

CODY Systems - Privacy Policy

v2025 Effective as of April 9, 2025.

This “Privacy Policy” describes the privacy practices of CODY Computer Services, Inc. (DBA CODY Systems) and our subsidiaries and affiliates (collectively, “CODY”, “we”, “us”, or “our”) and how we process personal information that we collect through our digital properties that link to this Privacy Policy, including our websites www.codysystems.com and www.codyconnect.com, social media pages, marketing activities, live events and other activities, and any other website that we own or control and which posts or links to this Privacy Policy (collectively, the “Service”).

CODY provides a platform and suite of tools, applications and system education / support resources for public safety (“CODY Platform”). This Privacy Policy does not apply to information that we process on behalf of our business customers (such as government agencies, educational institutions, businesses and other organizations) while providing the CODY Platform and services to them. Our use of information that we process on behalf of our business customers may be governed by our agreements with such customers. If you have concerns regarding your personal information that we process on behalf of a business customer, please direct your concerns to that customer.

Our websites, products and services are designed for our business customers and their representatives. We do not offer products or services for use by individuals for their personal, family or household purposes. Accordingly, we treat all personal information we collect as pertaining to individuals in their capacities as business representatives and not their individual capacities.

Personal Information We Collect

Information you provide to us.

Personal information you may provide to us through the Service or otherwise includes:

- **Business and personal contact information**, such as your first and last name, email and mailing addresses, phone number, professional title and organization name.
- **Content you choose to upload to the Service**, such as text, images, audio, and video, along with the metadata associated with the files you upload.
- **Profile information**, such as your username and password that you may set to establish an online account with us, biographical details, your photograph, interests, and preferences, and any other information that you add to your account profile.
- **Registration information**, such as information that may be related to a service, an account or an event you register for.

- **Communications data**, based on our exchanges with you, including when you contact us through the Service, communicate with us via chat features, social media, or otherwise.
- **Demographic Information**, such as your city, state, country of residence, postal code, and age.
- **Precise geolocation information**, such as when you authorize our websites to access your location.
- **Transaction information**, such as information relating to or needed to complete your orders on or through the Service and other details of products or services you have purchased from us, including order numbers and transaction history.
- **Survey data**, and any information you share when you complete a survey.
- **User-generated content**, such as photos, images, comments, questions, messages, works of authorship, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- **Job application data**, such as professional credentials and skills, educational and work history, LinkedIn profile page, personal website, authorization to work in the U.S., immigration status, criminal history, and other information that may be included on a resume or curriculum vitae as well as in a cover letter. This may also include diversity information that you voluntarily provide.
- **Marketing information**, such as your preferences for receiving communications about our activities, events, and publications, and details about how you engage with our communications.
- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Cookies and Other Information Collected by Automated Means

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation

paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

- **Location data** when you authorize our Service to access your device's location.
- **Communication interaction data** such as your interactions with our email, text or other communications (e.g., whether you open and/or forward emails) – we may do this through use of various methods.

Cookies and similar technologies. Some of our automatic data collection is facilitated by the following technologies.

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends and "persistent cookies" that remain longer, "first party" cookies that we place.
- **Local storage technologies**, like HTML Web Storage, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Session-replay technologies**, may employ software code to record users' interactions with the Services in a manner that allows us to watch video replays of those user sessions for support purposes. The replays include users' clicks, mobile app touches, mouse movements, scrolls and keystrokes/key touches during those sessions. These replays help us diagnose usability problems and identify areas for improvement.
- **Chat technologies**, may employ cookies and software code to operate the chat features that you can use to communicate with us through the Service. Such third parties may access and use information about webpages visited on our website, your IP address, your general geographic information (e.g., city, state), and other personal information you share through online chats for the purposes described in this Privacy Policy.

Referrals

Users of the Service may have the opportunity to refer friends or other contacts to us. If you are an existing user, you may only submit a referral if you have permission to provide the referral's contact information to us so that we may contact them.

How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Service. We may use your personal information to:

- provide, operate and improve the Service and our business

- provide a demo of our products and services
- provide information about our products and services
- personalize the Service, including remembering the devices from which you have previously logged in and remembering your selections and preferences as you navigate the Service
- establish and maintain your user profile on the Service
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages
- communicate with you about events or contests in which you participate
- understand your needs and interests, and personalize your experience with the Service and our communications
- provide support and maintenance for the Service
- respond to your requests, questions and feedback

For research and development. We analyze use of the Service to analyze and improve the Service and to develop new products and services, including by studying user demographics and use of the Service.

Marketing and advertising. We may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Testimonials.** We may use your feedback to post comments about your experience with any Service on the website, in our marketing and promotional materials.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations, or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and

- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

With your consent. In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To manage our recruiting and process employment applications. We may use personal information, such as information submitted to us in a job application, to facilitate our recruitment activities and process employment applications, such as by evaluating a job candidate for an employment activity, and monitoring recruitment statistics.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you.

Retention. We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

How We Share Your Personal Information

We do not share your personal information with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

Service providers. We may share your personal information with third party organizations that provide services on our behalf or help us operate the Service (such as customer support, hosting, analytics, email delivery, marketing, online chat functionality providers, and database management services). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy and are prohibited from using or disclosing your information for any other purpose.

Survey Partners. We may use third party survey providers to create and administer surveys. Should you choose to respond to a survey, information you enter is shared and may be stored by such survey provider(s). Such providers may also collect information about your interaction with each survey, such as usage, device, and referral data.

Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so. For example, we may share your personal information with third-party advertisers with whom we are collaborating to offer you additional services such as raffles, and promotions. We will share personal information that is needed for these other companies to provide the services that you have requested.

Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Professional advisors. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

For compliance, fraud prevention and safety. We may share your personal information for the compliance, fraud prevention and safety purposes described above.

Business transfers. We may disclose personal information in the context of actual or prospective business transactions (e.g. investments in CODY, financing of CODY, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisors. We may also disclose your personal information to an acquirer, successor, or assignee of CODY as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Other users and the public. If you provide a testimonial that is intended to be public, we may disclose your information to other users and the public. This information can be seen, collected and used by others, including by being cached, copied, screen captured or stored elsewhere by others (for example, search engines) and we are not responsible for any such use of this information.

Your Choices

In this section, we describe the rights and choices available to all users.

Access or Update Your Information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account or contacting CODY (depending on which method is made available for a given aspect of the Service).

Opt out of communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.

Cookies & Browser Web Storage. We may allow service providers and other third parties as noted herein to use cookies and similar technologies to track your browsing activity over time and across the Service websites.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Location data. Users of our websites have the choice whether to allow us to access your precise location data. You can disable our access to your device's precise location data in your mobile device and/or browser settings.

Choosing not to share your personal information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Delete your content or close your account. You can choose to delete certain content and/or your entire account. If you wish to do so and/or request to close your account, please contact us.

Other Sites, Mobile Applications and Services

The Service may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security Practices

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a

manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

How to Contact Us

Please direct any questions or comments about this Policy or privacy practices to legal@codysystems.com. You may also write to us via postal mail at:
CODY Systems

Attn: Legal – Privacy

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