



PRIVACY POLICY

Last Updated: August 20, 2018

This website is operated by **TrueRisk Labs, Inc.** (hereinafter the “**TRL**”). This privacy policy governs your access to the TRL platform (the “**Platform**”), our website www.truerisklabs.com (the “**Website**”), and the services we provide through the Website (collectively, the “**Services**”).

The term “**you**”, “**your**” or “**User(s)**” shall refer to any entity or person that that accesses, views, uses our Services, and/or starts an account with us. The terms “**we**,” “**our**,” “**us**” shall refer to TRL.

Since we may gather certain types of information about our users, we feel you should fully understand our policy and the terms and conditions surrounding the capture and use of that information. This Privacy Policy discloses what information we gather and how we use it. The private information you provide on the Services will be used only for its intended purpose.

BY VISITING, USING AND ACCESING THE SERVICES, YOU CONSENT TO THE DATA PRACTICES DESCRIBED IN THIS STATEMENT. IF YOU DO NOT AGREE WITH OUT PRIVACY PRACTICES, DO NOT USE THE SERVICES.

INFORMATION WE COLLECT

We will collect information, including both **Personal Information** and **Non-Personal Information**, when you interact with us and the Services, for example when you:

- Access or use the Services;
- Create an account with us;
- Open or respond to our e-mails;
- Contact customer service;
- Visit any page online that displays our ads or content;
- Purchase services on or through our website;

PERSONAL INFORMATION

“**Personal Information**” means information about you that specifically identifies you or, when combined with other information we have, can be used to identify you. As a general rule, we do not collect Personal Information about you when you visit and/or use the Services, unless you choose to provide such information to us. Submitting Personal Information through the Services

is voluntary. By doing so, you are giving us your permission to use the information for the stated purpose.

(a) LEGAL BASIS FOR COLLECTING YOUR PERSONAL INFORMATION

We collect, process and use your information for the purposes described in this Privacy Policy, based at least on one of the following legal grounds:

- **With your consent:** We ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time.
- **When Performing this Agreement:** We collect and process your Personal Information in order to provide you with the Services, following your acceptance of this Privacy Policy; to maintain and improve our Services; to develop new services and features for our Users; and to personalize the Services in order for you to get a better user experience.
- **Legitimate interests:** We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with our Services, protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; enforcing legal claims, including investigation of potential violations of this Privacy Policy; in order to comply and/or fulfil our obligation under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request, as well as our Terms and Conditions and our billing process.

(b) INFORMATION WE COLLECT AND HOW WE COLLECT INFORMATION

Through this Website and the associated Services, we may collect information that can identify you when you voluntarily submit it to us. Your Personal Information may include:

- Your name;
- Email address;
- Your telephone number;
- Current address or principal place of business;
- Other similar information.

(c) STORAGE OF PERSONAL INFORMATION

We will take reasonable precautions, as well as physical, technical, and organizational measures in accordance with industry standards, as described herein, to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

The Services are maintained in the United States of America and all servers, which store your Personal Information, are secured and located in the United States of America. Computer safeguards, such as firewalls and data encryption are used to protect your information. We authorize access to your information only for those employees or agents who require it to fulfill

their job responsibilities and these individuals are required to treat this information as confidential.

However, the security of information on or transmitted via the Internet cannot be guaranteed. Unauthorized entry of use, hardware or software failures, and other factors may compromise the security of your Personal Information. All information you send to us electronically or through email is not secure. Any transmission is at your own risk as the transmission of information via the Internet is not completely secure. Users are solely responsible for protecting their passwords, limiting access to their computers, and signing out of the Account after their sessions. By accessing the Services, the User consents to and authorizes the export of their Personal Information to the United States and its storage and use as specified in the Privacy Policy.

Your information will be retained for as long as your Account is active or is needed to provide you the Services, having regard to the purposes described in the Privacy Policy and the legal and regulatory requirements. The Accounts and Personal Information will be retained for, at least a period of five (5) years after they are closed by Users or as necessary to comply with the legal obligations or to resolve disputes. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

NON-PERSONAL INFORMATION

We collect and temporarily store certain information about your usage of the Services. Non-Personal Information means information that alone cannot identify you, including data such as cookies, pixel tags, web beacons and device information. The information includes, without limitation:

- **Device Data-** We may collect information such as: the type of computer and/or mobile device you use; the unique device ID of your computer and/or mobile device; the IP address of your computer and/or mobile device; the operating system of your computer and/or mobile device; and the type of mobile internet browsers of your computer and/or mobile device.
- **Usage details-** when you access and use the Services, we may automatically collect certain details of your access to and use of the Services, including traffic data, location data, logs and other communication data and the resources that you access and use on or through the Services.
- **Location information-** When you first visit or use the Services we may request permission to collect and use your device's precise geolocation. You can opt not to permit the collection of this information, but you may not be able to use the Services without access to your location. We need your location information in order to provide our Services. You can control how and whether we collect your precise geolocation information through your device's settings.

If you do not want us to collect this information, you may either change your device's privacy settings or ***do not access or use the Services***.

INFORMATION COLLECTION TECHNOLOGIES

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies):** We may use "cookies" on our Website to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. The purpose of a cookie is to tell the web server that you have returned to a specific page. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Services.
- **Web Beacons:** Pages of the Services and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related Services statistics (For example, recording the popularity of certain content and verifying system and server integrity).
- **Social Ad Platforms:** We may also use Google Analytics, Facebook, Twitter and LinkedIn's functionality of re-marketing through their tracking cookies and pixel-based retargeting services. This means that if you provided your consent to Google, Facebook, Twitter or LinkedIn (the "**Social Ad Platforms**") to be provided with personalized commercial offers, you may be served with ads (including advertisements of third parties) based on your access to the Services or Website, outside of the Services and Website and across the internet. In such event the Social Ad Platforms, will place cookies on your web browser and use such cookies to serve you ads based on past visits to our Services and Website.

Please visit the Social Ad Platforms Privacy policy to find out how they use such information:

- Google Adwords: <https://policies.google.com/technologies/ads>
- Facebook: <https://www.facebook.com/about/privacy/>
- Twitter: <https://business.twitter.com/en/help/ads-policies/other-policy-requirements/policies-for-conversion-tracking-and-tailored-audiences.html>
- LinkedIn: <https://www.linkedin.com/legal/cookie-policy>

CHANGING YOUR DATA COLLECTION SETTINGS

We strive to provide you with choices regarding the Personal Information you provide to us. You may need to adjust the settings on your computer and/or device to restrict the collection of information by the Services, but this may prevent you from accessing all of the features of the Services.

- **Tracking Technologies:** You may be able to set your browser or device to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Services may then be inaccessible or not function properly.
- **Location Information:** You can choose whether or not to allow the Services to collect and use real-time information about your device's location through the device's privacy settings. If

you block the use of location information, some parts or all of the Services may be inaccessible or not function properly.

- **Social Ad Platforms:** If you wish to opt-out of re-targeting and tracking functionality of the Social Ad Platforms, you may do so through each platform directly. **PLEASE NOTE** that these tracking and targeting by Social Ad Platforms, is provided pursuant to your engagement with the Social Ad Platforms and the actual nature and scope of Personal Information collection and processing performed by such Social Ad Platforms may not be fully known to us. If you would like to learn more or make further inquiries with respect to such nature or scope please refer to each Social Ad Platforms directly.

In addition, if you wish not to receive ads from us based on information we obtain from use of cookies and pixel tags, please send us an e-mail to admin@truerisklabs.com and we will respond within a reasonable timeframe and in accordance with applicable laws.

THIRD-PARTY AUTOMATIC INFORMATION COLLECTION

When you use the Services or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks and ad servers.
- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.
- Your Internet provider.

These third parties may use tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your Personal Information or they may collect information about your online activities over time and across different Services, mobile applications and other online sites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

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.

HOW WE USE YOUR INFORMATION

We use information collected as described in this Privacy Policy for the following:

(1) Operation

- Operate, maintain and improve the Services;
- Provide you with the Services and their contents, and any other information, products or services that you request from us;
- Provide you with interest-based ads, push notifications, communications, and offers for products and services from us based on your precise geolocation;
- Manage your account, including processing payments and refunds;
- Facilitate and fulfill orders placed on the Services;

- Send you reminders, technical notices, updates, security alerts, support and administrative messages and marketing messages;
- Answer your questions and respond to your requests;
- Ensure that content from our Services is presented in the most effective manner for you and for your computer or device for accessing the Services;
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including the Terms and Conditions; and
- Notify you when there are changes to any products or services we offer or provide through the Services.

(2) Usage and Analytics

- Estimate our audience size and usage patterns;
- Perform analytics and conduct customer research;
- Evaluate your eligibility for certain types of offers, products or services that may be of interest to you;
- Analyze advertising effectiveness; and
- Communicate and provide additional information that may be of interest to you about us and our business partners.

(3) Location: We will use location data for the following reasons:

- To provide our Services targeted to your location;
- To display information that is relevant to your particular location;

HOW TO ACCESS, UPDATE, WITHDRAW CONSENT OR DELETE YOUR INFORMATION

If the law applicable to you grants you such rights, you may ask to access, correct, or delete your Personal Information that is stored in our systems or that we otherwise control. You may also ask for our confirmation as to whether or not we process your Personal Information or ask to withdraw any consent you have previously provided to TRL in connection with our use and processing of your Personal Information. Subject to the limitations in law, you may request that we update, correct, or delete inaccurate or outdated information. You may also request that we suspend the use of any Personal Information the accuracy of which you contest while we verify the status of that data.

If you wish to exercise any of these rights or withdraw your consent, please contact us at: admin@truerisklabs.com

When handling these requests, we may ask for additional information to confirm your identity and your request. Please note, upon request to delete your Personal Information, we may retain such data in whole or in part to comply with any applicable rule or regulation and/or response or defend against legal proceedings versus us or our affiliates, or as we are otherwise permitted under such law applicable to you.

While we strive to honor all reasonable requests, please be aware that we backup the data to prevent accidental or malicious destruction of your information. Information on backup servers

may take some time to be completely deleted from the system. If you request that we remove you from our system and delete all your information, please note that you may still receive materials while your request is being processed.

If you request that your information be deleted, we will keep your information for a period of time in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their Account and opening a new Account. However, if you request to delete your information, your Personal Information will not be used by TRL or our third-party providers for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

SECURITY

We take reasonable steps to protect the personal data provided to us from unauthorized access, use or disclosure. The safety and security of your information also depends on you. Unfortunately, the transmission of information via the internet and mobile services is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your personal information transmitted through our Services. Any transmission of Personal Information is at your own risk. We are not responsible for any third-party circumvention of any privacy settings or security measures we provide. If you suspect that there has been a breach of the security of your data you should contact us and include details of the nature of the breach, the date of the breach, and the full circumstances of the breach.

COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

We represent and warrant that we will comply with all applicable laws, rules, regulations, directives and guidelines regarding the collection, use and disclosure of data collected from or about Users or specific devices which apply to the services utilized hereunder (collectively, the “**Rules**”). The term “Rules” shall include, without limitation, (i) United States Federal Trade Commission Laws regarding the collection, use and disclosure of data from or about users and/or specific devices; (ii) the Children’s Privacy Protection Act of 1998 (COPPA) and (iii) if applicable, the Rules of any other jurisdiction, including and European Union General Data Protection Regulation (“EU GDPR”), rules, regulations and/or directives promulgated by a pertinent Data Protection Act, and all amendments and updates to them or regulations as replaced or superseded from time to time.

HOW WE DISCLOSE YOUR INFORMATION

The Personal Information you provide to us whether voluntarily or automatically, may be used and disclosed without limitations, in the following instances:

- With vendors who provide services for us (who are required to protect the Personal Information);
- To report or collect on debts owed to us or our partners;
- With partners from which we offer products and services or whom we have entered into an agreement that provides for the disclosure, sale, lease, or license of your Information;

- To a prospective buyer or buyer of TRL, or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all our assets;
- As part of bankruptcy, liquidation or similar proceeding;
- To comply with legal requirements for the enforcement of law, regulations, court orders, subpoena, a warrant during the course of a legal proceedings or otherwise; or
- To protect and safeguard our copyright, trademarks, legal rights, intellectual property rights or safety; or
- In response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts in the United States.

HOW WE DISCLOSE YOUR NON-PERSONAL INFORMATION

We may also disclose Non-Identifiable Information:

- For the same reasons we might share Personal Information;
- With our advertisers for their own analysis and research;
- To facilitate targeted content and ads; or
- With Third-Party Ad Servers to place our ads on the Services and on third-party websites

LINKS TO OTHER WEBSITES

The Website and Services may contain links to other third-party websites not operated or controlled by us. This Privacy Policy only applies to the Services. We are not responsible for the content, accuracy, or opinions expressed in other websites. We are not responsible for the privacy policies and/or practices of third parties. Please note that when you use a link to go from the any of our Websites to another website, our Privacy Policy is no longer in effect. We encourage you to review all policies, rules, terms and regulations, including the privacy policy, of each website that you visit.

HOW TO ACCESS, UPDATE & DELETE YOUR INFORMATION]

You have the right to review, correct, update, or amend the Personal Information where it is inaccurate. You are also entitled to request the deletion or destruction of both the Account and Personal Information by sending a request to admin@truerisklabs.com Additionally, you may request a copy of the information we have collected about you by contacting us with your full name and email address.

If you do not wish to have your Personal Information used or shared as described in this document, please discontinue the use of the Services or do not provide such information. While we strive to honor all reasonable requests, please be aware that we backup the data to prevent accidental or malicious destruction of your information. Information on backup servers may take some time to be completely deleted from the system. If you request that we remove you from our system and delete your Account, please note that you may still receive materials while your request is being processed.

If you request that your account be deleted, we will keep your information for a period of time in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid

detection simply by closing their Account and opening a new Account. However, if you delete your Account, your Personal Information will not be used by us or our third-party providers for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

NOTICE CONCERNING CHILDREN

We do not direct our website or services directly or indirectly towards children. We do not target the Services towards children, nor do we knowingly collect information about children. If we learn that the information of a child under the age of 13 is stored within its system, we will promptly delete any information in that Account. If you become aware that a child under the age of 13 has provided us with Personal Information, please notify us immediately and we will terminate the Account and delete such information.

UPDATES TO THIS POLICY

We reserve the right to change, modify, update, add, or remove portions of this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting to this page. When we do update it, for your convenience, we will make the updated policy available on this page. If you opt out of receiving communications, you may not receive certain notifications, however, they will still govern your use of the Services, and you are responsible for proactively checking for any changes. We encourage you to check this Privacy Policy frequently to stay up to date on any changes. You can determine if changes have been made by checking the effective date on the Privacy Policy. Continued use of the Website after the effective date of any change in this Privacy Policy will constitute acceptance of such changes and it will signify that you agree to abide by and be bound by the modified Privacy Policy.

CONTACT US

If you have questions, comments, or concerns regarding this Privacy Policy, please contact us at the following email address: admin@truerisklabs.com We will respond to your request within a reasonable timeframe. Please include the following information in your request:

- 1) Your name;
- 2) Your contact information, including phone number, mailing address, and email address; and;
- 3) The precise nature of your request, inquiry, or complaint.

By Mail:

TrueRisk Labs, Inc.

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