

ACCUDILIGENCE LLC - PRIVACY POLICY AGREEMENT

AccuDiligence LLC (AccuDiligence) values its users' privacy. This Privacy Policy ("Policy") will help you understand how we collect and use personal information from those who visit our website or make use of our online facilities and services, and what we will and will not do with the information we collect. Our Policy has been designed and created to ensure those affiliated with AccuDiligence LLC of our commitment and realization of our obligation not only to meet, but to exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. If at any point in time AccuDiligence decides to make use of any personally identifiable information on file, in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to whether to permit the use of their information in this separate manner.

This Policy applies to AccuDiligence LLC, and it governs any and all data collection and usage by us. Through the use of AccuDiligence.com, you are therefore consenting to the data collection procedures expressed in this Policy.

Please note that this Policy does not govern the collection and use of information by companies that AccuDiligence LLC does not control, nor by individuals not employed or managed by us. If you visit a website that we mention or link to, be sure to review its privacy policy before providing the site with information. It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent to better understand the way in which websites garner, make use of and share the information collected.

Whenever you give us personal data, you are consenting to its collection, processing, and use in accordance with this privacy policy. You may withdraw your consent at any time by emailing supprt@AccuDiligence.com with your full name and registered email address, although if you elect to withdraw, we reserve the right not to register you as a user or provide you with any products or services.

INFORMATION ACCUDILIGENCE MAY COLLECT FROM YOU

AccuDiligence may collect and process the following data about you:

- Voluntarily provided information which may include your name, address, email address, phone number, billing and/or credit card information etc. which may be used when you purchase products and/or services and to deliver the services you have requested.
- Information automatically collected when visiting our website, which may include cookies, third party tracking technologies and server logs.
- Information that you provide by filling in forms on our Site, providing details by registering accounts for our products or services or other means (e.g., giving business cards) at a marketing event.

- Information you provide us through inquiries and/or feedback.
- Your Internet Protocol (IP) address, operating system and web browser used.
- AccuDiligence may also ask you for information when you report a problem with our site.
- If you contact us, AccuDiligence may keep a record of that correspondence.
- Details of your visits to our site including, but not limited to, traffic data, location data and other communication data, and the resources that you access.

IP ADDRESSES

AccuDiligence may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our business partners. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

COOKIES

Cookies are small text files that websites save to your computer. These pieces of information are used to improve services for you through, for example: (i) remembering settings, so you don't have to keep re-entering them whenever you visit a new page; (ii) remembering information you've given (e.g. your email account identifier) so you don't need to keep entering it.

Session cookies allow us to track your actions during a single browser session, for example to remember the items returned from a search. They do not remain on your device beyond your session.

Persistent cookies remain on your device between sessions and allow us to authenticate you and to remember your preferences.

Session and persistent cookies can be either first or third-party cookies — a first-party cookie is set by the website being visited. A third-party cookie is issued by a different website to that being visited.

Our website may use a third-party cookie to gather anonymized information for the benefit of all web users. AccuDiligence does not use behavioral targeting cookies. All our cookies fall within the ICC classifications Strictly Necessary, Functionality and Performance and none within the classification Behavioral Targeting.

If at any time you wish to disable our cookies you may do so through the settings on your browser, but if you do so you will not be able to use certain important features of our service.

To learn more about cookies and how to manage them, visit [AboutCookies.org](https://www.aboutcookies.org).

JOB APPLICANTS

If you are making a job application or inquiry, you may provide us with a copy of your CV or other relevant information. We may use this information for the purpose of considering your application or inquiry. Except when you explicitly request otherwise, we may keep this information on file for future reference.

PROVIDING PRODUCTS AND SERVICES

If you purchase or use our products or services, we may use your personal data for purposes which include but are not limited to:

- Verifying your credentials.
- Carrying out end user compliance checks for export control purposes.
- Issuing security information alerts and other alert messages.
- Providing maintenance and technical support.
- Providing information about product upgrades, updates and renewals.
- Generating logs, statistics and reports on service usage, service performance and security items.
- Developing and enhancing products, services, and our infrastructure.
- Processing orders and generating billing information.

Certain products and services may include features that collect additional personal data for other purposes, as described in the applicable customer agreement. For detailed information, please also refer to the applicable product or service description.

WHERE YOUR PERSONAL DATA IS STORED

Your personal data is securely stored by AccuDiligence on the Amazon Web Services (AWS) servers located regionally as required by local data privacy compliance regulations.

AccuDiligence has set up systems and processes to prevent unauthorized access or disclosure of your data.

NOTICE TO EUROPEAN UNION USERS

AccuDiligence LLC's operations are located primarily in the United States. If you provide information to us, the information may be transferred out of the European Union (EU) and sent to the United States for processing. (The adequacy decision on the EU-US Privacy became operational on August 1, 2016. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes. It allows the free transfer of data to companies that are certified in the US under the Privacy Shield.) By providing personal information to us, you are consenting to its storage and use as described in this Policy.

YOUR RIGHTS AS A DATA SUBJECT

Under the regulations of the General Data Protection Regulation ("GDPR") of the EU you have certain rights as a Data Subject. These rights are as follows:

- The right to be informed: this means we must inform you of how we intend to use your personal data and we do this through the terms of this Policy.
- The right of access: this means you have the right to request access to the data we hold about you and we must respond to those requests within one month. You can do this by sending an email to support@accudiligence.com.
- The right to rectification: this means that if you believe some of the data we hold is incorrect, you have the right to have it corrected. You can do this by logging into your account with us, or by sending us an email with your request.
- The right to erasure: this means you can request that the information we hold be deleted, and we will comply unless we have a compelling reason not to, in which case you will be informed of same. You can do this by sending an email to support@accudiligence.com.
- The right to restrict processing: this means you can change your communication preferences or opt-out of certain communications. You can do this by sending an email to support@accudiligence.com.
- The right of data portability: this means you can obtain and use the data we hold for your own purposes without explanation. If you wish to request a copy of your information, contact us at support@accudiligence.com.
- The right to object: this means you can file a formal objection with us regarding our use of your information with regard to third parties, or its processing where our legal basis is our legitimate interest in it. To do this, please send an email to support@accudiligence.com.

In addition to the rights above, please rest assured that we will always aim to encrypt and anonymize your personal information whenever possible. We also have protocols in place in the unlikely event that we suffer a data breach and we will contact you if your personal information is ever at risk. For more details regarding our security protections see the section below or visit our website at [AccuDiligence.com](https://www.AccuDiligence.com).

TRANSFERRING PERSONAL DATA

When you give us personal data, that data may be used or processed internally at AccuDiligence personnel anywhere in the world, including countries outside the European Economic Area ("EEA"), though storage remains at its regional servers. It is not processed by outsourced or non-staff personnel. AccuDiligence places substantial importance on protecting the confidentiality of personal information and seeks the cooperation of all its suppliers in furthering this goal.

AccuDiligence will only transfer personal information to a supplier where the supplier has provided assurances that they will provide at least the same level of privacy protection as is

required by this Policy and only where you have given us explicit permission to do so as part of a specific product or service offering from the supplier.

AccuDiligence LLC may feel it necessary, from time to time, to contact you on behalf of our other external business partners with regards to a potential new offer which may be of interest to you. If you consent or show interest in presented offers, then, at that time, specific identifiable information, such as name, email address and/or telephone number, may be shared with the third party.

Where AccuDiligence has knowledge that a supplier is using or sharing personal information in a way that is contrary to this policy, AccuDiligence will take reasonable steps to prevent or stop such processing.

SECURITY

AccuDiligence endeavors to hold all personal data securely in accordance with our internal security procedures and applicable law. We update and test our security on an ongoing basis. AccuDiligence will do its best to protect your personal data, but AccuDiligence cannot guarantee the security of your data transmitted to our site through the Internet; any such transmission is at your own risk.

Once AccuDiligence has received your information, AccuDiligence will maintain appropriate administrative, physical, technical and organizational measures to protect your personal data accessed or processed by AccuDiligence against unauthorized or unlawful processing or accidental loss, destruction, damage or disclosure. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers and servers in which we store personally identifiable information are kept in a secure environment. This is all done to prevent any loss, misuse, unauthorized access, disclosure or modification of the user's personal information under our control.

USES OF THE INFORMATION

AccuDiligence LLC does not now, nor will it in the future, sell, rent or lease any of its customer lists and/or names to any third parties. In addition, AccuDiligence uses information held about you in the following ways:

- To provide you with information, products or services that you request from us, or which AccuDiligence feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our products or service, when you choose to do so.
- To notify you about changes to our products and services.

If you are an existing customer, AccuDiligence will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those that were the subject of a previous sale to you.

If you receive an email which claims to come from us but does not use our domain, or if you are suspicious that an email may not be approved by us, then please send a copy of the email to support@AccuDiligence.com so we can investigate. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box on the form on which AccuDiligence collects your data. We will not sell or rent your data to third parties or share your data with third parties for marketing purposes. We may use third party software to send you information for marketing purposes but such third parties will not have access to or be able to read your personal information.

LINKS TO OTHER WEBSITES

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. AccuDiligence LLC does not claim nor accept responsibility or liability for the privacy policies, practices and/or procedures of other such websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and read the privacy statements of every website that collects personally identifiable information. Please check these policies before you submit any personal data to these websites. This Privacy Policy Agreement applies only and solely to the information collected by our website.

DISCLOSURE OF YOUR INFORMATION

AccuDiligence may not use or disclose the information provided by you to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries except under the following circumstances:

- as necessary to provide services or products you have ordered;
- in other ways described in this Policy or to which you have otherwise consented;
- in the aggregate with other information in such a way so that your identity cannot reasonably be determined;
- as required by law, or in response to a subpoena or search warrant;
- to outside auditors who have agreed to keep the information confidential;
- as necessary to enforce the Terms of Service;
- as necessary to maintain, safeguard and preserve all the rights and property of AccuDiligence.

In the event that AccuDiligence sells or buys any business or assets, AccuDiligence may disclose your personal data to the prospective seller or buyer of such business or assets.

If AccuDiligence or substantially all of its assets are acquired by a third party, personal data held by it about its subscribers and users will be one of the transferred assets.

AccuDiligence may disclose your personal information if AccuDiligence is under a duty to disclose or share your personal data in order to comply with any legal obligation or where required to do so by law; or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of AccuDiligence, or others.

NON-MARKETING PURPOSES

AccuDiligence greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (such as bug alerts, security breaches, account issues, and/or changes in AccuDiligence products and services). In certain circumstances, we may use our website, newspapers, or other public means to post a notice.

CHILDREN UNDER THE AGE OF 13

AccuDiligence's website is not directed to, and does not knowingly collect personal identifiable information from children under the age of thirteen (13). If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we shall immediately take the necessary steps to ensure that such information is deleted from our system's database. Anyone under the age of thirteen (13) must seek and obtain parent or guardian permission to use this website.

UNSUBSCRIBE OR OPT-OUT

All users and visitors to our website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our website please send an email that you wish to unsubscribe to support@accudiligence.com. If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe or opt-out. AccuDiligence will continue to adhere to this Policy with respect to any personal information previously collected.

ACCESS TO INFORMATION

GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with GDPR

ACCEPTANCE OF TERMS

By using this website, you are hereby accepting the terms and conditions stipulated within the Privacy Policy Agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our sites. In addition, your continued use of our website following the posting of any updates or changes to our terms and conditions shall mean that you agree and acceptance of such changes.

CHANGES TO OUR PRIVACY & DATA PROTECTION POLICY

AccuDiligence reserves the right to amend this Data Privacy Policy at any time, for any reason, without notice to you. You should check our Site to see the current Data Privacy Policy that is in effect and any changes that may have been made to it.

This policy was last amended on August 5, 2020.

HOW TO CONTACT US

If you have any questions or concerns regarding the Privacy Policy Agreement related to our website, please feel free to contact us at the following email, telephone number or mailing address.

Mailing Address:

AccuDiligence LLC

7901 4th St N, Suite 300

St Petersburg, Florida 33702

Email: support@accudiligence.com

Telephone Number: +1 727 677-0063

The data controller responsible for your personal information for the purposes of GDPR compliance is: tomj@accudiligence.com.