

OUR PRIVACY MISSION STATEMENT

LICIEL Environment, LLC. (“**LICIEL Environment**”) recognizes that when its clients and customers, partners, prospective clients and customers, employees and other individuals provide personal data, they expect their privacy will be respected.

Such expectations are taken seriously and therefore we are committed to safeguarding each individual's privacy and personal data.

It is our endeavor to be transparent about the data we collect about you and about its usage and sharing, therefore we would like to you know why and how the data is collected, how it is used and shared, as well as what is done in order to protect your personal data.

It is our belief that you should have choices regarding how your personal data is shared and how we communicate with you.

1. INTRODUCTION

Welcome to the LICIEL Environment website (the “**Site**”). LICIEL Environment is a software developer and information technology service provider specialized in the home inspections field. The products and services provided include applications software, CRM Database services, webpages development, cloud information storage and associated services (“**Services**”).

This Privacy Policy explains what data we collect when you use our Site and/or the Services, why we collect it and how that data is used. It applies to personal data and other information collected by us from or about: (i) visitors to, or users of, our Site, (ii) prospective customers, (iii) current customers (“**Customers**”), and (iv) job applicants.

LICIEL Environment complies with the EU-U.S. Privacy Shield frameworks (“**Frameworks**”) as set forth by the U.S. Department of Commerce regarding the processing of personally identifiable information transferred from the EU to the U.S. LICIEL Environment has certified that it adheres to the Privacy Shield Principles (described below). If there is any conflict between the policies in this Privacy Policy and the EU Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Frameworks and to view our certification page, please visit <https://www.privacyshield.gov/>.

By using the Site and/or the Services, and providing us with your personal data, you consent to the processing of your personal data in the manner set out in this Privacy Policy.

2. INFORMATION WE COLLECT

When you interact with the Site, we may collect information that, alone or in combination with other information, could be used to identify you ("**Personal Data**"), as described below:

Personal Data That You Provide Through the Site: When you create an account, order products or services, request information, communicate with customer service, subscribe to emailing lists, we collect the following Personal Data from you:

- First and last name
- Title
- Company name
- Email address
- Mailing address
- Date of birth
- Phone number
- Fax number
- Account password
- Payment and billing information
- Country location
- Employment History and education

Service Data: In providing the Services to Customers, we process on behalf of Customers Personal Data they upload or otherwise submit to our Services ("**Service Data**"). While our Customers decide what data to submit, Service Data typically includes information about their customers, prospects, employees, consultants or independent contractors, suppliers and other individuals or third parties ("**End Users**").

Automatically Collected Data: When you visit the Site, we may automatically collect information about you through cookies. This information includes the browser or operating system that you use to access the Internet, your IP address, the date and time you may have viewed certain pages on the Site. Please see the "Use of cookies" section below to find out more about how we use cookies and similar technologies.

3. HOW COLLECTED INFORMATION IS USED

To provide the Services to Customers and respond to requests. We use account-related data provided by Customers to us in connection with the purchase, sign-up, use or support of Customer accounts (such as usernames, email address and billing information) to provide you with access to the Services and/or the Site, contact you regarding your use of the Services and/or the Site or to notify you of important changes to the Services and/or the Site. For EU data subjects, such use is necessary for the performance of the contract between you and us.

When you ask for information about the Services (for example, when you ask us to send you offers or price information), we will use your contact information to respond to your requests. For EU data subjects, such use is necessary to respond to or implement your request prior to entering into a contract with us.

We process Service Data on behalf of Customers for the purpose of providing the Services to Customers in accordance with the applicable Customer contract.

For marketing purposes. To the extent permitted by applicable law, we will use your Personal Data to send you information by email on our new products or services or other promotions. Where required by the applicable law, we will obtain your consent before doing so. (for example, if you are an EU data subject), we will send you such information only with your consent, which was given at the time you provided us with the Personal Data. In such case, if you do not provide us with your consent to the processing of your Personal Data for this purpose, we will not send you this information.

You have the right to withdraw your consent at any time, including by following the instructions contained in each promotional communication we send you permitting you to “opt-out” of receiving future promotional information. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us at:

- **Email:** info@liciel.us
- **Postal Mail:** LICIEL ENVIRONMENT
244 5th Avenue Suite C38
New York City, New York, 10001

Please note that we will continue to contact you via email to respond to your requests and regarding the provision of our Services.

To analyze, administer, support, improve use of the Site and the Services. We use data relating to your use of the Site and/or the Services to analyze, administer, support and improve your access to and use of the Site and the Services. We may also compile, anonymize and/or aggregate your Personal Data and other data and use such anonymized and/or aggregated data for our business purposes, including sharing such data with affiliates and business partners. This aggregate information does not identify you. For EU data subjects, this use of your Personal Data is necessary for our legitimate interests in understanding how the Site and the Services are being used by you and to improve your experience on it.

To process applications for a job. When you apply for employment through our Site, your contact details and data about your employment history and education may be collected by our provider of recruiting services and we will use such data to evaluate your job application, to conduct job interviews, and as is otherwise needed for recruitment. For EU data subjects, processing of this data is necessary to

respond to your request to process your application for employment. If you do not provide this data, we will not be able to process the application that you send through our Site.

Other Uses of Personal Data. We also may use your Personal Data in other ways for which we provide specific notice at the time of collection.

If you are an EU data subject, please see the “EU Data Subjects” section below for information on your rights in relation to your Personal Data.

4. SHARING AND DISCLOSURE

We may share your Personal Data and other information with certain third parties without further notice to you, as set forth below:

- **Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions: providers of payment processing and fraud prevention, marketing, web analytics, hosting, email communication and customer support services, and recruiting services. Pursuant to our instructions, these parties may access, process or store Personal Data in the course of performing their duties to us.
- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.
- **Legal Requirements:** 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 or lawful requests by public authorities, including meeting national security or law enforcement requirements and applicable law, rule, order, or regulation, (ii) protect and defend the rights or property of LICIEL Environment, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

5. UPDATE YOUR INFORMATION

If you need to change or correct your Personal Data provided to us, or wish to have Personal Data removed from our systems, please contact us as described in the “Contact Us” section below and we will address your requests as required by applicable law.

6. EU DATA SUBJECTS (This section applies if you are an EU data subject)

LICIEL Environment, LLC. is the data controller for processing personal data provided to us through the Site. Our registered office is at: 244 5th Avenue Suite C38, New York City, New York, 10001.

Subject to applicable law, you have the following rights in relation to your Personal Data:

Right of access: If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to data portability:** Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to object:** Request at any time to stop processing your Personal Data. We will do so if:
 - We are relying on a legitimate interest to process your Personal Data — unless we demonstrate compelling legitimate grounds for the processing; or
 - We are processing your Personal Data for direct marketing.
- **Rights in relation to automated decision-making and profiling:** You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

You may exercise your rights by contacting us as indicated under “Contact Us” section below.

Data Protection Officer. LICIEL Environment has appointed a Data Protection Officer. The appointed person’s contact information is as follows:

DELOT Stephane LICIEL ENVIRONMENT
244 5th Avenue Suite C38, New York City, New York, 10001.
E-mail: info@liciel.us

7. PRIVACY SHIELD

Personal Data collected by LICIEL Environment may be stored temporarily on servers located in Canada and will be stored in the United States, where we are located.

We rely on our Privacy Shield certification to transfer Personal Data and other information that we receive from the EU and Switzerland to LICIEL Environment in the U.S. and we process such in accordance with the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability (“**Privacy Shield Principles**”), as described below.

Notice And Choice. This Policy provides notice of the Personal Data collected and transferred under the Privacy Shield and the choice that you have with respect to such data. It also provides information about other Privacy Shield Principles that are set forth below. When we process Service Data on behalf of our Customers, the Customer will be responsible for providing appropriate notice and choice to End Users, as the Customer controls the Personal Data it has submitted to our Services. We honor all Customers’ requests from their End Users to limit use or disclosure of End Users’ Personal Data.

Accountability for Onward Transfers: We may be accountable for the Personal Data we receive under the Privacy Shield that we may transfer to third-party service providers (as described in the “Sharing And Disclosure” section above) if they process Personal Data in a manner inconsistent with the Privacy Shield Principles and we are responsible if they do so and for the harm caused. We will only disclose Service Data supplied by our Customers to third parties where permitted or required by the Customer, and in accordance with the Privacy Shield Principles.

Security: We maintain security measures to protect Personal Data as described in the “Security” section of this Policy.

Data Integrity and Purpose Limitation: We will take reasonable steps to ensure that Personal Data is reliable for its intended use, and that it is accurate, complete and current for as long as long as we retain it. We will keep your Personal Data only for as long as is reasonably necessary for the purposes described in this Policy, or for the duration required by law or our customer agreement, whichever is the longer.

Access: You have certain rights to access, correct, amend, or delete Personal Data where it is inaccurate, or has been processed in violation of the Privacy Shield Principles. Please see the “EU Data Subject”

section above for more information on rights of EU data subjects. When we process Service Data on behalf of our Customers, the Customer will be responsible to respond to requests for exercising your rights. We honor all Customers' requests from their End Users to access, correct, amend, or delete End Users' Personal Data.

Recourse, Enforcement, Liability: In compliance with the Privacy Shield Principles, LICIEL Environment commits to resolve complaints about our processing of your Personal Data. Individuals with inquiries or complaints regarding this Private Shield Policy should first contact LICIEL Environment as follows:

- **Email:** info@liciel.us
- **Telephone:** 646-568-9766
- **Postal Mail:** LICIEL ENVIRONMENT
244 5th Avenue Suite C38
New York City, New York, 10001

LICIEL Environment has further committed to refer unresolved Privacy Shield complaints to an alternative dispute resolution provider. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

If your complaint is not resolved through these channels, under certain conditions a binding arbitration option may be available before a Privacy Shield Panel. For additional information, please visit: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

We are subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to Personal Data received or transferred pursuant to the Frameworks.

8. PUBLICLY POSTED INFORMATION

This Privacy Policy shall not apply to any information you post to the public areas of the Site. This includes, but is not limited to, comments to the LICIEL Environment blog or in the LICIEL Environment forum. Comments posted to public areas may be viewed, accessed and used by third parties subject to those third parties' privacy practices and policies.

9. CHILDREN

LICIEL Environment does not knowingly collect Personal Data from children under the age of 13. If you have reason to believe that a child under the age of 13 has provided Personal Data to LICIEL Environment through this Site, please contact us at info@liciel.us and we will endeavor to delete that information from our databases.

10. LINKS TO OTHER WEBSITES

The Site may contain links to other websites not operated or controlled by us (“**Third Party Sites**”). The privacy practices described in this Privacy Policy do not apply to Third Party Sites. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact those sites directly for information on their privacy practices and policies.

11. SOCIAL MEDIA

Through our Site, you can choose to access certain social media websites and services that are owned and/or controlled by third parties, such as Facebook, Twitter, Instagram, Pinterest and YouTube (“**Social Media Services**”). When you choose to access and use Social Media Services, including interacting with our pages on those sites, you will be sharing your Personal Data and other information with them. The information that you share with the Social Media Services will be governed by the specific privacy policies and terms of service of the Social Media Services and not by this Privacy Policy.

12. SECURITY

We maintain reasonable and appropriate security measures to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in light of the risks inherent in processing this information. However, the Internet cannot be guaranteed to be fully secure and we cannot ensure or warrant the security of any information you provide to us. Please keep this in mind when providing us with your Personal Data.

13. USE OF COOKIES

LICIEL Environment uses cookies on the Site. A cookie is a piece of information sent to your browser from a website and stored on your computer’s hard drive. Cookies can help a website like ours recognize repeat users and allow a website to track web usage behavior. Cookies work by assigning a number to the user that has no meaning outside of the assigning website. We use cookies to collect information about your device, such as IP address, operating system and browser type.

The Site also uses pixel tags, a technology similar to cookies that is placed on a website or within the body of an email for the purpose of tracking activity on websites, or when emails are opened or accessed, and is often used in combination with cookies. The Site uses pixels tags, from the below third parties, to help us improve use of our Site and the services, and know when content has been shown to you.

Upon your first connection to our Site, you will be asked to confirm whether you agree to our use of cookies and similar technologies in accordance with this Policy, and if you accept we will store them on your computer.

Some cookies expire at the end of your visit to our website (session cookies), others remain on your computer or terminal device for a longer period (persistent cookies).

The types of cookies and similar technologies that we use are detailed below:

Category/Name Purpose

We use temporary cookies file which are erased when you close your web browser. When you restart your browser and revisit the Site, the Site will not recognize you.

SessionID

In particular, we use a cookie called "SESSION" that allows to identify when a user has logged into the Site. This cookie is essential to use and navigate the Site. Without such cookie, you would not be able to properly view our Site and basic functions of our Site would not work.

Security

LICIEL Environment uses some cookies (in particular, a cookie called USERID) that may be necessary to facilitate use of our Site, for example to improve the safety and security of our Site, authenticate account users, balance traffic on our Site and remember information that you submitted on forms when you request services on our Site.

Your Choices

On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. Please see the links below for guidance on how to modify your web browser's settings on the most popular browsers:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

Note, however, that if you reject our request to use cookies or turn cookies off, you may be unable to access certain parts of the Site and you may not be able to benefit from the full functionality of the Site.

To find out more about cookies and similar technologies, including how to see what cookies and similar technologies have been set and how to manage and delete them, visit www.allaboutcookies.org, and/or to www.youronlinechoices.com and/or or the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org>, and follow the opt-out instructions there. If you access the Site on your mobile device, you may not be able to control tracking technologies through the settings.

14. OTHER TERMS AND CONDITIONS

Your access to and use of our Site is subject to the Terms of Service.

15. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy at any time. We will post all changes to this Privacy Policy on this page. By continuing to use the Site and/or the Services or providing us with information following such a replacement Policy being uploaded, you agree that you will be deemed to have agreed to be bound by the Privacy Policy as changed.

16. CONTACT US

Please feel free to contact us if you have any questions about LICIEL Environment's Privacy Policy or the information practices of our Site.

You may contact us as follows:

- **Email:** info@liciel.us
- **Telephone:** 646-568-9766
- **Postal Mail:** LICIEL ENVIRONMENT
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New York City, New York, 10001