

## Proper Authorities Self-Storage Privacy Policy

This privacy notice was updated on 3/28/2024 and is effective immediately.

This website is located generally at **Proper Authorities Self-Storage** and is the official website for **Proper Authorities Self-Storage** (the “Site”). This Site is owned and operated by **Proper Authorities Self-Storage, Inc** (“Proper Authorities Self-Storage”, “the Company”, “we” or “us”).

Your privacy is very important to us. Because we gather certain types of personally identifiable information (“Personal Information”) from users of our Site, subscribers of our services and for various other operational and business purposes, we feel you should know how we collect, use, disclose, manage, and store the Personal Information that you may voluntarily provide us and the Personal Information that is collected passively through the use of cookies or image tags on our Site. We collect this information to learn more about who is interested in our products and services, to improve navigation experience on our pages, and to provide you with what you request through the web form. This Privacy Policy is incorporated by reference in the Site’s [General Terms of Use](#), which is binding on all Site users. This Policy applies only to the Personal Information collected by Proper Authorities Self-Storage via the Site and does not govern any such information collected by its corporate affiliates (“Affiliates”), or any other company or third party, unless specifically stated.

**If you do not agree with this Privacy Policy, please do not participate in the online or off-line activities and services that require you to provide your Personal Information. (The type of Personal Information collected is listed below.)** This Policy provides information regarding your choices to either Opt-out or Opt-in when your Personal Information is used for various promotional and marketing purposes by Proper Authorities Self-Storage, the Site, its corporate affiliates, and/or our advertisers, service providers, sponsors, or promotional partners (collectively, “Advertisers”).

### YOUR PENNSYLVANIA PRIVACY RIGHTS

Residents of the State of Pennsylvania that have an established business relationship with a company that conducts business in Pennsylvania, under a new provision of the Pennsylvania Civil Code, have the right to request from that company a list of all third parties to which the company has disclosed Personal Information about the resident for direct marketing purposes during the preceding year. Alternatively, the law provides that if the company has a privacy policy that gives either an Opt-out or Opt-in choice for use of Personal Information by third parties (such as Advertisers or Affiliates) for marketing purposes, the company may instead provide you with information on how to exercise your disclosure choice options.

This site qualifies for the alternative option; it has a comprehensive privacy policy and provides you with details on how you may Opt-out or Opt-in to the use of your Personal Information by third parties for direct marketing purposes. Therefore, we are not required to maintain or disclose a list of the third parties that received your Personal Information for marketing purposes during the preceding year.

If you are a Pennsylvania resident and have an established business relationship with us and want to receive information about how to exercise your third-party disclosure choices you must send a request to the following address with a preference on how our response to your request should be sent (email or postal mail). You may contact us in two ways. Send email to Privacy Administrator at [paselfstorage1015@gmail.com](mailto:paselfstorage1015@gmail.com)

**Alternatively, you may contact Proper Authorities Self-Storage at:**

**Proper Authorities Self-Storage**

PO Box 62  
Wysox, PA 18848  
Attn: Your Pennsylvania Privacy Rights  
c/o Privacy Administrator

**For requests sent via email, you must put the statement “Your Pennsylvania Privacy Rights” in the subject field of your email. All requests sent via postal mail must be labeled “Your Pennsylvania Privacy Rights” on the envelope or post card and clearly stated on the actual request.** For all requests, please include your name, street address, city, state, and zip code. (Your street address is optional if you wish to receive a response to your request via email. Please include your zip code for our own recordkeeping.) We will not accept requests via the telephone or by facsimile. We are not responsible for notices that are not labeled or not sent properly, or do not have complete information.

To all other users of this Site, if you have other questions about this Privacy Policy, please contact our Privacy Administrator at the following email address: [paselfstorage1015@gmail.com](mailto:paselfstorage1015@gmail.com) or:

**Proper Authorities Self-Storage**

PO Box 62  
Wysox, PA 18848  
Attn: Privacy Administrator

**GENERAL PRIVACY GUIDELINES**

Unless specified otherwise on the Site, all subscribers to our Services and users of the Site must be at least 18 years of age. In the instance where users of the Site are permitted to be under the age of 18, Proper Authorities Self-Storage will not knowingly collect any personal information directly from children under the age of 13. This Site is governed by and operated in accordance with the laws of the United States. We make no representation that this Site is operated in accordance with the laws of other nations. By your participation in our Site activities, you certify that you are at least 18 years of age. Please be aware that any Personal Information you transfer to us will be transferred to and processed in the U.S and subject to U.S. law. By using this Site, participating in any Site activities, and/or providing us with your Personal Information, you consent to this transfer of Personal Information to the U.S., and waive any claims that may arise under your own national laws. All users of the Site are required to provide true, current, complete and accurate Personal Information when prompted and we will reject and delete any entry that we believe in good faith to be false, fraudulent, or inconsistent with this Privacy Policy.

Your continued participation on this Site indicates your acceptance of this Privacy Policy and of the collection, use, disclosure, management, processing and storage of your Personal Information as described below. We may from time to time, transfer or merge any Personal Information collected off-line to our online databases or store off-line information in an electronic format. We may also combine Personal Information we collect online with information available from other sources,

including information received from our corporate affiliates, Advertisers, or marketing companies. This Privacy Policy covers all such Personal Information and will remain in full force and effect as long as you are a user of the Site. **We reserve the right to revise this Privacy Policy at any time by updating this document without advance notice to you. Such revisions shall be effective to you immediately upon posting. Therefore, we encourage you to check this Privacy Policy often.**

We use your Personal Information to provide you with the features, services, or goods you request, to respond to billing and/or other such questions related to Proper Authorities Self-Storage's services offered through the Site and to notify you about updates and new features that may be of interest to you. (We explain below in the next section what our policy is for the collection, use and disclosure of Personal Information to Advertisers.)

We may also use your information for hiring, operational and business purposes, to find out how we can improve our services and your use of the Site via surveys or online tracking mechanisms, and to develop new services and features that may be of interest to you. We use aggregate Personal Information to help us to evaluate and modify existing services and features.

We may also use your information to allow you to connect with other users of Proper Authorities Self-Storage's Services.

We will not sell, exchange, rent, lease or otherwise disclose your Personal Information or Sensitive Personal Information to third-party marketers that are not associated with Proper Authorities Self-Storage as operational service providers or Advertisers unless it is necessary to: 1) conform to regulatory and legal requirements or to comply with legal process; 2) to protect the safety and security of our users, employees, or property; 3) to defend the rights of the Site or Proper Authorities Self-Storage; or 4) to enforce the General Terms of Use Agreement.

Notwithstanding the foregoing, however, we may share your Personal Information with our subsidiaries, corporate parents, and Affiliates primarily for business, operational, promotional and marketing purposes.

It is also necessary that we share your Personal Information and Sensitive Personal Information with our operational service providers, the specialists that provide us with internal support for our operations and activities and/or for Site design, development, hosting and operations including maintenance, management, storage and/or fulfillment of our services and other activities.

We reserve the right to collect Personal Information using any new technology yet to be developed and to use such technology to provide new services and features to you, as well as for marketing and promotional purposes.

#### **CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND USE**

As used in this Policy, "personal information" or "personal data" means any information or data relating to an identified or identifiable natural person or household that we process in connection with our Websites, Apps, and Services; an identifiable natural person or household is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person or household.

**Personal Information you actively provide to us:**

<b>Category of Personal Data</b>	<b>Examples</b>	<b>Proper Authorities Self-Storage uses this personal data to:</b>
Contact and Account Information	Name, username, email address, phone number, IP address, and any other identifiers a user provides when accessing or using the Service Account holders' usernames and account numbers Billing name and address for paid Services Phone number for Proper Authorities Self-Storage, title	Create a customer account Provide Proper Authorities Self-Storage Services Communicate with a customer Respond to requests for support Market to potential customers
Information about use of non-Proper Authorities Self-Storage services through integrations or otherwise	Social media account information, single-sign-on service tokens, Google/Apple/Microsoft sign-in tokens	Create a customer account Provide Proper Authorities Self-Storage Services Communicate with a customer Respond to requests for support Market to potential customers
Payment information	Billing name, address, and credit card or other payment information. Offering, price and other information about your purchase.	Bill account holders who subscribe to paid offerings

**Personal Information we collect automatically when you visit our Website or Apps or use our Services:**

<b>Category of Personal Data</b>	<b>Examples</b>	<b>Proper Authorities Self-Storage uses this personal data to:</b>
Service Usage Data	Internet Protocol ("IP") address, MAC address, other device ID ("UDID"), device type, operating system type and version, client version, type of camera, microphone or speakers, connection type and other related information User feedback ratings, internal feature usage analytics, usage logs, cookie identifiers Traffic data about the communications that take place through our platform (such as chat, video conferencing, SMS), network monitoring data Call Detail Records produced by a telephone call or other telecommunications transactions. The record contains various attributes of the call, such as time, duration, completion status, source number and destination number;	Connect you to and optimize your experience using our Website, Apps, and Services Provide customers dashboards and reports Respond to requests for support Conduct fraud and threat analysis, and detect and prevent spam or unlawful or abusive activity or other violations of our <a href="#">Terms of Service</a> ("ToS")

	<p>Fraud data such as blacklist history and security logs</p> <p>Metadata such as session logs and join &amp; leave time of participants</p> <p>Log data including IP address, Internet Service Provider (“ISP”), browser type, referring/exit pages, operating system, date/time stamp, and/or clickstream data</p> <p>Publicly available data from End User accounts</p>	<p>Monitor performance of our data centers and networks</p> <p>Conduct analytics to improve Proper Authorities Self-Storage’s Website, App and Service performance</p> <p>Personalize your experience with our Websites, Apps and Services</p> <p>Comply with applicable law</p>
SMS messages	Content of blocked SMS messages that violate our spam rules	Conduct fraud and threat analysis, and detect and prevent spam or unlawful or abusive activity or other violations of our ToS
Geolocation information	Information about where you are located when using the Service	<p>Provide the Service</p> <p>Communicate with users about the service</p> <p>Respond to requests for support</p> <p>Market Proper Authorities Self-Storage products and services to account holders and/or other potential users</p>

**Personal Information you may choose to allow us to access when you use our Apps or services:**

We do not upload or store this information but use it to enhance the user experience. Allowing this access is optional. This data is not shared with any third parties.

<b>Category of Personal Data</b>	<b>Examples</b>	<b>Proper Authorities Self-Storage uses this personal data to:</b>
End User Contact List Data	All data for contacts stored on a device, including contact name, phone number, email address.	<p>Provide Proper Authorities Self-Storage Services to the Proper Authorities Self-Storage customer on whose behalf we collect or the information.</p> <p>Improve the user experience for incoming calls, messages, and faxes.</p>
End User Files and Photos	All files and photos stored on a device.	Proper Authorities Self-Storage access files and photos to send them as fax or multimedia messages.

**Personal Information we collect from End Users on behalf of Proper Authorities Self-Storage customers:**

If you are not a Proper Authorities Self-Storage customer but you engage in communications powered by Proper Authorities Self-Storage (an “End User”), we may collect and store personal information about you on behalf of a Proper Authorities Self-Storage customer.

<b>Category of Personal Data</b>	<b>Examples</b>	<b>Proper Authorities Self-Storage uses this personal data to:</b>
End User Personal Data	Name, username, email address, phone number, IP address, cookie identifiers and any other identifiers a user provides when accessing or using the Service Other forms of personal information we collect on behalf of the relevant customer such as title, role, organization, phone number and other related information Other forms of personal information we collect as necessary to offer the relevant Website, App or Service such as IP address, cookie identifiers and other related information	Provide Proper Authorities Self-Storage Services to the Proper Authorities Self-Storage customer on whose behalf we collect or store the information Communicate with a customer Respond to requests for support Detect and prevent spam or fraudulent activity, and detect and prevent unlawful or abusive activity or other violations of our AUP For other legitimate business purposes permitted by our agreement with the relevant Proper Authorities Self-Storage customer

Certain Proper Authorities Self-Storage products and services may also access and store personal information about you from a customer’s social media accounts or accounts a customer may have with other third-party services, when the customer chooses to connect its Proper Authorities Self-Storage accounts with its other accounts. This personal information may include name, email, geolocation and any other publicly available information on these platforms. With respect to social media, only personal information that an End User has directly provided to the relevant Proper Authorities Self-Storage customer or that an End User has designated as publicly accessible will be accessed or stored. We use this personal information in connection with providing our Services to our customers.

**DISCLOSURE TO ADVERTISERS**

We may also use your Personal Information for the marketing of events, products or services of our Advertisers (“Advertiser Promotions”). As we do not currently share Personal Information with our Advertisers, the way in which users may receive information about such Advertiser Promotions would be indirectly via

newsletters, email or direct mail from Proper Authorities Self-Storage. However, depending on the activity and the Advertiser, we may in the future choose to let our Advertisers send you marketing information directly. In such event, with respect to any Personal Information we may collect in connection with a particular Advertiser Promotion via forms and other methods on the Site, the same will provide you with notice (which may be via a link to a revised privacy policy or other terms and conditions) of our intention to share such information with our Advertisers. With respect to previously collected Personal Information we choose to share with Advertisers, you will receive an email notice of our intention to do so. Please be informed that our Advertisers may not have the same privacy policies that we do. Therefore, you will need to tell us if you do not want to receive marketing information directly from our Advertisers. You will need to check the “Opt-out” click boxes that may be included on the registration area for the particular Advertiser Promotion, in the email notice, or alternatively, notify the Site’s Privacy Administrator at [paselfstorage1015@gmail.com](mailto:paselfstorage1015@gmail.com). You will also need to tell us if you do not wish to receive marketing or promotional materials from the Site in the same manner.

We also provide you with an option to “Opt-out” of receiving advertising and promotional email from us in compliance with federal law by installing an Opt-out mechanism directly in any such email messages. You must use the designated method in the email message to notify us of your Opt-out request, as we cannot guarantee that other methods of notification will be effective or timely. Please be aware that we may continue to contact you via email for administrative or informational purposes, including follow-up messages regarding contests you have entered or other transactions you have undertaken. By law, such messages are not considered to be commercial email.

## **COOKIES AND IMAGE TAGS**

The use of cookies is an industry standard and they are currently used on most websites, including this Site. We may send “cookies” to your computer primarily to enhance your online experience. “Cookies” are files that can identify you as a unique customer and store your personal preferences as well as technical information (including click through and click stream data). Cookies can either be permanent (*i.e.*, they remain on your computer until you delete them) or temporary (*i.e.*, they last only until you close your browser). Proper Authorities Self-Storage uses these cookies, some of which are essential, to operate the Site. Importantly, cookies do not personally identify a user, but do recognize the user’s web browser. Unless you identify yourself by filling out a form on the Site, you remain anonymous to Proper Authorities Self-Storage. Some examples of cookies Proper Authorities Self-Storage uses include:

**Preference Cookies** – Proper Authorities Self-Storage uses these cookies to remember your preferences. When you register at a Proper Authorities Self-Storage website, we use cookies to store unique, randomly assigned user IDs that we generate for administrative purposes. These cookies enable you to enter the Proper Authorities Self-Storage sites without having to log on each time.

**Advertising Cookies** – These cookies are used to serve you with advertisements that may be relevant to you and your interests. We use cookies to make advertising more engaging to users, as well as to assist in reporting on marketing program performance and analytics.

**Security Cookies** – These cookies are used for general security purposes and user authentication. We use security cookies to authenticate users, prevent fraudulent use of login credentials, and protect user data from access by unauthorized parties.

Image tags work in conjunction with cookies and are small image files that may be located on select pages of our Site, or within web-based email newsletters, or marketing emails that we may send. (Image tags are also called web beacons, web bugs, clear GIFs or single-pixel GIFs.) Tracking is important because we can better understand what parts of our website are used the most, when to launch new services and how to enhance current offerings. We may share the information we receive from cookies and image tags with third parties and our Advertisers in aggregate form, which means that such information generally does not contain specific Personal Information or Sensitive Personal Information about any one visitor. In short, cookies and image tags collect a user's Internet protocols and server information. Such data files allow our Site to remember your web browser when you visit our Site and are necessary tools for quick and efficient access to areas of our Site. A cookie will not allow the Site to learn any Personal Information (such as your real name and email address) or Sensitive Personal Information that you have not otherwise disclosed.

On their own, cookies or image tags do not contain or reveal any personally identifiable information. However, if you choose to furnish the website with personally identifiable information, this information can be linked to the data stored using cookies/Web beacons.

By accepting this Privacy Notice, you specifically agree to our use of cookies and image tags as described herein. You may adjust your browser to reject cookies from us or from any other website. If you have a Flash player installed on your computer, your Flash player may be able to be set to reject or delete Flash cookies. Please consult the "Help" section of your browser or Flash player for more information. Additionally, by setting your Web browser to display HTML e-mails as text only, you may be able to prevent the use of some image tags. However, certain areas of our websites may only be accessed in conjunction with cookies or similar devices, and you should be aware that disabling cookies or similar devices might prevent you from accessing some of our content.

You should be aware that different rules might apply to the collection, use or disclosure of your Personal Information by other third parties in connection with their advertisements, promotions and other websites you encounter on the Internet. The use of cookies and other technology by these third parties is within their control and not ours. Even if we have a relationship with the third party, we do not control those sites or their policies and practices regarding your Personal Information. This Privacy Policy does not cover any use of Personal Information that a third party or an Advertiser may collect from you. We encourage you to investigate and ask questions directly of them in this regard.

## **ADVERTISING, OTHER THIRD-PARTY CONTENT AND HYPERLINKS**

This Privacy Policy does not cover third-party advertising or third-party content that may be present on the Site. This Site may provide banner and general advertising from third parties, in addition to other content provided by our Advertisers or operational service providers. Users may from time to time purchase goods or services offered through, or otherwise participate in or send messages concerning such advertising, promotions or third-party content offered through the Site. Such correspondence, transactions and agreements are solely between the user and the Advertiser or the third-party content provider and do not involve the Site. Also, Advertisers and such third-party content providers may not have the same privacy policies that we do and you are encouraged to read their privacy policy first. (Also see our section called "Cookies and Image Tags")

This Site may provide links to third-party websites that could be of interest to our users, including the websites of our Advertisers. Proper Authorities Self-Storage does not own or control these websites and therefore, is not responsible for the content, business practices, nor operations of such websites. Third-party websites linked on this Site may have different privacy policies and business practices than we do. **The presence of a link to a third-party website does not constitute or**



**imply our endorsement, recommendation, or sponsorship of the third-party content, goods, or services available through, or contained on, the Site. By use of this Site, you have agreed that you will use the hyperlinks to third-party sites at your own risk.**

**We also reserve the right to engage with third parties to track and analyze anonymously identifiable usage and volume statistical information from users who visit our Sites. We also may use other third-party cookies to track performance of our advertisements, and may use anonymized aggregated data from any source for targeted advertising purposes, including in conjunction with third parties.**

## **SECURITY MEASURES**

We conduct the collection, management, maintenance and storage of website user information in a secure and commercially reasonable manner using acceptable industry standards of security technology and practices (such as electronic security systems and password protections) to protect against the loss, misuse or alteration of Personal Information. We also request that our operational service providers take such precautions. The Proper Authorities Self-Storage website databases are accessible only by authorized personnel.

However, please note that when users transmit Personal Information over an unsecured Internet connection, the Site is not responsible for the security of that information during the transmission stage as your email or registration could be copied or intercepted by unknown third parties. We use a secured connection only for the collection of Sensitive Personal Information, which is necessary for the purchase of goods or services, but we do not use a secured connection for other types of activities. Therefore, you understand, acknowledge, and agree that you transmit certain Personal Information over this Site at your own risk.

## **HIPAA**

Proper Authorities Self-Storage does not require or intend to access Customer data in the course of providing services, including but not limited to any confidential health related information of Customer's clients, which may include group health plans, that constitutes Protected Health Information, as defined in 45 C.F. R. §160.103 under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA Rules"). However, Protected Health Information (PHI) may be present in "data at rest" within Proper Authorities Self-Storage systems (including the content of voicemail, call recording, SMS/MMS text messaging, and faxes) but are encrypted with access and audit controls as also defined by HIPAA and HITECH rules.

## **CPNI**

In the course of providing Services to you, we collect and maintain certain customer proprietary network information ("CPNI"). CPNI includes the types of services you currently purchase, related usage and billing information for those services. Your telephone number, name and address are not CPNI. We value our relationships with our customers and are committed to respecting and protecting your CPNI and to complying with applicable law regarding CPNI. Accordingly, we do not sell, trade or share your CPNI, including your calling records outside of Proper Authorities Self-Storage's family of companies, including our Affiliates, or with anyone not authorized to offer our products or services, or to perform functions on our behalf (e.g. operational service providers) except as authorized by you or required by law. Generally, we can use your CPNI to offer additional services to you, and for billing and collections purposes. We can also disclose your CPNI for legal

or regulatory reasons, including in response to subpoenas, court orders and the like. We can also use CPNI to investigate fraud and to prevent violation of our policies and agreements with you and unlawful use of our network, services and other customers.

## **CHILDREN'S PRIVACY POLICY**

Proper Authorities Self-Storage does not sell products or services for purchase by children. Proper Authorities Self-Storage does not knowingly solicit or collect Personal Information from children or teenagers under the age of eighteen. If you believe that a minor has disclosed Personal Information to Proper Authorities Self-Storage, please e-mail us at [paselfstorage1015@gmail.com](mailto:paselfstorage1015@gmail.com) to report this to us.

## **REVIEW, UPDATE, CORRECT, OR DELETE PERSONAL INFORMATION OR SENSITIVE PERSONAL INFORMATION**

Generally, you may review, update or delete your Personal Information or Sensitive Personal Information collected by the Site. You may also correct factual inaccuracies. Certain types of Personal Information that are necessary to check eligibility, such as birth date or age, cannot be deleted, but may be modified with sufficient verification of the new information. Note that we reserve the right to terminate or delete any membership or entry if we believe the Personal Information submitted was knowingly false or fraudulent.

To review, update or delete your Personal Information or Sensitive Personal Information collected by the Site, please email the Site's Privacy Administrator at [paselfstorage1015@gmail.com](mailto:paselfstorage1015@gmail.com). To have access to your Personal Information or Sensitive Personal Information, you must provide proof of identification such as full name, street address, city/state and zip code, user ID and password, and/or information about your recent activity on the website. We reserve the right to deny access to any user if we believe there is a question about your identity. And if the burden or expense of providing access to your Personal Information is disproportionate to the risks to your privacy, or if the legitimate rights of others would be violated, we may decide not to provide access to such information. In such cases, we will provide to you an explanation of why access cannot be provided and a contact person for further inquiries.