

User Privacy Notice

This Privacy Notice was posted on January 10, 2019. It is effective for all users.

USZoom LLC is committed to your privacy. This privacy notice explains our collection, use, disclosure, retention and protection of your personal information.

This is the privacy policy ("POLICY", "NOTICE") of USZoom, LLC, a Delaware limited liability corporation ("USZOOM", "OUR", "WE", "US"). The POLICY applies to OUR secure hosted digital mailbox applications which require registration and payment and may include digital mailbox services (DMS), check processing, tools, or other mail and message related services that WE perform. The POLICY is applicable to all websites and services operated by USZOOM including but not limited to: iPostall.com, iWorkspaceMail.com, iCollegeMail.com, iRVMail.com, USAMAIL1.com and their associated apps collectively "THE SERVICES" or "HOSTED SERVICES".

This policy governs OUR treatment of data collected from users ("USERS", "YOU", "YOUR") of THE SERVICES.

WE take very seriously the job of providing high quality service and protecting YOUR privacy. Therefore, we endeavour to reflect the understandings and standards found in the GDPR. The information below outlines the commitment WE have made to protect YOUR privacy. WE may amend this privacy notice at any time by posting the amended version on this site including the effective date of the amended version. WE will announce any material changes to this privacy notice through the USZoom.com website, iPostall website or app, and/or via email.

1. Scope:

This privacy notice applies to any of THE SERVICES offered by USZoom LLC, where this privacy notice is referenced, regardless of how YOU access or use them, including through mobile devices.

This privacy notice also applies to the provision of USZoom LLC services through any USZoom LLC partner's website, application, service or tool where it is referenced and where YOUR listings and their content are published or advertised in accordance with the terms of this NOTICE.

2. Personal data:

a) What is considered Personal Data?

Under GDPR, Personal Data 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. GDPR does not consider Personal Data to include information that has been anonymised or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

b) What is considered Special Category Data?

Special Category Data is Personal Data which the GDPR says is more sensitive, and as such needs more protection.

This includes:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life; or
- sexual orientation.

As YOUR DMS provider WE and YOUR Commercial Mail Receiving Agent (CMRA) of choice from within OUR network, may receive on YOUR behalf and collect both Personal Data and Special Category Data when YOU use OUR Services.

3. How and when do WE collect Personal Data?

WE collect Personal Data from YOU and any devices (including mobile devices) YOU use when YOU: use OUR Services, register for an account with US, provide US information on a web form, update or add information to YOUR account, or when YOU otherwise correspond with US.

Some of this Personal Data, such as a way to identify YOU, is necessary to enter into OUR User Agreement. The provision of all other Personal Data is voluntary but may be necessary in order to use OUR DMS or the CMRA services of OUR partners. WE may also collect Personal Data from other sources, as described below.

a) Personal Data YOU give US when YOU use OUR SERVICES or register for an account with US:

- Identifying information such as YOUR name, addresses, telephone numbers or email addresses when YOU register for an account with US.
- Confirmation that YOU have reached legal majority in your jurisdiction and in the jurisdiction of your CMRA of choice. In case YOU are a minor – your CMRA will require the consent of YOUR legal guardian.
- Other content that YOU generate, or that is connected to YOUR account
- Financial information (such as credit card or bank account numbers) in connection with in-platform transaction.
- Postage, billing and other information used to purchase OUR SERVICES or send an item, as well as, where postal services are provided through one of OUR programs, information required to clear customs (such as Tax ID or other identification numbers) and relevant postage information (such as tracking numbers and tracking updates).
- In some instances, when YOU use OUR Services, YOUR gender may be recorded when an item is addressed to YOU by sender as such.
- YOU may also provide US other information through a web form, by updating or adding information to YOUR account, dispute resolution or when YOUR otherwise communicate with US regarding OUR Services.
- Additional information WE are required or authorised by applicable national laws to collect and process in order to authenticate or identify YOU or to verify the information WE have collected.

b) Personal Data WE collect automatically when YOU use OUR Services or register for an account with US:

We collect information about YOUR interaction with OUR Services, YOUR advertising preferences and YOUR communications with us. This is information we receive from devices (including mobile devices) YOU use when YOU access OUR Services. This information could include the following:

- Device ID or unique identifier, device type, ID for advertising and a unique device token.
 - Location information, including location information from YOUR mobile device. Keep in mind that most mobile devices allow YOU to control or disable the use of location services by any application on YOUR mobile device in the device's settings menu. However, doing so may hamper or prevent you from enjoying some of our SERVICES.
 - Computer and connection information such as statistics on YOUR page views, traffic to and from the sites, referral URL, ad data, YOUR IP address, YOUR browsing history and YOUR web log information.
- **Information collected for the use of OUR Hosted Services:**

When YOU sign up for a Hosted Service that requires registration:

- WE ask YOU for personal information (such as YOUR name, email address, and an account password).
 - For services such as DMS, WE also request credit card or other payment account information, but we do not store this information.
 - WE also request address and telephone information, while in some cases i.e. opening an account at a CMRA with PS form 1583 - physical copies of YOUR identification papers. For services such as check processing and depositing.
 - WE may request and store information relating to YOUR banking account. All information will be maintained in encrypted form on secure servers and/or in secure physical facilities, as appropriate.
 - WE may combine the information YOU submit under YOUR account with information from other USZOOM services or third parties in order to provide YOU with a better experience and to improve the quality of OUR services.
 - For certain services, WE may give YOU the opportunity to opt out of combining such information.
 - WE do not contact site visitors unless they have given US explicit permission to do so, have written to US, or have begun (or completed) the process of signing up for one of OUR services. Except in the unlikely event that WE are required to do so by law, personal details of YOUR visit to OUR publicly-accessible websites will never be shared with any third party without YOUR permission.
- **Personal Data WE collect using cookies and similar technologies:**

WE use cookies, web beacons, unique identifiers and similar technologies to collect information about the pages YOU view, the links YOU click and other actions YOU take when using OUR Services, within OUR messages or email content. When YOU visit or interact with OUR sites, services, applications, tools or messaging, WE or OUR authorised service providers may use cookies and other similar technologies to help provide YOU with a better, faster and safer experience, and for advertising and marketing purposes of OUR SERVICES.

When YOU visit OUR websites:

WE will inform YOU that WE wish to send to YOUR computer one or more cookies - a small file containing a string of characters - that uniquely identify YOUR browser, hence regarded as Personal Data. WE use cookies for the purpose of improving the quality of OUR service by storing USER preferences and tracking USER trends. WE respect your right to control the use of cookies and have granted our USERS the ability to easily consent to accept OUR cookies or reject or disable them. However, some website features and services may not

function properly if YOUR cookies are disabled. WE respect YOUR right to withdraw YOUR cookie consent at any time.

Personal Data collected from other sources:

- WE supplement the personal information WE collect directly with information collected from third parties and add it to YOUR account information. For example, WE collect and use demographic and other information that is publicly available in an applicable jurisdiction, additional contact information, credit check information, and information from credit bureaus, as allowed by applicable national laws.
- If YOU give US Personal Data about someone else, YOU must do so only with that person's authorisation. You should inform them how WE collect, use, disclose, and retain their Personal Data according to OUR privacy notice.

4. Purposes of the collection of Personal Data and how WE use it:

WE may use technologies considered automated decision making or profiling. WE will not make automated-decisions about YOU that would significantly affect YOU, unless such a decision is necessary as part of a contract that we have with YOU, WE have YOUR consent, or WE are required by law to use such technology.

WE use YOUR Personal Data to provide and improve OUR Services, provide YOU with a personalised experience on OUR sites, contact YOU about YOUR account and OUR Services, provide YOU customer service, (provide YOU with personalised advertising and marketing for our SERVICES) and to detect, prevent, mitigate and investigate fraudulent or illegal activities.

WE use the personal information WE collect from YOU for a range of different business purposes and according to different legal bases of processing. The following is a summary of how and according to which legal basis WE use YOUR personal information.

a) Contractual, legal, vital interest and public good bases:

WE use YOUR personal information to fulfil a contract with YOU and provide YOU with OUR Services, to comply with OUR legal obligations, protect YOUR vital interests, or as may be required for the public good. This includes:

- To provide payment processing and account management, operate, measure and improve OUR Services, keep OUR Services safe, secure and

operational, and customise site/app content that includes items and SERVICES that YOU may like in response to actions that YOU take.

- To contact YOU regarding YOUR account, to troubleshoot problems with YOUR account, to resolve a dispute, to collect fees or monies owed or as otherwise necessary to provide YOU customer service.
 - When contacting YOU for such purposes as outlined above, WE may contact YOU via email, telephone, SMS/text messages, postal mail and via mobile push notifications.
 - When contacting YOU via telephone, to ensure efficiency, WE may use auto-dialled or pre-recorded calls and text messages and as authorised by applicable law. Message and data rates may apply.
- To provide other services requested by YOU as described when WE collect the information.
- WE use general location information to provide YOU with location-based services such as advertising (when YOU opt in for such), search results and other personalised content.
- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities.
- To enforce OUR User Agreement, this privacy notice, or other policies.

b) Legitimate interest basis:

WE use YOUR Personal Data to pursue OUR legitimate interests where YOUR rights and freedoms do not outweigh these interests. WE have implemented controls to balance OUR interests with YOUR rights. This includes to:

- Prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities by potential clients or current ones via comparing their credit card details with credit card score databases.
- Improve OUR Services, for example by reviewing information associated with stalled or crashed pages experienced by USERS allowing US to identify and fix problems and give YOU a better experience.
- Personalise, measure and improve OUR advertising based on YOUR opt-in advertising customisation preferences
- Contact YOU via email or postal mail in order to offer YOU coupons, discounts and special promotions, poll YOUR opinions through surveys or questionnaires and inform YOU about OUR Services, as authorised by applicable law.
- Contact YOU about public policy matters, or other current events, related to YOUR ability to use OUR Services. This could include an invitation to join a petition, letter writing, call or other sort of public policy related campaigns.

- Deliver targeted marketing, service updates and promotional offers based on YOUR opt-in communication preferences.
- Measure the performance of OUR email marketing campaigns (e.g. by analysing open and click rates).
- Monitor and improve the information security of OUR site and mobile applications.

c) Consent basis:

With YOUR opt-in consent, WE may use YOUR personal information to:

- Provide YOU with marketing via telephone calls, email, SMS/text.
- Provide YOU with marketing from other USZoom LLC corporate family members.
- Provide YOU with marketing from OUR partners or third parties.
- Customise third party advertising YOU might see on third party websites.
- Use YOUR precise geo-location to provide location-based services.
- Use YOUR special category personal data to facilitate transactions in certain categories.

WE respect YOUR right to withdraw YOUR consent at any time.

d) Accuracy Principle:

Ways YOU can access, control, correct and delete YOUR Personal Data

WE respect YOUR right to access, correct, request deletion or request restriction of OUR usage of YOUR Personal Data as required by applicable law. WE also take steps to ensure that the Personal Data WE collect is accurate and up to date.

- YOU have the right to know what Personal Data WE maintain about YOU
- WE will provide YOU with a copy of YOUR Personal Data in a structured, commonly used and machine-readable format on request.
- If YOUR Personal Data is incorrect or incomplete, YOU have the right to ask US to update it or YOU may do so yourself through YOUR account portal.
- YOU have the right to object to OUR processing of YOUR Personal Data.
- YOU can also ask US to delete or restrict how WE use YOUR Personal Data, but this right is determined by applicable law and may impact YOUR access to some of OUR Services

YOU can see, review and change most of YOUR Personal Data by signing in to YOUR account. Please, update YOUR Personal Data immediately if it changes or is inaccurate.

WE endeavour to honour any statutory right YOU might have under GDPR to access, modify or erase YOUR personal information.

Where YOU have a statutory right to request access or request the modification or erasure of YOUR Personal Data, WE can still withhold that access or decline to modify or erase YOUR Personal Data in some cases in accordance with applicable national laws.

If YOU request that WE stop processing some or all of YOUR Personal Data or YOU withdraw (where applicable) YOUR consent for OUR use or disclosure of YOUR Personal Data for purposes set out in this privacy notice, WE might not be able to provide YOU all of the Services and customer support offered to OUR USERS and authorised under this privacy notice and OUR TOS.

Upon YOUR request, WE will close YOUR account and remove YOUR Personal Data from view as soon as reasonably possible, based on YOUR account activity and in accordance with applicable national laws.

e) **Storage Limitation and Retention**

How long do WE keep YOUR Personal Data?

WE retain YOUR Personal Data for as long as necessary to provide the Services YOU have requested, or for other essential purposes such as complying with OUR legal obligations, resolving disputes, and enforcing OUR policies.

OUR specific retention times for Personal Data are documented in OUR regional records retention schedules. How long WE retain Personal Data can vary significantly based on context of the Services WE provide and on OUR legal obligations.

The following factors typically influence retention periods:

- **How long is the Personal Data needed to provide OUR Services?** This includes such things as maintaining and improving the performance of OUR products, keeping OUR systems secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most of OUR data retention periods.
- **Is the Personal Data considered Special Category Personal Data under GDPR?** If so, a shortened retention time is generally appropriate for sensitive data.
- **Have YOU provided consent for a longer retention period?** If so, WE will retain data in accordance with YOUR consent.

Are WE subject to a legal, contractual, or similar obligation to retain YOUR Personal Data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or Personal Data retained for the legitimate purposes such as litigation.

After it is no longer necessary for US to retain YOUR Personal Data, WE will dispose of it in a secure manner according to OUR data retention and deletion policies.

f) Integrity and Confidentiality Principle

How do WE protect YOUR Personal Data?

WE protect YOUR Personal Data using technical and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration.

Some of the safeguards WE use are:

- firewalls
- data encryption and anonymization
- physical access controls to OUR data centres
- role-based access
- information access authorisation controls.
- strict contractual confidentiality obligations based on GDPR requirements or recommendations, between Data Controllers, Data Processors and employees.
- strict internal disciplinary measures including employment termination if they fail to meet these obligations.

5. How WE might share YOUR Personal Data:

WE may disclose YOUR Personal Data to other members of the USZoom LLC corporate family or to third parties i.e. YOUR CMRA Postal Store of choice on OUR DMS platform. This disclosure may be required for US to provide YOU access to OUR Services, to comply with OUR legal obligations, to enforce OUR TOS, to facilitate OUR marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to OUR Services. WE attempt to minimise the amount of Personal Data WE disclose to what is directly relevant and necessary to accomplish the specified purpose. WE do not sell, rent or otherwise disclose YOUR Personal Data to third parties for their marketing and advertising purposes without YOUR explicit consent.

WE may disclose YOUR Personal Data to the following parties for the following purposes:

a) USZoom LLC corporate family members, who may use it to:

- Provide joint content and services (like registration, transactions and customer support)
- Help detect, investigate, mitigate and prevent potentially fraudulent and illegal acts, violations of OUR User Agreement and data security breaches
- Provide YOU personalised advertising
- Improve their products, sites, applications, services, tools and marketing communications.
- Members of OUR USZoom LLC corporate family will use YOUR personal information to send YOU marketing communications only if YOU have selected to opt-in or have consented to receive such communications from them or if otherwise permitted by the law.

b) Service Providers, Financial, CMRA/ Postal Store Network/ Franchise Partners as follows:

- Third party service providers who help US to provide OUR Services, payment processing services, assist US in providing customised advertising, to assist US with the prevention, detection, mitigation, and investigation of potentially illegal acts, violations of OUR TOS, fraud and/or security breaches, bill collection, affiliate and rewards programs, co-branded credit cards and other business operations.
- Third party CMRA Postal Networks and Franchises with whom WE partner to deliver or DMS to YOU, for them to provide content and services (such as, registration, transactions and customer support). These third-party CMRA Postal Networks and Franchises partners will use YOUR personal information to send YOU marketing communications only if YOU have opted in or requested their services.
- Third party postage providers (e.g., DHL, UPS, USPS, etc.) with whom WE share delivery address, contact information and shipment tracking information for the purposes of facilitating the delivery of items purchased and other delivery related communications.
- If WE transfer/ share Personal Data to third party providers, i.e. CMRA Postal Stores or Networks this will be solely on the basis of an agreement limiting use by the third party provider of such Personal Data to processing necessary to fulfil their; legal duties in the CMRA capacity, contract with us, marketing communications only if YOU have opted in or requested their services, and obligating the third party provider to take security measures with regard to such data. Third party providers are not permitted to sell, lease or in any other way transfer the Personal Data to any other third parties.

- When transacting with a third party such as for mail forwarding or delivery, the third party may request that WE provide him/her with information about YOU necessary to complete the transaction, such as YOUR name, account ID, email address, contact details, postage and billing address, or other information from YOU needed to execute the task(s) and service(s) YOU have requested.
- If a transaction fails, is put on hold, or is later invalidated, WE may also provide the third party with details of the unsuccessful transaction
- The third party receiving YOUR information should only use it for purposes related to the transaction. Please refer to their privacy policy or their respective websites.
- Where WE utilize the services of Financial Institutions (i.e. PayPal Inc.) WE may disclose YOUR personal information to them and their corporate family to:
 - Prevent, detect, mitigate, and investigate potentially illegal acts, fraud and/or security breaches, and to assess and manage risk, including to alert YOU if fraudulent activities have been detected on YOUR PayPal account
 - To provide customer services, including to help service YOUR account or resolve disputes (e.g., billing or transactional disputes)
 - To facilitate the processing of payment cards when YOU pay within OUR Services with a payment card and WE use PayPal to process YOUR payment

c) Law enforcement, legal proceedings and as authorised by law to:

- Comply with OUR legal requirements, enforce OUR TOS, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property or safety.
- Law enforcement or governmental agencies, or authorised third-parties, in response to a verified request or legal process relating to a criminal investigation or alleged or suspected illegal activity or any other activity that exposes us, YOU, or any other of OUR USERS to legal liability. WE will only disclose information WE deem relevant to the investigation or inquiry, such as name, city, state, postcode, telephone number, email address, User ID history, IP address, fraud complaints, bidding and listing history.
- Credit agencies or bureaus as authorised by applicable national laws (e.g. information on late or missed payments or other defaults on YOUR account that may be reflected in YOUR credit report or file).
- Third parties involved in a legal proceeding, if they provide US with a subpoena, court order or substantially similar legal basis, or WE otherwise believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity.

- Facilitate delivery and related services for purchases YOU made using PayPal.

6. Global Privacy Standards

As YOUR DMS providers, WE at USZoom LLC take YOUR Personal Data privacy and protection very seriously. WE endeavour to follow GDPR guidelines and are constantly evaluating and updating OUR systems and policies, to reflect the latest GDPR standards.

Regardless of where YOU reside worldwide, YOU are contracting with **USZoom LLC, 400 Rella Blvd, Suite 123, Montebello NY 10901 USA**

The company YOU are contracting with is YOUR Data Controller, and is responsible for the collection, use, disclosure, retention and protection of YOUR personal information in accordance with OUR global privacy standards, this privacy notice, as well as any applicable national laws.

WE may process and retain YOUR Personal Data on OUR servers in the U.S. and elsewhere in the world where OUR data centres are located.

7. Other important Privacy Information

This section describes some additional privacy information related to YOUR use of OUR Services that YOU may find important.

- **Data Controllers (C), Processors (P), and Data Protection Officers (DPO)**

As USZoom LLC and its subsidiaries determines the purposes and means of the processing of YOUR personal data they are the legal C of YOUR Personal Data.

CMRA/Shipping Stores on OUR platform act on OUR behalf and do not control the means and purpose of the processing, thereby legally defined as P.

Should YOU elect to opt in to receive advertising or marketing material from a CMRA/Shipping Store on OUR platform, this will legally define them per GDPR as Controllers of the Personal Data YOU have chosen to share with them. Additionally, USZoom LLC and its subsidiaries shall not be legally defined as C, Joint C, or P with regards to the Personal Data shared with the CMRA/Shipping Store.

- **Communication tools**

WE may scan messages automatically and check for spam, viruses, phishing and other malicious activity, illegal or prohibited content or violations of OUR User Agreement, this privacy notice, or OUR other policies.

- **Children's Privacy**

OUR websites and apps are general audience websites and may be used by children. WE do not knowingly collect Personal Data from USERS deemed to be children under their respective national laws. As different countries are entitled to derogate from the GDPR standards regarding this issue and legislate their own age restrictions providing that it does not go below the age of 13, WE will require parental consent when required to do so by the local law of the country where the signup originates from.

- **Third Party Privacy Practices**

This privacy notice addresses only OUR use and handling of Personal Data WE collect from YOU in connection with providing YOU OUR Services. If YOU disclose YOUR information to a third party or visit a third-party website via a link from OUR Services, their privacy notices and practices will apply to any Personal information YOU provide to them or they collect from YOU.

WE cannot guarantee the privacy or security of YOUR Personal Data once YOU provide it to a third party and WE encourage YOU to evaluate their privacy and security policies before entering into a transaction and choosing to share YOUR Personal Data. This is true even where the third parties to whom YOU disclose Personal Data are delivery partners on OUR site.

- **Contact Us**

If YOU have a question or a complaint about this privacy notice, OUR global privacy standards, or OUR information handling practices, YOU can reach the Global Privacy Office in writing at:

Global Privacy Office

USZoom LLC

400 Rella Blvd, Suite 123,

Montebello NY 10901 USA

YOU can also email OUR Global Privacy team at **dataprotection@uszoom.com**

WE endeavour to handle YOUR requests and inquiries regarding YOUR rights in a professional manner.

8. Change of Ownership

If USZoom LLC or any of OUR subsidiaries are subject to a merger or acquisition with/by another company, WE may share information with them. WE will endeavour that Personal Data sharing shall be in accordance with GDPR. Should such an event occur, WE will require that the new combined entity follow this privacy notice with respect to YOUR Personal Data. If WE intend to handle YOUR Personal Data for any purposes not covered in this privacy notice, YOU will receive prior notification of the processing of YOUR personal information for the new purposes and necessary lawful bases as outlined by the GDPR.