

SME & ASSOCIATES, INC.

PRIVACY POLICY

Effective Date: January 1, 2025

Revised Privacy Policy

SME & Associates, Inc. and SMEAA, Inc. (the “Company”) are committed to maintaining robust privacy protections for users of the Company's Site and Service.

This Privacy Policy explains how information may be collected, used, shared, protected, and managed when you access or use the Site or Service.

INTRODUCTION AND DEFINITIONS

Purpose

SME & Associates, Inc. and SMEAA, Inc. (the “Company”) are committed to maintaining robust privacy protections for users. This Privacy Policy is designed to help you understand how we collect, use, safeguard, and disclose information you provide to us and to assist you in making informed decisions when using our Service.

Site

For purposes of this Privacy Policy, “Site” refers to the Company’s website and any related online access points identified by the Company. The original policy identified the Site as **smeassociates.org** and contemplated access through a mobile application where applicable.

Service

“Service” refers to the Company’s services accessed through the Site, including functions through which users may report time, submit documents, and log into their accounts.

Company / We / Us / Our

The terms “Company,” “we,” “us,” and “our” refer to SME & Associates, Inc. and SMEAA, Inc., as applicable to the Site or Service.

You

“You” refers to the individual using or accessing the Site or Service.

Acceptance

By accessing or using the Site or Service, you acknowledge this Privacy Policy and the applicable Terms of Use. Where consent is required by applicable law, the Company will obtain consent in the manner required by law.

I. INFORMATION WE COLLECT

Personal and Non-Personal Information

We collect “Non-Personal Information” and “Personal Information.” Non-Personal Information may include information that does not, by itself, identify you, such as anonymous usage data, general demographic information, referring and exit pages and URLs, platform types, preferences you submit, preferences generated from information you submit, and click activity.

Personal Information

Personal Information may include information that can identify or relate to you, such as your email address, date of birth, Social Security information, name, and address when you submit that information through registration or other Company processes.

Information Collected Through Technology

The Service may collect information supplied by your browser, device, or software application when you view or use the Service. This may include the website you came from (referring URL), browser type, device information, date and time of access, and other information that does not directly identify you.

Cookies

The Company may use cookies or similar technologies. Cookies are small text files that may contain an anonymous unique identifier. Cookies may help us collect Non-Personal Information and maintain records of preferences on an

individual or aggregate basis.

Types of Cookies

The Company may use both persistent and session cookies. Persistent cookies may remain on your device until they expire or are deleted. Session cookies generally expire when you close your browser.

Information Collected Through Cookies

The Company may use cookies or related technologies to collect information such as email address and IP address, as described in the original policy and subject to applicable law and technology configuration.

II. INFORMATION YOU PROVIDE BY REGISTERING FOR AN ACCOUNT

Account Registration

Users who subscribe to or access certain Service functions may be required to create a personal profile. Registration may require an email address, username, and password.

Use of Registration Information

By registering for the Service, you authorize the Company to collect, store, and use registration information in accordance with this Privacy Policy and applicable law.

III. CHILDREN'S PRIVACY

Age Restriction

The Site and Service are not directed to children under 13. The Company does not knowingly solicit or collect Personal Information from anyone under 13 or knowingly permit anyone under 13 to sign up for the Service.

Information Discovered From a Child

If the Company learns that it has collected Personal Information from a child under 13 without the required parental or guardian consent, the Company will take reasonable steps to delete the information as soon as practicable, subject to applicable law and record-retention requirements.

IV. HOW WE USE AND SHARE INFORMATION

Personal Information

Except as otherwise stated in this Privacy Policy, the Company does not sell, trade, rent, or otherwise share Personal Information with third parties for their marketing purposes without consent, except where permitted or required by applicable law.

Service Providers and Vendors

The Company may share Personal Information with vendors and service providers performing services for the Company. Such vendors are expected to use Personal Information as directed by the Company and in accordance with applicable contractual and legal requirements.

How We Use Personal Information

Personal Information may be used to communicate with users; respond to questions; obtain feedback; provide technical support; provide, administer, and improve the Service; and provide promotional communications where permitted.

Legal, Security, and Safety Disclosures

The Company may disclose Personal Information when it has a good-faith belief that access, use, preservation, or disclosure is reasonably necessary to comply with applicable legal process or an enforceable governmental request; enforce applicable Terms of Service; investigate potential violations; address fraud, security, or technical concerns; or protect the rights, property, or safety of users, the Company, or the public, as permitted or required by law.

Non-Personal Information

The Company may use Non-Personal Information to improve the Service, customize user experiences, identify trends, and analyze usage patterns. Non-Personal Information may be aggregated and may be shared with partners, advertisers, and other third parties as permitted by applicable law.

Business Transactions

If the Company undergoes a business transaction, such as a merger, acquisition, reorganization, or sale of all or a portion of its assets, Personal Information may be among the assets or information transferred as part of that transaction, subject to applicable law.

V. CHANGES TO INFORMATION PRACTICES

Changes

If the Company changes its information practices, the Company may update this Privacy Policy and post the revised policy on the Site. Where required by applicable law, users will receive notice and/or an opportunity to make choices concerning material changes.

Reviewing the Policy

Users are encouraged to periodically review the Site and this Privacy Policy for updates concerning how information is collected, used, protected, and disclosed.

VI. HOW WE PROTECT INFORMATION

Security Measures

The Company implements security measures designed to protect information from unauthorized access. Accounts may be protected by passwords, and users are encouraged not to disclose passwords and to log out after each use.

Technical Safeguards

The Company may use technological security measures such as encryption, firewalls, and secure socket layer (SSL) technology, as applicable to the Service.

No Absolute Guarantee

No security system can guarantee that information will never be accessed, disclosed, altered, lost, or destroyed through a security incident. Users acknowledge the inherent risks associated with transmitting and storing information electronically.

VII. YOUR RIGHTS AND CHOICES REGARDING PERSONAL INFORMATION

Marketing Communications

You may opt out of promotional communications at any time where an opt-out is provided. Promotional emails may contain unsubscribe instructions.

Administrative Communications

Opting out of promotional communications does not necessarily stop administrative, transactional, security, legal, or service-related communications.

Other Privacy Rights

Depending on where you live and applicable law, you may have additional privacy rights concerning access, correction, deletion, restriction, objection, portability, or other uses of Personal Information. Requests may be directed to the contact information below, and the Company will respond as required by applicable law.

VIII. LINKS TO OTHER WEBSITES AND APPLICATIONS

Third-Party Services

The Service may provide links to or compatibility with other websites or applications. The Company is not responsible for the privacy practices, information, or content of third-party websites or applications that are not controlled by the Company.

Separate Privacy Policies

This Privacy Policy applies to information collected by the Company through the Site and Service. If you access a third-party website or application through a link or integration, that third party's privacy policy may apply to information collected by that third party.

Review Third-Party Policies

Users are encouraged to review the privacy statements of third-party websites and applications before providing information or proceeding to use those services.

IX. CHANGES TO THIS PRIVACY POLICY

Company Right to Revise

The Company reserves the right to change this Privacy Policy and applicable Terms of Service from time to time.

Notice of Significant Changes

For significant changes, the Company may provide notice through the primary email address associated with an account or by placing a prominent notice on the Site, as appropriate and as required by applicable law.

Effective Date of Changes

Where the Company provides notice that a significant change will take effect after a stated notice period, the change will become effective at the end of that period. Non-material changes or clarifications may take effect immediately unless otherwise required by law.

X. CONTACT US

Privacy Questions

If you have questions regarding this Privacy Policy or the privacy practices of the Site or Service, please contact the Company at:

Contact Email

smeaaainc.corporate@outlook.com

Effective Date

This revised Privacy Policy is effective January 1, 2025.

Prior Version

This revision replaces the prior version identified in the original document as last updated March 28, 2020.

IMPORTANT NOTICE**Applicable Law**

This Privacy Policy describes the Company's information practices in a clear and understandable manner. Specific privacy rights, obligations, disclosures, retention requirements, and consumer protections may vary based on applicable federal, state, or other law and the nature of the information involved.

Conflict With Law

If a provision of this Privacy Policy conflicts with a mandatory requirement of applicable law, the applicable legal requirement controls to the extent of the conflict.