

# Citizenserve Privacy Policy

Last Updated: May 5, 2022

## **Introduction.**

This Privacy Policy applies to all products, services, websites, and apps offered by Online Solutions, LLC, except where otherwise noted. We refer to these products, services, websites, and apps collectively as “services” in this policy.

References to “data” in this Privacy Policy will refer to whatever data you use our services to collect, whether it be data collected in a form, data collected through an interface to Citizenserve, or data inserted on a site hosted by us. Reference to personal information or just information means information about you personally.

## **Definitions.**

**Service:** Service means the [www.citizenserve.com](http://www.citizenserve.com) website and the Citizenserve mobile application operated by Online Solutions, LLC.

**Personal Data:** Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

**Usage Data:** Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

**Cookies:** Cookies are small files stored on your device (computer or mobile device).

**Data Controller:** Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

**Data Processors (or Service Providers):** Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

**Data Subject (or User):** Data Subject is any living individual who is using our Service and is the subject of Personal Data.

## **Information we collect about you.**

Information that Online Solutions, LLC collects about you includes the following:

### **Contact information.**

You might provide us with your contact information, whether through use of our services, a form on our website, or an interaction with one of our employees. Personally identifiable contact data may include, but is not limited to:

- Email address.
- First name and last name.
- Phone number.
- Address, City, County, State, Province, ZIP/Postal Code.
- Cookies and Usage Data.

### **Usage information.**

We collect usage information about you whenever you interact with our websites and services. This includes which webpages you visit, what you click on, when you perform these actions, and data you enter or change. Emails sent by Online Solutions, LLC or by users through our services include page tags that allow the sender to collect information about who opened those emails and clicked on the links in them. We provide more information on cookies below and in our Cookies Policy.

### **Device and browser data.**

We collect information from the device and application you use to access our services, including your IP address, operating system version, device type, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

### **Information from page tags.**

We use third party tracking services that employ cookies and page tags (also known as web beacons) to collect data about visitors to our websites. This data includes usage and user statistics.

### **Log data.**

Like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type, and timestamps. We also log any changes that are made to data and who made the change, including Citizenserve user name,

originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type, and timestamps.

#### **Referral information.**

If you arrive at an Online Solutions, LLC website from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

#### **Information from third parties and integration partners.**

We collect your personal information from third parties where, for example, you give permission to those third parties to share your information with us or where you have made that information publicly available online.

***If you have a Citizenserve.com account, we will also collect:***

#### **Account Information.**

- **Registration information.** You need a Citizenserve account before you can use the services of Online Solutions, LLC (dba Citizenserve). When you register for an account, we collect your first and last name, title, username, password, phone number, and email address.
- **Account settings.** You can set various preferences and personal details on pages, such as the information contained on the My Settings page.

#### **How we use the information we collect.**

Online Solutions, LLC uses the collected data for various purposes:

- To provide and maintain our Service.
- To notify you about changes to our Service.
- To allow you to participate in interactive features of our Service when you choose to do so.
- To provide customer support.
- To gather analysis or valuable information so that we can improve our Service.
- To monitor the usage of our Service.
- To detect, prevent and address technical issues.

You have consented to us using certain types of tracking and third party cookies on our websites. In particular, we use:

## **Cookies and similar technology.**

We may use or combine multiple technologies, such as cookies, page tags, mobile identifiers, and IP addresses to infer users' common identities across different services and multiple devices such as tablets, browsers, and mobile phones. These third party data platforms may sometimes use data that we provide to them in order to improve their technologies and their ability to match common devices to users.

Cookies are files with a small amount of data which may include an anonymous, unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies may also be used such as beacons, tags, and scripts to collect and track information and to enable us to analyze and improve our Service.

Examples of cookies we use:

- **Session cookies.** We use Session cookies to operate our Service.
- **Preference cookies.** We use Preference cookies to remember your preferences and various settings.

We process your personal information in the following categories of data for legitimate interests pursued by us, which are described in detail in this Privacy Policy. We have undertaken to ensure that we place clear limitations on each of these uses so that your privacy is respected and only the information necessary to achieve these legitimate aims is used. Our primary goal is to improve upon our services and make sure these services are relevant for all of our users, while also ensuring that personal information of all users is respected and protected.

- **Contact information.** We use contact information to respond to your inquiries and send you information as part of the services. We use your email address to send you general updates on your account.
- **How you use our services.** We use information about how you use our services to improve our services for you and all users.
- **Device and browser data.** We use device data both to troubleshoot problems with our service and to make improvements to it. We also infer your geographic location based on your IP address. We collect this information to help us improve your service experience through a specific device/browser by optimizing how the website looks in a particular browser, how your screen brightness affects your experience, and to ensure the service operates optimally and as it should on different devices and browsers.
- **Log data.** We use log data for many different business purposes including:
  - To monitor abuse and troubleshoot. For example, your IP address could be used to determine where an unknown/unauthorized access may have occurred in your account.
  - To create new services, features, or content or to make recommendations.
  - To track behavior at the aggregate/anonymous level to identify and understand trends in the various interactions with our services.

- To fix bugs and troubleshoot product functionality.
  - To maintain an audit trail for security purposes.
- **Third parties and integrations.** We collect and use information from third parties and integration partners to:
  - Personalize our services for you, and
  - Ensure you can use our service in conjunction with other services.
- **Service uses.** To manage our services we will internally use your information and data, for the following limited purposes:
  - To enforce our agreements where applicable.
  - To prevent potentially illegal activities.
  - To screen for and prevent undesirable or abusive activity. For example, we have automated systems that screen content for phishing activities, spam, and fraud.
  - To track the most visited and most useful parts of the website to identify what are our most popular features and services.
- **Legal uses.** To respond to legal requests or prevent fraud, we may need to use and disclose information or data we hold about you. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

We collect and use the following on the basis that we have to use this information in order to fulfill our contract with you:

- **Your account information.** We need to use your account information to run your account, provide you with services, provide you with customer support, and contact you about your service or account. We occasionally send you communications of a transactional nature (e.g., service-related announcements, changes to our services or policies, a welcome email when you first register). You cannot opt out of these communications since they are required to provide our services to you.

## **Information You Share.**

When you share information with others on Citizenserve, the information may be indexable by search engines. Our services provide you with different options for sharing and deleting content, but we cannot delete content from search engines, so you need to be careful about information you make public.

## **Information We Share.**

We do not share your information or data with third parties outside of Online Solutions, LLC except in the following limited circumstances:

- Your account information and data will be shared with the primary administrator(s). Your administrator(s) may be able to view your account data; change your passwords;

suspend, transfer, or terminate your account or restrict your settings. Please refer to your organizations internal policies if you have questions on this policy.

## **Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR).**

If you are from the European Economic Area (EEA), the legal basis for Online Solutions, LLC to collect and use the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Online Solutions, LLC may process your Personal Data because:

- We need to perform a contract with you.
- You have given us permission to do so.
- The processing is in our legitimate interests and it is not overridden by your rights.
- To comply with the law.

## **Retention of Data.**

Online Solutions, LLC will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Online Solutions, LLC 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 Service, or we are legally obligated to retain this data for longer periods.

## **Transfer of Data.**

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Online Solutions, LLC will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or municipality unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure of Data.**

**Disclosure for Law Enforcement.** Under certain circumstances, Online Solutions, LLC 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).

**Legal Requirements.** Online Solutions, LLC may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation.
- To protect and defend the rights or property of Online Solutions, LLC.
- To prevent or investigate possible wrongdoing in connection with the Service.
- To protect the personal safety of users of the Service or the public.
- To protect against legal liability.

## **Security of Data.**

The security of your data is important to us but remember that 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.

## **Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA).**

Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **Your Data Protection Rights under the General Data Protection Regulation (GDPR).**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Online Solutions, LLC aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update, or delete the information we have on you. Whenever made possible, you can access, update, or request deletion of your Personal Data directly

within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Online Solutions, LLC relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## **Service Providers.**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Links to Other Sites.**

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy.**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with

Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **Changes to This Privacy Policy.**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us.**

If you have any questions about this Privacy Policy, please contact us:

- By email: support@citizenserve.com
- By phone number: 800-325-9818