

TruVise.ai
PRIVACY POLICY

Last Updated: June 15, 2021

This Privacy Policy (this “Policy”) describes the practices of Technology Holdings Corp., dba TruVise.ai (“TruVise”) for collecting, using, maintaining, disclosing, and otherwise processing (collectively, “processing”) the information that we collect from you or receive from others, as well as how we protect and secure your data. If you have additional questions regarding your rights under this Policy or any agreement you may have with TruVise regarding your data, please contact us. **Please read this Policy carefully to understand our processing of your information and how we will treat it.**

This Policy generally applies to the information that TruVise processes. However, this Policy is subordinate to any specific terms and conditions set forth in any contract for services or other agreement you may have with TruVise relating to a service or to data.

Further, this Policy applies only to information TruVise processes. This Policy does not apply to information processed by others, who may have their own privacy policies that apply to you. For example, this Policy does not apply to information processed by our clients and business partners, which may include your financial institution or insurance agency, who similarly may have their own privacy policies that apply to you. It is our policy, however, to treat all Personal Information received from our clients and business partners with the same or greater care that they use.

1. What information does TruVise collect?

TruVise generally collects what can be describes as Personal Information and Non-Personal Information. We collect this information from publicly available sources, when you provide it to us, when you purchase or inquire of our goods or services, and when you work with our business partners who provide this information to us.

“Personal Information” is information that can be used to identify, locate, or contact you, a natural person, as well as any other information about you that we may connect with Personal Information, and including any information otherwise defined as personal information under applicable law. For example, Personal Information that we may collect includes:

- Identifying information, such as your full name and federal or state issued identification numbers, which may include your Social Security number, driver’s license number, and passport number.
- Contact information such as your name, email address, phone number, physical address.
- Residence information such as county name, status as homeowner or renter, age of home, estimated home value, and length of residence.
- Financial information, such as your financial institution’s account number, account balance, and transaction history, including financial products and purchases made, estimated income, as well as your banking information as necessary to process payments for TruVise’s goods and services.
- Credit information, such as your credit history and investment experience.

- Personal characteristic information, such as your sex, race or ethnicity, marital status, household composition, children up to 18 years of age and media preferences.
- Employment information, such as your present employer and work history.
- Education information, such as your school and education history.
- Relationship information such as your preferences or potential interest in TruVise's or its business partners' goods and services.
- Transactional information such as purchases, services requested, customer service inquiries, session data, customer account activity, and other customer account information.
- Identifiable Internet information, such as browser history and usage information, as well as interaction with our websites or advertisements, to the extent such information is kept in a form that can identify you.

“Non-Personal Information,” on the other hand, is information that does not identify you as a natural person and is not identifiable to you as a natural person. For example, Non-Personal Information that we collect includes:

- Cookies and other similar tracking technologies processed in a non-identifiable way.
- Information we anonymize by rendering it unidentifiable to a natural person.
- Information we aggregate by combining it with other data in such a way that no natural person can be identified or linked to any specific information.
- The name, form, contact details, relationship information, transaction history, or financial information of legal persons. By “legal persons,” we refer to legal, business entities other than natural persons, such as corporations, limited liability companies, non-profit organizations, and other business entities.

2. Why does TruVise collect this information?

TruVise collects and processes Personal Information for a variety of purposes depending on the information being processed. TruVise processes Personal Information to serve our clients and business partners, to serve you, to deliver our goods and services to you, and to improve our goods and services and market them to you. TruVise may also process Personal Information as may be necessary to comply with a legal obligation.

To summarize, TruVise processes Personal Information for the following purposes:

- To serve our clients and business partners, which may include your financial institution or insurance agency, by making predictive recommendations for your potential interest in our clients' goods and services.
- To oversee and complete transactions with TruVise's clients and business partners.
- To prepare, deliver, maintain, or otherwise provide TruVise's goods and services.

- To support and improve TruVise's goods and services.
- To set up and maintain your user account and allow you to interact with TruVise and other users of TruVise's goods and services.
- To provide you with service by resolving disputes, addressing complaints, and troubleshooting any technical problems encountered.
- To measure and understand the effectiveness of TruVise' goods and services.
- To comply with applicable laws and regulations. Please note that if we are asked to provide Personal information pursuant to a lawful subpoena or court order, we will first notify you unless a court has ruled otherwise. We will further endeavor to verify all requests and only to disclose the information legally requested.
- To communicate offers for goods and services, including offers based on your interests and purchase of TruVise's goods and services, to administer promotional events, and to engage in other marketing activities that may be of interest to you. Please note that we will provide you the opportunity to opt out of direct marketing communications or market research inquiries, but we will still need to gather certain Personal Information as necessary to accomplish these other purposes described here.

If we would like to process your Personal Information for any other purpose, we will disclose this to you at the time it is collected and may request your express consent.

With respect to Non-Personal Information, because this information does not identify a natural person TruVise may use and process it for other purposes, such as improving our goods and services. For example, TruVise may use anonymized or aggregated information to improve or develop its goods and services, create and publish reports, conduct statistical analyses about client interest, monitor industry trends, and otherwise engage in activities that do not result in the disclosure of identifiable information.

To be clear, TruVise is committed to respecting your privacy and will not process, sell, rent, or lease your Personal Information except for the reasons disclosed herein or as requested at the time of collection, and then only in the context of your or your financial institution's or insurance agency's relationship with TruVise.

3. Will TruVise share this information with third parties?

To provide certain services, TruVise may have to share information with third parties who use our goods and services or provide goods or services to us, such as our clients, business partners, service providers, vendors, or developers and operators of software used in our services.

We will maintain controls and oversight, including contractual obligations where appropriate, to ensure that any third party who we engage to assist us in processing your Personal Information will only have access to the Personal Information necessary for it to perform specific, designated tasks on our behalf, will only use the information for this purpose, and will protect your Personal Information to at least the same extent that we do. In other words, we will require all third parties with whom we share your Personal Information to be obligated to follow the same commitments we make to you. Furthermore, prior to sharing your Personal Information with any third party, we will evaluate such third party to ensure it can meet these obligations.

Please note, however, that this Policy applies only to information that we process and share with others—it does not apply to Personal Information that *you* share with third parties.

TruVise may also share information to comply with our legal obligations, such as responding to lawful requests from government or judicial entities. In the event we are asked to disclose your Personal Information, we will attempt to validate the request and inform you of it prior to disclosure.

Finally, TruVise may disclose Personal Information where needed as part of a sale or transfer of our assets, enforce our rights, protect our property, or protect the rights, property, or safety of others, or as is needed to support external auditing, compliance, and governance functions. That said, any successor entity of TruVise will only be permitted to access Personal Information if they are subject to the same commitments we have made to you.

If TruVise needs to share your Personal Information for a purpose not identified here, we will obtain your consent before doing so and will disclose this purpose at the time of obtaining your consent. For example, TruVise may wish to use your information in demonstrations or other marketing materials and, if so, will contact you before doing so.

With respect to Non-Personal Information, because this information does not identify a natural person we may share it as we find appropriate to improve our services. For example, we may engage expert partners to lead reviews of anonymized, aggregated data that we can then use to ensure we are providing you, our clients, and business partners with the best possible product. In the event we disclose anonymized or aggregated data, we will prohibit the recipient from attempting to re-identify any of this data.

4. How long will TruVise keep my information?

TruVise keeps different kinds of information for different lengths of time depending on the purpose for which it is processing the information and depending upon your specific situation. In any event, TruVise will retain your Personal Information as long as necessary to accomplish the relevant purpose, but no longer.

5. How does TruVise keep my information secure?

Taking into account the nature of the information gathered and the prevailing industry standards, TruVise maintains a comprehensive security program that is reasonably designed to protect the security, confidentiality, and integrity of your Personal Information through administrative, technical, and physical controls appropriate to the sensitivity of the information. Moreover, when developing or improving our goods and services, we incorporate privacy and security into our design. For example, we ensure that only employees who need the Personal Information to perform the purposes above are granted access, and that the devices on which such Personal Information is secured are kept in a secure environment protected from loss, misuse, unauthorized access, disclosure, modification, or other security incidents. For further example, we ensure any sensitive information is kept encrypted and is transmitted only in a secure way. For more information on TruVise' information security program, please contact us.

6. What are my choices with respect to my information?

Your first choice is always to limit the information you provide. You may also opt out of certain marketing information by visiting our website and communicating your choices to us, or by clicking “unsubscribe” at the bottom of marketing emails you might receive.

Regarding cookies and other tracking technologies, you can manage these by adjusting the settings on your browser, commonly referred to as the browser’s “Do Not Track” settings. All browsers are different, so you may need to visit the “help” section of your browser to learn more about cookie preferences and other privacy settings that may be available. You can also manage how your mobile device and mobile browser share location information with TruVise, as well as 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 more. In general, TruVise will comply with your browser’s “Do Not Track” settings.

TruVise will support your ability to access, correct, and delete your Personal Information. If we have obtained your Personal Information from your financial institution or insurance agency, however, we may confirm your request through them.

For assistance with exercising your choices, or if you have any questions about your choices, please contact us.

6. Regarding children under the age of 13:

Please note, TruVise does not intend to collect Personal Information from children under the age of 13. If you believe a child is providing us Personal Information, please contact us directly so we may investigate and delete it.

7. For international residents:

TruVise is headquartered in the United States of America. It and its authorized processors may transfer your information to the United States of America and access it from the United States of America for the purposes described in this Policy. TruVise protects the privacy and security of Personal Information in the manner described in this Policy regardless of where it is collected, stored, accessed, or otherwise processed.

8. For California residents:

This notice does not apply to employment-related Personal Information collected from California-based employees, job applicants, contractors, or similar individuals.

The California Consumer Privacy Act (the “CCPA”) affords those who reside in the State of California certain rights as a data subject. If you are a resident of the State of California, we encourage you to read and learn about those rights on your own, but the following will help you to begin to understand them:

- **Access:** You have the right to request that we disclose certain information to you about our collection and use of your Personal Information.
- **Erasure:** In some cases, you may have the right to request that we erase your Personal Information in our possession.

- **Data Portability:** This allows you to request a copy of your Personal Information that we may have and transfer that information to someone else without any interference from us. In some cases, you may be able to request that we transfer your Personal Information directly to a third party on your behalf. We will verify any third party that purports to represent you prior to providing them a copy of your Personal Information.
- The CCPA further provides California residents the right to direct us not to sell your personal information. WE DO NOT SELL YOUR PERSONAL INFORMATION.

We will not discriminate against you for exercising any of your CCPA rights.

The categories of Personal Information that we collect from California residents are described in Section 1, above, and include identifying, contact, financial, credit, personal characteristic, employment, education, relationship, transactional, and identifiable Internet information. The purposes for which we process Personal Information is described in Section 2, above, and include servicing our clients and business partners; overseeing and completing transactions; preparing, delivering, maintaining, and otherwise providing our goods and services; supporting and improving of our goods and services; setting up and maintaining user accounts; proving you with service, measuring and understanding the effectiveness of our goods and services, complying with laws and regulations; and communicating offers for goods and services subject to your opportunity to opt out of direct marketing communications or market research inquiries.

In addition, California's "Shine the Light" law permits you to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes.

To make a request regarding any of these rights or to ask questions or provide comments about this Privacy Notice for California Residents, please contact us at Inquiries@TruVise.ai. You may also write us at: 666 Walnut Street, Suite 1720, Des Moines, IA 50309.

It is our policy to post any changes to this Privacy Notice on this page. We may or may not contact you directly concerning significant changes. We encourage you to visit this page periodically and check for changes. To the extent permitted by law, your continued use of our services after a change is deemed to be your consent to any such change.

9. Does this Policy ever change?

TruVise may post changes to this Policy on this page. Please refer to the "last updated" date above. Except where otherwise indicated in this Policy or where required by law, we may or may not contact you directly concerning certain changes, and therefore we encourage you to visit this page periodically and check. By using TruVise's services or purchasing its goods after a change to this Policy, you are deemed to consent to any changes, unless otherwise provided by law.

10. How do I contact you?

For questions about this Policy or to exercise any of the rights or choices we have described in this Policy, please contact Inquiries@TruVise.ai. You may also write us at: 666 Walnut Street, Suite 1720, Des Moines, IA 50309.

