



## **PRIVACY POLICY**

When you use our services (the “Services”), you trust us with your information. This Privacy Policy (“Policy”) is meant to help you understand what data we collect, why we collect it, and what we do with it. This is important; we hope you will take time to read it carefully.

### I. Summary.

Although we encourage you to read the entire Policy, the following provides a summary of some of the important aspects of this Policy:

- This Policy may modify our obligations of confidentiality in the GPO Membership Agreement (“Membership Agreement”) that you agreed to be bound by, though we do not expect this to be the case. To the extent that this Policy conflicts with those obligations, the terms of this Policy shall prevail.
- This Policy is applicable to all information that we collect in connection with our Services.
- We may collect both Non-Personal Information and Personal Information in connection with our Services.
- We may also collect Sensitive Personal Information in connection with our Services.
- We will not use or share Your Personal Information (including Sensitive Information) except as expressly permitted by this Policy. We will not use or share your Personal Information (including Sensitive Information) with any third parties for use in direct marketing purposes.

### II. Scope of this Policy.

This Policy covers ONLY Information we collect through our Services. THIS POLICY DOES NOT COVER THE COLLECTION, USE, OR SHARING OF ANY INFORMATION BY THIRD PARTIES WITH WHICH YOU MAY INTERACT OR COMMUNICATE IN CONNECTION WITH YOUR USE OF THE SERVICES. For information about what policies may apply to the information you may share with any third party, please contact the third party before sharing your information.

### III. Information We Collect.

The Information we collect may include both “non-personal” and “personal” information. We may also obtain “sensitive” personal information about you or from you. For purposes of this Policy:

“Non-Personal Information” refers to information that may not by itself be reasonably associated with, linked to, or used to individually identify you. For example, general, non-specific



information regarding your use of the Services or derived from the information that you provide to us while using the Services.

“Personal Information” refers to information that may be reasonably associated with, linked to, or used to individually identify an individual, a group of individuals, or you; or allow an individual, a group of individuals, or you to be personally identified or contacted. For example, Personal Information may include information such as your name, email address, telephone number, address, or credit card number, either alone or in combination with other information.

“Sensitive Personal Information” refers to Personal Information regarding more sensitive areas such as financial information, such as bank account or credit card numbers, medical or health conditions, precise geolocation information, or other sensitive topics.

#### IV. Sources of Information.

We may collect information from a variety of sources. For example:

Directly from You. We may collect information about you or from you directly from you when you provide information to us. For example, by visiting and using our website site, registering for an account, or otherwise using the Services. We may use any information you provide to us in accordance with this Policy.

From Third Parties. We may also obtain information about you from third parties who have a right to provide us with that information. For example, we may obtain information about you from third parties that have the right to provide that information to us. We may use any information about you we receive from a third party in accordance with the terms we establish with that third party. Only if we combine that information with information we collect under this Policy will we be required to use that Information in accordance with this Policy.

Through your Use of the Services. We may collect information about you or from you automatically when you use the Services. For example, we and our third party advertisers and service providers may use “cookies,” “web beacons,” and other automated tracking technology to monitor and collect information regarding how you access, use, and interact with the Services. “Cookies” are commonly used small files that are stored on your computer or mobile device to help identify you as a unique user. “Web beacons” (also known as “single-pixel” or “clear” GIFs) include electronic images imbedded in the Services that allow us to recognize when you visit that area of the Services.

We and our third party advertisers and service providers may use cookies, web beacons, and other tracking technology that expire once you close your browser or log out of your account. We may also use technologies that persist and stay on your computer until you delete them. Most browsers will allow you to erase cookies from your computer or mobile device, block acceptance of cookies, or receive a warning before a cookie is stored. You may also be able to refuse certain web beacons by adjusting the settings on your browser or email software. Please refer to your browser or email software instructions or help screen to learn more about these functions.

The computers we use to provide the Services may also automatically record information about you or from you. For example, our web servers may record the information you enter, the



Services you use, your IP address, or cookies that are set on your browser. We may use any information we collect from you automatically through use of the Services in accordance with this Policy.

Please note that our third party advertisers and providers also use cookies, web beacons, or other tracking technologies in advertisements and other messages displayed on or communicated through the Services. We do not have access to information that would confirm all uses of cookies, web beacons, or other tracking technology by our third party advertisers and providers.

#### V. How We Use Information.

Non-Personal Information. We may use and share the Non-Personal Information we collect and obtain for any lawful business purpose without any duty or obligation of accounting or otherwise to you, provided that the information remains Non-Personal Information. This will include, by way of example, sharing that Non-Personal Information with third parties or developing products, services, and other offerings based on the Non- Personal Information and providing those offerings to other users and third parties.

Personal Information. We may use the Personal Information we collect about you or from you for a variety of purposes. These include:

- Operating our consumer products, websites, applications and other services;
- Providing Services to you;
- Customizing and improving the Services for you;
- Providing maintenance, support, and customer service;
- Providing notices and announcements to you;
- Providing offers for products, services, or other offerings that we feel may be of interest to you;
- Processing payments;
- Developing additional products, services and offerings; and
- Research and analysis.

We may combine and enhance the Personal Information we collect and obtain about you or from you with information we receive from third parties, provided that we use the combined information in accordance with this Policy.

We may also use the Personal Information we collect and obtain about you or from you to generate Non-Personal Information. When we do so, we will take reasonable measures to ensure



that the Non-Personal Information is no longer personally identifiable and may not later be reasonably associated with, linked to, or used to identify you. This will include, by way of example, storing the Non-Personal Information separately from any Personal Information. Once we generate Non-Personal Information from any Personal Information, we will not later attempt to again make that information personally identifiable. However, we may combine and enhance that Non-Personal Information with other Non-Personal Information we receive or obtain third parties.

We will not share your Personal Information with any third parties, except that in accordance with the confidentiality provisions of the Membership Agreement, we may disclose such information (i) on a “need to know” basis to our duly authorized officers, directors, representatives, consultants, accountants, attorneys, agents and vendors, provided they agree to the same level of confidentiality as described herein; and (ii) in respect of, or as permitted by, any legal, tax or regulatory obligation or requirement, including, without limitation, 18 U.S.C. § 1833(b).

You should not provide any personal information to us, unless you agree to the use of that information in accordance with this Policy.

Sensitive Personal Information. The Information we collect and obtain regarding you may include Sensitive Personal Information, e.g., when you share Sensitive Personal Information in communications with us. We will use any Sensitive Personal Information about you or from you solely in accordance with this Policy to enable the operation of the Services. However, we are not responsible for monitoring the Sensitive Personal Information you may exchange with others through the Services or for the use of that information by other third parties with whom you share that information.

We will not share your Sensitive Personal Information with any third parties, except that in accordance with the confidentiality provisions of the Membership Agreement, we may disclose such information (i) on a “need to know” basis to our duly authorized officers, directors, representatives, consultants, accountants, attorneys, agents and vendors, provided they agree to the same level of confidentiality as described herein; and (ii) in respect of, or as permitted by, any legal, tax or regulatory obligation or requirement, including, without limitation, 18 U.S.C. § 1833(b).

## VI. How We Share Information.

We may share Information about you or from you in a variety of ways, including all of the ways that are permitted in the confidentiality provisions of the Membership Agreement. For example:

Affiliates. We may share information with companies that we own or control, that are owned or controlled by us, or that are under common ownership or control with us.

Business Partners. We may share information with business partners for which we collect information through the Services. We will work with our business partners to provide notice to you concerning the purpose for which any Personal Information is being collected on behalf of any business partner. Unless we otherwise notify you, any information we collect on behalf of a business partner will be in accordance with this Policy.



Service Providers. We may share information with third parties that help us provide the Services. For example, we may use third parties to: (a) host, maintain, or manage the Services; (b) collect or analyze information; (c) customize or assist us in managing our databases; or (d) provide other function relating to us performing the Services. We ask that these third parties agree to use the information we share with them only to perform their obligations to us and to treat all Personal Information they receive from us in compliance with this Policy, **BUT WE SHALL NOT BE RESPONSIBLE IF THEY FAIL TO DO SO.**

Other Entities. We may share Information with third parties so that they may develop and offer additional products and services to you that we believe will be of interest to you based on the information we collect and obtain about you or from you.

Law Enforcement. We may share information with law enforcement agencies if we reasonably believe unlawful activities have occurred or the information may aid in an investigation into unlawful activity. We may also share information with law enforcement if we determine, in our sole judgment, that you have violated our agreements or policies or that the release of your information may protect our rights, property, interests, or safety or the rights, property, interests, or safety of any third party.

Legal Processes. We may share Information as required by, or permitted by, law, whether in response to subpoenas, court orders, other legal processes, or as we believe is necessary to exercise our legal rights, including to defend against legal claims that have been or might be brought against us.

Business Transactions. If there is a transfer of ownership or control of any portion of us or the Services to a third party, whether or not in the context of an acquisition, merger, or reorganization, we may transfer information that third party, provided that the use of any of your Personal Information by that third party remains subject to the terms of this Policy.

## VII. Choice and Opt-out.

We may give you the opportunity to “opt-out” of having your Personal Information used or shared for certain purposes otherwise permitted by this Policy. For example, we may provide you with a choice whether to receive certain messages through/from us.

If you no longer wish to receive certain messages from us or to have your Personal Information shared in the manner otherwise permitted by this Policy, you may seek to opt- out of receiving those messages or having your Personal Information shared in that manner. In some cases, opting out of receiving messages or having your Personal Information shared will not affect your ability to use the Services. However, some messages are necessary to the use and operation of the Services.

Likewise, some sharing of Personal Information is necessary to provide you with the Services. If you wish to opt-out of receiving these messages or of sharing your Personal Information in this manner, we may be required to limit or cancel your access to the Services.



All opt-out requests can be made as indicated through any messages that we send you or by contacting us at 9075 Harmony Drive, Midwest City, OK 73130, (405) 458-0410. Note that it may take up to ten (10) business days to remove contact information from our lists, so messages from us may continue for a time after a removal request is made.

#### VIII. Additional Terms.

Children. The Services are not directed to children under 18 years of age. The Company does not knowingly solicit or collect personal information from children under 18 years of age.

Do Not Track. Certain web browsers and other devices you may use to access our online platforms may permit you to indicate your preference that you do not wish to be “tracked” online. At this time, we do not modify your experience, or the Information we collect from you, based on whether such a preference is indicated.

Review and Update of Information. While we take reasonable steps to ensure that the Personal Information we collect from you is reliable for its intended use, accurate, complete, and current, we rely on you to update and correct your Personal Information. Please contact us as described above to review, update, or change any of the Personal Information we have on file for you.

Your California Privacy Rights. California law provides that California residents have a right to request that businesses tell them how their personal Information has been shared with third parties for use in direct marketing purposes. There is an exception to this requirement for businesses that have adopted and disclosed, in their privacy policy, a policy of not disclosing a person’s Personal Information to third parties for use in direct marketing purposes if that person has exercised an option to opt-out of the disclosure of their Personal Information to third parties for such purposes. We have adopted a policy of never using or sharing your Personal Information (including Sensitive Information) with any third parties for use in direct marketing purposes and thus fall within this exception.

Notification of Changes. We may notify you of any changes to this Policy. Changes to this Policy will be effective 30 days following such notice. Your continued use of the Services after any change has become effective will constitute your acceptance of that change. Unless we seek and receive consent from you, we will use the Personal Information we collect and obtain about you or from you in accordance with the version of this Policy effective when the Personal Information was last collected.