

AccuFund Privacy Policy

Introduction and Overview

AccuFund, Inc. (“AccuFund”) believes everyone has a right to privacy. Privacy is an important part of the value that we deliver to our customers.

Scope of this Privacy Statement and our role

As a technology company, we’re providing this Privacy Statement (which we’ll refer to as the “Statement”) to explain how we collect, use, and share information when you interact with us and our offerings and services. This Statement is global in nature, meaning that it is applicable to all of our products, subscriptions and services, regardless of where accessed, and it describes our privacy practices when we process:

- a) Personal information for the purposes of providing the benefits of any AccuFund products, subscriptions or services (collectively, the “Products”); and/or
- b) Personal information as necessary to manage, run and improve our business.

AccuFund determines the purposes and means of the processing of personal information (“Information Controller”). AccuFund may share your personal data with any of its affiliates, parents, or subsidiaries to process as joint controllers for the purposes set out in this Statement. If you have any questions about the processing of your personal data, please contact us at the address provided below.

This Statement does not apply where AccuFund processes personal information as a service provider on behalf of a customer or entity who acts as the Information Controller. When we act as a service provider, the privacy statement of the relevant Information Controller and our agreements with such business or entity will govern our processing of personal information.

In certain circumstances, there may be more than one Information Controller processing your information. For example, your employer or a financial partner may also act as an Information Controller. In these situations, we act as an independent Information Controller over our processing activities, meaning that we make determinations over how your personal information will be processed independently from the other Information Controller. The other Information Controller may have their own obligations under applicable information privacy law, and you may need to speak with the other Information Controller directly for questions on how they process your personal information.

The AccuFund Products

The AccuFund Products and your information

When we say “Products” we mean that when you choose to share data with us, we use that data together, not just within the individual offering(s) you’re using. The personal information

we use in this centralized way is all the information that AccuFund knows about you. It includes your credentials; your name and contact details; payment information; information about your activities, your interests and preferences; insights about your finances or your business; the content you place in our Products; and information we have collected about you from third-party sources.

Organizational account information

Some services within the AccuFund Products allow you to interact with an organization (such as your employer). If you are granted access to an organization or household account, the owner of the organization or a designated administrator may control and administer details of your account, for example, by deciding your access rights; making decisions about your personal information; or requiring you to take certain actions. If your access rights are amended by the owner or designated administrator, then you may lose access to the information that is in the control of the organization.

Your use of the AccuFund Products as part of an organization's account may be subject to the organization's policies, which may be different from this Statement. We are not responsible for the privacy or security practices of other organizations, and you should consider both the organization's policies and whether you are comfortable enabling the organization with access to your information prior to connecting to their services.

Information we collect

Information we receive from you

The personal information that we receive about you depends on the context of your interactions with AccuFund, how you configure your account and the choices that you make, including your privacy settings. Personal information that you provide may also depend upon what Products you use, your location and applicable law.

- a) Creating an account. We collect information when you create an account, interact with the AccuFund Products or activate a subscription. Personal information may include your contact information (such as your name, address, phone number and email), profile photo, billing information (your payment information), usernames and credentials.
- b) Identification information. We collect information to verify your identity, including your name, social security number, social insurance number, driver's license numbers, and government-issued identification details.
- c) Customer support, product research, training and feedback. We may collect personal information when you reach out to us for support, give us feedback, participate in optional surveys, product research or training and you choose to share.
- d) Social and community content. We may receive content you post publicly about us, or on our social media pages and our community pages.
- e) Device information. We may collect information about your device such as Internet Protocol ("IP") addresses, log information, error messages, device type, and unique device identifiers. For example, we may collect IP addresses from you as part of our sign in and security features.
- f) Content. We may receive information about your business, your finances, expenses, invoices, financial statements, details of your financial transactions, payroll details, payment details, details about your customers or vendors or employees, income and wage information, and/or

investment information.

- g) Usage information. We may collect usage information such as the pages you viewed, the features you use, your browser type and details about any links with which you interact.
- h) Location information. Certain features in the AccuFund Products may collect your precise location information, device motion information, or both, if you grant permission to do so in your device settings.
- i) Camera and contacts. Certain features may have access to your camera and contacts if you grant permission in your device settings.
- j) Information from cookies and other technologies. AccuFund and our service providers may use commonly used tools such as cookies, web beacons, pixels, local shared objects and similar technologies (collectively "cookies") to collect information about you ("Cookie Information") so we can provide the experiences you request, recognize your visit, track your interactions, and improve your and other customers' experience. You have control over some of the Cookie Information we collect and how we use it. For full details on how we use cookies and similar technologies please see our Cookie Policy.
- k) Information stored locally. Some of our web-enabled desktop services and offerings synchronize with the information on your computer. In doing so, we may collect information such as device information, product usage, and error reports. We may also store personal information locally on your device.

Information provided by others

Our Products may allow you to connect with other people and organizations. As a result of those connections, others may be able to input information about you. For example, your employer may input information about your salary and work activity in order to process their payroll. You may also be able to input or process information about others, for example, if you are an account administrator. If you input information about others into our platform, you must only do so if you have first received the appropriate rights and permissions to do so, including by getting advanced written consent, if required by applicable law.

Other information sources

We may also get information about you from others where permitted by applicable law. We protect and process information obtained from those parties as described in this Statement, consistent with any additional restrictions imposed by the source of the information. Our sources may vary over time and depend upon how you use the Products. For example, we may receive information from:

- a) Your service providers. If you choose to sync a non-AccuFund account/service with your account, we will receive information from that account/service according to your settings with that account/service. For example, if you connect a point of sale application to your account, we may receive details of your business's sales records.
- b) Supplemental information and identity verification providers. Service providers who help us verify your identity, the specifics of your business and/or supplement the information you have provided and ensure the accuracy of your information. For example, we use third-party service providers to validate your mailing address, phone number or provide additional details about your business. These providers may include, for example, your financial institution, telecommunications provider or email provider.

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- c) Customer Support providers. Service providers who provide us with information about you or your interaction with the AccuFund Products for troubleshooting purposes. For example, we may obtain support information or technical issues you have raised with these third parties.
 - d) Risk management, cybersecurity & anti-fraud providers. We may receive information from service providers who help us assess risks associated with our Products, including to help combat fraud, illegal activity and to help protect your personal information.
 - e) Content providers. We may receive information from software providers that make user-generated content from their service available to others, such as local business reviews or public social media posts.
 - f) Communication providers & social networks. If you give us permission, we may collect information from email providers, communication providers and social networks.
 - g) Joint offering partners. We may offer co-branded Products or engage in joint-marketing activities with others.
 - h) Publicly-available sources. We collect information from publicly available sources, such as open government databases.
 - i) Government agencies. We may receive information from various government agencies.
 - j) Required information. Some AccuFund Products require you to provide information for it to function. If you do not wish to provide the required information, you may not be able to use certain features.

How we use personal information

We collect and process personal information from you only where:

- a) We have your consent to do so;
 - b) We need the personal information to perform a contract with you or provide a service to you;
 - c) Provide you with the benefits of the AccuFund Products and operate our business;
 - d) The processing is in our legitimate business interests in those jurisdictions where legitimate business interest is a legitimate basis for processing; or,
 - e) We need to comply with legal requirements, including applicable laws and regulations.
- Personal information is used to operate our business for the following purposes that are required to originate and maintain our relationship with you, including but not limited to:
- a) Provide you with the AccuFund Platform and create your account
 - b) Improve our products and services
 - c) Run and manage our business, including resolving billing and financial disputes
 - d) Communicate with you, such as sending you electronic notifications concerning your financial privacy
 - e) Advertise and market our services and experiences
 - f) Personalize your experience and tailor recommendations and offers presented to you, including through the development of insights about you and your needs
 - g) Provide you with support and resolve disputes
 - h) Conduct research, including by partnering with academic institutions
 - i) Comply with our legal and regulatory requirements
 - j) Authenticate your identity, including through the use of Biometric Data
 - k) Protect the rights, property, safety or security of the AccuFund Products, our customers, employees or others and prevent fraudulent or illegal activity
 - l) To exercise our rights in the course of judicial, administrative or arbitration proceedings
 - m) To enforce, remedy or apply our Terms of Service or other agreements and/or

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- n) For other purposes that are compatible with the disclosed purposes if and where this is permitted by applicable law.

Automated Processing

We may process your personal information using automated and manual (human) methods. Our automated methods may include artificial intelligence (AI) and a range of technologies that help our services learn and reason to improve our ability to personalize and enhance your experience in the AccuFund Products.

How we share your information

We may share your information in the following circumstances:

- a) With your consent. In accordance with our principles, except for as outlined below, we only share your information with third parties when you have directed us to do so.
- b) When you connect to your social media account. Some of our features enable you to connect to a social media account or share information on social media platforms, like Facebook and Twitter. Any information you choose to share on social media may potentially be visible to a global audience and will be subject to the social media provider's privacy policies (not this Statement). You should take care only to share information on social media that you are comfortable sharing.
- c) For research. With appropriate controls, we may share information with third-parties, such as academic institutions, government and non-profit organizations, for research purposes or to publish academic or policy-related materials. We only share information in a way that would not allow any individual to be identified.
- d) For joint features, sales, promotions and events. We may share your information with third-party companies who are jointly providing features, sales initiatives, promotions or events with us.
- e) With financial services providers. We may share personal information with collection agencies, credit bureaus and loan service providers, and payment card association members. We may also share your personal information with other companies, lawyers, credit bureaus, agents, government agencies, and card associations in connection with issues related to fraud, credit, defaults, or debt collection.
- f) When you publicly post the information. We may provide opportunities for you to publicly post reviews, questions, comments, suggestions or other content, which may include personal information, such as your name or user name. Anything you share in a public forum is public, and you should think carefully before you decide to share.
- g) With service providers or agents. We may share personal information with our service providers or agents who provide services on our behalf for the purposes described in this Statement. Service providers or agents are required to implement reasonable privacy and information protection controls to maintain the privacy and security of information provided to them consistent with the privacy practices outlined in this Statement. Service providers or agents may include companies that assist us with our advertising, marketing and sales efforts, help us with our technology offerings (such as hosting, security or anti-fraud providers) and help us run our business.
- h) For mergers and acquisitions. If we are involved with a merger, asset sale, financing, liquidation, bankruptcy, or the acquisition of all or part of our business to another company, we

may share your information with that company and its advisors before and after the transaction date.

- i) No sale of personal information to third parties. We do not and will not sell personal information to third parties. We do share personal information with third parties for the business purposes described in this Statement.
- j) With our affiliates and subsidiaries and your right to limit information sharing. We may share your information with our affiliates and subsidiaries for everyday business purposes as described in this Statement, including for marketing purposes. Certain laws may provide you with the right to limit our information sharing activities in certain circumstances. Please review these rights in the “Country and Region-Specific Terms” section below.
- k) Cookies and other tracking technologies. You can find information on changing your browser settings to opt-out of cookies in your browser settings. In certain countries, you may also be able to make changes to your cookies settings by using our cookie preferences tool. If you disable some or all of the cookies the service, or parts of the service may not work. For more information, please see AccuFund’s Cookies Policy.
- l) For advertising and analytics. AccuFund may use advertising networks and other providers to display advertising or to manage our advertising on other sites. Our advertising partners may place cookies on unaffiliated websites in order to serve advertisements that may be relevant to you based on your browsing activities and interests and determine the effectiveness of such advertisements.
- m) For legal reasons. We may share your information with third-parties for legal reasons without your consent, and as permitted by law, including:
 - i) When we reasonably believe disclosure is required in order to comply with a subpoena, court order, or other applicable law, regulation or legal process
 - ii) To protect the rights, property, or safety of AccuFund, the Products, our customers or others
 - iii) To protect or defend against attacks
 - iv) To enforce, remedy, or apply our Terms of Service or other agreements
 - v) To prevent fraud, cybersecurity attacks or illegal activity
 - vi) For debt collection
 - vii) With regulatory agencies as necessary to help detect and combat fraud and/or protect Accufund, our customers or users, or in required institutional risk control programs.

Your information rights and choices

Your rights

We believe that you have rights to information that pertains to you, your household and/or your business. If another person has input or processed information in the AccuFund Products on behalf of you, your family or your business (and we are processing such information as an Information Controller), you may ask to receive a copy of your information, even if you do not have an account with us.

Verification

To help protect privacy and the security of your information, you may be asked to provide additional information to verify your identity and/or ownership rights prior to us exercising your

data rights. If we are unable to verify your identity or ownership rights to the data, we may not be able to provide you with data rights until you are able to provide us with proper documents.

Information retention

Unless you specifically ask us to delete your personal information, we may retain your personal information as long as it is necessary to comply with our data retention requirements and provide you with services and the benefits of the AccuFund Products. However, even if you request a deletion, we may be required to maintain your information for as long as necessary to:

- a) Comply with our legal or regulatory compliance needs (e.g. maintaining records of transactions you have made with us);
- b) To exercise, establish or defend legal claims; and/or
- c) to protect against fraudulent or abusive activity on our service.

This means we may keep different information for different periods. If your account is canceled because you've not used it in a long time, we may delete this information straight away.

There may be occasions where we are unable to fully delete, anonymize, or de-identify your information due to technical, legal, regulatory compliance or other operational reasons. Where this is the case, we will take reasonable measures to securely isolate your personal information from any further processing until such time as we are able to delete, anonymize, or de-identify it.

International data transfers

You agree and AccuFund reserves the right to store and process your personal information in the United States and in any other country where AccuFund or its affiliates, subsidiaries, or service providers operate facilities in accordance with and as permitted by applicable laws and regulations. Some of these countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as protective).

When we transfer, store or process personal information outside of your jurisdiction, we take appropriate safeguards to require that your personal information remain protected in accordance with this Statement and applicable law. We may use contracts or the European Commission approved Standard Contractual Clauses to help ensure your information is protected.

Security of your personal information

We use physical, technical and organizational safeguards designed to protect your information. However, despite these controls, we cannot completely ensure or warrant the security of your information.

Changes to our Privacy Statements

From time to time we may change or update this Statement. We reserve the right to make changes or updates at any time. If we make material changes to the way we process your personal information, we will notify you by posting a notice in our platform or on a community

post; by sending you a notification; or by other means consistent with applicable law.

You can see when this Statement was last updated by checking the “last updated” date displayed at the top of this Statement. Please review this Statement periodically to stay informed about how AccuFund protects your privacy.

Collection and use of children's personal information

Our services are not intended for or directed to children. We do not knowingly collect personal information from children. If you believe we may have information from a child, please contact us.

Country and Region-Specific Terms

Additional terms may apply to you based upon the country you reside in or the products you use. Please click the country or region that applies to you to learn more about additional terms and rights that may apply to you.

United States

If you are a resident of the United States, you may have the following rights:

If you are a Vermont resident, you may have the following rights:

AccuFund will not share your non-public personal information with unaffiliated third parties unless you authorize us to make those disclosures without your consent, other than as permitted by law.

If you are a California resident, you may have the following rights:

Access. You may have the right to access:

- a) The categories of personal information we have collected about you,
- b) The sources from which that information was collected,
- c) The business or commercial purpose for collecting your personal information,
- d) The categories of third parties with whom we share your personal information,
- e) The specific pieces of personal information we have collected about you,
- f) The categories of personal information we sold about you,
- g) The categories of third parties to whom we sold personal information about you, and
- h) The categories of personal information we disclosed for a business purpose.

Deletion. You may have the right, under certain circumstances, to request that we delete the personal information you have provided to us.

Non-discrimination. You have the right to be free from discrimination related to your exercise of any of your California privacy rights.

Verification. In order to protect your personal information from unauthorized access or deletion, we may require you to verify your credentials before you can submit a rights request. If you do

not have an account with us, or if we suspect that your account has suffered fraudulent or malicious activity, we may ask you to provide additional personal information for verification. If we are subsequently unable to confirm your identity, we may refuse your rights request.

Authorized agents. You may use an authorized agent to submit a rights request. If you do so, the agent must present signed written authorization to act on your behalf, and you may also be required to independently verify your identity or your legal authority or ownership of the personal information with us.

Please note that we may claim legal exemptions for certain types of personal information from all or certain parts of the CCPA pursuant to various CCPA exemptions.

What you can do to manage your privacy

You have choices when it comes to managing the privacy of your personal information.

Update your privacy settings. You may update your privacy settings by visiting your account settings.

Manage marketing communications from us. To update your marketing communication preferences, please email us at sales@accufund.com.

Download a copy of your personal information. You may request a copy of your personal information by visiting your account.

Correct your personal information. You can edit and correct your personal information at any time by changing it directly in our products and services.

Delete your personal information. You may request for us to delete your personal information by visiting your account settings.

Cookies and other tracking technologies. You may be able to opt-out of interest based advertising by visiting the Digital Advertising Alliance of Canada Opt-Out Page, NAI Opt-Out Page and the Choices Opt-Out Page.

Your Right to Limit Information Sharing: You have the right to limit our sharing of your information to both affiliates and third-parties for marketing purposes.

Canada

While we take steps to maintain protection of your personal information, your personal information may be disclosed in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in those other jurisdictions or countries.

If you are a resident of Canada, you may have the following rights:

a) Access, Correction or Deletion. You may request to access, to correct or to delete your personal information (provided we no longer have a business need to retain your personal information). Even if you request for your personal information to be deleted, certain aspects

may be retained for us to: meet our legal or regulatory compliance (e.g. maintaining records of transactions you have made with us); exercise, establish or defend legal claims; and to protect against fraudulent or abusive activity on the AccuFund Platform. Data retained for these purposes will be handled as described in "Information Retention".

- b) Withdraw consent. You can withdraw your consent at any time to collection, use and disclosure of your personal information. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- c) File a complaint. You have the right to file a complaint with the applicable Privacy Commissioner about our collection and processing of your personal information.
- d) What you can do to manage your privacy
- e) You have choices when it comes to managing the privacy of your personal information.
- f) Update your privacy settings. You may update your privacy settings by visiting your account settings.
- g) Manage marketing communications from us. To update your marketing communication preferences, you can go to the marketing preference tools in your account settings. You may also click unsubscribe at the bottom of the marketing emails.
- h) Cookies and other tracking technologies. You may be able to opt-out of interest based advertising by visiting the Digital Advertising Alliance of Canada Opt-Out Page, NAI Opt-Out Page and the Choices Opt-Out Page.
- i) Correct your personal information. You can edit and correct your personal information at any time by changing it directly in our products and services.
- j) Request a copy of your personal information. You may request a copy of your personal information by contacting us.
- k) Delete your personal information. You may request for us to delete your personal information by contacting us.