# **Privacy Policy**

ETZ SOFT, INC.

D/B/A ETZ

PRIVACY POLICY

Date of Last Revision: May 15, 2022

## **OUR COMMITMENT TO PRIVACY**

ETZ Soft, Inc. ("ETZ"), knows that you care about how your personal information is used and shared, and we take your privacy seriously. Our primary goal is to provide you with exceptional service, and we understand that you may have questions or concerns regarding your personal information and how it will be used. To make this privacy policy easy to find, we make it available from the home page of the ETZ website at ETZ.com (the "Site"). You may also email us at support@etzsoft.com with any privacy-related questions you have.

# APPLICABILITY OF PRIVACY POLICY

This privacy policy applies to all information we collect through our web and mobile applications from current and former ETZ users, including you. When you are no longer our customer, we may continue to share your information as described in this policy.

Throughout this policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been

aggregated and/or anonymized so that it does not identify a specific user.

By using the service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Site or otherwise use the products or services.

## 1. PERSONAL DATA WE COLLECT

Personal Data You Provide: We collect personal information when you create an account or link your accounting or tracking software to the service. The personal information collected during these interactions may vary based on what you choose to share with us, but it will generally include your name, date of birth, physical address, email address, phone number, and a log of the transactions you authorize through the service. We may need to collect additional information, such as your street address, certain digits of your social security number or zip code to fulfill our legal obligations related to providing the service to you. In addition, while you are using a mobile device or mobile application, we may collect your location information.

Personal Data We Collect Through Our Social Media Pages: We have pages on social media sites like Facebook, Instagram, and Twitter ("Social Media Pages"). When you interact with our Social Media Pages, we will collect personal information that you elect to provide to us, such as your contact details. In addition, the companies that host our Social Media Pages may provide us with aggregate information and analytics regarding the use of our Social Media Pages.

Personal Data We Receive Automatically from Your Use of the Service: When you visit, use and interact with the service, we may receive certain information about your visit, use or interactions.

For example, we may monitor the number of people that visit the service, peak hours of visits, which page(s) are visited, the domains our visitors come from (e.g., google.com, yahoo.com, etc.), and which browsers people use to access the service (e.g., Firefox, Microsoft Internet Explorer, etc.), broad geographical information, and navigation pattern. In particular, the following information is created and automatically logged in our systems:

- Log data: Information that your browser automatically sends whenever you visit the Site ("log data"). Log data includes your Internet Protocol address, browser type and settings, the date and time of your request, and how you interacted with the service.
- Cookies: Please see the 'Cookies' section below to learn more about how we use cookies.
- Device information: Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- Usage Information: We collect information about how you use our service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency and duration of your activities.

Cookies: We use cookies to operate and administer our Site, gather usage data on our Site and improve your experience on it. A "cookie" is a piece of information sent to your browser by a website you visit. Cookies can be stored on your computer for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it), and

help recognize your computer when you open your browser and browse the Internet again (persistent cookies). For more details on cookies please visit <u>All About Cookies</u>.

Analytics: We use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this data, go to <a href="https://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>.

Online Tracking and Do Not Track Signals: We and our third-party service providers may use cookies or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Site. Our Site currently does not respond to "Do Not Track" ("DNT") signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do respond to DNT signals in the future, we will update this Privacy Policy to describe how we do so.

Your Choices. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. Please see the links below for guidance on how to modify your web browser's settings on the most popular browsers:

- Internet Explorer
- Mozilla Firefox
- Google Chrome
- Apple Safari

Please note that if you limit the ability of websites to set cookies, you may be unable to access certain parts of the Site and you may not be able to benefit from the full functionality of the Site.

Advertising networks may collect personal information through the use of cookies. Most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit the Network Advertising Initiative's online resources at <a href="http://www.networkadvertising.org">http://www.networkadvertising.org</a> and follow the optout instructions there.

If you access the Site on your mobile device, you may not be able to control tracking technologies through the settings.

## 2. HOW WE USE PERSONAL DATA

We may use personal information for the following purposes:

- To help you access and use the service;
- To respond to your inquiries, comments, feedback or questions;
- To send administrative information to you, for example, information regarding the service, and changes to our terms, conditions, and policies;
- To analyze how you interact with our service;
- To maintain and improve the content and functionality of the service (please see the "Cookies" section above to learn how we use cookies);
- To develop new products and services;

- To prevent fraud, criminal activity, or misuses of our service, and to ensure the security of our IT systems, architecture and networks; and
- To comply with legal obligations and legal process and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or other third parties.

Aggregated Information. We may aggregate personal information and use the aggregated information to analyze the effectiveness of our service, to improve and add features to our service, and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our services and share aggregated information like general user statistics with prospective business partners. We may collect aggregated information through features of the software that supports our service, through cookies, and through other means described in this Privacy Policy.

Marketing. We may contact you to tell you about services we believe will be of interest to you. For instance, if you elect to provide your email or telephone number, we may use that information to send you special offers. You may opt out of receiving emails by following the instructions contained in each promotional email we send you. You can also control the marketing emails and/or text messages you receive by updating your settings through your account. In addition, if at any time you do not wish to receive future marketing communications, please contact us at support@etzsoft.com. If you unsubscribe from our marketing lists, you will no longer receive marketing communications but we will continue to contact you regarding our Site and services and to respond to your requests.

## 3. SHARING AND DISCLOSURE OF PERSONAL DATA

In certain circumstances we may share your personal information with third parties without further notice to you, unless required by the law, as set forth below:

- Vendors and Service Providers: To assist us in meeting business operations needs and to perform certain services and functions, we may share personal information with vendors and service providers, including providers of hosting services, cloud services and other information technology services providers, email communication software and email newsletter services, advertising and marketing services, financial service providers (including payment card processors, banks, and API services) customer relationship management and customer support services, and web analytics services (for more details on the third parties that place cookies through the Site, please see the "Cookies" in section 1). Pursuant to our instructions, these parties will access, process or store personal information in the course of performing their duties to us. We take commercially reasonable steps to ensure our service providers adhere to the Security Standards (see section 8) we apply to your personal information.
- Business Transfers: If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of service to another provider, your personal information and other information may be shared in the diligence process with counterparties and others assisting with the transaction and transferred to a successor or affiliate as part of that transaction along with other assets.

- Legal Requirements: If required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of users of the services, or the public, or (v) protect against legal liability.
- Other users: Your personal information may be accessible to other users of the service with whom you interact. For example, where you share a sub-account with other users (such as if you create a sub-account to share expenses related to a family vacation), the other users with access to the sub-account will have access to the transactions you authorize within that sub-account.
- Affiliates: We may share personal information with our affiliates, meaning an entity that controls, is controlled by, or is under common control with ETZ. Our affiliates may use the personal information we share in a manner consistent with this Privacy Policy.

### 4. DATA RETENTION

We keep personal information for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a business need to do so, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is the longer.

## 5. UPDATE YOUR INFORMATION

Please log in to your account or contact us at support@etzsoft.com if you need to change or correct your personal information.

## 6. CHILDREN

Our service is not directed to children who are under the age of 13. ETZ does not knowingly collect personal information from children under the age of 13. If you have reason to believe that a child under the age of 13 has provided personal information to ETZ through the service please contact us at support@etzsoft.com and we will endeavor to delete that information from our databases.

## 7. LINKS TO OTHER WEBSITES

The service may contain links to other websites not operated or controlled by ETZ, including social media services ("Third Party Sites"). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

# 8. SECURITY

You use the service at your own risk. We implement reasonable technical, administrative, and organizational measures to protect personal information both online and offline from loss, misuse, and unauthorized access, disclosure, alteration or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the service or e-mail. Please keep this in mind when disclosing any personal information to ETZ via the Internet. In addition, we are not responsible for circumvention

of any privacy settings or security measures contained on the service, or third party websites.

# 9. YOUR CHOICES

In certain circumstances providing personal information is optional. However, if you choose not to provide personal information that is needed to use some features of our services, you may be unable to use those features. You can also contact us to ask us to update or correct your personal information.

# 10. CHANGES TO THE PRIVACY POLICY

The service, and our business may change from time to time. As a result, we may change this Privacy Policy at any time. When we do we will post an updated version on this page, unless another type of notice is required by the applicable law. By continuing to use our service or providing us with personal information after we have posted an updated Privacy Policy, or notified you if applicable, you consent to the revised Privacy Policy and practices described in it.

# 11. CALIFORNIA PRIVACY RIGHTS - DO NOT TRACK SIGNALS

Our Site currently does not respond to "Do Not Track" (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy.

# 12. CONTACT US

If you have any questions about our Privacy Policy or information practices, please feel free to contact us at support@etzsoft.com.

# **ETZ PRIVACY NOTICE**

FACTS: WHAT DOES ETZ SOFT, INC. ("ETZ") DO WITH YOUR PERSONAL INFORMATION?

# Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

## What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Transaction history and overdraft history
- Account transactions and checking account information

When you are no longer our customer, we continue to share your information as described in this notice.

## How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their

customers' personal information; the reasons ETZ chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information:

For our everyday business purposes — such as to process your transactions and respond to court orders and legal investigations, or report to credit bureaus

- Does ETZ share? Yes
- Can you limit this sharing? No

For our marketing purposes — to offer our products and services to you

- Does ETZ share? Yes
- Can you limit this sharing? No

For joint marketing with other financial companies

- Does ETZ share? Yes
- Can you limit this sharing? No

For our affiliates' everyday business purposes — information about your transactions and experiences

- Does ETZ share? Yes
- Can you limit this sharing? Yes

For our affiliates' everyday business purposes — information about your creditworthiness

- Does ETZ share? No
- Can you limit this sharing? We don't share

For our affiliates to market to you

- Does ETZ share? No
- Can you limit this sharing? We don't share

For nonaffiliates to market to you

- Does ETZ share? No
- Can you limit this sharing? We don't share

Questions? Go to etzsoft.com

Who we are:

Who is providing this notice?

This notice is being provided on behalf of ETZ Soft, Inc.

## What we do:

How does ETZ protect my personal information?

 To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does ETZ collect my personal information?

- We collect your personal information, for example, when you
  - Open an account or provide account information
  - Give us your contact information or tell us who receives the money
  - Tell us where to send the money
- We also collect your personal information from other companies.

Why can't I limit all sharing?

- Federal law gives you the right to limit only
  - sharing for affiliates' everyday business purposes information about your creditworthiness
  - o affiliates from using your information to market to you
  - sharing for nonaffiliates to market to you

 State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

## **Definitions:**

## **Affiliates**

 Companies related by common ownership or control. They can be financial and nonfinancial companies.

## Nonaffiliates

- Companies not related by common ownership or control.
  They can be financial and nonfinancial companies.
  - ETZ does not share with nonaffiliates so they can market to you.

# Joint marketing

- A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
  - Our joint marketing partners include may include other financial companies.

# Other important information

 California Residents Only: We will not share information we collect about you with nonaffiliates, except as permitted by law, including, for example, with your consent or to provide financial services you have requested.