

# PRIVACY POLICY

This privacy policy applies to the SPENDiD Service and all sites, services, and applications linked to Marthaler-Hill, LLC (dba SPENDiD), its subsidiaries and affiliates (those services, the “Service”, that site, the “Site”, that application, the “App”). The Service, the Site, and the App are owned by Marthaler-Hill, LLC. The privacy policy also incorporates by reference, the Terms of Service, and any other policies available at the Site, on the App, or a part of the Service.

**BY USING THE SITE OR APP, YOU AGREE TO THE PRIVACY POLICY. IF YOU DISAGREE WITH THE PRIVACY POLICY, DO NOT USE THIS SITE OR APP.**

SPENDiD reserves the right, at its sole discretion, to change, modify, add or remove portions of this privacy policy, at any time. You are responsible for periodically reviewing the privacy policy for changes. By continuing to use the Site or App, you accept any changes at the time they are implemented.

## Scope

This privacy policy describes how any personal information collected as a result of your subscription and use of the Service will be maintained by SPENDiD.

## Collection of Personal Data

Most access is restricted only to users. When you access the Service, SPENDiD will collect certain information from you. In some instances, SPENDiD may gain access to legally allowed personal data through third-parties or affiliates. Some of the information that may be collected can include, but is not limited to:

- contact information such as name, email address, address and telephone number;
- information related to your current living accommodations;
- additional information required to verify your identity;
- logs, contact information and other information about the communications between registered users.
- information based on your activities using the Service, such as search information, computer sign-on data, statistics on page views, traffic to, from and within the website, ad data, and IP address and standard web log information; and
- supplemental information from third parties (for example, if you incur a debt to SPENDiD, a credit check may be conducted by obtaining additional information about you from a credit bureau, as permitted by law); and
- any other information you may provide.

## Use

All personal data collected will be used, primarily, to provide the Services in an effective and personalized manner. Your personal information may be used to:

- Provide customer support and services as requested, including confirming emails related to the Service, reminders and transactions.
- Facilitate communication between interested parties registered on the Service.

- Customize your experience and otherwise measure and improve the Service.
- Keep you informed about targeted marketing, service updates, and promotional offers through various means of communication. (There is an option to opt-out of marketing communications)
- Compare information for accuracy and verify it with third parties.
- Measure consumer interest in the products and other services offered by SPENDiD.
- Help promote a safe Service and detect and prevent error, fraud and other potentially prohibited or illegal activity.
- Enforce the Terms of Use and other agreements and policies of the Service.
- To collect fees as otherwise described at the time of collection.

### **Disclosure**

SPENDiD does not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. SPENDiD may share analytics and non-identifying information without your explicit consent. SPENDiD may share some or all of your personal information with:

- Subsidiaries and assigns of SPENDiD and affiliate members. Affiliates will use this information to send you marketing communications only if you've requested their services.
- Law enforcement offices, third-party rights owners or others in the good faith belief that such disclosure is reasonably necessary to enforce the Terms of Use or Privacy Policy; respond to claims that a posting or other content violates the rights of a third party; or protect the rights, property or personal safety of other users or the general public.
- Parties to whom you grant permission for SPENDiD to share.
- Service providers under contract who help with the business operations of the Service; or
- As permitted by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders or other legal process.

### **Communication**

The Service may collect information related to marketing and branding. You agree for someone from or on behalf of SPENDiD to contact you by any means provided for contact through your use of the Service.

### **Email Preferences**

All users have the opportunity to opt out of receiving nonessential (i.e., promotional or marketing-related) communications from SPENDiD after setting up an account. To remove your contact information from SPENDiD's lists and newsletters, simply edit by following the opt out link included in each email.

### **Cookies**

SPENDiD or its service providers may place cookies or web beacons on your computer when you use portions of the Service. Permanent cookies help facilitate personalized features, such as automatically logging into your personalized home page. Session cookies, which are deleted

when you log out of the Site or App or browse to a different website, to monitor and improve the functionality and usability of our website. Cookies can be blocked by changing the settings on your browser (contact your Internet Service Provider for help), but doing so may prevent delivery of certain services.

### **Analytics Services**

The Service may use various web analytics services. These services may record mouse clicks, mouse movements, scrolling activity as well as any text you type using the Service, except text in password fields. The Service will not collect personally identifiable information that you do not voluntarily enter while using the Service. The Service does not track browsing habits across other service platforms or text input in password fields.

### **Third Parties**

This privacy policy only applies to information collected by SPENDiD from you. If you disclose your information to others, whether registered users of this Site, the App, or through other sites throughout the Internet, this privacy policy does not apply. SPENDiD does not control the privacy policies of third parties, even if the Site or App links directly to another website or application that collects your personal data.

### **Accessing, Reviewing and Changing Your Personal Information**

You are responsible for the personal information you provide upon registering. You are also responsible for making any necessary changes to your personal data. If you request, SPENDiD will close your account and remove your personal data from the Service according to applicable law. Some personal data will be maintained by SPENDiD to comply with law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with any investigations, enforce the Terms of Service, and take other actions permitted by law.

### **Account Protection**

Do not disclose your password to anyone. You are responsible for all actions of your username and password. Giving away your password will permit another person access to your personal data. If your password has been compromised, please change it immediately.

### **Security**

SPENDiD will make every reasonable effort to protect your personal data. SPENDiD, however, makes no warranty or promise that your personal data or private communications will not be intercepted due to unauthorized access or disclosure.

### **Notice to California Users**

If you are a California user, the following provisions apply to our processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“California Personal Information”). For California users, the provisions of this California Addendum prevail over any conflicting provisions in other sections of this Privacy Policy.

We have collected the following categories of California Personal Information within the last 12 months from the sources listed below:

**(a) Identifiers:** such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers. This category of information is collected from you, your devices, and third parties such as linked sites, and public databases.

**(b) Personal information described in subdivision (e) of Section 1798.80** (California customer records statute): such as a name, address, telephone number, credit card number, debit card number, or other financial information. This category of information is collected from you, your devices, and third parties such as linked sites.

**(c) Commercial information:** including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. This category of information is collected from you, your devices, and third parties such as linked sites, and public databases.

**(d) Internet or other similar network activity:** including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with a website, application, or advertisement. This category of information is collected from you and your devices.

**(e) Geolocation data:** including physical location or movements. This category of information is collected from you and your devices.

**(f) Sensory data:** including electronic, visual, or similar information. This category of information is collected from you and third parties such as linked sites.

**(g) Inferences:** such as a profile about a consumer’s preferences, characteristics, and behavior, drawn from information we collect and insights we receive from third parties such as our marketing and advertising partners and data analytics providers.

Please see the Collection of Personal Data Section to learn more about the types of information we collect and how we collect them.

For each of the above categories, please see the Use Section for more information on how we use the California Personal Information for our business purposes.

We may also use the information we collect for our own or our service providers’ other operational purposes, purposes for which we provide you additional notice, or for purposes compatible with the context in which the California Personal Information was collected.

Within the last 12 months, we have disclosed California Personal Information for our business purposes.

To learn more about the categories of third parties with whom we share such information, please see the Disclosure Section.

We do not sell, and within the last 12 months have not sold, California Personal Information.

### **California Privacy Rights**

If you are a California user, you have certain rights related to your California Personal Information, including:

The right to request that we disclose to you:

- the specific pieces of California Personal Information we have collected;
- the categories of California Personal Information we have collected about you;
- the categories of sources from which the California Personal Information is collected;
- our business or commercial purpose for collecting or selling California Personal Information; and
- the categories of third parties with whom we share California Personal Information.

The right to request that we delete California Personal Information about you, which we have collected from you.

You may request to exercise these rights by:

- Calling us at (205) 944-9678; or
- Emailing us at [admin@SPENDiD.io](mailto:admin@SPENDiD.io) .

As required under applicable law, please note that we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide your email address to verify your identity in response to exercising requests of the above type. We may limit our response to your exercise of the above rights as permitted under applicable law.

We may not discriminate against you because of your exercise of any of the above rights or any other rights, subject to the rights and the obligations under the California Consumer Privacy Act, including by:

- Denying you goods or services;
- Charging different prices or rates for goods or services, including through the use of discounts, loyalty program, or other benefits or imposing penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by law that can result in different prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Under California law, you may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. We will require the agent to provide proof of that written permission. As permitted by law, we may require you to verify your own identity in response to a request, even if you choose to use an agent.

You may contact us with questions and concerns about our privacy policies or practices by contacting us using any of the methods provided in this policy.

The information contained in this policy is subject to change without notice.

Marthaler-Hill, LLC (dba SPENDiD)

Updated by the Company's General Counsel on March 21, 2020.