



## SPERSE PRIVACY POLICY

Sperse LLC (the "Company") respects your privacy and is committed to maintaining robust privacy protections for its users. Our Privacy Policy ("Privacy Policy") is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Services.

This Privacy Policy is applicable to data entered in or processed by the Company's website at [www.Sperse.com](http://www.Sperse.com), the Company's web application, and the services offered by the Company through the website and applications (collectively, the "Services"). This Privacy Policy is applicable for all situations including, but not limited to, all types of user devices (computer, tablet, ...) and internet browsers such as Chrome, Firefox, and Internet Explorer. In addition, it is applicable for all Services billing types, paid and trial. By using our site or services, you consent to our collection, storage, use and disclosure of your personal information as described below.

### INFORMATION WE COLLECT

We collect "Non-Personal Information" and "Personal Information." Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. Personal Information could include your first and last name, email address, phone number, and postal address.

### PERSONAL INFORMATION THAT YOU PROVIDE TO US

**Account information:** To become a subscriber to the Services, you will need to create a personal profile. You can create a profile by registering with the Services and entering standard account information such as, but not limited to, name, email address, phone number, billing details (credit card information), user name, and password. By registering, you are authorizing us to collect, store and use your information in accordance with this Privacy Policy. You represent that you are the owner of such personal data or have authorization to provide it to us.

**Payments:** A third-party intermediary is used to manage credit card processing. This intermediary is not permitted to store, retain, or use your billing information for any purpose except for credit card processing on our behalf.

**Other Personal Information:** There are other ways in which you may provide personal information. These include various user inputs on our Website, for example when submitting web forms, requesting customer support, participating in surveys, and chat sessions with the Company.

### COOKIES

In an effort to improve the quality of the Services, we track information provided to us by your browser or by our software application when you view or use the Services, such as the website you came from (known as the "referring URL"), the type of browser you use, the type of device from which you connected to the Services, the time and date of access, IP address, operating system, and other information that does not personally identify you. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user's browser from our servers and are stored on the user's computer hard drive. Sending a cookie to a user's browser enables us to collect Non-Personal information about that user and keep a record of the user's preferences when utilizing our services, both on an individual and aggregate basis.

The Company may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser. For example, if you have chosen to store your login credentials, we accomplish this by using a persistent cookie.

Most internet browsers give a user the option to block all, a group of, or specific cookies. This can be done by setting the preferences in the browser. The exact steps to accomplish this vary by browser. Please refer to the "help" section of your browser on instructions to do this. However, if you set your browser to block cookies or make them inactive, this can potentially limit your scope of functionality on our site. If you wish to use any such functionality that requires the use of cookies at our site, then you must accept the use of cookies on our site. Your acceptance of the use of cookies on our site gives us your approval to collect and associate your data as mentioned above.

## HOW WE USE AND SHARE INFORMATION

**Personal Information:** Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to user's email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy. In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers.

Our contracts with these third parties require them to maintain the confidentiality of the Personal Information we provide to them, only act on our behalf and under our instructions, and not use Personal Information for purposes other than the product or service they are providing to us or on our behalf.

Most of these services will not receive any personal information unless the user activates a particular feature that requires the third party service to function. Where possible, data is pseudo-anonymized, meaning that while a unique id is present, it cannot be linked to particular personal information by the third party service provider.

Third party service providers we use on Sperse with their respective Privacy Policies:

- **PayPal** - provides a payment option when upgrading to paid Sperse products on the Sperse websites. <https://www.paypal.com/us/webapps/mpp/ua/legalhub-full>
- **Plaid** - bank and financial account data aggregation. <https://plaid.com/legal/#end-user-privacy-policy>
- **QuickBook** - accounting software. <https://www.intuit.com/privacy>
- **Salt Edge** - bank and financial account data aggregation. [https://www.saltedge.com/pages/privacy\\_policy](https://www.saltedge.com/pages/privacy_policy) and [https://www.saltedge.com/pages/dashboard\\_privacy\\_policy](https://www.saltedge.com/pages/dashboard_privacy_policy)
- **Xero** - accounting software. <https://www.xero.com/about/legal/privacy>

**Non-Personal Information:** In general, we use Non-Personal Information to help us improve the Services and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

## SECURITY

We implement security measures designed to protect your information from unauthorized access. Your account is protected by your account password and we urge you to take steps to keep your personal information safe by not disclosing your password and by logging out of your account after each use. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using our Services, you acknowledge that you understand and agree to assume these risks.

## TRANSFER OF PERSONAL INFORMATION

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes to the Site so that you may opt out of the new information practices. We suggest that you check the Site periodically if you are concerned about how your information is used.

## COMMUNICATIONS

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional e-mail. You can also indicate that you do not wish to receive marketing communications from us in your user "Settings" section of the Site. Please note that notwithstanding the promotional preferences you indicate by either unsubscribing or opting out in the Settings section of the Site, we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy.

**DO NOT TRACK**

Most internet browsers have a “do not track” (DNT) setting which sends a signal to websites visited by a user about the user's browser DNT selection (On or Off, or the equivalents). Currently, we do not support DNT. This is partly because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators. In addition, there is no consistent standard of interpreting a user's intention. The Company will revisit and reevaluate DNT when future developments occur.

**COMPLIANCE WITH LAWS**

Only if required to do so, we will share your information, including Personal Information, in order to respond to investigations, court orders, legal process, or to investigate, prevent or take action regarding illegal activities, suspected fraud, or involving the physical safety of any person, violations of our Terms of Service, or any matter as legally required.

**CHANGES TO OUR PRIVACY POLICY**

The Company reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site. Significant changes will go into effect after 30 or more days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.

**CONTACT US**

If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to [support@sperse.com](mailto:support@sperse.com).

---

Last Updated:     March 5th, 2021.