

## Apruvd, LLC

### Privacy Notice

REVISION DATE: OCTOBER 25, 2023

Welcome to the Apruvd, LLC, an Arizona limited liability company, (“Apruvd,” “we,” or “us”) website. Your privacy is very important to all of us at Apruvd. This page explains the policy governing online data collection and usage adopted by Apruvd (the “Privacy Notice”), which includes the software, website, and online services that make up Apruvd (collectively the “Services”). This Privacy Notice does not govern collection of data offline. By using the Services, you consent to the data practices described in this Privacy Notice.

FOR MORE INFORMATION OR IF YOU HAVE ANY QUESTIONS ABOUT THIS PRIVACY NOTICE, PLEASE CONTACT US AT [SUPPORT@APRUVD.COM](mailto:SUPPORT@APRUVD.COM).

#### **1. Personal Information**

This Privacy Notice explains to you how your personal information is protected, collected, and used. Personal information is information about you that is personally identifiable, such as your name, address, phone number, email address, and other information that is not otherwise publicly available (“Personal Information”). The privacy practices of this Privacy Notice apply to our services and products available through this website, including any platforms accessible through this website, and any mobile applications offered by Apruvd (collectively, the “Site”), and your use of the Site. This Privacy Notice also describes the types of information we may collect from you or that you may provide when you visit the Site, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Please read this Privacy Notice carefully to understand our policies and practices regarding your information and how we will treat it. By visiting the Site, you agree to be bound by the terms and conditions of this Privacy Notice. If you do not agree, please do not use or access this Site. From time to time, Apruvd may modify this Privacy Notice and post such modifications here on this Site. Any modifications are effectively immediately, and your use of this Site after any such modification constitutes your acceptance of the modified Privacy Notice. By submitting Personal Information to us through this Site, you expressly consent to our use and disclosure of your Personal Information in accordance with this Privacy Notice. This Privacy Notice is incorporated into and subject to the terms of the Apruvd Terms of Use and Service Agreement, available at [www.apruvd.com](http://www.apruvd.com).

#### **2. Information Collection & Use**

Apruvd collects Personal Information from you through your registration process to use the Services. The legal basis or business purpose for collecting Personal Information from you through the Services is for our legitimate business interests, namely, to allow us to provide the Services that will most likely meet your

needs and preferences and to monitor and improve our Services. We only collect Personal Information about you that we consider necessary for achieving this purpose.

In general, you can browse the Site and “opt-out” from providing us with any Personal Information. Once you agree to provide us with Personal Information, you are no longer anonymous to us. If you choose to use and/or purchase certain Services we may require you to provide contact and identity information, billing information, and other Personal Information as indicated on the forms throughout the Site. Where possible, we indicate which fields are required and which are optional. You always have the option not to provide information by choosing not to use or purchase a particular service.

We also collect information about you that does not itself identify you individually and aggregate information, which is information about use of our Services, such as pages visited on our Site. The information we collect depends on the purpose and nature of your interactions with the Site and on what services and features you use on our Services.

Under some circumstances, we may require some additional financial information. We use your financial information, including credit card information, to verify the accuracy of your name, address and other information, as well as to bill you for your use of our services and products.

We may track certain behavior on the Site. We collect several types of information from and about users of our website, including information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or offline; about you but that individually does not personally identify you; and/or
- about your internet connection, IP address, and the equipment you use to access our Site and usage details.

We collect this information:

- directly from you when you provide it to us through filling in forms on our website;
- automatically as you navigate through the Site. Information collected automatically may include usage details;
- from third parties, for example, our business partners.
- From Platform users sending email or text messages marketing campaigns to a target through our Services;
- In email, text, and other electronic messages between you and the Site; and
- Through mobile and desktop applications by use of the Services.

We use this information to do internal research on our users' demographics, interests, and behavior to better understand our customers.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Site, we may collect and retain such information in a file specific to you.

We reserve the right, at any time and without notice to you, to add to, change, update, or modify this Privacy Notice. If we decide to change our Privacy Notice, we will post a new notice on our Site and change the date at the top of the Privacy Notice. Any change, update or modification will be effective immediately upon posting on our Site and will apply to any personal information provided to us on and after that date. Your continued use of this Services after we make changes is deemed to be acceptance of those changes, so please check the Privacy Notice periodically for updates.

### **3. Use of Your Personal Information**

We use your Personal Information, and other information we obtain from your current and past activities on the Site for our legitimate business purposes, to: resolve disputes; troubleshoot problems; measure consumer interest in our products and services; inform you about online and offline offers, products, services, and updates; customize your experience on the Site and with Apruvd's Services; detect and protect us against error, fraud, and other criminal activity; enforce our Terms of Use and Service Agreement; provide you with notices about your account/subscription; carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections; and as otherwise described to you at the time of collection. We may compare and review your Personal Information for errors, omissions, and accuracy.

You agree that we may use your Personal Information, including your email address, to improve our marketing efforts, to analyze the Site usage, to improve the Services, and to customize Apruvd's Content, layout, and services. These uses improve the Site and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe, and customized experience while using the Site and/or the Services.

We have the right to de-identify or aggregate data. Deidentified information is information that cannot reasonably be used to infer information about, or otherwise be linked to, a particular identifiable person. To the extent that we deidentify your Personal Information we will (i) take reasonable measures to ensure that the information cannot be associated with an individual, (ii) publicly commit to maintain and use the information in deidentified form and not to attempt to reidentify it, (iii) implement technical safeguard that prohibit reidentification, (iv) implement business processes that specifically prohibit reidentification, (v) implement business processes that prevent inadvertent release of deidentified information, (vi) make no attempt to reidentify the information, and (vii) contractually obligate any recipients of the deidentified information to

comply with all provisions in this Privacy Notice. For the avoidance of doubt, de-identified data is not considered Personal Data.

#### 4. **Communications from the Site or app**

We may occasionally send you information on products or services. Out of respect for your privacy, we provide you a way to unsubscribe from each of these communications. If you no longer wish to receive such communications, you may opt-out of receiving them by following the instructions included in each such communication or by contacting us.

You will be notified when your Personal Information is collected by any third party that is not our agent/service provider, so you can make an informed choice as to whether or not to share your information with that party.

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if access to our services and products is temporarily suspended for maintenance, we might send you an email. Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account and subscription for our Services.

#### 5. **Information Sharing and Disclosure**

We do not sell, rent, or share any of your Personal Information, including your email address, to third parties for their marketing purposes without your explicit consent. However, the following describes some of the ways that your Personal Information may be disclosed in the normal scope of business to provide our Services and products to customers:

- **Purpose:** We may disclose your Personal Information to fulfill the purpose for which you provide it.
- **External Service Providers:** There may be separate services offered by third parties that we refer to as external service providers that may be complementary to your use of the Services. If you choose to use these separate services or products, disclose information to the external service providers, and/or grant them permission to collect information about you, then their use of your information is governed by their Privacy Notice. We do not disclose your Personal Information, including your email address, to external service providers unless you provide your explicit consent. With your consent, we may provide some of your Personal Information to the external service provider offering such services, for your convenience. To prevent our disclosure of your Personal Information to an external service provider, you can decline such consent or simply not use their services or products. Because we do not control the privacy practices of these third parties, you should evaluate their practices before deciding to use their services.
- **Internal Service Providers:** We may use third parties that we refer to

as internal service providers to facilitate or outsource one or more aspects of the business, product, and service operations that we provide to you and therefore we may provide some of your Personal Information, including your email address, directly to these internal service providers. These internal service providers are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information we provide them for any other purpose except to facilitate the specific outsourced Apruvd related operation, unless you have explicitly agreed or given your prior permission to them for additional uses. If you provide additional information to an internal service provider directly, then their use of your Personal Information is governed by their applicable Privacy Notice.

- **Buyers or Successors:** To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Apruvd LLC's assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding in which personal information held by Apruvd about our Site users is among the assets transferred.
- **Legal Requests:** Apruvd cooperates with law enforcement inquiries, as well as other third parties to enforce laws, such as: intellectual property rights, fraud and other rights, to help protect you, other users, and Apruvd from bad actors. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, we can (and you authorize us to) disclose your name, city, state, telephone number, email address, username history, and fraud complaints without a subpoena. Without limiting the above, in an effort to respect your privacy, we will not otherwise disclose your Personal Information to law enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss, or report suspected illegal activity.
- **Other Disclosures:** We may also disclose your Personal Information: (i) to enforce or apply our Terms of Use and Service Agreement or other agreements, including for billing and collection purposes; or (ii) if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Apruvd LLC, our customers, or others.

Due to the existing regulatory environment, we cannot ensure that all of your private communications and other Personal Information will never be disclosed in ways not otherwise described in this Privacy Notice. By way of example (without limiting the foregoing), we may be forced to disclose Personal Information, including your email address, to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your Personal Information

that they collect from the Site. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should neither rely upon nor expect, that your Personal Information or private communications will always remain private.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

### **Your California Privacy Rights**

This section of the Privacy Notice applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

California Civil Code Section § 1798.83 permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [support@apruvd.com](mailto:support@apruvd.com) or write us at: Apruvs, LLC Attn: Compliance Department 15150 North Hayden Road, Suite 102 Scottsdale, AZ 85254. Please note that we do not share your personal information to any third-party for marketing or advertising purposes.

As stated above in Section 2, Apruvs collects Personal Information from you through your registration process to use the Services. The legal basis or business purpose for collecting Personal Information from you through the Services is for our legitimate business interests, namely, to allow us to provide the Services that will most likely meet your needs and preferences and to monitor and improve our Services. We only collect Personal Information about you that we consider necessary for achieving this purpose.

Under some circumstances, we may require some additional financial information. We use your financial information, including credit card information, to verify the accuracy of your name, address and other information, as well as to bill you for your use of our services and products. We obtain the categories of personal information listed directly below from you, our customer or their agents, indirectly from you, our customers or their agents in the course of providing services to you or them, directly from our Site, or from third parties that interact with us in connection with the services we perform.

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). Personal information does not include publicly available information from government records, de-identified or aggregated consumer information, or information excluded from CCPA’s scope, including personal information covered by sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the

Driver's Privacy Protection Act of 1994.

We may use or disclose the personal information we collect for one or more of the following legitimate business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to verify identity or provide fraud prevention services, we will use that information to provide the services.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. In particular, we have collected and disclosed to a third party the following categories of personal information from consumers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>	<b>Disclosed to a third party</b>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	Yes, disclosed to our service providers and third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES	Yes, disclosed to our service providers and third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.



<b>Category</b>	<b>Examples</b>	<b>Collected</b>	<b>Disclosed to a third party</b>
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES	Yes, disclosed to our service providers and third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	No.
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	N/A

<b>Category</b>	<b>Examples</b>	<b>Collected</b>	<b>Disclosed to a third party</b>
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	Yes, disclosed to our service providers.
G. Geolocation data.	Physical location or movements.	NO	N/A
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	N/A
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO	N/A
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	N/A
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	N/A

If you are a resident of California, you have other rights under the CCPA:

- **Right of Access:** You can access your collected personal information by contacting us at support@apruvd.com.
- **Right to correct, update, or delete:** You can correct, update or request deletion of your personal by contacting us at support@apruvd.com. We can't make changes to or delete your information in some situations where it is necessary for us to maintain your information, for example if we need the information to complete transactions, continue providing services to you, or comply with applicable law. As an example, in the course of

providing fraud prevention services to you or our customers, we may be required to retain your personal information for up to 180 days.

- **Right to Request Disclosure of Information Collected:** Please contact us at support@apruvd.com to request further information about the categories of personal information we have collected about you, where we collected your personal information, and for what purpose we use your personal information.
- **Right to Disclosure of Information Sold and Right to Opt-Out:** You have the right to know what information of yours we have sold, and you have the right to opt-out of any sale of your information. We do not sell any of your information. If you have any questions about these rights, please contact us at support@apruvd.com.
- **Right to Non-Discrimination:** We do not and will not discriminate against you if you exercise your rights under the CCPA.

When you contact us regarding any of your rights under the CCPA, we will verify your identity before we provide any information. If you have any questions or comments about your rights under the CCPA, please contact us at our toll free telephone number (480) 477-9150 or support@apruvd.com.

6. **Colorado Privacy Act (“CPA”), Connecticut Data Privacy Act (“CTDPA”), Nevada Privacy of Information Collected on the Internet from Consumers Act (“NPICICA”), Utah Consumer Privacy Act (“UCPA”), Virginia Consumer Data Protection Act (“VCDPA”), Disclosures**

### **Categories of Personal Information Collected**

As set forth above, we collect the following categories of information: identifiers (such as your name and email address), personal information (such as your name and contact information), internet or other similar network activity, geolocation data, and inferences drawn from the collected personal information. This information is collected directly from you when you provide it to us or automatically as you navigate through the Site. We use this information for one or more legitimate business purposes, including to improve our Services and offer information about our Services to you.

### **Rights of Colorado, Connecticut, Nevada, Utah, and Virginia Residents**

If you are a resident of Colorado, Connecticut, Nevada, Utah, or Virginia, you have other rights under your respective states’ consumer privacy statutes:

- **Right of Access:** You can access your collected personal information.
- **Right to correct, update, or delete:** You can correct, update or request deletion of your personal information. We can’t make changes to or delete your information in some situations where it is necessary for us to maintain

your information, for example if we need the information to comply with applicable law.

- **Right to Request Disclosure of Information Collected:** You may request further information about the categories of personal information we have collected about you, where we collected your personal information, and for what purpose we use your personal information.
  - **Right to Disclosure of Information Sold or Shared and Right to Opt-Out of the Sale or Sharing of your Personal Information:** You have the right to know what information of yours we have sold, the categories of Personal Information shared, and you have the right to opt-out of any sale or sharing of your information. We do not sell or share any of your information.
  - **Right to Disclosure of Targeted Advertising and Right to Opt-Out (Colorado, Connecticut, Utah, & Virginia):** If you are a resident of Colorado, Connecticut, Utah, or Virginia, you have the right to know what information of yours we have processed for targeted advertising. We do not engage in targeted advertising.
  - **Right to Disclosure of Profiling (Colorado, Connecticut, Utah, & Virginia):** If you are a resident of Colorado or Virginia, you have the right to know what information of yours we have processed for the purposes of profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.
  - **Right to Non-Discrimination:** We do not and will not discriminate against you if you exercise your rights under the CPA, CTDPA, NPICICA, UPA, or VCDPA.
7. **Exercising your Rights Under the CCPA, CPRA, CPA, CTDPA, NPICICA, UPA, or VCDPA**

### Submitting a Request

To exercise the rights described in this Privacy Notice, please submit a verifiable consumer request to us via email: [support@apruid.com](mailto:support@apruid.com).

Only you, or someone legally authorized to act on your behalf (if in California, the person legally authorized to act on your behalf must be registered with the California Secretary of State), may make a verifiable consumer request related to your Personal Information. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows Apruid to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, which may include the user's:

- First name

- Last name
- Email address
- Please describe your request with sufficient detail that allows Apruvd to properly understand, evaluate, and respond to your request.

### **Verifying Requests**

Apruvd cannot respond to your request or provide you with Personal Information if Apruvd cannot verify your identity or authority to make the request and confirm the Personal Information that relates to you. If Apruvd cannot initially verify your identity or authority, Apruvd will follow internal procedures to verify your identity and authority. Apruvd attempts to respond to a verifiable consumer request within forty-five (45) days of its receipt. If Apruvd requires more time (up to 45 days), Apruvd will inform you of the reason and extension period in writing.

If you have an account with Apruvd, Apruvd will deliver Apruvd’s written response to that account. If you do not have an account with Apruvd, Apruvd will deliver Apruvd’s written response by mail or electronically, at your option.

Any disclosures Apruvd provides will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response Apruvd provides will also explain the reasons Apruvd cannot comply with a request, if applicable. For data portability requests, and to the extent that Apruvd is able, we will select a format to provide your Personal Information that is readily usable and should allow you to transmit the Personal Information from one entity to another entity. If we are not able to do so, we will let you know

Apruvd does not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If Apruvd determines that the request warrants a fee, Apruvd will tell you why Apruvd made that decision and provide you with a cost estimate before completing your request.

If you have any questions or comments about your rights under the CCPA, CPRA, CPA, NPICICA, VCDPA, and CTDPA please contact us at [support@apruvd.com](mailto:support@apruvd.com)

### **8. Users from Outside of the United States**

**General:** By using the Services you acknowledge and agree that: (i) your information will be processed as described in this Privacy Notice; and (ii) you consent to have your information transferred to us and our facilities in the United States or elsewhere, including those of third parties as described in this Privacy Notice.

**European Economic Area (EEA) or Switzerland:** If you are based in the EEA or Switzerland, you acknowledge and agree that we may transfer your information (including personal information) to us and our facilities in the United States or elsewhere, including those of third parties as described in this Privacy

Notice. Please review our Terms of Service and the applicable services agreement for more information regarding any other applicable data protections.

**Legal Basis for processing your information:** If you are a user located in the EEA or Switzerland, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. We will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate business interests. In some cases, we may also have a legal obligation to collect personal information from you. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to Contact Us” heading below. Apruvd adheres to the General Data Protection Regulation (“GDPR”).

## 9. **GDPR**

### **Introduction**

The goal of the GDPR is to standardize data protection laws and processing across the EU, and to give individuals stronger, more consistent rights to access and control their personal information. Apruvd is committed to ensuring the security and protection of all personal information that we process, and to approach data protection in a compliant and consistent manner. We have developed and are continuously implementing and updating our data protection roles, policies, procedures, controls, and measures to ensure maximum compliance.

In most processing contexts, Apruvd acts as a processor or service provider for a controller institution or certifying entity. In those situations, where required by applicable law, Apruvd only transfers personal data to third countries or international organizations where the controller institution or certifying entity has authorized Apruvd to do so in accordance with applicable law.

When we transfer information from individuals in the EEA to countries that have not received an adequacy finding under Article 45 of the GDPR, we rely on alternative adequate safeguards, such as the contractual mechanisms set forth in Article 46 of the GDPR or derogations for specific situations set forth in Article 49 of the GDPR. In the limited situations where we act as a controller and rely on a cross-border transfer mechanism under Article 49, we only collect and transfer your information to third countries: (i) with your consent; (ii) to perform a contract with you; or (iii) to establish, exercise, or defend legal claims.

### **Methods of Compliance**

- Information Audit – We periodically audit information to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
- Policies & Procedures – We monitor and update data protection policies

and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws.

- Data Retention & Erasure – We have updated our retention policy and schedule to ensure that we meet the ‘data minimization’ and ‘storage limitation’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new ‘Right To Be Forgotten’ obligation and are aware of when this and other data subject’s rights apply; along with any exemptions, response time frames and notification responsibilities.
- Data Breaches – We have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time, and have disseminated these to all employees.
- International Data Transfers & Third-Party Disclosures –We carry out strict due diligence checks with all recipients of personal information to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.
- Subject Access Request (SAR) – We have revised our SAR procedures to accommodate the revised 30-day time frame for providing the requested information and for making this provision free of charge. Our procedures detail how to verify the data subject, what steps to take for processing an access request, and what exemptions apply to ensure that communications with data subjects are compliant, consistent and adequate.
- Legal Basis for Processing – We reviewed all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the related activity. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of GDPR and Schedule 1 of the Data Protection Bill are met.
- Privacy Notice/Policy – We have revised our Privacy Notices to comply with GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- Direct Marketing – We have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions, a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.
- Processor Agreements – Where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting, etc.), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of

the service provided, the necessity of the processing activity, the technical and organizational measures in place and compliance with GDPR.

- **Special Categories Data** – Where we obtain and process any special category information, we do so in compliance with the Article 9 requirements and have high-level encryptions and protections on all such data. Special category data is only processed where necessary and is only processed when we have first identified the appropriate Article 9(2) basis or the Data Protection Bill Schedule 1 condition. Further, in general, we do not request or require sensitive or special category information about you, including:
  - Racial or ethnic origins
  - Political opinions
  - Religious or philosophical beliefs
  - Trade-union membership
  - Genetic data
  - Biometric data
  - Data regarding Your health (including mental or physical health), sex life, or sexual orientation
  - Criminal records
  - Citizenship or immigration status
  - Rights of Data Subject
- **Right of access:** You can access your collected personal information.
- **Right to correct, update, or delete:** You can correct, update, or request deletion of your personal information.
- **Right to restriction of processing:** You can ask us to restrict processing your personal information
- **Right to object to processing:** You may object to the processing of your personal information by us at any time. This right does not exist if we have already processed your personal information.
- **Right to data portability:** You can ask to take your personal information that you provided to us, in a structured format, from us.
- **Right to withdraw consent:** You have the right to withdraw your consent to our processing of your information. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to file a complaint with the local supervisory authority:** You have a right to raise questions or complaints with your local data protection authority at any time.



If you have any questions or comments about this Privacy Notice, please contact us at [support@apruvd.com](mailto:support@apruvd.com).

#### **10. Canadian User Rights – PIPEDA**

We make every effort to cooperate with you in compliance with the Personal Information Protection and Electronic Documents Act (“PIPEDA”), and all federal and provincial laws and regulations, including those related to privacy and anti-spam legislation.

PIPEDA aims to protect the privacy rights of individuals by regulating how organizations handle their personal information and fostering transparency, accountability, and consent in the collection and use of personal data.

This Privacy Notice and any applicable agreement you enter in with us detail our obligations in regard to confidentiality, transparency, accountability, and consent in the collection and use of data. PIPEDA compliance are predicated on all Parties’ compliance with these provisions.

Further, with regard to PIPEDA’s ten “fair information principles” forming the ground rules, so to speak, for how Personal Information should be collected and disclosed, the Privacy Notice complies with that as well. The goal of the Fair Information Principles is to examine any collection and use of Personal Information, and ensure that it only be used in such a way that a reasonable person would consider appropriate in the circumstances. We comply with that ask by being fully transparent and open with regard to all of its policies, and approaching them in not only a fully reasonable manner, but also in a cautious manner looking toward protecting all Personal Information.

When you contact us regarding any of your rights under PIPEDA we will verify your identity before we provide any information. If you have any questions or comments about your rights under PIPEDA please contact us at [support@apruvd.com](mailto:support@apruvd.com).

#### **11. Children’s online privacy protection act**

We do not knowingly collect information from minors. Our Site is intended for and directed towards adults. Our Services are not directed to minors and we do not knowingly collect Personal Information from minors. Our Site is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Site or on or through any of its features/register on the Site, make any purchases through the Site, use any of the interactive or public comment features of this Site or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child

under 13, please contact us at support@apruvd.com or Compliance Department, 15150 North Hayden Road, Suite 102, Scottsdale, AZ 85260.

## 12. Log Files

As is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyze trends, to administer the Site, to track users' movements around the Site and to gather demographic information about our user base as a whole. We do not link this automatically-collected data to personally identifiable information. We track trends in users' usage and volume statistics to create a more efficient and usable Site and product offerings, and to determine areas of the Site or our Services that could be improved to enhance the user and customer experience. Log files are used on the Site, and in any link to the Site from an email.

## 13. Manage Your Security Settings

Some internet browsers have incorporated "Do Not Track" features. We respond to Do Not Track signals by not tracking browser and URL information collected through a tracking pixel. However, for security purposes, we do not respond to Do Not Track signals for information collected via server logs, such as user IP address and firewall events.

You may manage how your browser handles cookies and related technologies by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. You can opt-out of being targeted by certain third-party advertising companies online at <http://www.networkadvertising.org/choices/>.

You may manage how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

## 14. Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this Site may then be inaccessible or not function properly.

- **Disclosure of Your Information for Third-Party Advertising.** We do not share your personal information to any third-party for marketing or advertising purposes.
- 15. **Promotional Offers from the Company.** If you do not wish to have your email address/contact information used by us to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to support@apruvd.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to us as a result of a product purchase, warranty registration, product service experience, or other transactions.
- 16. **Cookies and Related Technologies**

When you use the Site, we collect certain information by automated electronic means, which may include:

- **Browser Cookies** – A cookie is a small file placed on the hard drive of your computer or mobile device. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.
- **Flash Cookies** – Certain features of our Site may use locally stored objects called Flash Cookies to collect and store information about your preferences and navigation to, from, and on our Site. Flash Cookies are not managed by the same browser settings as are used for Browser Cookies.
- **Web Beacons** – Our emails and certain pages of our Site may contain small electronic files known as Web Beacons that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). Web Beacons are sometimes also referred to as clear gifs, pixel tags, and single-pixel gifs.
- **Session Cookies** are temporary cookies used for various reasons, such as managing page views, and are usually erased by your browser when you exit it.
- **Persistent Cookies** are used for a number of reasons, such as storing your preferences and retrieving certain information you have previously provided. Persistent Cookies are stored on your devices after you exit your browser. **Analytics Cookies** are cookies that allow us to count visits and traffic sources, so we can measure and improve the performance of the website. They help us know which pages are the most and least popular and see how visitors move around the website. All information these cookies collect

is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited the website.

- Functional Cookies are cookies that enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- Targeting Cookies are cookies that may be set through the website by our advertising partners. They can be used by these third parties to build a profile of your interests based on the browsing information they collect from you, which includes uniquely identifying your browser and terminal equipment. If you do not allow these cookies you will still see basic advertising on your browser that is generic and not based on your interests.
- Throughout the Company's Privacy Statement, we use the term "Cookies" to include Browser Cookies, Flash Cookies, Web Beacons, Session Cookies, Persistent Cookies, Analytics Cookies, Functional Cookies, and Targeting Cookies.

Our use of cookies, pixel tags and other technological measures includes:

- Collecting certain information about your equipment, browsing actions, and patterns;
- Speeding up your searches;
- Keeping details of your visits to our Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Services;
- Keeping track of your specified preferences allowing us to customize our Site according to your individual interest;
- Conducting research and diagnostics to improve our Services, including speeding up searches;
- Improving security;
- Measuring and analyzing the performance of our Services including estimating audience size and usage patterns;
- Delivering ads and other content relevant to your interests and providing advertisers with insights about the people who see and interact with their ads and visit their websites;
- Estimating our audience size and usage patterns

The information from cookies is also stored in web server logs, which are then transmitted back to the Site by your computers or mobile devices. These servers and cookies are operated and managed by us and/or our service providers. As you use the Site and Services, your browsers communicate with servers operated

by the Company and/or our service providers to coordinate and record the interactivity and fill your requests for services and information.

Cookies are also used to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site; and
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect is statistical and may include Personal Information, such as your IP address. Cookies help us improve our Site and Services and help us deliver better Site and Services, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Site.

#### **17. Links to Other Sites**

This Site may contain links to other sites that are not owned or controlled by Apruvd. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Notice applies only to information collected by this Site.

#### **18. Accessing and Correcting Personally Identifiable Information**

If you want to update or delete your contact information, terminate your subscription, or have other questions or requests, please contact us at support@apruvd.com. While we are ready to assist you in managing your subscriptions, and closing your account, we cannot always delete records of past interactions and transactions. For example, we are required to retain records relating to previous purchases for financial reporting and compliance reasons.

#### **19. Security**

We follow generally accepted industry standards to protect Personal Information, including your email address, submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. Any transmission of personal information is at

your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

All information you provide to us is stored on our secure servers behind firewalls. We utilize Amazon Web Services, with servers located in the United States, and industry standard best practices. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

#### **20. Changes in this Privacy Statement**

If we decide to change our Privacy Notice, we will post those changes to this Privacy Notice and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Notice at any time, so please review it frequently.

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