# ACEISS PLATFORM PRIVACY POLICY

**Last Updated**: 09/01/20<mark>25</mark>

#### 1. Introduction

This Privacy Policy describes how Aceiss, Inc. ("Aceiss", "we", "us" or "our") collect, use, store, and share your information when: (1) you access and/or use our proprietary cloud-based software-as-a-service platform offering or any other websites, mobile applications, or other digital properties we own and operate, including <a href="https://aceiss.com">https://aceiss.com</a> ("Properties"); (2) you use our products and services ("Services"); (3) you communicate with us in any manner, including by email, direct messaging, telephone, and/or in person ("Communications"); and (4) we interact with certain third party partners.

We provide a platform for our business customers ("Business Customers") that have specific resources such as GitHub accounts, and wish to better monitor use and maintain records ("Business Customer Resources"). When a Business Customer implements our Services, we will collect certain information on their behalf related to Business Customer Resources. When acting in this capacity, we are a "service provider" (also known as a "processor") and are processing information at the instruction of our Business Customer in accordance with our agreement with them.

Business Customers independently determine how to process and use your information that we provide. Requests related to such information and their use should be directed to the Business Customer.

## 2. What Type Of Information Do We Collect?

Depending on how you interact with our Properties and Services, the nature of our Communications, and how we may interact with certain third party partners, we may collect the following pieces of your information:

- Basic Identifying Information. Information you provide when you sign-up for an account for our Services such as your full name, postal address, e-mail address, phone number, account name, username, and other similar identifiers.
- <u>Device Identifier and other Unique Identifiers</u>. Information such as your device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, and other unique identifiers.
- <u>Internet or Other Network Activity</u>. Information such as your browsing or search history, and other information regarding your interactions with our Properties, emails, and advertisements.
- <u>Geolocation Data</u>. Information that permits us to determine your location so that we can determine the best place for you to pick up products and samples.
- <u>User Content</u>. Information such as your Communications with us and any other content you provide, such as social
  media profiles, photographs of receipts, images, videos, survey responses, comments, product reviews, testimonials,
  and other content.
- <u>Audio and Visual Information</u>. Information such as photographs, images, videos, and recordings of your voice (such as when we record customer service calls for quality assurance).
- Inferences. Information such as inferences drawn from or created based on the information identified above.

You may choose to voluntarily provide other information to us that we do not request, and, in such instances, and in such situations we have no control over what categories of personal information such disclosure may include. Any additional information provided by you to us is provided at your own risk.

## 3. How Do We Collect Your Information?

We collect your information in three ways: (1) directly from you when you use our Properties, Services, and Communicate with us; (2) automatically using online technologies when you engage with our Properties, Services, and Communications; and (3) from our third party partners.

- <u>Directly from you</u>. We collect information directly from you when you enter your information on our Properties, create an account for our Services, update your profile, access our content, participate in our rebate programs, take a survey or a poll or enter a contest, use our Properties and Services, engage in Communications with us, or sign-up to receive emails, text messages, or certain other Communications from us.
- <u>Automatically Using Online Technologies</u>. When you visit our Properties, open or click on emails we send you or related Communications, or interact with our advertisements, we or other third parties may automatically collect certain information about you using online tracking technologies such as cookies, pixels, web beacons, software

- developer kits, and related technologies. For more information, see <u>Cookies and Related Online Tracking</u> Technologies below.
- **From Our Partners**. We collect information from our third party partners, such as brands, data analytics providers, marketing or advertising providers, fraud prevention service providers, and vendors that provide services.

## 4. Cookies and Related Online Tracking Technologies

We and our third-party partners use cookies, pixels, web beacons, software development kits, and other similar online tracking technologies to gather information about you when you use our Properties, interact with some of our Services, and engage with our Communications. Some of the online tracking technologies are used to maintain the security of our Properties, manage your account, prevent crashes, fix bugs, save your preferences, assist with basic Properties' functions, advertising, analytics, and other performance functions.

Our Properties use Google Analytics for analytics purposes. You can learn more about Google Analytics by vising <u>How Google uses information from sites or apps that use our services</u>.

#### 5. How Do We Use Your Information?

We use your information for a variety of purposes, including to:

- Provide our Properties and Services to You and our Business Customers. We use your information to provide our Properties and Services to you, including to: (1) create and manage your account when you sign-up to use our Services; (2) facilitate your access and use of our Properties; (3) process feedback on the Services; (4) send you notifications relating to your account and participation in our Services; (5) answer your Communications; and (6) perform other related business functions.
- <u>Communicate with You</u>. We use your information to engage in Communications with you, such as to respond to your requests, inquiries, issues, feedback, and to provide customer service.
- Market and Advertise. We use your information for marketing and advertising purposes, including sending
  marketing, advertising, and promotional communications to you by email. We also use your information to show
  you advertisements.
- <u>Conduct Analytics and Personalization</u>. We use your information to conduct research and analytics, including to improve our Properties and Services. We also use your information to understand your interaction with our Properties, advertisements, Services, and our Communications with you. We also use your information to personalize your experience, to save you time when you visit our Properties and use our Services, and to better understand your needs.
- <u>Security and Fraud Prevention</u>. We use your information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions. We also use your information to enforce our terms and procedures, prevent against security incidents, and prevent the harm to other users of our Services.
- <u>Legal Obligations</u>. We use your information to comply with our legal and regulatory obligations, to establish and exercise our rights, and to defend against legal claims.
- Business Functions. We use your information to support our core business functions, including to maintain records
  related to business management, loss prevention, collecting amounts owed, and identifying and repairing errors or
  problems in the Properties.

#### 6. How Do We Disclose Your Information?

We may disclose or share your information with affiliated and non-affiliated third-parties, including in the following scenarios:

- <u>To Our Business Customers</u>. We generally process information on behalf of our business customers when you access or use their Business Customer Resources. We share such information in accordance with our agreement with them and their instructions.
- <u>In a Business Transfer.</u> We may disclose or share your information as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the unlikely event of insolvency, bankruptcy, or receivership, in which such information could be transferred to third parties as a business asset in the transaction.

- To Non-Affiliated Third Parties. We may disclose or share your information with certain non-affiliated third parties to facilitate your access and use of our Properties, our Services, and to provide us with certain business functions, including but not limited to sharing your information with brand partners, internet service providers, advertising networks, data analytics providers, governmental entities, operating systems and platforms, social media networks, payment processors, and other service providers who provide us a service (e.g., customer service, auditing, marketing, debugging to identify and repair errors that impair existing intended functionality on our Properties, and/or protecting against malicious, deceptive, fraudulent, or illegal activity).
- <u>For Legal Process And Protection</u>. We may disclose or share your information to satisfy any law, regulation, legal process, governmental request, or where we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to: (1) enforce or apply our agreements; (2) protect our interests, property, or safety of others; (3) in connection with claims, disputes, or litigation; and (4) to protect our Properties.

## 7. Analytics and Advertising

We use analytics services, such as Google Analytics, to help us understand how users access and interact with the Service. Additionally, we collaborate with agencies, advertisers, ad networks, and other technology providers to display ads for our products and services on various websites and platforms. For example, we run ads through Google and Facebook, which may appear on their platforms as well as on other websites and services. We may allow the following companies to serve advertisements on our behalf across the Internet and within applications: Google AdWords and LinkedIn. These advertisements may use email addresses and cookies collected during your interactions with us. These entities employ technologies such as cookies, web beacons, device identifiers, and other tools to gather information about your usage of the Services and other websites or applications. This includes data such as your IP address, web browser, pages viewed, time spent on pages or in apps, links clicked, and conversion metrics. This information may be used by Aceiss to analyze and track data, assess the popularity of certain content, deliver advertising and content tailored to your interests across our Services and other websites, and gain insights into your online activity.

For further information on the types of tracking technologies we use on the Service and your rights and choices regarding analytics, Interest-based Advertising, and Matched Ads, please see the <a href="What Type of Information Do We Collect">What Type of Information Do We Collect</a>? and <a href="Your Rights and Choices">Your Rights and Choices</a> sections. For more information about cookies, please see our section on <a href="Cookies and Related Online Tracking Technologies">Cookies and Related Online Tracking Technologies</a>.

## 8. How Do We Protect Your Information?

Although no system can guarantee the complete security of your information, we take all commercially reasonable steps to ensure your information is protected in alignment with all applicable laws and regulations, as appropriate to the sensitivity of your information.

## 9. How Long Do We Keep Your Information?

We keep your information for as long as is necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to nature of the information subject to disposal.

## 10. Links To Third Party Sites

Our Properties and Services may contain links to third party websites and services. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review.

## 11. Your Rights and Choices

## A. Account

You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings or sending an email to the email address set out as set out in the <u>Contact Us</u> section below. We may require additional information from you to allow us to confirm your identity.

Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **B.** Communications

The following is information about how to opt out of receiving certain communications from, depending on means of delivery:

• <u>E-mails</u>. You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link, or emailing us at the email address set out as set out in the <u>Contact Us</u> section below with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or our ongoing business relations.

## C. Cookies and Tracking Technologies

The following disclosures relate to your rights and choices in connection with cookies and other tracking technologies:

- <u>Do Not Track</u>. Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. We do not currently monitor or take action with respect to "Do Not Track" signals. For more information on "Do Not Track," visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.
- <u>Cookies and Pixels</u>. Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

### D. Analytics & Advertising

Please see the following resources related to third-party analytic services implemented on our Properties:

- <u>Google Services</u>: Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> and by Google Analytics for Display Advertising or the Google Display Network at <a href="https://www.google.com/settings/ads/onweb/">https://www.google.com/settings/ads/onweb/</a>.
- <u>LinkedIn Services</u>: LinkedIn provides tools and information to allow you to opt out of their ad programs. For more information about managing your preferences related to LinkedIn cookies, please see LinkedIn's manage your advertising preferences page <u>here</u>. If you are not a member of LinkedIn, you can opt-out of LinkedIn program through the following link: <a href="https://www.linkedin.com/psettings/guest-controls">https://www.linkedin.com/psettings/guest-controls</a>.
- Meta Services: Meta's services like Facebook allow you manage how your data is shared with Facebook. To manage your Facebook data sharing preferences, including opting out of personalized advertising, please visit your Facebook account settings. You can also control which third-party applications can access your Facebook information through these settings. While opting out will limit the sharing of your data, please note that some information may still be used for essential purposes.

#### 12. Children

Our Properties and Services are not intended for children under the age of 13. This includes any links to other websites that we provide for our convenience. We don't knowingly collect the information of children under 13 for any reason.

#### 13. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time. Any and all changes will be reflected on this page, and where appropriate provided in person or by another electronic method. The effective date will be stated at the top of this Privacy Policy. You should regularly check this page for any changes to this Privacy Policy.

# 14. Accessibility

To print a copy of this Privacy Policy, please click here [https://aceiss-app-public.s3.us-east-1.amazonaws.com/assets/documents/AFG/Aceiss+Platform+-+Master+Terms+of+Use+-+2025.pdf].

If you require a copy of this Privacy Policy in an alternative format, please Contact Us.

## 15. Contact Us

If you have any comments or questions, please contact us through the following methods:

Physical Address: 18 Locust Avenue #344, New Canaan, CT 06840

Email: support@aceiss.com