

# Privacy Policy – BOSS Business Services

## Policy on protection of clients' personal data

### 1. Introduction

The Office BOSS, Inc. (“BOSS”, “we”, “our” or “us”) are committed to respecting your privacy and processing personal data in accordance with the CA CCPA. The Privacy Policy set out in this document relates to all websites and mobile applications owned or controlled by BOSS at any given time. The applications are subject to change but set out in the BOSS Kiosk developer pages on the Apple Store and the BOSS Kiosk developer page on the Google Play Store. Collectively they will be referred to as “the Apps” and will include any alternative means of offering or delivering our software and services provided in the future. Certain parts of the Privacy Policy will only relate to some of the websites, the Apps or app categories. The Privacy Policy should be read carefully to discover how we obtain, process, store and disclose your personal data. The policy also sets out your rights as a data subject.

### 2. Personal Data

#### *Purpose and Lawful Basis*

Personal Data	Processing Operation and Purpose	Lawful Basis
Account Information (e.g. First Name, Last Name, Phone Number, PMB Number, email and subscription status)	<ul style="list-style-type: none"><li>i. To provide Notifications and Newsletters with exclusive information pertaining to your PMB, Parcels, Shipments and content and inform you of offers, urgencies or deficiencies in your Account information or Payment status.</li><li>ii. To create an account, allowing you to link your local PMB and BOSS Kiosk Store to your BOSS Kiosk APP account and manage your subscription.</li></ul>	<ul style="list-style-type: none"><li>i. We require your consent*.</li><li>ii. Necessary for the performance of a contract we have with you.</li><li>iii. Necessary for the performance of requested services by you.</li><li>iv. Necessary to comply with legal obligations.</li></ul> <p><i>*By download and use of the BOSS Kiosk APP, or use of a BOSS KIOSK, you consent to Notification and Newsletters from both The Office BOSS and/or the BOSS Kiosk App). App Notifications are accepted/declined at installation of the APP on all smart phones.</i></p>

	<p>iii. To provide access to Premium features, Shipping Preparation, PMB Payments, etc.</p>	
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	<p>iv. To notify you about material changes to the Terms of Service and Privacy Policy.</p>	<p><i>To revoke your consent for email Notifications click 'Unsubscribe' at the bottom of one of our emails. To revoke and delete your data stored online, simply choose the delete (trash can) on the BOSS Kiosk Account</i></p>
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Photo	<p>A User Photo shall be collected upon performing a shipment at any BOSS Kiosk. This photo shall be stored as part of the Transaction and Shipment History on record. No phot of the user shall be stored within your account specific online account.</p>	<p>By use of a BOSS Kiosk for shipping transactions, you consent to the collection of Transaction data including Date, Name, Phone number, email, parcel details, shipping details and photo.</p>
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Payment details	<p>To allow purchases to be made through the BOSS Kiosk and BOSS Kiosk APP using card payment, APPLE PAY and Google Wallet.</p>	<p>Necessary for the performance of transaction request made by you. CC Card, Google Wallet and Apple PAY Numbers are not collected by BOSS Kiosk Operations either online or at the physical kiosk. Payment data is handled strictly in compliance with PCI requirements.</p>
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Some of the Apps or websites may not process every category of personal data listed above. This will be clear if and when it applies (e.g. if not asked for your email address, it is not being processed).

#### Necessary for performance of Requested Transaction

We process some of your personal data because it is necessary for the performance of a Transaction or Account Management contract we have with you or it is necessary prior to entering into such a contract. If you do not wish to provide a phone number or email for example, we cannot create your account and you will be unable to avail of certain features. It should be noted, however, that not every app will process this data.

#### Changes to Personal Data

It is important that the personal data we have in relation to you is current and accurate. If your personal data (e.g. email address) changes during our relationship, please inform us promptly. If, for whatever reason, your personal data is inaccurate or incomplete you have the right for this to be corrected or completed.

Some of the Apps require data to be backed up with iCloud, for more information on how Apple processes your personal data see [Apple's Privacy Policy](#). The option to synchronize data across devices using [Google Drive](#) or [Dropbox](#) may also be provided, please refer to their privacy policies.

### **3. Automatic Collection, Retention and Sharing**

#### Device and Usage information automatically collected

In conjunction with our partners we automatically collect and log certain information stored on your terminal device ("**Device Data**") including device type, operating system specification, network settings, unique device identifier and IP address. "**Usage Data**" is collected and logged to discover how the Apps are used and which features are popular, it includes data relating to the time you are active, purchases and the features, buttons or screens you interact with. This helps to inform and improve our direction and development. We rely on our legitimate interest of measuring and analyzing app usage to further inform development and improve the overall user experience.

Our Analytics providers may by default use IP addresses to determine your general non-specific location. Among other things, this allows geographic sorting and protects us and our apps against misuse and nefarious activity.

#### Retention of Personal Data

We are committed to the principle of storage limitation and will retain your personal data for no longer than is necessary to fulfil our processing purposes. Following account deletion, revocation of consent or a written deletion request, your personal data will be retained for no longer than 30 days, save for certain instances where legal obligations require longer retention periods.

We will also anonymize some personal data so it will no longer be associated with you. In this event we are entitled to retain and use the information freely.

### Sharing with Third Parties

In order to provide you with our services, carry out our activities and to comply with legal obligations, we share your personal data with certain third parties such as:

- cloud storage providers, to help us securely store and back-up your data. To be able to provide these services, the providers receive your Account Information and Photo (as part of BOSS Kiosk Transactions). The providers we currently use are located in the US.
- analytics providers, who assist us in the improvement and optimization of the App. To be able to provide these services, the providers receive Device Data and Usage Data. We currently use a provider located in the US.
- newsletter and mailing providers, to enable us to generate and send newsletters to you if you have subscribed. To be able to provide this service, the providers receive your Account Information. The providers we use are located in the US.
- payment providers, who execute card payments for purchases made on the BOSS Kiosk and BOSS Kiosk APP. To do this, the providers receive your payment details and Account Information. The provider we currently use is located in the US.
- subscription infrastructure platforms, who facilitate the offering of in-app subscriptions. In doing so they receive your Account Information. The platform we are currently using is located in the US.
- cookie consent management platforms, who assist us in managing and implementing your preferences when you visit our websites. The platforms receive automatically collected device information to provide this service. The platform we are currently using is located in the US.
- law enforcement authorities, government authorities, government bodies and the courts where they request it and disclosure is lawful. (e.g. prevention and detection of crime).

## **4. International Data Transfers**

For BOSS Kiosk and BOSS Kiosk APP usage outside the US, we transfer your data to our partners outside the US. We are committed to ensuring your personal data is protected when transferring to third countries without an adequate level of protection.

## 5. Security

We have implemented appropriate technical and organizational security measures to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to. These measures include encryption and pseudonymization. Access to your personal data is granted strictly on a need to know basis and we have carefully selected our service providers with security considerations in mind.

## 6. Your Rights

### General Rights

You have several rights in relation to your personal data, these include the right to:

- **Access** a copy of the personal data we hold about you;
- **Correction** or **completion** of any inaccurate or incomplete personal data;
- **Erasure** (save for personal data necessary to comply with legal obligations or for the establishment, exercise or defense of legal claims);
- **Obtain** a copy of your personal data in a portable format;
- **Restrict** the processing of your personal data, in the following instances: -
  - 1) You are contesting the accuracy of your personal data and we need time to verify it.
  - 2) Processing has been found unlawful, but you oppose erasure.
  - 3) You require the personal data for the establishment, exercise or defense of legal claims, but we no longer need it for our processing purposes.
  - 4) You have objected to processing based on our legitimate interests and a final decision is pending.
- **Withdraw** consent or explicit consent for specific processing.
- **Object** to the processing of personal data based on our legitimate interests on the grounds that they are overridden by your interests or fundamental rights and freedoms.
- **Object** to the processing of personal data for direct marketing purposes.

If you wish to exercise any of these rights, please contact us. We may request proof of identification to verify your request.

### Complaint: Supervisory authority

If you think we have infringed your rights under data protection legislation, you have the right to lodge a complaint. The right to lodge a complaint is without prejudice to any other administrative or judicial remedy you may have. The contact information for the U.S Office of Financial Research is provided below:

Written complaints should be submitted to the OFR Privacy Program at [privacy@ofr.treasury.gov](mailto:privacy@ofr.treasury.gov). Include “Privacy Complaint” or “Civil Liberties Complaint” in the subject line to ensure review of your complaint. All complaints must be written in English and submitted as requested. Include the following information when filing your complaint:

- Name
- A brief summary of the complaint or description of the specific circumstances
- A brief summary of other steps taken, if any, by you or the OFR to resolve the complaint
- **OFFICE OF FINANCIAL RESEARCH**  
U.S. Department of the Treasury  
717 14th Street, NW  
Washington, DC 20220

## 7. Age Requirement

You must be at least 13 years of age to use any of the Apps.

## 8. Cookies

We use cookies and other such tracking technologies (“**Cookies**”) to remember certain details when a “**User**” visits some of the websites owned or otherwise controlled by BOSS.

Cookies are small data files that transfer to the User’s computer, phone, or other such device (“**Terminal Device**”) upon visiting some of the websites. Information is then obtained on the return visit. Cookies are stored locally on a Terminal Device for different periods, determined by their expiry date. **Session Cookies** are deleted once the browser is closed, while **Persistent Cookies** may remain on the Terminal Device until a given date.

Cookies can be categorized in two further ways: by the party that placed them (“**Source**”); and what they are used for (“**Function**”).

### 1. **Source**

- (a) **1st Party Cookies** (placed by BOSS)
- (b) **3rd Party Cookies** (placed by Third Party Vendors)

## **2. Function**

- (a) **Necessary Cookies**
- (b) **Preference Cookies**
- (c) **Statistics Cookies**
- (d) **Marketing Cookies**

We require your consent to place Preference, Statistics and Marketing Cookies. When you visit some of our websites you will be asked for your cookie preferences by a Cookie Banner. These preferences can be changed at any time through the Cookie Settings window, accessed by clicking the black circular button at the bottom left corner of your display. For further information on the specific cookies used on a website please see the relevant Cookie Banner or Cookie Settings window. ***Necessary Cookies***

Necessary Cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

There is no option to use the site without Necessary Cookies and unlike the latter three categories, we do not need User consent. The Cookie Banner and Cookie Settings window will by default permanently enable these cookies.

### ***Preference Cookies***

Preference Cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

### ***Statistic Cookies***

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

### ***Marketing Cookies***

Marketing cookies are used to track visitors across websites. The intention is to display advertisements that are relevant and engaging for the individual User and thereby more valuable for publishers and third-party advertisers.

### **Disabling and Deleting Cookies**

The current versions of Safari and Mozilla Firefox, by default, block third-party Cookies. For more information please refer to the following blog posts regarding [Safari](#) and [Mozilla Firefox](#). If other Browsers, such as Google Chrome or Microsoft Edge are used, third-party Cookies can be blocked manually through the Browser settings.

The option may also exist in the Browser settings to block all Cookies, including strictly necessary ones. However, the websites may not work as intended, or at all. Most Browsers will allow the User to delete all Cookies or to delete them on an individual basis. The User should be aware that by doing so, their preferences for the websites may be lost. For instructions specific to a particular Browser, please refer to the online support pages provided by the Browser.

## **9. Contact**

If you wish to get in contact with us please email [BOSSKiosk@theofficeboss.com](mailto:BOSSKiosk@theofficeboss.com) or write to us at *The Office BOSS, Inc., Attn: BOSS Kiosk APP Privacy Policy, 12177 Business Park Dr. Suite #2, Truckee CA 96161, USA.*

Questions, comments and requests in relation to this privacy policy or the processing of your personal data should be addressed to our Data Protection Officer (“DPO”).

## **10. Changes to this Privacy Policy**

We are constantly reviewing our Privacy Policy to ensure compliance with data protection legislation. Our apps are also constantly evolving and new features and services may change how we process your personal data. Any substantive or material change to this Privacy Policy will be brought to your attention.

*Last updated: December 16, 2024*