POINTGAUGE PRIVACY POLICY

Effective Date: October 5, 2026
Last Updated: October 5, 2026

This Privacy Policy explains how **CodeLux**, doing business as **PointGauge** ("PointGauge," "we," "us," or "our"), collects, uses, stores, and protects information in connection with the PointGauge software platform, websites, applications, client portals, subcontractor portals, and related services (collectively, the "Platform").

PointGauge is committed to protecting the privacy of individuals and businesses that use the Platform.

PointGauge does not sell personal information.

The information PointGauge stores is primarily information provided by customers and users in connection with their use of the Platform, such as names, usernames, email addresses, company information, project information, documents, photographs, videos, messages, and other information necessary to provide the Platform.

This Privacy Policy should be read together with the PointGauge Terms of Use.

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1. INFORMATION WE COLLECT

PointGauge collects and processes information that is necessary to provide, maintain, secure, and improve the Platform.

The types of information we may collect include the following.

1.1 Account Information

When a user creates or is invited to an account, PointGauge may collect:

- First and last name;
- Username;
- Email address;
- Phone number, if provided;
- Company name;
- Job title or role;
- Account credentials or authentication information;
- Subscription information;
- User preferences; and
- Other information voluntarily provided during account creation.

PointGauge does not require users to provide information that is not reasonably necessary for the applicable Platform functionality.

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2. CUSTOMER-PROVIDED INFORMATION

Customers and their Users may submit information to PointGauge as part of their use of the Platform.

This may include:

- Project names;
- Project addresses;
- Client names and contact information;
- Subcontractor names and contact information;
- Vendor information;
- Estimates;
- Budgets;
- Receipts;
- Invoices;
- Contracts;
- Documents;
- Photographs;
- Videos;
- Audio;
- Messages;
- Tasks;
- Schedules;
- Milestones;
- Financial information;
- Project notes;
- Work information;
- Material information;
- Project status information; and
- Other information entered or uploaded by Users.

The Customer generally determines what information is entered into its PointGauge account.

PointGauge does not independently determine what project information a Customer should collect.

3. CLIENT AND SUBCONTRACTOR INFORMATION

Customers may invite Clients and Subcontractors to use portions of the Platform.

When a Client or Subcontractor receives access, PointGauge may collect information such as:

- Name;
- Email address;
- Username;
- Phone number, if provided;
- Company name;
- Account credentials;
- Project-related information;
- Documents;
- Messages;
- Signatures;
- Photographs;
- Videos; and
- Other information submitted through the Platform.

The Customer generally determines what information is shared with Clients and Subcontractors.

PointGauge does not sell Client or Subcontractor information.

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4. INFORMATION COLLECTED AUTOMATICALLY

When users access the Platform, certain technical information may be collected automatically as part of normal operation.

This may include:

- IP address;
- Browser type;
- Device type;
- Operating system;
- Login timestamps;
- Account activity;
- Pages or features accessed;

- Error information;
- Authentication events;
- Security events; and
- Other technical information necessary to operate and secure the Platform.

PointGauge uses this information primarily for:

- Authentication;
- Security;
- Fraud prevention;
- Troubleshooting;
- Platform performance;
- Error detection;
- Service reliability; and
- Maintaining the Platform.

PointGauge does not use automatically collected technical information to sell personal information to advertisers.

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5. PAYMENT INFORMATION

Customers may provide payment information when purchasing PointGauge subscriptions or add-ons.

Payment transactions may be processed by third-party payment processors.

PointGauge generally does not need to store complete payment card numbers to provide the Platform.

Payment processors may collect and process payment information in accordance with their own privacy policies and terms.

PointGauge may receive limited payment-related information such as:

- Billing name;
- Billing address;
- Payment status;
- Subscription;
- Transaction amount;
- Last four digits of a payment card, where provided by the payment processor;
- Payment method type; and
- Other information necessary to administer billing.

PointGauge does not sell payment information.

6. HOW WE USE INFORMATION

PointGauge uses information for legitimate business and operational purposes, including to:

1. Create and manage accounts;
2. Provide access to the Platform;
3. Provide Customer, Client, and Subcontractor portals;
4. Store and display Customer Data;
5. Facilitate project management;
6. Facilitate document sharing;
7. Facilitate electronic signatures;
8. Process invoices and other Platform functionality;
9. Provide AI-powered functionality when enabled;
10. Communicate with users;
11. Process subscriptions and payments;
12. Provide customer support;
13. Maintain Platform security;
14. Detect and prevent fraud and abuse;
15. Diagnose technical problems;
16. Monitor Platform performance;
17. Comply with legal obligations;
18. Enforce our Terms of Use;
19. Protect the rights, property, and safety of PointGauge and its users; and
20. Develop, maintain, and improve the Platform.

PointGauge does not sell personal information.

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7. AI FEATURES

Certain PointGauge subscriptions may include AI-powered functionality.

When a user uses an AI feature, information submitted for that feature may be processed by PointGauge and, where necessary, third-party AI infrastructure providers used to provide that functionality.

For example, a user may submit:

- A project description;

- A project document;
- A photograph;
- A video walk;
- Audio;
- A project update;
- A question; or
- Other project information.

That information may be processed to generate outputs such as:

- Project summaries;
- Task lists;
- Scope information;
- Project updates;
- Answers to questions;
- Extracted project information; or
- Other AI-generated information.

AI processing is performed to provide the requested PointGauge functionality.

PointGauge does not sell personal information to AI providers.

PointGauge may use third-party technology providers to process information on PointGauge's behalf as necessary to provide the Platform.

Users should not submit information to AI Features that they do not have the right or authorization to submit.

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8. THIRD-PARTY SERVICE PROVIDERS

PointGauge relies on certain third-party providers to operate the Platform.

These providers may provide services such as:

- Cloud hosting;
- Database infrastructure;
- File storage;
- Authentication;
- Payment processing;
- Email delivery;
- AI processing;
- Security;
- Monitoring;

- Analytics;
- Communications; and
- Other infrastructure or operational services.

PointGauge only provides third-party providers with information reasonably necessary for them to perform their services.

Third-party providers may process information in accordance with their own agreements and privacy policies.

PointGauge does not authorize third-party service providers to sell PointGauge Customer Data for their own unrelated purposes.

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9. DATA SHARING

PointGauge does not sell personal information.

PointGauge may disclose or provide access to information in the following circumstances.

9.1 At the Customer's Direction

A Customer may intentionally share information through the Platform with:

- Clients;
- Subcontractors;
- Employees;
- Vendors;
- Project participants; or
- Other authorized individuals.

PointGauge provides the Platform to facilitate those interactions.

The Customer is responsible for determining what information it shares with those parties.

9.2 Service Providers

PointGauge may share information with third-party service providers that help operate the Platform.

These providers may include infrastructure, hosting, payment, email, authentication, AI, storage, monitoring, security, and other technology providers.

9.3 Legal Requirements

PointGauge may disclose information when reasonably necessary to:

- Comply with a law;
- Respond to a valid legal process;
- Respond to a subpoena;
- Respond to a court order;
- Respond to a governmental request;
- Protect the rights or property of PointGauge;
- Protect the safety of users or others;
- Investigate fraud or abuse; or
- Address security threats.

Where legally permitted, PointGauge may provide notice before disclosing information in response to a legal request.

9.4 Business Transfers

If PointGauge is involved in a merger, acquisition, financing, reorganization, sale of assets, or similar business transaction, information associated with the Platform may be transferred as part of that transaction.

Any successor entity would remain subject to applicable privacy obligations.

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10. WE DO NOT SELL PERSONAL INFORMATION

PointGauge does not sell, rent, or trade personal information.

PointGauge does not operate a data brokerage business.

PointGauge does not sell Customer Data, Client information, Subcontractor information, or User information to advertisers or unrelated third parties.

PointGauge's business model is based on providing software subscriptions and related services, not selling user information.

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11. COOKIES AND SIMILAR TECHNOLOGIES

PointGauge may use cookies or similar technologies that are necessary to operate the Platform.

These technologies may be used for:

- Authentication;
- Maintaining login sessions;
- Security;
- Remembering preferences;
- Platform functionality;
- Performance monitoring; and
- Understanding how the Platform is used.

PointGauge may also use limited analytics technologies to understand Platform performance and improve the user experience.

PointGauge does not use cookies for the purpose of selling personal information.

Users may be able to control certain cookies through their browser settings. Disabling necessary cookies may affect Platform functionality.

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12. COMMUNICATIONS

PointGauge may use contact information to send users communications relating to their use of the Platform.

These communications may include:

- Account notifications;
- Password or authentication communications;
- Security alerts;
- Billing notices;
- Subscription notices;
- Support communications;
- Service announcements;
- Product updates;
- Legal notices; and
- Other operational communications.

PointGauge may send marketing communications where permitted by law.

Users may unsubscribe from non-essential marketing communications by following the unsubscribe instructions provided in the communication.

Users generally cannot opt out of communications that are necessary to operate or secure their account.

13. DATA RETENTION

PointGauge retains information for as long as reasonably necessary to:

- Provide the Platform;
- Maintain Customer Accounts;
- Provide requested services;
- Comply with legal obligations;
- Resolve disputes;
- Enforce agreements;
- Maintain security;
- Prevent fraud; or
- Protect the Platform.

Customer Data may remain associated with an active Customer Account for the duration of the Customer's Subscription.

Following account termination, PointGauge may retain information for a reasonable period for:

- Backup purposes;
- Legal compliance;
- Security;
- Fraud prevention;
- Dispute resolution; and
- Legitimate business purposes.

PointGauge may subsequently delete information in accordance with its data retention practices.

Backup copies may remain for a limited period after information is removed from active systems.

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14. DATA SECURITY

PointGauge uses commercially reasonable safeguards designed to protect information against unauthorized access, alteration, disclosure, or destruction.

These safeguards may include:

- Authentication controls;

- Access controls;
- Encryption where appropriate;
- Secure cloud infrastructure;
- Security monitoring;
- Administrative controls;
- Technical controls; and
- Other reasonable security practices.

However, no online service can guarantee absolute security.

Users are responsible for:

- Protecting their passwords;
- Using appropriate account security;
- Not sharing authentication credentials;
- Logging out of shared devices; and
- Promptly reporting suspected unauthorized access.

PointGauge cannot guarantee that unauthorized access, security incidents, or data loss will never occur.

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15. CUSTOMER RESPONSIBILITY FOR DATA

Customers generally control the information they enter into their PointGauge accounts.

Customers are responsible for:

- Determining what information to collect;
- Determining what information to upload;
- Ensuring they have appropriate rights to the information;
- Providing required notices to their employees, Clients, Subcontractors, and other project participants;
- Obtaining required permissions and consents;
- Determining which Users should have access;
- Controlling project-level permissions; and
- Complying with applicable privacy and data-protection laws.

PointGauge provides the software infrastructure but does not independently determine whether a Customer's collection or use of information is legally appropriate.

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16. CLIENT AND SUBCONTRACTOR PRIVACY

Clients and Subcontractors should understand that information they submit through a Customer's PointGauge account may be accessible to the Customer and other individuals authorized by the Customer.

For example, a Customer may be able to view:

- Profile information;
- Messages;
- Documents;
- Project information;
- Uploaded photographs;
- Uploaded videos;
- Electronic signatures;
- Tasks;
- Project activity; and
- Other information associated with the applicable project.

PointGauge does not control how a Customer uses information that the Customer is authorized to access.

Questions regarding how a Customer uses information should generally be directed to that Customer.

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17. YOUR PRIVACY RIGHTS

Depending on where you live, you may have certain rights regarding your personal information.

These rights may include, subject to applicable law:

- The right to know what personal information is collected;
- The right to access personal information;
- The right to request correction of inaccurate information;
- The right to request deletion of personal information;
- The right to obtain a copy of certain information;
- The right to limit certain uses of information;
- The right to opt out of certain processing activities; and
- The right to appeal certain privacy decisions.

Not every right applies in every circumstance.

Because PointGauge primarily provides business software to Customers, some information submitted through a Customer Account may be controlled by the Customer rather than PointGauge.

If you are a Client, Subcontractor, employee, or other individual whose information was provided to PointGauge by a Customer, you may need to direct your request to the applicable Customer.

PointGauge will reasonably assist with applicable requests where required by law.

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18. HOW TO REQUEST ACCESS, CORRECTION, OR DELETION

If you would like to request access to, correction of, or deletion of personal information held directly by PointGauge, contact:

support@pointgauge.com

Please include enough information for PointGauge to identify:

- Your name;
- Your account or company, if applicable;
- The nature of your request; and
- Any other information reasonably necessary to verify the request.

PointGauge may need to verify your identity before completing a request.

PointGauge may also need to contact the applicable Customer when the information is controlled by that Customer.

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19. CALIFORNIA PRIVACY RIGHTS

California residents may have additional privacy rights under applicable California privacy laws, including the California Consumer Privacy Act (“CCPA”), as amended.

PointGauge does not sell personal information.

PointGauge does not share personal information for cross-context behavioral advertising as those terms may be defined under applicable California law.

Depending on the circumstances and applicable law, California residents may have rights to:

- Know about personal information collected;
- Access personal information;
- Correct inaccurate personal information;
- Delete personal information;
- Obtain information about disclosures;
- Opt out of certain activities where applicable; and
- Receive equal treatment for exercising applicable privacy rights.

PointGauge may not discriminate against an individual for exercising rights granted by applicable law.

Because PointGauge provides business software, certain information processed on behalf of a Customer may be subject to the Customer's own privacy obligations and instructions.

California residents may contact PointGauge using the information in Section 18 to submit a privacy request.

PointGauge will process applicable requests in accordance with California law.

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20. TEXAS PRIVACY RIGHTS

PointGauge operates in Texas and may be subject to applicable Texas privacy laws, including the Texas Data Privacy and Security Act ("TDPSA") where applicable.

To the extent applicable, Texas residents may have rights concerning their personal data, including rights to access, correct, delete, and obtain a copy of certain personal data, subject to applicable exceptions and requirements.

PointGauge does not sell personal information.

PointGauge will process qualifying privacy requests in accordance with applicable law.

Privacy requests may be submitted using the contact information in Section 18.

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21. CHILDREN'S PRIVACY

PointGauge is intended primarily for business use.

The Platform is not directed toward children and expressly prohibits anyone under 18 from using the platfom.

PointGauge does not knowingly collect personal information from children for the purpose of providing child-directed services.

If you believe a child has provided personal information to PointGauge in circumstances where the information should not have been collected, contact PointGauge at:

support@pointgauge.com

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22. INTERNATIONAL USERS

PointGauge is primarily intended for businesses operating in the United States.

Information may be processed or stored in the United States or other locations where PointGauge or its service providers operate.

Users accessing PointGauge from outside the United States should understand that applicable privacy protections may differ from those in their jurisdiction.

Where required by applicable law, PointGauge will implement appropriate safeguards for international transfers of personal information.

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23. THIRD-PARTY LINKS AND SERVICES

The Platform may contain links to third-party websites, services, or applications.

PointGauge is not responsible for the privacy practices of third parties.

Users should review the privacy policies of third-party services before providing information to them.

Third-party services integrated with PointGauge may independently collect information according to their own terms and privacy policies.

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24. BUSINESS TRANSACTIONS

If PointGauge undergoes a merger, acquisition, financing, reorganization, sale of assets, bankruptcy, or similar transaction, information associated with the Platform may be transferred to the relevant successor or acquiring entity.

Any such transfer will be handled in accordance with applicable law.

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25. LEGAL DISCLOSURES

PointGauge may disclose personal information where reasonably necessary to:

- Comply with applicable law;
- Respond to legal process;
- Enforce the PointGauge Terms of Use;
- Protect PointGauge's rights or property;
- Protect users or the public;
- Investigate fraud;
- Investigate security incidents; or
- Prevent abuse of the Platform.

PointGauge will seek to limit such disclosures to what is reasonably necessary for the applicable purpose.

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26. DATA OWNERSHIP

Customer Data remains the property of the applicable Customer, subject to the rights of individuals and other parties who may have rights in particular information.

PointGauge does not claim ownership of Customer Data merely because it is stored or processed through the Platform.

PointGauge receives only the rights reasonably necessary to provide and operate the Platform.

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27. NO DATA SALE

For clarity:

PointGauge does not sell personal information.

PointGauge does not sell Customer Data.

PointGauge does not sell Client Data.

PointGauge does not sell Subcontractor Data.

PointGauge does not sell User Data to advertisers or data brokers.

PointGauge's revenue comes from software subscriptions and related services rather than the sale of personal information.

28. CHANGES TO THIS PRIVACY POLICY

PointGauge may update this Privacy Policy from time to time.

If material changes are made, PointGauge may provide notice through:

- The Platform;
- Email;
- A website notice; or
- Another reasonable communication method.

The updated Privacy Policy will identify its effective date.

Continued use of the Platform after the effective date of an updated Privacy Policy constitutes acknowledgment of the updated Privacy Policy to the extent permitted by law.

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29. CONTACT US

If you have questions, concerns, or requests regarding this Privacy Policy or PointGauge's privacy practices, contact:

PointGauge
Legal Entity: CodeLux
Website: https://pointgauge.com
Support Email: support@pointgauge.com

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30. EFFECTIVE DATE

This Privacy Policy is effective as of:

October 5, 2026

Last Updated: October 5, 2026