

## **Aqumulate LLC Privacy Policy**

Aqumulate LLC (“Aqumulate”, “we” or “our”) takes your privacy seriously and is committed to protecting your personal information. Please take a moment to review our Privacy Policy, which explains how we collect, use, and safeguard the information collected while using our software (the “Software”).

### **1. Collection and use of your personal information**

- a. *Registration.* In order to use the Software you must first register by providing your name, tax id, company name, phone number, email address, username and password.
- b. *Feedback and customer support.* We collect information that you may submit in connection with feedback, emails and customer support or other inquiries you make to us.

### **2. Information we collect automatically**

- a. We may collect information through technology to make our website and Software more useful to you. This includes collecting IP addresses and the use of technology to track traffic patterns on our website and Software. Once you access our website or login to our Software, we track your activity and interaction with our servers. We use this information to understand which areas of our website and Software are most appealing. We also use cookies, which are pieces of information that a website sends to your computer while you are viewing the website. Cookies provide information to our servers so that the site will remember who you are. These technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf. None of the information collected through these methods is, or is connected to, personally identifiable information about you.
- b. **E-mail Communication from You:** If you contact us by e-mail, we use your e-mail address only to respond to your specific request or question.
- c. **E-mail Communication from Us:** Our website may allow you to sign up for webinars, to receive newsletters and other information about our company. In order to participate in these activities, we collect your name, company, phone number and your email address. You may opt-out of any promotional material or communication from our company at any time.

### **3. How we use your personal information.**

- a. We do not and will not sell or rent your personal information to anyone, for any reason, at any time unless as otherwise stated in this Privacy Policy.
- b. We do not and will not sell or rent any account information, data, passwords, usernames, PINs, or other log-in information to anyone, for any reason, at any time.
- c. We may share your personally identifiable information with third-party contractors that provide services to Aqumulate. These contractors are bound by these same privacy restrictions.

- d. We may share personally identifiable information with third party systems / parties you choose to share such data with to carry out the Software's fundamental purpose of aggregating and synchronizing information such as demographics and account data.
- e. We use personally identifiable information of our users, for the following purposes:
  - 1. to aggregate accounts;
  - 2. to communicate with our users for purposes of customer service;
  - 3. to confirm interactions with the Software such as registration or a change of preferences; and
  - 4. to inform users about changes to the Software, this policy or our Terms of Service.
- f. We use aggregate information (which is not personally identifiable information to particular users) to analyze trends and to administer and improve the Software.
- g. We may aggregate non- personally identifiable information from multiple sources that includes but is not limited to transactional data associated with accounts and share this data with third parties. Any aggregated data that is shared with a third party will not include any names, account numbers or identifying numbers to any account. Such third parties are not limited to those third parties / systems which you have choose to share data with, as referenced above in subsection (d).

#### **4. How we share information.**

- a. We may share aggregate information (which is not personally identifiable to particular users) with our partners.
- b. We disclose personally identifiable information of our users in the following cases:
  - 1. We use third parties to provide services on or related to the Software;
  - 2. We disclose your information to third parties in cases where you give us your consent; and
  - 3. We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on us.

#### **5. Choice.**

- a. You may edit the registration information at any time through your "Settings" or "Profile" page.
- b. When you ask us to terminate your access to the Software, your personal information will be immediately and permanently deleted from our servers. We will also promptly disconnect any connection we had established to your account information and delete all account credentials. However, portions of your data, consisting of aggregate data derived from your account information, may remain on our production servers indefinitely. Your data may also remain on a backup server or media. Aquumulate keeps these backups to ensure our continued ability to provide the Service to you in the event of malfunction or damage to our

primary production servers. We also reserve the right to use any aggregated or anonymous data derived from or incorporating your personal information.

**6. Software Updates.**

We reserve the right to update the Software at anytime without providing you advance notice of such update. Such updates can be done for any reason but may improve the functionality of the Software or add new features.

**7. Security.**

Aqumulate uses encryption techniques and authentication procedures to maintain the Software security from unauthorized access.

These precautions apply only to our Software and we do not exercise control over how your information is stored, maintained or displayed by third parties.

**8. Children's Privacy.**

We do not knowingly collect personal information from children under 13. If we learn that we have collected the personal information of a child under 13 we will take steps to delete the information as soon as possible.

**9. Merger.**

In the event Aqumulate goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personally identifiable information will likely be among the assets transferred. You will be notified of any such change in ownership or control of your personal information.

**10. Changes to Policy.**

We reserve the right to modify this privacy policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you, by email, or by means of a notice while accessing the Software.

**11. Contact Us.**

You can contact us at [support@aqumulate.com](mailto:support@aqumulate.com) or 516-801-4931

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