

PRIVACY POLICY

The terms of this Privacy Policy are effective as of March 6, 2019.

This Privacy Policy applies only to <http://www.plusoneinnovates.com> (the "Site") and email communications controlled by Plus One, LLC, a subsidiary of Plus Relocation Services, LLC. This Privacy Policy describes how Plus One, LLC and its subsidiaries and affiliated companies ("Plus One" or collectively, "we", "us" or "our") collect, use and disclose personal information of visitors to our Site, users of our online services and others to whom we expressly provide that this Privacy Policy will apply (collectively, "you" or "your"). It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using our Site in any way, such as browsing or interacting with them, you acknowledge that you have read, understood and agree to be bound by the terms and conditions set forth in this Privacy Policy and the Terms and Conditions of Use. Your acknowledgement includes your consent and agreement to the manner of collection and use of information, including the use of personal information (described below). If you do not agree with this Privacy Policy and the Terms and Conditions of Use, you may not use this Site.

This policy applies only to individuals who visit our Site or interact with us through e-mail. It does not apply to information which we may collect offline or through any other means, including on any other website operated by any third party, or to any information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Site.

THE PERSONAL INFORMATION WE COLLECT

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual.

We collect and maintain different types of personal information that you and/or your employer provide to us on a voluntary basis. This may include:

- contact and identification information, such as your name, address, telephone number, e-mail address and employer information;
- product and service related information concerning the products and services that we provide to you or programs that we offer;
- for parties with whom we do business, credit and financial information such as your payment methods and preferences, and billing and credit history, where applicable; and
- business relationship information, including information related to your agreements, preferences, advisors and decision-makers, feed-back and information requested by or provided to you.

If you email us a question or request, we may use your email address to process your request and respond to your question.

We may also collect market-related information, which may include personal information, concerning market trends and activities impacting our business. This information may include contract terms, financial information and other information for the purpose of market analysis, resource planning, financial advisory services and strategic planning. We may also collect information related to our media, investor and public relations activities and information related to our interactions with financial, resource planning, regulatory and other analysts and advisors.

As a general rule, we collect personal information directly from you or through your employer. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions) or rely on the permission you have given to the third party.

From time to time, we may utilize the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

HOW WE COLLECT AND USE PERSONAL INFORMATION

We collect personal information from you to enable us to manage, maintain, and develop our business and operations, including:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the programs, products and services that have been requested;
- to be able to review the products and services that we provide to you so that we may understand your requirements for our programs, products and services and so that we may work to improve our products and services;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to administer or otherwise carry out our obligations in relation to any agreement you or your employer have with us;
- to protect us against error, breach of contract, negligence, fraud, theft, illegal activity and damage to our goods and property;
- to alert you to updated information and other new products and services from us, or third-parties, or to forward promotional materials to you, where you have consented to receive such information;
- to complete a transaction or service requested by you or your employer;
- to respond to inquiries or requests submitted by you or your employer;
- to ensure the Site is relevant to your needs;

- to help us create and publish content most relevant to you;
- to enable us to comply with applicable law or regulatory requirements; and
- any other reasonable purpose to which you consent.

DISCLOSURE

Your personal information may be used and disclosed:

- as permitted or required by applicable law or regulatory requirements; to meet national security or law enforcement requirements.
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of our regular reporting activities;
- to protect our rights and property;
- where the personal information is publicly available;
- during emergency situations or where necessary to protect the safety of a person or group of persons investigate fraud, or respond to a government request; or
- for any additional purposes for which we have obtained your consent.

We may use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

We may share your personal information with our employees, contractors, consultants, affiliates and other parties who require such information to assist us with managing our relationship with you, including third parties that provide services to us or on our behalf. For example, we may share your personal information from time to time with our third party information technology and data processing service providers so that we may operate our business. Additionally, we may share your information in connection with real estate services, destination services, corporate housing, household goods shipments, language and cultural training and other ancillary relocation related services.

Certain of our subsidiaries, affiliates, services providers and other parties with whom we share information under this Privacy Policy may perform activities outside of European Union, Switzerland or the United States. As a result, your personal information may be collected, used, processed, stored or disclosed in the European Union, Switzerland, United States, or other jurisdictions. In such cases, your information may be subject to the laws of those countries. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries.

We do not sell, transfer or disclose your personal information to any third party's other than for the limited purposes described in this Privacy Policy. We may share aggregated information that does not directly identify you.

We may disclose or transfer your personal information to third parties in connection with a corporate re-organization, merger or amalgamation, or the sale of all or substantially all of our assets, provided that the personal information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring this information.

TRACKING TECHNOLOGIES

When you visit our Site, we may automatically collect website use information, such as information about your Internet service provider, your operating system, browser type, domain name, Internet protocol (IP) address, your access times, the website that referred you to us, the Web pages you request, and the date and time of those requests. We use this information only to monitor our Site's performance and improve our Site's content and structure.

Plus One and its partners use cookies or similar technologies to analyze trends, administer the Site, and track users' movements around the Site. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Site.

SOCIAL MEDIA WIDGETS

Our Site does not include social media features.

CALIFORNIA'S DO NOT TRACK NOTICE

We do not track our web visitors across third party website to provide targeted advertising and, therefore, our Site do not respond to Do Not Track (DNT) signals. We do not support Do Not Track browser settings and do not currently participate in any Do Not Track frameworks that would allow any of our Site to respond to signals or other mechanisms from you regarding the collection of your personal information.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding our disclosure of personally identifiable information to third parties for their direct marketing purposes. To make such a request, please contact us using the methods described below.

CONSENT AND OPT-OUT

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

Unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy. You may change or withdraw your consent to the collection of personal information at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer. In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide products or services to, or acquire products or services from, you or your employer.

From time to time, we communicate via email or text with users who request information. For example, we may use your email address to confirm a request you have made, to send you information about changes to our products and services, and to send notices and other disclosures as required by law. If you do not wish to receive email communications from us, you may change or withdraw your consent at any time.

PLUS ONE'S POINT C

We typically collect information under the direction of your employer. If you are a relocating employee of one of our clients and would no longer like communication provided by your employer that use our service, please contact the employer that you interact with directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with your employer.

An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should email us at info@plusoneinnovates.com. If requested to remove data, we will respond within a reasonable timeframe.

We will retain personal data we process for as long as needed to provide our services. Plus One will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Users of the Plus One's Point C (the "System") opt-in to permit us to make certain information available to (i) their employer, or other third party that is sponsoring their use of the System, and (ii) service providers that provide services related to relocation, for the purpose of providing those relocation services.

System users may at any time also opt-out of receiving information from us, or from us making your information accessible through the System. If you wish to "opt-out" please email notices@plusoneinnovates.com.

PRIVACY POLICY REGARDING CHILDREN

We do not intend our Site to collect personal information from children under the age of 13. We urge parents to regularly monitor and supervise their children's on-line activities.

BY ACCESSING OR USING THE SITE, YOU DECLARE YOU ARE OF LEGAL AGE TO AGREE TO THIS PRIVACY POLICY OR, IF YOU ARE NOT OF LEGAL AGE, THAT YOU HAVE OBTAINED PARENTAL/LEGAL GUARDIAN CONSENT TO DO SO.

LINKS TO OTHER WEBSITE

Our Site may offer links to other website that may be subject to less stringent privacy standards. If you visit one of these linked website, you are then subject to the privacy policies and other policies of such website and are no longer protected by our policies. We are not responsible for, or able to monitor or control, the policies and practices of other companies, including with respect to their collection, use or disclosure or your personal information. You should review the privacy policies of these website before providing them with personal information.

SECURITY

No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk.

Once we receive your transmission, we make reasonable efforts to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. We use firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software.

In addition, although we obligate third parties who support our Site and their related offers or other programs to use any personal information only for the purpose of performing their work, we do not control such third parties' website or other security measures.

If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using these Site or providing personally identifiable information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of these Site. We may post a notice on our Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

UPDATING OR ACCESSING YOUR PERSONAL INFORMATION

Upon request, Plus One Service will provide you with information about whether we hold any of your personal information. If you wish to obtain access to the personal information that we maintain about you, or to correct, amend, update or delete such information, please contact our Privacy Officer in writing using the contact information provided below. Before responding to your request, we may ask you to verify your identity and to provide further details about your request. We will endeavor to respond within an appropriate timeframe and, in any event, within any timeframe required by law. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold

about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event, we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions. In some circumstances, we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

CHANGES TO THIS PRIVACY POLICY

From time to time, we may revise this Privacy Policy as well as the Terms and Conditions of Use. Any revisions made will be posted within the Privacy Policy or Terms and Conditions of Use, as applicable, on the Site and will take effect immediately after they are posted unless otherwise noted. Collection and use of information from that point forward will be subject to the revised terms. If you do not agree with any revision to this Privacy Policy or Terms and Conditions of Use, you must stop using and accessing the Site. Your continued access or use of the Site after any such revisions are posted will constitute your acceptance of these changes. You should review the Privacy Policy and Terms and Conditions of Use from time to time for any changes. This Privacy Policy was last updated on March 6, 2019.

GOVERNING LAW / VENUE / FORUM

Unless otherwise noted in this Privacy Policy, this Privacy Policy and Terms and Conditions of Use shall be governed by the laws of the State of Minnesota and by the federal laws of the United States, excluding their conflicts of laws provisions. Without prejudice to the procedure for making inquiries or complaints under the Privacy Shield Framework, as outlined below, all disputes, controversies and disagreements between the parties arising out of or related to this Privacy Policy shall be exclusively submitted for, resolved and finally settled by, binding arbitration. The arbitration shall be conducted by three (3) arbitrators exclusively in Hennepin County, Minnesota, in accordance with the Commercial Arbitration Rules of the American Arbitration Association. The Parties waive any objection that might be made on the ground that such venue may be in an inconvenient forum.

EU - U.S. PRIVACY SHIELD AND SWISS-US PRIVACY SHIELD

Plus Relocation Services, LLC ("PLUS") complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the United Kingdom and/or Switzerland, as applicable to the United States in reliance on Privacy Shield. PLUS has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Our commitments under the Privacy Shield are subject to the investigatory and enforcement powers of the United States Federal Trade Commission. If you believe that we are not processing your personal data within the scope of our Privacy Shield certification, you may direct any inquiries or complaints concerning our Privacy Shield compliance in the following ways:

(1) In the first instance, please send your inquiry or complaint to Stacey A. Myhro at smyhro@plusrelocation.com or by writing to the following mailing address:

Stacey A. Myhro, CCMAP
Senior Vice President, Contracts & Compliance
Plus One Services, LLC
600 Hwy 169 South, Suite 500
Minneapolis, MN 55426
United States of America

(2) Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint> you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

CONTACT INFORMATION

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. To ask questions or provide any comments about this Privacy Policy or our privacy practices, please contact our Privacy Officer by telephone or by email at:

Stacey A. Myhro, CCMAP
Senior Vice President, Contracts & Compliance
Plus One Services, LLC
600 Hwy 169 South, Suite 500
Minneapolis, MN 55426
United States of America
Phone: (952) 512 5530
Fax: (952) 593 2748
Email: smyhro@plusrelocation.com

You may also call us at Toll-Free 1-888-251-2825 (Mon-Fri, 8 am - 5 pm MST) or email us at info@plusoneinnovates.com. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you.