Privacy Policy

Protecting your private information is our priority. This Statement of Privacy applies to http://www.tequitable.com and tEQuitable Inc. and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to tEQuitable Inc. include http://www.tequitable.com and tEQuitable. The tEQuitable website is a marketing and digital services site. By using the tEQuitable website, you consent to the data practices described in this statement.

Collection of your Personal Information
In order to better provide you with products and services offered on our Site, tEQuitable may collect personally identifiable information, such as your:

- First and Last Name
- E-mail Address
- Employer

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use certain products or services available on the Site. These may include: (a) registering for an account on our Site; (b) entering a sweepstakes or contest sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting your credit card or other payment information when ordering products and services on our Site. To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

Use of your Personal Information
tEQuitable collects and uses your personal information to operate its website(s) and deliver the services you have requested.

tEQuitable may also use your personally identifiable information to inform you of other products or services available from tEQuitable and its affiliates.

Sharing Information with Third Parties
tEQuitable does not sell, rent or lease its customer lists to third parties.

tEQuitable may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to tEQuitable, and they are required to maintain the confidentiality of your information.

tEQuitable may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law
or comply with legal process served on tEquitable or the site; (b) protect and defend the rights or property of tEquitable; and/or (c) act under exigent circumstances to protect the personal safety of users of tEquitable, or the public.

Tracking User Behavior
tEquitable may keep track of the websites and pages our users visit within tEquitable, in order to determine what tEquitable services are the most popular. This data is used to deliver customized content and advertising within tEquitable to customers whose behavior indicates that they are interested in a particular subject area.

Automatically Collected Information
Information about your computer hardware and software may be automatically collected by tEquitable. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the tEquitable website.

Links
This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Security of your Personal Information
tEquitable secures your personal information from unauthorized access, use, or disclosure. tEquitable uses the following methods for this purpose:

- SSL Protocol

When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Sockets Layer (SSL) protocol.

We strive to take appropriate security measures to protect against unauthorized access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed.

Children Under Sixteen
tEquitable does not knowingly collect personally identifiable information from children under the age of sixteen. If you are under the age of sixteen, you must ask your parent or guardian for permission to use this website.
**E-mail Communications**
From time to time, tEQuitable may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication.

If you would like to stop receiving marketing or promotional communications via email from tEQuitable, you may opt out of such communications by clicking on the UNSUBSCRIBE button.

**External Data Storage Sites**
We may store your data on servers provided by third party hosting vendors with whom we have contracted.

**Changes to this Statement**
tEQuitable reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our site, and/or by updating any privacy information on this page. Your continued use of the Site and/or Services available through this Site after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

**Contact Information**
tEQuitable welcomes your questions or comments regarding this Statement of Privacy. If you believe that tEQuitable has not adhered to this Statement, please contact tEQuitable at:

tEQuitable Inc.
2148 Broadway
Oakland, California 94612

Email Address:
privacy@tequitable.com

Telephone number:
(844)-253-4100

**EU Residents**

If you are a resident of the European Union ("EU"), United Kingdom, Lichtenstein, Norway, or Iceland, you may have additional rights under the EU General Data Protection Regulation (the "GDPR") with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually
identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. tEQuitable will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at privacy@tequitable.com. Note that we may also process Personal Data of our customers’ employees in connection with our provision of services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

What Personal Data Do We Collect From You? We collect Personal Data about you when you provide such information directly to us, when third parties such as our business partners or service providers provide us with Personal Data about you, or when Personal Data about you is automatically collected in connection with your use of our Services.

Information we collect directly from you: We receive Personal Data directly from you when you provide us with such Personal Data, including without limitation the following:

- First and last name
- Email address
- Employer

Information we automatically collect when you use our Services: Some Personal Data is automatically collected when you use our Services, such as the following:

- IP address
- Web browser information
- Page view statistics

How Do We Use Your Personal Data? We process Personal Data to operate, improve, understand and personalize our Services. For example, we use Personal Data to:

- Analyze performance to improve our website and Services
- Respond to user inquiries
- Communicate with you about the Services
- Comply with our legal or contractual obligations

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.
• **Contractual Necessity:** We process the following categories of Personal Data as a matter of “contractual necessity”, meaning that we need to process the data to perform under our Terms of Service with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
  - First and last name
  - Email address
  - Employer

• **Legitimate Interest:** We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties.
  - IP address
  - Web browser information
  - Page view statistics
  
Examples of these legitimate interests include:
  - Operation and improvement of our business, products and services
  - Compliance with legal obligations

• **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

• **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

**How and With Whom Do We Share Your Data?** We share Personal Data with vendors, third party service providers and agents who work on our behalf and provide us with services related to the purposes described in this Privacy Policy or our Terms of Service. These parties include:

- Analytics service providers
- Hosting service providers

We also share information with third parties when you give us consent to do so.

Furthermore, if we choose to buy or sell assets, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party, and we would share Personal Data with the party that is acquiring our assets. You acknowledge that such transfers may occur, and that any
acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

**How Long Do We Retain Your Personal Data?** We retain Personal Data about you for as long as is necessary to fulfill the purposes outlined in this Policy. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes, or is otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

**What Security Measures Do We Use?** We seek to protect Personal Data using appropriate technical and organizational measures based on the type of Personal Data and applicable processing activity. For example, we use industry standard encryption for data in transit and at rest. Access to our systems and your data is restricted only to those who need access in order to support the service and our customers. We also take measures to ensure service providers that process personal data on our behalf also have appropriate security controls in place.

**Personal Data of Children:** As noted in the Terms of Service, we do not knowingly collect or solicit Personal Data from anyone under the age of 16. If you are under 16, please do not attempt to register for the Services or send any Personal Data about yourself to us. If we learn that we have collected Personal Data from a child under age 16, we will delete that information as quickly as possible. If you believe that a child under 16 may have provided us Personal Data, please contact us at privacy@tequitable.com.

**What Rights Do You Have Regarding Your Personal Data?** You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email privacy@tequitable.com. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need to you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.

- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data by emailing us at privacy@tequitable.com.

- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.

- **Withdrawal of Consent:** We will obtain your consent to process your Personal Data every time you use our Services and we collect such data. You may decline to provide
such consent, please note, however, that if you exercise this right to decline to provide consent, you may not be able to utilize some or all of our Services. Where you have previously provided your consent, you have the right to withdraw your

- **Portability**: You can ask for a copy of your Personal Data in a machine-readable format.

- **Objection**: You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes.

- **Restriction of Processing**: You can ask us to restrict further processing of your Personal Data.

- **Right to File Complaint**: You have the right to lodge a complaint about tEQuitable’s practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

**Transfers of Personal Data**: The Services are hosted and operated in the United States (“U.S.”) through tEQuitable and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to tEQuitable in the U.S. and will be hosted on U.S. servers, and you authorize tEQuitable to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. pursuant to EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, the details of which are further set forth below.

tEQuitable has certified to the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework set forth by the U.S. Department of Commerce regarding the collection and use of Personal Data transferred from the EU and Switzerland. For more information about the Privacy Shield Program, and to view tEQuitable’s certification, please visit www.privacyshield.gov. tEQuitable is committed to the Privacy Shield Principles of (1) notice, (2) consent, (3) accountability for onward transfer, (4) security, (5) data integrity and purpose limitation, (6) access and (7) recourse, enforcement and liability with respect to all Personal Data received from within the EU [and Switzerland] in reliance on the Privacy Shield. The Privacy Shield Principles require that we remain potentially liable if any third party processing Personal Data on our behalf fails to comply with these Privacy Shield Principles (except to the extent we are not responsible for the event giving rise to any alleged damage). tEQuitable’s compliance with the Privacy Shield is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

Please contact us at privacy@tequitable.com with any questions or concerns relating to our Privacy Shield Certification. If you do not receive timely acknowledgment of your Privacy Shield-related complaint from us, or if we have not resolved your complaint, you may also resolve a Privacy Shield-related complaint through JAMS, an alternative dispute resolution provider located in the United States. You can visit https://www.jamsadr.com/file-an-eu-us-
privacy-shield-or-safe-harbor-claim for more information or to file a complaint, at no cost to you. Under certain conditions, you may also be entitled to invoke binding arbitration for complaints not resolved by other means.

**What If You Have Questions Regarding Your Personal Data?** If you have any questions about this section or our data practices generally, please contact us using the following information:

<table>
<thead>
<tr>
<th>Name: tEQuitable, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical address:</td>
</tr>
<tr>
<td>2148 Broadway St</td>
</tr>
<tr>
<td>Oakland, CA 94612</td>
</tr>
<tr>
<td>Email address:</td>
</tr>
<tr>
<td><a href="mailto:privacy@tequitable.com">privacy@tequitable.com</a></td>
</tr>
</tbody>
</table>

| Designated EU Representative: |
| Jack Baylor, Stealth Worker, Inc. |
| Physical EU Address:          |
| 2 Ashton Place                |
| Gardiner’s Hill               |
| Cork, Ireland                 |
| Email address:                |
| privacy@tequitable.com        |

Effective as of February 26, 2019