

# ClearGov, Inc. - Privacy Policy

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## ClearGov Privacy Policy

ClearGov Inc. ("**ClearGov**", "**we**", "**our**" or "**us**") is committed to protecting Your privacy. This privacy policy (the "**Privacy Policy**") discloses our practices regarding information we collect and receive from users ("**User(s)**" or "**You**") of the ClearGov.com desktop (<https://www.cleargov.com>) and mobile websites (<https://m.cleargov.com>) (and any other versions of the ClearGov.com website) (the "**Sites**"), the ClearGov online and mobile applications (the "**Apps**") and other services, such as emails, all of which are owned and operated by ClearGov (collectively, the "**Service**"). Unless we state otherwise, any new features or functionality provided by ClearGov on the Sites and/or Apps are also part of the Service. By accessing or using the Service, whether through a personal computer, mobile device or any other means, or submitting any content or information for publication or distribution, You agree to be bound by this Privacy Policy.

Please note that the Service and the content on the Sites are intended for U.S. residents only, i.e. the people who live and work in the towns and cities that are covered by ClearGov. If you reside outside the U.S., ClearGov does not intend or desire to receive your data and ClearGov does not represent that it complies with any foreign laws, including but not limited to foreign privacy laws. Please read this Privacy Policy carefully before registering or using the Service or submitting any content. If You do not accept this Privacy Policy, You may not use the Service or submit any content.

Just like Your local community, ClearGov and the Service are growing and changing every day, and thus this Privacy Policy is subject to change by ClearGov at any time. The most current version of this Privacy Policy can always be accessed via the [ClearGov Terms and Conditions page](#), and Your rights and the handling of Your data will be governed by that version.

### Personal Information You Provide or We Collect

ClearGov receives and stores information You choose to provide to us directly. We also receive and store information that we collect automatically when You use the Service.

#### Personal Information You Provide

ClearGov receives and stores any information You enter on the Sites or through the Service or provide in any other way. In order to register or in connection with other uses of the Service (such as participation in contests, sweepstakes or promotions, subscribing to a

ClearGov email newsletter, subscribing to a project update, completing a workflow, permit or license request with a local government, or to contact us with an inquiry or to report a problem or provide feedback), You may be asked to provide, or voluntarily provide, certain personally identifiable information, such as Your name, username, password, email address, street address, or telephone number (**“Personal Information”**) or sensitive Personal Information such as Your credit card or other payment information. You are not required to provide Your Personal Information, but if You don’t, You may not be able to access or use parts of the Service.

If You submit an email address or other Personal Information through a ClearGov profile or workflow affiliated with any local government agency (including but not limited to subscribing to a project update), ClearGov may share that information with the applicable agency. As a result, You may receive emails or other communication from such agency. ClearGov does not control such communication, and information You provide to such agency is not subject to this Privacy Policy.

### **Personal Information You Provide to an Advertiser**

If You submit an email address or other Personal Information through an advertisement on the Service, ClearGov will share that information with the advertiser so that they may contact You directly. By providing Your email address or other Personal Information in or in response to an advertisement on the Service, You may receive promotional emails or other communication from the advertiser, and You hereby consent to receipt of such promotional emails and other communications by responding to an advertisement. ClearGov does not control such communication, and information You provide to any third party is not subject to this Privacy Policy.

### **Personal Information We Collect**

We receive and store certain types of information automatically whenever You interact with the Service. ClearGov and its third-party service providers, advertisers, advertising networks and platforms, agencies and other partners (“Partners”) may collect or receive information about You or Your computer or other device used to access the Service. This information includes, without limitation, Your IP address, browser type, operating system, Internet service provider, mobile network, type of mobile device, mobile carrier, phone number, credit card information, device identifiers and settings, advertising identifiers, browser settings, pages You have visited on the Service, search activity, date and time of Your access to or use of the Service, requested and referring URLs, and Your interaction with advertising and other data when You use the Service. Please see the Cookies, Web Beacons and Similar Technologies Section below for more information about how this information is collected and used.

## **Different Devices and Platforms**

If You access or use the Service through different devices (such as Your mobile phone and a computer) or through different platforms (such as a ClearGov App and the ClearGov Site), the information You provide and that we collect through these different devices and platforms may be cross-referenced and combined, and information and content You provide through one platform may be displayed or accessed through other platforms that are part of the Service.

## **Social Media Services**

If You choose to connect to or access the Service with a social networking service, such as Facebook or Twitter, we may share information about You with that service and they may share information with us, including Personal Information. You authorize us to collect, store and use that information for the purposes discussed in this Privacy Policy. Please refer to the privacy policies and terms of use for these third party services for information regarding how they use, disclose and otherwise handle Your information.

## **Location Information**

If You download or use the Apps, or access or use the Service on a mobile device, ClearGov may receive information about Your location (such as geo-location, beacon-based location and GPS location) and Your device, which may include a unique identifier for the device. We may use this information to determine Your location and to provide You with location-based services, such as advertising, search results and other personalized content. If You do not want us to obtain information about Your location, please disable the collection of location data. Please be advised that some features will not be available if You choose to disable the collection of location data. Personal Information obtained from Your mobile device in connection with any text or push notification services may include Your cell phone number, Your carrier's name, the date, time and content of Your messages and other information You provide to us as part of these services. Most mobile devices allow You to turn off location services, usually by adjusting the settings on the device. If You have questions about how to disable location services for Your device, please contact Your mobile service carrier or the device manufacturer.

## **Information from Other Sources**

We might receive information about You, including Personal Information, from other sources, and include and store it with other information about You. This could include, for example, information about search results and links, including sponsored links.

## **How We Use Your Personal Information**

ClearGov and our Partners may use Your information, including Personal Information and any other information You provide or we collect to:

- Provide the Service to You, including providing technical and other support for the Service and personalizing Your experience using the Service;
- Maintain, improve and develop the Service and features and content of the Service, including research and analysis with respect to the Service;
- Communicate with You regarding the Service or with marketing messages and respond to and fulfill Your inquiries and requests, such as subscriptions to ClearGov projects;
- Administer contests and sweepstakes, and notify You if You have won;
- Enforce this Privacy Policy and the [ClearGov Terms of Service](#), address fraud and other illegal activities, including claims of copyright infringement, and protect Your safety and the safety of other users of the Service;
- The purpose(s) for which You provide the information;
- Deliver, and help advertisers and content providers deliver advertising and content that is customized to Your individual behavior or demographic, based on Your use of the Service and other online or mobile websites, apps and services, location information and inferred interests;
- Analyze Your use of the Service and the performance of, and Your interactions with, advertising and content provided on the Service and provide reports to third parties regarding use of the Service and advertising on the Service, such as showing trends regarding preferences, advertising effectiveness and user experience on the Service. These reports may include aggregate or anonymized information;
- Associate Your activity across the Service and the different devices You use, and associate any accounts You may use across the Service;
- Carry out or support promotions;
- Provide location-based aspects of the Service, advertising, search results and content, in accordance with Your location settings;
- Back-up ClearGov systems, allow for disaster recovery and enhance security of the Service;
- Comply with legal obligations; and
- As You may otherwise agree or consent.

If You provide information, including Personal Information, through the Service, in Your public profile or by posting or commenting online, such information is available to other users of the Service. ClearGov does not control use of Your Personal Information or any other information by other persons. By posting or publishing Your information on the Service, You assume the risk that the information You provide will be viewed and used by third parties.

ClearGov may also receive information about You that is publicly or commercially available, and we may combine that information with information we have collected or received by other means, including information about Your use of the Service, for any of the purposes discussed in this Privacy Policy.

ClearGov and our Partners may use “cookies” or similar technology to associate Your information with an identifier associated with Your device or browser. We may also associate cookies with Your information, including de-identified or anonymized information, for use by ClearGov or our Partners to send advertisements and offers based on Your individual behavior and demographic information.

## How We Disclose Your Information

ClearGov may disclose Your information, including Personal Information, as follows:

- We may provide Your information to our service providers or Partners who provide services to us, such as user support; marketing services; hosting; research and analytics; administration of contests and sweepstakes; sending or supporting advertising; and otherwise in connection with provision of the Service. These service providers or Partners may also share information with ClearGov that they collect or obtain from or about You in connection with their services.
- Some portions of the Sites may use framing or other techniques to serve content to You from our Partners, or otherwise provide content that is hosted by our Partners, while preserving the “look and feel” of the ClearGov Service. Please note that the information You provide or that is collected about You in any such portion of the Sites is being provided to a third-party Partner.
- In order to process a payment, ClearGov may provide information, including Your personal information, to a third-party payment processor(s). ClearGov is not responsible for any third-party payment processor’s privacy practices.
- Advertisers and other Partners may use “cookies” on or through the Service to collect the same types of information for the same purposes as ClearGov. Such third parties may be able to associate information they collect in connection with the Service with other information they have about You from other sources.
- We may share non-personally identifiable information, such as location data, advertising identifiers or other information with third parties to facilitate targeted or interest-based advertising, including advertising across devices and platforms. We may also share aggregate or anonymized information with third parties, such as advertisers or other Partners.
- Our content partners may be able to use and display public content available through the Service, including content You have provided.
- We may release Your data in response to legal process such as a court order or subpoena or a request by law enforcement or a government agency, or as otherwise required by law.
- Your data will be transferred to other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of ClearGov’s business to that business entity.
- We may provide Your data in connection with any investigation, prevention or action ClearGov may take with respect to activities we believe may be illegal, or violate our

[Terms of Service](#) or other policies, or an emergency that may pose a threat to Your or another person's safety, or as necessary to protect ClearGov's rights and property.

We will not sell Your Personal Information to any third party not affiliated with ClearGov without Your consent, except in aggregated or anonymized form or in connection with the sale or merger of ClearGov or some or all of its assets or the division responsible for applicable services, or in the unlikely event of a bankruptcy.

We may sometimes send offers to certain users on behalf of other businesses. When we do this, we do not share Your name or address with the other business without Your express consent. You can opt-out of receiving such offers as provided in the Updating and Correcting Your Information section below.

If You participate in a contest or sweepstakes, or another part of the Service sponsored by a third party, the third party may obtain or collect information about You. ClearGov does not control how any such third party uses or discloses Your information. Be sure to review such third party privacy policies to find out how they will collect, use and disclose Your information.

If You register with ClearGov and create a profile, the information You provide in Your profile and the content You submit, such as posts, photographs and videos, and comments, and classifieds and events You place, may be publicly displayed and published on the Service. Information and content You submit is subject to this Privacy Policy and our [Terms of Service](#).

## **Cookies, Web Beacons, and Similar Technologies**

ClearGov and our Partners may use browser cookies, Flash cookies, or locally shared objects ("**LSOs**") that operate similarly to browser cookies, "web beacons," clear GIFs, advertising identifiers, tags, scripts and similar technologies (collectively the "**Cookies**") in connection with Your use of the Service or third party websites, mobile applications or platforms. Such Cookies may include unique identifiers, and may be placed on Your computer's browser or Your device, on web pages, in an email or in other locations. ClearGov and its Partners may use Cookies to recognize Your device; store Your preferences; track and collect information about user behavior, for example by counting the number of visitors to a web page, tracking open rates, clicks and forwards; prevent fraud; comply with legal requirements; and facilitate and enhance communication and interaction with the Service or with other websites or services. Cookies may be persistent or may be stored for a single session.

ClearGov, or our Partners, may also use Cookies and similar technologies to customize Your visit to or use of the Service, or to help enhance or improve the Service, for example by storing Your password or delivering relevant advertising to You when You use the Service. We may also work with our Partners to use such technologies to help them provide

advertisements to You when You visit other websites or applications and to research and analyze how the Service is used and user response to and interaction with advertisements.

ClearGov may work with our Partners to synchronize unique, non-personally identifiable identifiers in order to match our identifiers with those used by our Partners. These companies may collect and use non-personally identifiable information during Your visits to or use of the Service and other websites and apps. The use of Cookies, web beacons and similar technologies by such Partners and advertisers is not in ClearGov's control and is subject to the privacy policies of such third parties.

By accessing or using the Service, You consent to such use of Cookies and other technologies, and similar technologies that may be developed in the future, by ClearGov and our Partners. You may set Your browser to disable cookies or LSOs, or to refuse certain types of Cookies or warn You before accepting Cookies. LSOs using Adobe Flash can be managed using Flash management tools on the Adobe website. However, doing so may mean that certain parts of the Service may not work for You. Further, "opting out" does not prevent the display of all advertising. Some Partners may use technologies other than Cookies to recognize Your computer or device or to collect information about Your use of the Service or other websites or services, and You may not be able to block use of such technologies. While some browsers may transmit "do not track" signals to websites and online services, ClearGov does not currently take any action or respond to such signals.

ClearGov or its Partners may use mobile Software Development Kits ("SDKs") to collect information, such as Your IDFA or Android Advertising ID, and other information about how Your device interacts with the Service. SDKs allow app developers to enable advertising, collection of data and related services and analytics in apps. ClearGov may use this technology to deliver, or to help Partners deliver, advertising through the Apps and other mobile applications and browsers based on information associated with Your device. Depending on Your device, You may be able to reset Your device's advertising identifier by accessing the privacy settings.

### **Third Parties**

ClearGov Partners may use Cookies, widgets, SDKs, IP addresses and similar technologies when You access or use the Service or see advertisements provided through the Service for purposes such as providing You with advertising that is relevant to You, analytics purposes (for example to determine whether You later purchased a product or service in an advertisement You clicked on or took some other action), providing content from a content provider's server, and offering content or services based on the content of the pages You visit or other criteria. In some cases, because You must request content from the Partner's server or otherwise communicate directly with the Partner's server the Partner can collect Your information, such as Your IP address or browser information, as if You had visited their website or used their app directly. In connection with the foregoing, ClearGov Partners may



collect information about the content or ads You viewed, how long You spent on different pages or parts of the Service, how You arrived at specific pages on the Service, and how You responded to ads that You saw. Partners may also collect information about other apps on Your devices, the websites You visit, Your location and other information. ClearGov may also allow certain Partners, such as third-party ad servers, advertising agencies, technology vendors and providers of sponsored content to serve advertisements and collect information within the Service.

Some ClearGov Partners participate in programs intended to provide users with choices about whether and how to receive targeted advertising. You can learn more about these programs at the [Network Advertising Initiative](#) and [Digital Advertising Alliance](#) websites. Information about how Google collects and processes data is available from Google at <http://www.google.com/policies/privacy/partners>. Information about Google Analytics' currently available opt-outs is available from Google at <https://tools.google.com/dlpage/gaoptout/>. These websites are provided by third parties, not ClearGov. ClearGov does not control or operate these websites or the choices that our Partners, advertisers and others may provide through the tools offered on these websites.

## **Security**

The security of Your Personal Information is important to us. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect, including but not limited to SSL, firewalls, encryption, confidentiality agreements with employees and other third parties, restrictions on sharing data on a need-to-know basis, et. al. However, we cannot guarantee that communication between You and ClearGov, or information stored on the Service or our servers, will be free from unauthorized access, or will never be disclosed, modified or destroyed in a way that is not consistent with this Privacy Policy. By accessing or using the Service, You assume this risk.

## **Protection for Children**

The Service is not directed at children and ClearGov does not knowingly collect Personal Information from children under the age of 13. If we become aware that Personal Information has been collected from a child under age 13, we will take steps to delete that information as soon as possible.

## **Other Websites**

We may provide links to third-party websites and services from within the Service. These may include government websites, merchant websites, news websites and other websites and services not controlled by ClearGov and which may have privacy policies different than ours. ClearGov is not responsible for, and does not control, the privacy practices or content of these third-party websites. When You link away and/or provide data to such third parties, You do so at Your own risk and should read the applicable privacy policies of such other websites.



## Communications with ClearGov

By providing Your email address or telephone number to ClearGov, You expressly consent to receive emails or texts from us. We may use email or text to communicate with You, to send information that You have requested or to send information about other products or services developed or provided by us; however, except as provided in the How We Disclose Your Information section above, we will not give Your email address or telephone number to another party to promote their products or services directly to You without Your consent.

Any communication, content or material You transmit to us, by email or posting on the Service or other means, including any data, questions, comments, suggestions, or the like will be treated as non-confidential and non-proprietary, unless You notify us in accordance with this Privacy Policy to delete such communications, if feasible. Furthermore, You expressly agree that we are free to use any ideas, concepts, know-how, or techniques contained in any communication You send to us without compensation and for any purpose whatsoever, including but not limited to, developing, manufacturing and marketing products and services using such information.

If You prefer not to receive marketing emails from us, please follow the “unsubscribe” information included in any marketing email from the Service or let us know as provided in Updating and Correcting Your Information section below. If You have signed up to receive text messages and no longer wish to receive such messages, please follow the instructions to stop the delivery of such messages, which may include replying “STOP” to the text message.

## Updating and Correcting Your Information

If You are a registered user of the Service, You can remove, correct, or update Your profile information or unsubscribe from receiving marketing or other emails from ClearGov by editing Your user profile. You may also send unsubscribe or opt-out requests to us, at [Support@ClearGov.com](mailto:Support@ClearGov.com) and we will process Your request promptly after receipt. We will direct third parties such as Partners who previously were provided Your information to remove Your Personal Information unless such notification is impossible or involves disproportionate effort or unless You submitted Your Personal Information to such third party directly. Notwithstanding the foregoing, we are not responsible for removing Your Personal Information from the lists of any third party, including Partners.

## Do Not Sell or Share my Personal Information

Several state laws, including California's "Shine the Light" law, the California Consumer Privacy Act of 2018 (the **“CCPA”**), and the California Privacy Rights Act of 2020 (the **“CPRA”**), require certain businesses to respond to requests from the residents of such states asking about practices related to disclosing Personal Information, including disclosing Personal Information to third parties for the third parties' direct marketing purposes. In particular,

certain businesses are required to have in place a policy not to disclose Personal Information to third parties for the third parties' direct marketing purposes if the customer has opted-out of such information-sharing. ClearGov has such a policy. Further, the residents of such states have the right to be informed as to what Personal Information about them we may have, how we collected and may use that information, how long we intend to retain it for, and how to have it corrected or deleted, as well as the right to receive a copy of such Personal Information about themselves provided their identity is verified.

If You wish to learn about the Personal Information of Yours that ClearGov may hold, how to access, correct, modify or delete such information, how to limit the use of Your sensitive Personal Information, and/or opt-out of allowing ClearGov to automate the decisions regarding Your Personal Information or share Your Personal Information with third parties for the third parties' direct marketing purposes, or to find out more about Your opt-out rights (each, a **"Request"**), please contact us at [Support@ClearGov.com](mailto:Support@ClearGov.com) or mail Your written Request to ClearGov, Inc.; Attn: Legal; 2 Mill & Main, Suite 630; Maynard, MA 01754.

## For California Residents

Subject to certain exceptions under the CCPA, You have the right to delete Personal Information about You that We have collected from You. Upon receiving a Request, We will take reasonable steps to verify Your identity and respond to a Request by: (a) providing the requested information or taking the requested action; or (b) explaining why the CCPA or CPRA does not require Us to provide the requested information or take the requested action. We may deny a request (but comply to the greatest extent that We can) if the You are unable or unwilling to verify Your identity in conjunction with making a Request. We will not discriminate against California residents for exercising their rights under the CCPA or CPRA.

## Terms of Service

Use of the Service, and this Privacy Policy, is subject to our [Terms of Service](#), which is incorporated herein by reference.

## Changes to Privacy Policy

We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time and from time-to-time. We will post any changes here and You should check back periodically for any updates. We will disclose updates in the categories of Personal Information collected from You or our intended uses of such Personal Information if such new categories or uses are incompatible with the ones that were previously disclosed in this Privacy Policy. Your continued use of the Service following the posting of any changes to this Privacy Policy means You accept such changes.

## How to Contact ClearGov

If You have questions or concerns relating to this Privacy Policy or privacy for the Service, please contact us at:

- ClearGov Inc.
- 2 Mill & Main; Suite 630
- Maynard, MA 01754
- Email: [Support@ClearGov.com](mailto:Support@ClearGov.com)