legitimate business interest 	<ul style="list-style-type: none"> ○ Content Registration Information ○ Services Registration Information ○ Services Usage Information ○ Anonymized Information
To understand how you access and use our Services to ensure technical functionality of our Services, to prevent or investigate security breaches or other potentially prohibited activities, develop new products and services, and analyze your use of our Services, including your interactions with applications or services made available, linked to, or offered through our Services.	<ul style="list-style-type: none"> ○ Performance of a contract ○ Legitimate business interest 	<ul style="list-style-type: none"> ○ Content Registration Information ○ Services Registration Information ○ Services Usage Information ○ Anonymized Information
To communicate with you for Services-related purposes.	<ul style="list-style-type: none"> ○ Performance of a contract ○ Legitimate business interest 	<ul style="list-style-type: none"> ○ Content Registration Information ○ Services Registration Information ○ Services Usage Information
To communicate with you, either directly or through one of our service providers, for: marketing, research, to provide email updates, or other promotional purposes, via email, notifications or other messages, consistent with any permissions you may have communicated to us.	<ul style="list-style-type: none"> ○ Consent ○ Performance of a contract ○ Legitimate business interest 	<ul style="list-style-type: none"> ○ Content Registration Information ○ Services Registration Information ○ Services Usage Information

With your consent, we may use your geo-location to provide you with features or other content based on your location.	○ Consent	○ Services Usage Information

Legitimate Business Interests

Where we rely on “legitimate business interests” as the reason for processing your information, we have to carry out a balancing exercise to make sure your rights as an individual are not impacted. In some cases, we have set out our balancing test above. Otherwise, as a result of our balancing test, which is detailed below, we have determined, acting reasonably and considering the circumstances, that we are able to process your personal information in accordance with data protection laws on the basis that we have a legitimate business interest.

We have a legitimate business interest in processing your personal information as:

- We need the information to respond to your inquiries;
- We need the information to send you information; and
- We would be unable to provide our Services without processing your information.

We consider that it is reasonable for us to process your personal information for the purposes of our legitimate interests outlined above as (a) we process your personal information only so far as is necessary for such purpose and (b) it can be reasonably expected for us to process your personal information in this way. In most cases, the information is being processed for your benefit as well as ours.

If we wish to process your existing information for a new purpose other than as stated above, we must inform you of that further processing and provide information surrounding your information’s use.

4. Who we may share your information with.

In connection with our Services, we may share your personal information with the following types of recipients and for the following reasons:

Categories of Recipients	Reasons for sharing
Supplier partners	We share purchasing data of our members with our supplier partners in connection with our Services.
Service providers and others	We use service providers to operate our software and infrastructure, in particular providers which host, store, manage, and maintain our Services, its content and the data we process. This includes any email marketing or information security service providers.
Data analytics providers	We will share your personal information to create general data analytics regarding usage of our Services, on an aggregate basis and without personal identifiers.

Law enforcement and data protection authorities	We will share your personal information with third parties where required by law (including to respond to valid legal process such as a search warrant or a court order), where it is necessary in connection with our Services or where we have another legitimate interest in doing so.
Other legal or regulatory authorities	We will share your personal information for us to comply with our legal obligations, including assessing compliance with our regulatory requirements (e.g., using customer order information in the aggregate, including revenues generated in connection with our regulatory tax requirements).
Buyer or successor of our business	We will share your personal information with any buyer or successor in the event of a merger, reorganization, dissolution, or other sale or transfer of title.

Most, if not all, of the third parties with whom we may share your personal information are located and store your information in the United States, although some may store your information outside of the United States.

5. Your rights and options regarding your personal information.

Your data belongs to you, not us. Therefore, you have the following rights with respect to your data under certain circumstances:

- The **right to request access** to your personal information and the following information regarding our use of your personal information:
 - The purpose of such use
 - The categories of your personal information that we have used
 - Who we have disclosed your personal information to
- The **right to request us to correct** any inaccurate personal information concerning you.
- The **right to request us to erase** your personal information when we no longer need such data in connection with our services or, with respect to “special categories” of personal information, if you withdraw consent to our use of such information.
- The **right to withdraw consent** to our use of personal information, if we are relying on consent to use your personal information.
- The **right to request us to restrict** our use of your personal information (e.g., suspend our use of your personal information).
- The **right to object** to our use of your personal information where we are not using it to perform Services you have requested from us.
- The **right to receive** a copy of your personal information.

If you want to exercise any of the rights listed above, please contact us through one of the methods listed in Section 1 above.

6. How we safeguard your personal information.

We have put in place appropriate security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Other than third parties with whom we

share personal information in connection with our performance of Services, third parties we engage in our business who may have access to your personal information will only process your personal information on our instructions and they are required to only use your data as necessary to perform their contract with us.

While we are committed to protecting your personal information, please note that information communicated over the Internet is never 100% secure. Any transmission of personal information is at your own risk.

7. How long we store your personal information.

We may store your personal information as long as you use our Services to provide you with such Services and for legitimate business purposes.

We may store your personal information following completion of transactions with you to the extent required to comply with our legal, accounting, or reporting requirements and to provide information about our Services (such as your order history) requested by you. Additionally, we may continue to store your personal information contained in our standard back-ups.

Upon your request, we will delete or de-identify your personal information, unless, we are legally required or allowed to maintain such personal information.

8. Links.

Our Services may provide links to third-party websites that we do not control. We cannot be held responsible for third parties' privacy practices or content provided on these websites. If you click on one of these links, please understand that you are leaving our Service and any information you provide will not be covered by this Privacy Notice. Please read that website's privacy policy before providing any information.

9. Children.

Our Services is not directed to children under the age of eighteen (18) years. By using our Services, you represent that you are at least eighteen (18) years old. If you do not meet this age requirement, then you must not access or use our Services.

We do not knowingly collect information from children under the age of eighteen (18) years old. If you are under the age of eighteen (18) years old, please do not use our Services and do not provide any information to us.

For more information about the Children's Online Privacy Protection Act ("COPPA"), which applies to websites that direct their services to children under the age of thirteen (13), please visit the Federal Trade Commission's website <https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions>.

If you think we have collected information from a child under the age of eighteen (18) through our Services, please contact us through one of the methods listed in Section 1 above. If we learn that we have collected the information of a child under the age of eighteen (18) years old, we will take reasonable steps to delete such information.

10. Special notice to California residents.

Under California law, individuals that live in California and have provided their information to us may request information about our disclosure of certain information to third parties for their direct marketing purposes. In

response to your written request, we will provide a list of the categories of 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. If you would like to exercise your rights under California law, please send your written request to the address in Section 1 above.

11. Special notice to non-U.S. users regarding data transfers.

This website is intended for use by residents of the United States only. If you are located outside the United States and are using our Services, you should be aware that your personal information will be transferred to the U.S., the laws of which may be deemed by your country to have inadequate data protection. If you are located in a country outside the U.S. and submit personal information to us, you consent to the general use and disclosure of such information as provided in this Privacy Notice and to the transfer and/or storage of that information to the U.S.

12. Governing law and jurisdiction.

This Privacy Notice, your use of Our Services and this website, and the use of our information shall be construed, governed, and enforced under the laws of the State of Tennessee (without regard to rules governing conflicts of laws provisions). You agree that venue for all actions, arising out of or relating in any way to your use of our Services, shall be in federal or state court of competent jurisdiction located in Williamson County, TN, within one (1) year after the claim arises. Each party waives any objections based on forum non conveniens and waives any objection to venue of any action instituted hereunder to the extent that an action is brought in the courts identified above.

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