

## **Pennrose Privacy Policy**

**Effective Date: February 20, 2018**

**Last Updated: December 15, 2025**

### **Introduction**

Pennrose (collectively referred to herein as “Pennrose”, “we”, “our” or “us”), recognizes the importance of protecting personal data we may collect from visitors and any other individual or entity (“Users”, “you”, or “your”) who visit our web sites. This Privacy Policy applies to data collection by Pennrose and shall apply to your use of the website, [www.Pennrose.com](http://www.Pennrose.com) and other Pennrose-related sites, applications, software, communications, capabilities and services (“Services”) accessible on or by any top-level Pennrose domain owned by us (each, a “Site” and collectively the “Sites”), but excluding services that state that they are offered under a different privacy policy.

Our Privacy Policy explains: (1) what information we collect; (2) why we collect it; (3) how we use that information; (4) how we may share it; (5) the choices we offer, including how to access and update information; (6) and the measures we take to keep your information safe. Specifically, our Privacy Policy covers the following topics:

1. When This Privacy Policy Applies
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Please familiarize yourself with our privacy practices and let us know if you have any questions. By using the Sites, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Sites.

Irrespective of which country you live in, you authorize us to transfer, store, and use your information in the United States, and any other country where we operate. In some of these countries, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those in the country where you live.

If you have any questions or comments about this Privacy Policy, please submit a request to [privacy@Pennrose.com](mailto:privacy@Pennrose.com) or by mail at Pennrose, 1301 N. 31<sup>st</sup> Street, Philadelphia, PA 19121.

## **When this Privacy Policy Applies**

Our Privacy Policy applies to all the Services offered by Pennrose and its affiliates, including some Pennrose partners, and Services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our Services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## **Information We Collect**

We collect information, including personal data, to provide better services to all our Users. We use the term “Personal Data” to refer to any information that identifies or can be used to identify you. Common examples of Personal Data include: full name, email address, digital identity, such as a login name or handle, information about your device, and certain metadata.

“Sensitive Personal Data” refers to a smaller subset of Personal Data which is considered more sensitive to the individual, such as race and ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric information, physical or mental health information, medical insurance data, or sexual orientation.

When you use our Services, we collect Personal Data in the following ways:

1. Information You Give to Us

As you evaluate Pennrose, you may choose to provide us with Personal Data about yourself, including your name, company name, phone number, billing address, job title, industry, and email address by completing forms on our website. You may also choose to provide us with employment and education information when you apply for a job at Pennrose via our Site.

In some instances, you may elect to provide us with location and address information. You may also provide us with Personal Data about yourself when you report a problem or have a question about our services.

The Sites offer interactive and social features that permit you to submit content and communicate with us. You may provide Personal Data to us when you post information in these interactive and social features. Please note that your postings in some areas of the Sites may be publicly accessible or accessible to other Users.

## 2. Information We Obtain from Your Use of Our Site

We collect certain information automatically, such as your operating system version, browser type, and internet service provider. We also collect information about your interaction with the Site, such as creating or logging into your account, or opening or interacting with the Site on Your mobile device. When you use our Site, we automatically collect and store this information in service logs. This includes: details of how you used our Site; Internet protocol address; cookies that uniquely identify your browser, the referring web page and pages visited. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Data, but we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties.

## 3. Meeting and call recording and transcripts

We may record virtual meetings conducted via Microsoft Teams or other collaboration platforms for business, training, or compliance purposes. Participants will be notified prior to recording. By continuing to participate after notification, you consent to the recording of your audio, video, and any shared content. These recordings may be stored, reviewed, and, where necessary, disclosed in accordance with this Privacy Policy and applicable law.

## 4. Cookies and Similar Technologies

We and our partners use various technologies to collect and store information when you visit one of our services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third-party advertising and analytics partners include Google Analytics, Meta ads, and similar partners.

The technologies we use for this automatic data collection may include:

Cookies. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services.

Web Beacons. Pages of our services or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count Users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Clickstream Data. Clickstream data is information collected by our computers when you request Web pages from the Sites. Clickstream data may include information such as the page served, the time spent viewing the page, source of the request, type of browser making the request, the preceding page viewed and similar information. Clickstream data permits us to analyze how visitors arrive at the Sites, what type of content is popular, what type of visitors in the aggregate are interested in particular kinds of content on the Sites.

## **Information Collected Related to California Residents**

During the last twelve (12) months, we have collected the following categories of personal information from consumers.

<b>Category</b>	<b>Type of Identifiers We Collect</b>	<b>Collected</b>
Identifiers.	First and last name, business address, unique personal identifier, online identifier, Internet Protocol address, email address, signatures; account ID and password.	YES
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, business address, telephone number, employment, employment history, credit card number, debit card number, or any other financial information.	YES
Internet or other similar network activity.	Browsing history and time, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
Commercial Information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Professional or employment-related information.	Current or past job history or performance evaluations.	YES
Inferences drawn from other personal information.	Profile reflecting a person's preferences, behavior, attitudes; and social media account information.	YES

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from our website visitors or their agents. For example, from information that customers input into our mobile app.
- Indirectly from our customers or their agents. For example, through information we collect from our clients in the course of providing Services to them.
- Directly and indirectly from activity on our website ([www.Pennrose.com](http://www.Pennrose.com)). For example, from website usage details that are collected automatically. In addition, like many companies, we use “cookies” which are small text files a website can use to recognize repeat users, facilitate the user’s ongoing access to and use of the site and to track usage behavior of, for example, the webpages you visit.
- From social media websites, such as Facebook, Twitter, and LinkedIn.
- From third parties that assist us in providing certain transactions and services (e.g. payment processing, hosting), even though it appears that you may not have left our Site.

## How We Use Information We Collect

We use your Personal Data in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

1. To present, operate or improve the Site and Services, including analysis of Site activity;
2. To inform you about Services and Offerings available from Pennrose;
3. To authorize access to our Sites and Services;
4. To provide, maintain, administer or expand the Services, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Services, and other products and services we offer;
5. To customize or tailor your experience of the Services;
6. To administer content, promotion, sweepstakes, surveys, voting polls or other Site features;
7. To send you marketing information and other non-transactional communications via email, telephone calls, SMS, or push notifications about us as necessary for our legitimate interest in conducting director marketing or to the extent that you have provided prior consent;
8. With your consent as required by applicable law, we may send marketing and/or service-related text messages to your mobile device. You may opt out of receiving these messages by following the prompt in an individual message or updating your "Notifications" preferences under the website settings or the mobile application settings that control push notifications.
9. To improve our Site and Services;
10. To secure our Services, including to authenticate Users;
11. To use statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;
12. To respond to and support Users regarding their use of the Sites and Services;
13. To comply with all applicable legal requirements;
14. To enforce our Terms of Use and other agreements;
15. To perform data analysis and testing;
16. To investigate possible fraud or other violations of our lease agreements or any other agreements, including this Privacy Policy and/or attempts to harm our Users;
17. To resolve disputes;
18. To otherwise fulfill the purpose for which the information was provided.

We use the information we collect from our Sites to provide, maintain, and improve them, to develop new services, and to protect our company and our Users.

We use information collected from cookies and other technologies, to improve your User experience and the overall quality of our services. We may use your Personal Data to see which web pages you visit at our Site, which web site you visited before coming to our Site, and where you go after you leave our Site. We can then develop statistics that help us understand how our visitors use our Site and how to improve it. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

## Sale of Personal Information

In the preceding twelve (12) months, we have not sold any Personal Information.

## **Our Legal Basis for Collecting Personal Data**

Whenever we collect Personal Data from you, we may do so on the following legal bases:

1. Your consent to such collection and use;
2. Out of necessity for the performance of an agreement between us and you, such as your agreement to use our Services or your request for Services;
3. Our legitimate business interest, including but not limited to the following circumstances where collecting or using Personal Data is necessary for:
  - Intra-organization transfers for administrative purposes;
  - Product development and enhancement, where the processing enables Pennrose to enhance, modify, personalize, or otherwise improve our services and communications for the benefit of our Users, and to better understand how people interact with our Sites;
  - Communications and marketing, including processing data for direct marketing purposes, and subject to your opt-in for these purposes, and to determine the effectiveness of our promotional campaigns and advertising;
  - Fraud detection and prevention;
  - Enhancement of our cybersecurity, including improving the security of our network and information systems; and
  - General business operations and diligence;

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

## **Information We Share**

We do not share personal data with companies, organizations and individuals outside of Pennrose unless one of the following circumstances applies:

- **With your consent.** We will share Personal Data with companies, organizations or individuals outside of Pennrose when we have your consent to do so.
- **Business Accounts.** Your employer or your organization may offer you access to our Services. We will share Personal Data with your employer or organization. Your employer or organization can review and manage your use of such Services.
- **For external processing.** We provide personal information to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include marketing partners, third party hosted services providers, and similar partners. It is our policy to only share Personal Data with contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having

us share your information with our business partners and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business partners or vendors may limit your access to their services through the Sites.

- **For Legal Reasons.** We will share Personal Data with companies, organizations or individuals outside of Pennrose if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
  - meet any applicable law, regulation, legal process or enforceable governmental request.
  - enforce applicable Terms of Use, including investigation of potential violations.
  - detect, prevent, or otherwise address fraud, security or technical issues.
  - protect against harm to the rights, property or safety of Pennrose, our Users or the public as required or permitted by law.

We attempt to notify Users about legal demands for their Personal Data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

- **Business Transfers.** If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, Personal Data about our Users is often a transferred business asset. In the event that Pennrose itself or substantially all of our assets are acquired, Personal Data about our Users may be one of the transferred assets.
- **Non-Personal and Aggregate Site Use Information.** Pennrose may compile and share your information in aggregated form (i.e., in a manner that would not personally identify you) or in de-identified form so that it cannot reasonably be used to identify an individual (“De-Identified Information”). We may disclose such de-identified information publicly and to third parties, or to Pennrose Partners under agreement with us.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for one or more business purposes:

- Identifiers;
- Commercial information;
- Internet or other network activity information;
- Professional or employment-related information;
- Inferences drawn from other personal information.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates;
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with the Services we provide to you.
- Service providers and other third parties we use to support our business, including without limitation those performing core services (such as credit card processing, customer support services, customer relationship management, accounting, auditing, advertising and marketing, analytics, email and mailing services, data storage, and security) related to the operation of our business and/or the Services.
- Commercial providers;
- Enterprise accounts, such as your employer.

We may disclose your Personal Information for legal reasons. Specifically, we will share Personal Information with companies, organizations or individuals outside of Pennrose if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Fulfill any purpose for which you provide it;
- Meet any applicable law, regulation, legal process or enforceable governmental request;
- Enforce applicable Terms of Use, including investigation of potential violations;
- Detect, prevent, or otherwise address fraud, security or technical issues;
- Protect against harm to the rights, property, assets or safety of Pennrose, our customers or the public, content found on the Services, or to protect the Services from unauthorized use or misuse, as required or permitted by law;
- Facilitate a business transfer, such as to a buyer or other successor in the event of merger, acquisition, consolidation, divestiture, change in control, dissolution or other sale or transfer of some or all of Pennrose's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by Pennrose about its customers and users will be among the assets to be transferred, and any such successor may use your information for the same purposes set forth in the Privacy Policy.
- For any other purpose disclosed when you provide the information; and,
- When we obtain your consent to do so.

We attempt to notify you about legal demands for your Personal Information when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

### **Your Failure to Provide Personal Data**

Your provision of Personal Data is required in order to use certain parts of our services and our programs. If you fail to provide such Personal Data, you may not be able to access and use our Services and/or our programs, or parts of our Services and/or our programs.

### **Our Retention of Your Personal Data**

We may retain your Personal Data for a period of time consistent with the original purpose for collection. For example, we keep your Personal Data for no longer than reasonably necessary for your use of our programs and Services and for a reasonable period of time afterward. We also may retain your Personal Data during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

We retain your Personal Data even after your business relationship with us ends if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms of Use, or fulfill your request to “unsubscribe” from further messages from us.

### **Your Privacy Rights and Choices**

You may have certain rights relating to your Personal Information, subject to local data protection law. Whenever you use our Services, we aim to provide you with choices about how we use your Personal

Data. We also aim to provide you with access to your Personal Data. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of personal information we maintain about you or you may update or correct inaccuracies in that information by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.

- **Privacy Rights Specific to Californian and other US States**

Under the California Consumer Privacy Act and other US State based regulations, residents have specific rights regarding their personal information. This section describes these rights and explains how residents can exercise those rights.

Below we further outline specific rights which California residents may have under the California Consumer Privacy Act.

- Right to Access Your Data. You have the right to request that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past twelve (12) months. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.
- Right to Data Portability. You have the right to a “portable” copy of your Personal Information that you have submitted to us. Generally, this means you have a right to request that we move, copy or transmit your Personal Information stored on our servers or information technology environment to another service provider’s servers or information technology environment.
- Right to Delete Your Data. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.
- Right to Non-Discrimination for the Exercise of Your Privacy Rights. You have the right not to receive discriminatory treatment by us for exercising your privacy rights conferred by the California Consumer Privacy Act.

- **Exercising Your Rights**

If you are a California resident who chooses to exercise your rights, you can:

1. Submit a request via email to [privacy@Pennrose.com](mailto:privacy@Pennrose.com)
2. Pennrose, 1301 N. 31<sup>st</sup> Street, Philadelphia, PA 19121

You may also designate an agent to exercise your privacy rights on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester’s valid government-issued identification, and the authorized agent’s valid government issued identification.

- **Our Response to Your Request**

Upon receiving your request, we will confirm receipt of your request by email. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. In some instances, such as a request to delete personal information, we may first separately confirm that you would like for us to in fact delete your personal information before acting on your request.

We will respond to your request within forty-five (45) days. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

In some cases our ability to uphold these rights for you may depend upon our obligations to process Personal Information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, listed below, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*);
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
8. Comply with a legal obligation; or
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Our Opt-in/Opt-out Policy**

By providing an email address on the Pennrose Sites or Services, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any Service related notices, or to provide you with information about our events, invitations, or related educational information.

For purposes of this Privacy Policy, “opt-in” is generally defined as any affirmative action by a User to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us or a Pennrose Partner to unsubscribe from the service.
2. At any time, you can contact us through [privacy@Pennrose.com](mailto:privacy@Pennrose.com) or the address or telephone number provided below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Data.
3. At any time, you can reply "STOP" to the message in order to opt-out of receiving SMS texts.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service-related notices.

### **Third Party Links**

The Sites may contain links to webpages operated by parties other than Pennrose. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Site or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the User will be subject to upon linking to the third party's website. Pennrose strongly recommends that each User review the third party's terms and policies.

### **How We Protect Personal Data**

Pennrose maintains administrative, technical and physical safeguards designed to protect the User's Personal Data and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, taking into account technological reality, cost, the scope, context and purposes of processing weighted against the severity and likelihood that the processing could threaten individual rights and freedoms. For example, we restrict access to personal information to Pennrose employees, contractors, business partners and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. We use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Data.

If Pennrose collects account information for payment or credit, Pennrose will use the information only to complete the task for which the account information was offered.

## **Children**

The Site is not intended for use by children. We do not intentionally gather Personal Data about visitors who are under the age of 16. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16 in the applicable jurisdiction, please contact us at [privacy@Pennrose.com](mailto:privacy@Pennrose.com). If we learn that we have inadvertently collected the personal information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

## **Direct Marketing and “Do Not Track” Signals**

The Pennrose website does respond to Do Not Track (DNT) signals.

California residents are entitled to contact us to request information about whether we have disclosed Personal Data to third parties for the third parties’ direct marketing purposes. Under the California “Shine the Light” law, California residents may opt-out of our disclosure of Personal Data to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Data with third parties for marketing purposes at any time by submitting a request to [privacy@Pennrose.com](mailto:privacy@Pennrose.com). California users may request further information about our compliance with this law by contacting us at [privacy@Pennrose.com](mailto:privacy@Pennrose.com) or by writing to us at the address listed in the “How to Contact Us” section.

## **Changes to this Privacy Policy**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or programs, email notification or privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## **How to Contact Us**

If you have any specific questions about this Privacy Policy, you can contact us via email or phone or by writing to us at the address below:

Send e-mail to: [privacy@Pennrose.com](mailto:privacy@Pennrose.com)

Send mail to our address:

Pennrose  
1301 N. 31<sup>st</sup> Street  
Philadelphia, PA 19121