

# Privoro Privacy Policy

**REVISION DATE: August 4, 2020**

FOR MORE INFORMATION OR IF YOU HAVE ANY QUESTIONS ABOUT THIS PRIVACY POLICY, PLEASE CONTACT US AT [PRIVORO.COM/SUPPORT](https://privoro.com/support). YOU MAY ALSO VISIT THE LEGAL SECTION ON OUR WEBSITE AT [PRIVORO.COM/LEGAL](https://privoro.com/legal).

## 1. PERSONAL INFORMATION

Your privacy is very important to all of us at Privoro. Privoro LLC, an Arizona limited liability company, for itself and on behalf of its subsidiaries (collectively, “Company”, “we”, “our”, or “us”) established this privacy policy (“Privacy Policy”) to explain how and why we collect, protect, store, maintain, use, and may disclose the personally identifiable information gathered by us when you access or use (a) [Privoro.com](https://privoro.com), our software as a service or other technology platform, and any of our related websites, applications, services, and our downloadable mobile, cloud-based, or desktop application(s), firmware or other software (including any associated content, and any customizations made to those websites, platforms, and applications), in each case as now existing or later developed (collectively, the “Site”), (b) our products (including without limitation our hardware systems and solutions, technology platform, and Beta Products, as that term is defined in our [Terms of Service](#) (“Products”), whether provided or offered on or through the Site, or (c) our services accessible through the Site (“Services”) or through any of our Products, including without limitation the information gathered from any email, text, and other electronic messages through the Site. Personal information is information about you that is personally identifiable, such as your name, email address, and other information not otherwise publicly available (“Personal Information”).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Site, Services, or Products, or certain functionalities of our Site, Services, or Products. By accessing or using our Site, Services, or Products, you agree to be bound by the terms and conditions of this Privacy Policy. This Privacy Policy may change from time to time. If you chose to use or access our Site, Services, or Products after we make changes to our Privacy Policy, your use or access will be deemed an acceptance of those changes, so please check the Privacy Policy periodically for updates.

## 2. INFORMATION COLLECTION & USE

When you use or access our Site, Services, or Products (including as a user or beta test user), we collect Personal Information about you to enable us to provide and improve upon the Site, Services, or Products used or accessed by you, but 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. If you voluntarily provide your Personal Information to us, you will no longer be anonymous to us. If you use or access our certain portions of our Site, or certain Services or Products, we may require you to provide contact and identity information, billing information, and other Personal Information as indicated on forms throughout the Site or Products. Where possible, we indicate the fields you must complete to use our Site, Services, or Products and those fields that are optional. You always have the option not to provide your information by choosing not to use, access, or purchase one or more of our Services or Products, or access certain portions of our Site.

### **We collect several types of information from and about users of our Site, Services, or Products, including information:**

- you supply to us that personally identifies to you, such as your name, postal address, e-mail address, telephone number, or any other identifier you provide to us, and by which you may be contacted online or offline; and
- about you but does not individually identify you, such as your internet connection, equipment used to access our Site, Services, or Products, and usage details.

### **We collect this information:**

- Directly from you when you provide it to us through your access to or usage of our Site, Services, or Products.
- Automatically as you navigate through the Site, Services, or Products. Information collected automatically may include usage details, IP addresses, and information collected through cookies.



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We may track certain information based upon your behavior when you use or access our Site, Services, or Products. We use this information to do internal research on our users' demographics, interests, and behavior to better understand our customers. This information may include, but may not be limited to, the URL that you just came from, the URL you go to next, your computer browser information, and your IP address.

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 Site, Services, or Products, we may collect and retain such information in a file specific to you.

**Specifically, when you use or access our Site, Services, or Products, we may collect the following information from you:**

- Information you provide us when completing forms to use our Services or Products, or certain portions of our Site. This includes information you provide us when you register to use our Services or Products, or certain portions of our Site, subscribe to our service, post material, or request further services from us. We may also ask you for information when you report a problem with our Site, Services, or Products.
- Details of transactions you carry out when using or accessing our Site, Services, or Products, and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Site or Products.
- With respect to certain portions of our Site, or our Services or Products, we may require the capture of biometric and behavioral trait data which includes, but is not limited to, your voice pattern, gait, and behavioral characteristics, that are used to establish identity for purposes of user authentication and trust. These data points are fully encrypted and processed through a proprietary machine learning system for the purpose of providing additional factors of authentication. Further, this data is minimalized and not retained beyond what is necessary to establish authentication of the end user.
- Your search queries on the Site, Services, or Products.

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.

## 3. USE OF YOUR PERSONAL INFORMATION

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We use your Personal Information, and other information obtained through your use or access of our Site, Services, or Products to present their contents and features to you; 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 with the Site, Services, or Products; detect and protect us against error, fraud and other criminal activity; to provide you with notices about your account or subscription, including expiration and renewal notices; to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection; enforce our "Terms of Use," "Terms and Conditions," or "End-User License Agreement," as may be applicable; 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 and promotional efforts, analyze usage, improve our Site, Services, or Products, and customize the content, form, features, and services offered on or through the Site, Services, or Products. These uses improve the Site, Services, or Products and better tailor each of them to meet your needs, so as to provide you with a smooth, efficient, safe, and customized experience while using the Site, Services, or Products.

## 4. COMMUNICATIONS FROM COMPANY

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We may occasionally send you information on other products, services, special deals, and promotions. 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 our promotional communications, you may opt-out of receiving them by following the instructions included in each such communication or by contacting us.

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if access to our products is temporarily suspended for maintenance, we might send you an email or text message. Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, please do not submit your Personal Information on or through the Site, Services, or Products.



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## 5. INFORMATION SHARING AND DISCLOSURE

As a matter of policy, 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.
- **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 the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Site, Services, or Products, and users is among the assets transferred.
- **Legal Requests:** We cooperate 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 Company 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: (1) to enforce or apply our Terms of Use, including for billing and collection purpose; or (2) if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Due to the existing regulatory environment, we cannot ensure all your private communications or other Personal Information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (and without limitation), 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 us. 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.

You can review and change certain of your personal information by logging into the Site and visiting your account profile page.

You may also visit [Privoro.com/Support](https://Privoro.com/Support) to submit a ticket to request access to, correct or delete any personal information that you have provided to us. We cannot delete certain your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## 6. COOKIES AND RELATED TECHNOLOGIES

When you use our Site, Services, or Products, 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, Services, or Products. 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, Services, or Products.
- **Flash Cookies** – Certain features of our Site, Services, or Products may use locally stored objects called Flash Cookies to collect and store information about your preferences and navigation to, from, and on our Site, Services, or Products. Flash Cookies are not managed by the same browser settings as are used for Browser Cookies.
- **Web Beacons** – Our emails and certain parts of our Site, Services, or Products may contain small electronic files known as Web Beacons that permit the Company, for example, to count users who have viewed those pages or opened an email and for other related Site,



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# Privoro Privacy Policy

Service, or Product statistics (for example, recording the popularity of certain Product 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** – 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** – 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.
- Throughout the Company's Privacy Policy, we use the term "Cookies" to include Browser Cookies, Flash Cookies, Web Beacons, Session Cookies, and Persistent Cookies

The information from Cookies is also stored in web server logs, which are then transmitted back to the Company 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, Services, or Products, 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, Services, or Products, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site, Services, or Products; 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, and we may maintain or associate it with Personal Information we collect in other ways or receive from third parties. Cookies help us improve our Site, Services, or Products and help us deliver better a better Site, Services, or Products, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Site, Services, or Products according to your individual interests.

- Speed up your searches.
- Recognize you when you return to our Site, Services, or Products.

## Third-Party Use of Cookies and Other Tracking Technologies.

Some content or applications, including advertisements, on the Site, Services, or Products are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Site, Services, or Products. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different products and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We may use third parties such as network advertisers to serve advertisements on our Site, Services, or Products and on third-party products or other media (e.g., social networking platforms) that enable us and third parties to target advertisements to you for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors, and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information, including personal information, about you.

Users in the United States may opt out of many third-party ad networks. For example, you may go to the Digital Advertising Alliance ("DAA") Consumer Choice Page for information about opting out of interest-based advertising and your choices regarding having information used by DAA companies. You may also go to the Network Advertising Initiative ("NAI") Consumer Opt-Out Page for information about opting out of interest-based advertising and your choices regarding having information used by NAI members.

Opting out from one or more companies listed on the DAA Consumer Choice Page or the NAI Consumer Opt-Out Page will opt you out from those companies' delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising through our Site, Services, or Products or on other products or applications.



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# Privoro Privacy Policy

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You may continue to receive advertisements, for example, based on the particular products that you are viewing (i.e., contextually based ads). Also, if your browsers are configured to reject cookies when you opt out on the DAA or NAI products, your “opt out” may not be effective. Additional information is available on the DAA’s website at [aboutads.info](http://aboutads.info) or the NAI’s website at [networkadvertising.org](http://networkadvertising.org).

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## 7. MANAGE YOUR SECURITY SETTINGS

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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 [atnetworkadvertising.org/choices](http://atnetworkadvertising.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.

If you wish to opt out of receiving offers directly from Company service providers, you can follow the opt-out instructions in the emails that they send you.

## 8. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

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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 Website may then be inaccessible or not function properly.

- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your Personal Information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by using the opt-out method. You can also always opt-out by going to [Privoro.com/Support](http://Privoro.com/Support) to submit a support ticket with your request.
- **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 going to [privoro.com/Support](http://privoro.com/Support) to submit a support ticket with your request. 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.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers’ target-audience preferences, you can opt-out by going to [Privoro.com/Support](http://Privoro.com/Support) to submit a support ticket with your request. For this opt-out to function, you must have your browser set to accept browser cookies. We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the on the NAI’s website at [networkadvertising.org](http://networkadvertising.org).

## 9. RIGHTS TO ACCESS AND CONTROL YOUR PERSONAL INFORMATION

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Any personal data that we collect is based upon your consent as detailed in this Privacy Policy. You have many choices concerning the collection, use, and sharing of your data, including the ability to:

- **Delete Data:** You may request that we delete your Personal Information. Please note that we cannot delete your Personal Information except by also deleting your user account.
- **Change or Correct Data:** You can also ask us to change, update, or fix your data in certain cases, particularly if it’s inaccurate. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.



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# Privoro Privacy Policy

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- **Object to, or Limit or Restrict, Use of Data:** You may request that we do not use your Personal Information, but keep in mind that this will terminate our ability to provide any Service(s) to you.
- **Right to Access and/or Take Your Data:** You can ask us for a copy of your Personal Information.

You may visit [Privoro.com/Support](https://Privoro.com/Support) to submit a support ticket to request access to, obtain copies of, correct, or delete any Personal Information that you have provided to us.

We will retain your personal information as long as you maintain your use of the Site, Services, or Products, or as needed to provide you access to or use of the Site, Services, or Products and related services. Once you request to discontinue use of the Site, Services, or Products and related services and deletion of your personal information, we will delete it within 30 days from the date of your request, unless we must retain it to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our terms of use, or fulfill your request to “unsubscribe” from further messages from us. We will retain de-personalized information after you have discontinued your use of the Site, Services, or Products and related services.

## 10. YOUR CALIFORNIA PRIVACY RIGHTS

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California Civil Code Section § 1798.83 permits users of our Site, Services, or Products 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 visit [Privoro.com/Support](https://Privoro.com/Support) to submit a support ticket with your request.

## 11. SECURITY

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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. While our data encryption and hardware security are industry leading, 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, Services, or Products.

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, Services, or Products, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## 12. CHANGES IN THIS PRIVACY STATEMENT

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If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and other places we deem appropriate so 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 Policy at any time, so please review it frequently.

## 13. CHILDREN UNDER THE AGE OF 18

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We do not knowingly collect information from minors. Our Site, Services, or Products are intended for and are directed toward adults. Our Site, Services, or Products are not directed to minors and we do not knowingly collect Personal Information from minors. None of our Site, Services, or Services are intended for children under 18 years of age. No one under age 18 may provide any personal information to us on the Site or by using our Services or Products. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on our Site, Services, or Products, or by way of any features or registration of the Products, do not make any purchases through the Products or use any of the interactive or public comment features of our Site, Services, or Products, and do not 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 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us by visiting [Privoro.com/Support](https://Privoro.com/Support) to submit a support ticket.



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