



PRIVACY POLICY

INTRODUCTION

DirectApps Inc., the parent company of Launch Consulting Group, including its subsidiaries and assigns (collectively, the “Company” “we,” or “us”) respects the privacy and security of its customers, prospects, business partners, event attendees, consultants, and job applicants.

Please take the time to read this Privacy Notice and the related statements in their entirety to ensure you are fully informed. If you have any questions or concerns about our use of your personal information, please contact us at LCG-Compliance@launchcg.com.

Our Services Privacy Policy covers our privacy practices in connection with use of our professional services, including information technology consultancy, events, and trainings that we provide to customers. It also describes our privacy practices with respect to customers and partners, contact information we process in connection with the use of our professional services, and/or technology provided by our partners to our customers. A copy of the Services Privacy Policy may be requested for appropriate business, legal, or compliance reasons by sending a written email to LCG-Compliance@launchcg.com.

ABOUT US

The Company, solves complex problems to ensure your technology works the way it was designed to. Veteran Owned and Operated.

For more information please see the About Us section of our [Website](#).

HOW WE OBTAIN YOUR INFORMATION

The Company may collect information about you in the following three (3) categories:

1. Information provided voluntarily to the Company.
2. Information from third parties.
3. Information collected by navigating through the [Website](#).

Information provided voluntarily to the Company includes:

- Completing forms on our Website (including, but not limited to, name, business mailing address, email address, and business telephone number).
- Registering for one of our trainings.
- Contacting us directly.
- When you register for or attend an event.
- Entering a promotional contest on our Website.

Information from third parties includes:

- Data received from third parties in connection with your use of our Website
- Data received from third parties in connection with attendance at an event.

Additionally, we may combine information we collect from third parties with information you provide us to update, expand, or provide you with tailored information regarding our services, trainings, and

events.

Information we collect as you navigate through the Website includes:

- Internet protocol address (“IP”)
- Browser type
- Internet service provider (“ISP”)
- Referring pages
- Files viewed on our site
- Operating System
- Date/Time stamp

Additionally, the Company and its third parties use cookies and similar technologies for storing and honoring your preferences and settings, enabling you to sign in, providing interest-based advertising, combating fraud, analyzing how our products perform, and fulfilling other legitimate purposes.

HOW WE USE YOUR INFORMATION

The Company may use the information we collect about you for the following purposes:

- Providing our professional services to our partners and customers.
- Providing information and services that you request from us.
- Communicating with you, at your request, about events and trainings.
- Registering you for events and trainings that you sign up for.
- Carrying out our legal and compliance obligations from any contracts entered into by you and the Company. [Website Terms of Use](#).
- Personalizing our services to meet partner and customer requirements.
- Operating our business, which includes analyzing our performance, developing our workforce, and doing internal research.
- Contacting you for marketing purposes, in accordance with your marketing preferences including, but not limited to, promotional offers for our own or third parties’ products or services.

Additionally, the Company may partner with third parties to display advertising on our Website or to manage our advertising on the third party sites. Our third parties may use technologies such as cookies to gather information about you on our Website or other websites to provide you with advertising based on your browsing activities and interests. If you do not want interest-based ads delivered to you, you may opt out by emailing privacy@launchcg.com.

HOW WE SHARE YOUR INFORMATION

We may share personal information provided by you as described in this Privacy Notice with the following categories of recipients:

- To our subsidiaries, affiliates, or their or our successors or assigns.
- To our contractors, business partners, service providers, and other third parties we use to support our business (e.g., third-party hosting facilities) or third parties with products, services or positions that may be of interest to you, provided such parties provide at least the same level of privacy protection as is required of the Company. These companies are authorized to use your personal information only as necessary to provide these services to us.
- To a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all of our assets (including in the event of a reorganization, dissolution or liquidation), in which case, personal information held by us about you will be among the assets transferred to the buyer or acquirer.
- To any competent law enforcement body, regulatory, government agency, court or other third party to: (i) comply with any court order, a request from any competent law enforcement agency, or any other legal obligation; (ii) enforce or apply our Website Terms of Use or terms of

- any other agreement; and (iii) protect the rights, property, or safety of the Company or others.
- To any other person or organization with your consent to the disclosure.
- To fulfill the purpose for which you provide it.

LEGAL BASIS FOR PROCESSING

If you are a resident of the EEA, the UK, or Switzerland, the Company's processes your personal information pursuant to one or more of the following legal bases:

- The processing is in our legitimate interests which do not override your data protection interests or fundamental rights and freedoms.
- The processing is necessary to perform a contract with you.
- The processing is necessary to comply with our legal obligations.
- We may also seek your consent to process or retain your personal information in certain, limited circumstances that we clearly identify to you.

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

The Company adheres to the processing of personal data it receives, under GDPR, the EU-U.S. Privacy Shield Framework, and the Swiss-U.S. Privacy Shield Framework. The Company is responsible for the processing of personal data it receives under GDPR and each Privacy Shield Framework, and subsequent transfers to a third party acting as an agent on behalf of the Company. The Company complies with GDPR and the Privacy Shield Principles for all onward transfers of personal information from the EEA, the UK, and Switzerland.

INTERNATIONAL TRANSFERS

The Company stores and processes any information collected in connection with its website and/or an event in: (i) any country where we have facilities, (ii) any country in which we engage service providers; or (iii) any country where events are held.

The company will protect your personal data (as defined in the European Union's ("EU") General Data Protection Regulation ("GDPR")) when it is transferred outside of the EEA, UK, or Switzerland by:

- Processing it in a territory which the European Commission has determined provides an adequate level of protection for personal data; or
- Otherwise implementing appropriate safeguards to protect your personal data, including through the use of Standard Contractual Clauses or another lawful transfer mechanism approved by the European Commission, such as the EU-U.S. and Swiss-U.S. Privacy Shield Framework.

SECURITY

The Company maintains appropriate technical and organizational measures, including, administrative, physical, and technical safeguards, designed to protect the personal information obtained as discussed in this Privacy Notice from accidental or unlawful destruction, loss, alteration, unauthorized disclosure and access.

DATA RETENTION

The Company retains personal information when there is a business need to do so for as long as is needed to fulfill the purposes outlined in this Privacy Notice. Additionally, we will retain information for a longer period only if it is required by law. When we have no on-going legitimate business need to process your information we will delete or anonymize the data.

OUR USE OF COOKIES AND SIMILAR TECHNOLOGY

When we gather your information via a website, we may collect certain information automatically. This information may include Internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.

The Company uses cookies or similar technologies to administer our websites and track users' movements around our websites. You can control the use of cookies at the individual browser level, but if you choose to disable this feature, it may limit your use of our services and website.

We also partner with third parties to either display advertising on our websites or to manage our advertising on other websites. Our third parties may use technologies such as cookies to gather information about your activities on our websites and other websites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by emailing privacy@launchcg.com.

YOUR PRIVACY RIGHTS

Certain jurisdictions may provide you with privacy rights under applicable data protection or privacy laws regarding the information you provide to us.

- If you are a resident of the EEA, UK, or Switzerland whose personal data is subject to EU data protection law, you have certain privacy rights which include: the right to be informed, to access your information, to correct any information that is inaccurate, to have your information erased, to restrict or suppress your information, to obtain and reuse your personal data, to object to the processing of your personal information, and to object to how your data is used in automated decision making, if applicable. If you wish to enact your rights, please contact us emailing privacy@launchcg.com.
- If you are a resident of California whose personal information is subject to the California Consumer Privacy Act of 2018 ("CCPA"), you may review further details about the personal information we have collected about you over the last 12 months, including the categories of sources, by reading How We Obtain Your Information section above. We collect this information for the business and commercial purposes described in the How We Use Your Information section above. We share this information with the categories of third parties described in the How We Share Your Information section above. As defined in the CCPA, we do not sell your personal information. The CCPA, subject to certain limitations, provides California residents the right to request to know more details about the categories or specific pieces of personal information we collect, including how we use and disclose this information, to delete their personal information, to opt out of any "sales" that may be occurring, and to not be discriminated against for exercising these rights. California residents may make a request pursuant to their privacy rights under the CCPA by emailing LCG-Compliance@launchcg.com.
- If you do not wish to receive our email marketing communication for promotional purposes, you may opt out by emailing privacy@launchcg.com.
- If we rely on your consent to process your personal information, you can contact us at any time to withdraw your consent.

We will respond to any privacy request in accordance with the requirements of the applicable data protection laws. Please note, that in order to fulfil your request, we may need you to provide certain information to verify your identity. Depending upon applicable data protection and privacy law, individuals may also designate an authorized agent to exercise these rights on their behalf.

GENERAL INFORMATION

Third-Party Websites and Applications

This Privacy Notice does not apply to information collected on any third party site or by any third party application that may link to or be accessible from the Website. This Privacy Notice does not apply to information collected by customers, our business partners, and other third parties or third party applications or services, even if this information is collected using our website or at an event.

Children

We do not knowingly collect personal information from anyone under the age of 13. If we learn that we have collected personal information from a child under age 13, we will delete that information promptly.

Changes to Our Privacy Notice

The Company reserves the right to update or change this Privacy Notice from time to time. If we make material changes to this Privacy Notice, we will post it to our website home page prior to or at the time of the change becoming effective. We ask that you review the Privacy Notice periodically to stay informed about any updates or changes that we may have made.

Contact Information

To ask questions or comment about this Privacy Notice and our privacy practices or if you need to update, change, or remove your information or exercise any other rights please email us at privacy@launchcg.com or by mail at Launch Consulting Group, ATTN: Shivani Malik, 275 118th Ave SE, Bellevue WA 98005.