

VIR2US, INC.

PRIVACY POLICY – PORTALS & PRODUCTS/SOFTWARE DOWNLOADS

Updated: September 2021

We at Vir2us, Inc. (“Vir2us,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to our information collection and use of your information through our websites/portals located at <http://www.vir2us.com/>, ipac3.com, vmunity.com and XeroPass.com (collectively, the “Site”) and any products/software purchased and/or downloaded through the respective product portals.

By using the Portal(s) and related software/products, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

The Information We Collect and/or Receive –

In the course of operating the Site/Portals and using the products/software available through the portals, we will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

- Contact Information.

If you would like to contact us via the Contact Us page on the Site, you will need to provide your name and e-mail address (collectively, the “Contact Information”).

- Other Information.

In addition to the Contact Information, we may collect additional information (the “Other Information”). Such Other Information may include:

From Your Activity. In an ongoing effort to improve the Site, we automatically collect certain information when you visit the Site. Such information includes, without limitation, IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Site visitors visit, and similar information concerning your use of the Site.

From Cookies. We collect information using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the Site. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Site may not function properly.

Third Party Analytics. We use third-party analytics services (such as Google Analytics) to evaluate your use of the Site, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Site and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Site, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Site. Information Collected by or Through Third-Party Companies.

We may share Other Information about you with third parties for ad distribution and ad optimization (defined as the tailoring, targeting (i.e., behavioral, contextual, and retargeting), analyzing, managing, reporting, and optimizing of ads). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such Other Information for such purposes. Pixel tags enable us, and these third-parties, to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. You may opt-out of the tailoring of advertising based on information we collect. To learn more about the use of this information, or to choose not to have this information used by our providers or third-party advertising partners by opting out, please visit the Network Advertising Initiative by clicking:

http://www.networkadvertising.org/managing/opt_out.asp.

How We Use and Share the Information

You authorize us to use your Contact Information, and Other Information (collectively, the "Information") to provide the requested information and services to you; to improve our Site; to solicit your feedback; and to inform you about our company, products and services. You also authorize us to use and/or share your Information as described below.

Agents, Providers and Related Third Parties. We may engage other companies and individuals to perform certain business-related functions on our behalf. Examples may include providing technical assistance, order fulfillment, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law. We may also share your Information with any of our parent companies, subsidiaries, or other companies under common control with us.

Aggregated Information. In an ongoing effort to better understand our users and our Site, we might analyze your Information in aggregate form in order to operate, maintain, manage, and improve the Site. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our Site to current and prospective business partners and to other third parties for other lawful purposes. [MJ3]

Business Transfers. As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, your Information may be part of the transferred assets.

Legal Requirements. To the extent permitted by law, we may also disclose your Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, or safety of Vir2us or others.

Accessing and Modifying Information and Communication Preferences –

If you have provided us any personal information, you may access, remove, review, and/or make changes to the same by contacting us at privacy@vir2us.com. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any Vir2us marketing e-mail. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

How We Protect the Information –

We take commercially reasonable steps to protect your Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

External Sites –

The Site may contain links to External Sites. Vir2us has no control over the privacy practices or the content of these External Sites. As such, we are not responsible for the content or the privacy policies of those External Sites. You should check the applicable third-party privacy policy and terms of use when visiting any External Sites.

Children –

We do not knowingly collect personal information from children under the age of 13 through the Site. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide personal information through the Site without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

Important Notice to Non-U.S. Residents –

The Site and the servers are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us maybe transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction.

If you are located outside the United States and choose to use the Site, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.

California Residents –

Under California Civil Code Section 1798.83, California residents who have an established business relationship with Vir2us may choose to opt out of our sharing their personal information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your personal information to third parties for the direct marketing purposes, please send an e-mail to privacy@vir2us.com with “Privacy Policy” in the subject line or write to us at:

Vir2us, Inc.
755 Baywood Drive, Second Floor
Petaluma, California 94954

In addition, Vir2us does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals. [MJ4]

Changes to This Privacy Policy –

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time with or without notice to you. Any such changes will be posted on the Site. By accessing the Site after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of your information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

How to Contact Us –

If you have questions about this Privacy Policy, please contact us via e-mail at privacy@vir2us.com with “Privacy Policy” in the subject line.