

Privacy Policy

Last updated: September 2024

System Improvements, Inc. (“SI”, “we”, “us” and “our”) respects your privacy and is committed to protecting your personal data. We treat any data that relates to an identified or identifiable individual as “personal data,” no matter where the individual lives. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or aggregated data. We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions or offenses.

This Privacy Policy will inform you about how we handle your personal data when you visit or interact with our website (regardless of your location when you visit the website), purchase our goods or services, contact us by phone, or interact with us in person.

This website is not intended for children, and we do not knowingly collect data relating to children. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us.

It is important that you read this privacy policy together with any other privacy policy or agreement that we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you click on a link or leave our website, we encourage you to read the privacy policy of every website you visit.

Data Subject rights

Privacy laws around the world provide certain rights for data subjects. These include the following:

- Right to be informed
- Right of access

- Right to rectification
- Right to erasure
- Right to restrict processing
- Right of data portability
- Right to object
- Rights related to automated decision-making, including profiling

This Privacy Notice is intended to provide you with information about what personal data we collect about you and how it is used. If you wish to confirm that we are processing your personal data, or to have access to the personal data we may have about you, please contact us.

Personal Data SI Collects from You

While using our website or services when you call or contact us, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. You are not required to provide any personal data to SI, but we may not be able to provide you with our products or services or respond to customer service requests.

We may collect the following types of personal data:

Contact Data includes name, billing address, delivery address, email address, and telephone numbers.

Device Information includes the type of device you use, the IP address of your device, your mobile operating system, internet browser or information sent by your browser, other unique device identifiers, and diagnostic data.

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.

Usage Data includes information about how you use our website and services. It may include information such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Other Information You Provide to Us includes the content of your interactions with customer support or when you create an account and connect with us through third-party social media channels like Google, Facebook, Instagram, Twitter, and LinkedIn, such as your name, email address, activities, or contact list associated with that account, and any other information you share with us.

How Your Personal Data is Collected

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your name, contact information, or financial data by filling in forms or by corresponding with us by phone, email, or otherwise. This includes personal data you provide when you:

- purchase our services;
- subscribe to our publications;
- request marketing to be sent to you; or
- provide us with feedback or contact us.

Automated technologies or interactions. As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookie Policy available on www.Taproot.com for more information.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources, such as analytics providers, advertising networks, and search information providers. We may also receive contact, financial, and transaction data from providers of technical, payment, and delivery services, and/or identity or contact data from data brokers or aggregators.

SI's Use of Personal Data

SI uses personal data to provide our services, to process transactions, to communicate with you, and to comply with the law. We may also use personal data for other purposes with your consent. SI only uses personal data when we have a valid legal basis to do so. All collected data will be used lawfully, fairly, and in a transparent manner. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You have the right to withdraw consent to marketing at any time by contacting

us at privacy@taproot.com, through the webform available at [Contact](#), or by selecting the “Unsubscribe” button on any of our marketing communications.

Most commonly, we will use your personal data in the following circumstances:

- Performance of a contract - Where we need to perform the contract we are about to enter into or have entered into with you.
- Responding to requests or inquiries – Where we need to identify you in order to respond to your request.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, such as marketing communications to support our business. We may use your personal data to contact you with newsletters, marketing, courses, or promotional materials and other information that may be of interest to you. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that information.
- Compliance with a legal obligation.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at privacy@taproot.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including legitimate interest
To register you as a new user	(a) Identity (b) Contact	Performance of a contract with you
To provide you with various services we offer, where we will then: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	(e) Marketing and Communications	
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Responding to requests made by you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<p>(a) Technical</p> <p>(b) Usage</p>	Necessary for our legitimate interests (to understand types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including legitimate interest
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our products/services and grow our business) (b) Consent

How We Disclose Your Personal Data to Third Parties

We may share your personal data with third-parties to offer our products and services to you:

With Service Providers to Run Our Website or Provide a Product or Service to You- We may share your personal information with service providers to monitor and analyze the use of our website and services, for payment processing, or to contact you. These service providers include:

- GOOGLE (INCLUDING GOOGLE ANALYTICS)** Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on this website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity. Their Privacy & Terms web page can be found at <https://policies.google.com/privacy>
- ZOHO** Zoho assists in tracking internal technology improvements and customer support inquiries. Their Privacy Policy is available at <https://www.zoho.com/privacy-commitment.html>
- INVISIBLE RECAPTCHA** We use an invisible captcha service named reCAPTCHA, which is operated by Google. The reCAPTCHA service may collect information from

you and from your device for security purposes. The information gathered by reCAPTCHA is held in accordance with the Privacy Policy of Google: [Google Privacy Policy](#)

- **MICROSOFT AZURE** We use Azure as a hosting provider for some of our services and for some of our internal systems. Their Privacy Policy can be found at <https://privacy.microsoft.com/en-us/privacystatement>.
- **WOW!** We use WOW! as a hosting provider for some of our services. Their Privacy Policy can be found [here](#)

With Marketing Service Providers – These Parties help us manage and send communications or assist us in providing TapRoot® courses to you. We will only do this where we have a legal basis to do so.

- **HUBSPOT.COM** - Their Privacy Policy can be found at <https://legal.hubspot.com/privacy-policy>
- **THINKIFIC.COM** - Their Privacy Policy can be found at <https://www.thinkific.com/privacy-policy/>

With Payment Service Providers: We may provide products and/or services to you and process your payments through third party payment processors. We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

- **AUTHORIZE.NET** - Their Privacy Policy can be found at [Authorize.net Privacy Policy](#)

For Business Transfers: We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of assets, financing, or acquisition of all or a portion of our business to another company.

With Business Partners: We may share your information with our business partners to offer you certain products, services, or promotions. This includes contractors and some API partners.

With Other Users: When you share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If you interact with other users or register through a third-party social

media service, your contacts on the third-party social media service may see your name, profile, pictures, and description of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you and view your profile.

With Your Consent: We may disclose your personal information for any other purposes but only where we have obtained your explicit consent. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

With Legal Authorities: Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency), or where we need to comply with a legal obligation.

Retention of Your Personal Data

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period if we have a lawful basis for processing, in the event of a complaint, or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our website and services, or we are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data Between Countries

If you are using our website or purchase any products or services from outside the United States of America, then we will transfer and store your personal data from the country where you are located to the United States where SI is located.

This may also involve transferring your data outside of your country as many of the third parties we use to process your personal data are based in the United States.

Whenever we transfer your personal data, we ensure protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK or EU which give personal data the same protection it has in the EU or UK. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU or UK.
- SI keeps an updated list of sub-processors. You may email licensing@taproot.com at any time to request an updated list.
- You may subscribe to receive notice of updates to the list of sub-processors by sending an email with the subject line “Sub-Processor Updates” to licensing@taproot.com, and include any pertinent contact information.
- You may object in writing to SI’s appointment of a new sub-processor within five (5) calendar days of such notice, provided your objection is based on reasonable grounds related to data protection. In such event, the parties will discuss such concerns in good faith with a view to achieving resolution. If the parties are not able to agree, you may terminate your Agreement with SI for convenience and/or request that your personal data be deleted from our systems.

Security of Your Personal Data

The security of your personal data is important to us, but no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to request access to your personal data or deletion of your personal data.

No fee usually required. You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we need. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.

Opt Out. You may opt out of receiving marketing communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us. Where you opt out of receiving marketing messages, this will not apply to personal data provided to us for product or service purchases, or other transactions.

California Consumer Privacy Act

California consumers have a right to knowledge, access, and deletion of their personal information under the California Consumer Privacy Act. California consumers also have a right to opt out of the sale of their personal information by a business and a right not to be discriminated against for exercising their California privacy rights. We do not sell the personal information of California consumers and do not discriminate in response to privacy rights requests.

Cookies and Tracking Technologies

SI does not track its customers over time and across third-party websites to provide targeting advertising and therefore does not respond to **Do Not Track** (DNT) signals. Third Parties that have content embedded on our website set cookies on a user's browser and/or obtain information about the fact that a web browser visited a specific website from a certain IP address. Third parties cannot collect any other personally identifiable information from our website unless you provided it to them. If you are visiting third-party websites, you can set preferences in your web browser to inform websites that you do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of your web browser. SI makes available a comprehensive Cookie Tracking Policy that describes the cookies and tracking technologies used on our website and provides information on how users can accept or reject them. To view the notice, click on the notice here or find the notice on our website at <https://www.taproot.com/cookie-policy/>

Changes to this Privacy Policy

We may update this Policy from time to time. You are advised to review this Privacy Policy periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on our website with a new “Last Update” date at the top of this Privacy Policy. We will always put a notification on our website before the updated Privacy Policy takes effect. If we have your data on file, we will also notify you by email of any updates to our Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

Privacy Questions

SI is the controller and responsible for your personal data. We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below. If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: System Improvements, Inc.

Email address: privacy@taproot.com

DSAR Request Webform: [Contact](#)

Postal address: 238 S. Peters Rd., Knoxville, TN 37923

Telephone number: 865-539-2139

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Our EU Representative:

Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Our nominated EU Representative is: Instant EU GDPR Representative Ltd.

Adam Brogden contact@gdprlocal.com

Tel +35315549700

INSTANT EU GDPR REPRESENTATIVE LTD

Office 2,

12A Lower Main Street, Lucan Co. Dublin

K78 X5P8, Ireland

Our UK Representative:

Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. Our nominated UK Representative is: GDPR Local Ltd.

Adam Brogden contact@gdprlocal.com

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