

**PPN Analytics Limited Liability Company
d/b/a TruPacta**

PRIVACY POLICY

Effective Date: **Jan 1st, 2025**

- 1. Introduction.** This Privacy Policy describes how, along with our subsidiaries and affiliates (collectively referred to as “TruPacta,” “we,” “us,” or “our”), TruPacta processes Personal Information when we provide services or when you use our websites, mobile, and other online applications and products and services (collectively, the “**TruPacta Sites**”). We are committed to ensuring the privacy and integrity of the Personal Information you share with us or we otherwise collect as we provide these Services. Throughout this Privacy Policy, “**Personal Information**” means any information relating to an identified or identifiable individual.

- 2. Information We Collect.** Information is gathered from the TruPacta Sites by us, our service providers, advertisers, sponsors and partners. Our TruPacta Sites are not intended for children under 13 years of age. No one under age 13 may provide any information to or on TruPacta Sites. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website through any of its features, register on the Website, make any purchases through the Website, or use any of the interactive or public comment features of this Website. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at contact@trupacta.com.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your State Privacy Rights for more information.

- 3. Information You Provide.** We may collect information that you choose to provide on the TruPacta Sites in a variety of ways, such as when you:
 - A. register for one of our products or services. This information may include your name, address, telephone number, email address, and credit information;
 - B. make information available to us via social networking logins, such as Facebook, Instagram, or Twitter;
 - C. express an interest in the services and products offered by TruPacta;
 - D. participate in chats, web forums, or other interactive sessions;
 - E. provide payment card information for one of our products or services;
 - F. subscribe to newsletters, access podcasts, or provide feedback; and
 - G. participate in surveys, sweepstakes or other promotions.

- 4. Automated Information.** Information regarding your use of TruPacta Sites may be collected and/or aggregated through the use of automated means. This automatically collected information may include information such as:
 - A. your IP address, the type of browser and operating system used;
 - B. date and time you access the TruPacta Sites and pages you visit, and if you linked from or to another website, the address of that website;
 - C. email you open and links you click on within those email;
 - D. your ISP or mobile carrier, and the type of handheld or mobile device that you used; and
 - E. your behavior while using our site, including the time you spend on portions of the site and how you interact with various aspects of the site.

5. Data Technologies.

- A. Various technologies are used to automatically collect information, such as cookies, local shared objects, and web beacons (generally referred to as “Data Technologies”). “Cookies” are small identifiers sent from a web server that are stored on your device for the purpose of identifying your browser or storing information or settings in your browser. “Local shared objects,” sometimes known as Flash Cookies, may be used to store your preferences or display content based upon what you have viewed on various websites to personalize your visit. A “web beacon,” also known as an internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies. Anonymous advertising identifiers are increasingly being used on mobile devices and otherwise in a manner similar to Cookies. When we refer to Data Technologies, we are including all current and similar future technologies.
- B. One or more Data Technologies may be used on the TruPacta Sites and other websites and mobile applications (that may not be the TruPacta Sites) by us, by another party on our behalf, or by third parties in accordance with their privacy policies. Data Technologies may be used by us and others, on our behalf and on their own behalf, to transmit information to you or about you and connect information about you from different sources, websites, devices, and mobile applications.

6. Photos and Videos. We may target and track the photos and videos you view on the Sites. You consent to our tracking of your photo and video viewing through the Site or third-party social media for up to two years or as permitted by applicable law.

7. Location Information. When you download or use the TruPacta Sites, we may collect physical location information that is sufficiently precise to allow us to locate a specific person or device (“Location Information”). We only collect Location Information with your permission (e.g., such as when you agree to provide it to us after you initially access or download the TruPacta Sites). We may use Location Information and provide it to third parties to provide you with content and services that are relevant to a particular location, such as advertising, search results and direction, to evaluate and improve the TruPacta Sites, or to provide you with relevant content and services relevant.

8. Publicly Posted Information. Information that you make available to us and others via social media networks, forums, blogs, list serves, chat rooms or similar functionality is public information that we or others may share or use in accordance with the law.

9. Combined Information and Information from Other Sources. We may combine information that you provide to us with information we receive from our affiliates and other sources, as well as with other information that is automatically collected. The combined information may include information about your use of the TruPacta Sites, your use of other websites, devices and mobile applications and information from our affiliates and other sources.

10. How We May Use the Information We Collect. We may use information we collect for the following purposes:

- A. for everyday business purposes, such as establishing and managing your user account, providing products and services you request, processing and collecting payments and providing customer support;
- B. to offer our other products or services and/or the products or services of others to you;
- C. to communicate about, and administer your participation in, special events, programs, surveys, contests, sweepstakes and other offers or promotions;
- D. to enable you to interact with TruPacta and our users and others through various means, such as through our message boards, blogs and social media;

- E. to evaluate and improve our business, including developing new products and services and analyzing the effectiveness of products, services, applications and websites;
- F. to provide or sell to third parties to allow them to market or advertise their products or services to you;
- G. to diagnose and address technical and service problems;
- H. to perform data analyses, including market and Consumer research, trend analysis, demographic analysis and financial analysis;
- I. to deliver content correlating to your interests and browsing and usage history, both within the TruPacta Sites and on other websites and applications;
- J. to comply with applicable legal requirements and our policies; and
- K. to contact you via telephone, text or chat. We will obtain your consent to contact you when and in the manner required by law.

11. Advertising Networks

- A. Advertising that is customized based on predictions generated over time from your visits across different websites, devices and mobile applications is sometimes called “online behavioral” or “interest-based” advertising. We may partner with advertising networks, which are companies that deliver targeted advertisements to Consumers and generate statistics and metrics related to the delivery of interest-based advertisements. They may utilize information collected through a variety of Data Technologies to provide customization, auditing, research and reporting for us, our affiliates and other advertisers. This data collection takes place both on the TruPacta Sites and on third-party’s websites and mobile applications. This process allows TruPacta and third parties to deliver targeted advertising, enhance marketing programs and help track the effectiveness of such efforts. Our advertising networks also may use this information for determining or predicting the characteristics and preferences of their respective advertising audiences and measuring the effectiveness of their advertising in accordance with their privacy policies.
- B. We do not provide information that is directly associated with a specific person (such as name and address) to an advertising network when you interact with or view a customized advertisement. However, when you view or interact with an advertisement, the advertiser may make an assumption that you are interested in the subject matter of the advertisement.
- C. Some companies disclose when they are using interest-based advertising programs on the TruPacta Sites to deliver third-party ads or collecting information about your visit for these purposes and give you the ability to opt-out of this use of your information. You may see an icon in or around third-party advertisements on the TruPacta Sites that use interest-based advertising programs and on pages where data is collected and used for online interest-based advertising. Clicking on this icon will provide additional information about the companies and data practices that were used to deliver the ad. You can opt out of delivery of targeted advertising to you by multiple companies by visiting www.aboutads.info/choices, www.networkadvertising.org/managing/opt_out.asp and www.evidon.com. Please note that even if you opt out, you will continue to receive advertisements, but they will not be tailored to your specific interests.

12. Information We Share. We do not sell or otherwise share information about you that we collect or receive, except as described below:

- A. **Affiliates.** We may share information about you, including Personal Information, with our corporate affiliates, who will use it in accordance with their privacy policies.
- B. **Our Service Providers.** We may engage third parties to provide the services offered through or in connection with the TruPacta Sites on our behalf. We require such providers to maintain

information about you as confidential and to use the information only to perform the services specified by us in a manner consistent with this Privacy Policy.

- C. **Co-Sponsored Promotions.** In the event that you participate in a survey, sweepstakes, contest or other promotion that is co-sponsored by TruPacta and a third party, we may share information collected in conjunction with the survey, sweepstakes, contest or promotion, including Personal Information, with that third party. After the information is provided to those third parties, the subsequent use or disclosure of such information is subject to their privacy policies and practices. Surveys, sweepstakes and other promotions conducted on behalf of TruPacta and a third party will include branding from both TruPacta and the third party.
- D. **Promotions on behalf of Third Parties.** Periodically, third parties may conduct surveys, contests, sweepstakes and other promotions for their own purpose on the TruPacta Sites. Information you provide in response to those activities is governed by their privacy policies. Surveys, sweepstakes and other promotions conducted solely for the purpose of a third party will include only the third party's branding.
- E. **Corporate and Asset Transactions.** If we sell all or substantially all of our business or sell or transfer all or a material part of our assets, or are otherwise involved in a merger or transfer of all or a substantial part of our business, we may transfer all information we have collected and stored, including Personal Information, to the party or parties involved in the transaction as part of that transaction.
- F. **Other.** We may access or disclose information, including Personal Information, to:
 - 1. protect or defend our interests and the legal rights or property of TruPacta and our affiliates;
 - 2. protect the rights, interests, safety and security of users of the TruPacta Sites or members of the public;
 - 3. protect against fraud or for risk management purposes; or
 - 4. comply with prudent legal practice as we may determine, and applicable law or legal process.

12. Your Choices. You are entitled to make certain choices about how we communicate with you.

- A. You may choose not to provide Personal Information, even though that might impact your ability to register or receive a particular product or service.
- B. If you do not want to receive interest-based advertisements, you can opt out as detailed in the "Advertising Networks" section above.
- C. If you do not want to receive marketing email from us, you can follow the unsubscribe link provided in those emails.
- D. You have a number of choices regarding certain Data Technologies. Most web browsers automatically accept cookies, but you can usually modify your browser's setting to decline cookies if you prefer. You may also render some web beacons unusable by rejecting their associated cookies and disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or the website of the technology provider. If you choose to decline Cookies or similar technologies, however, please note that certain features may not function properly or at all as a result. You may be able to adjust the use of advertising identifiers on mobile devices through the settings on your device. Finally, if you do not want to use a uniquely generated telephone number, you may choose to not call us.
- E. If you do not want us to use Location Information, you can decline our initial invitation to provide that information, or opt out by changing the location services settings on your mobile device. However, please note that certain features may not function properly or at all as a result if you opt out.

13. California Addendum - California Consumer Privacy Rights. If you are a California consumer, the following provisions apply to our processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household ("California Personal Information"). For California consumers, the provisions

of this California Addendum prevail over any conflicting provisions in other sections of this Privacy Policy. We do not sell, and in the past 12 months we have not sold, California Personal Information. Additionally, we do not sell or share, and in the past 12 months we have not sold or shared, California Personal Information of individuals we know to be under 16 years of age. We use for internal business purposes customer records information, commercial information, Internet or other network activity information, and geolocation data.

We have collected the following categories of California Personal Information within the last 12 months from the sources listed below:

- A. Identifiers such as name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- B. Customer records information (such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit/debit card number, other financial information, medical or health insurance information).
- C. Commercial information (such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories, or tendencies).
- D. Geolocation Data.
- E. Internet or other similar network activity, including, but not limited to, browsing history, search history, browser settings like language preference, and information regarding a consumer's interaction with a website, application, or advertisement. This category of information is collected from you and your devices.

We retain each category of California Personal Information as described in this Privacy Policy. For each of the above categories, we use the California Personal Information for a variety of business purposes such as:

- F. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- G. Helping to ensure security and integrity to the extent the use of a consumer's personal information is reasonably necessary and proportionate for these purposes;
- H. Debugging to identify and repair errors in our systems;
- I. Short-term, transient use including contextual non-personalized advertising shown as part of a consumer's current interaction with us;
- J. Providing services on our behalf or on behalf of another, including maintaining or servicing accounts, providing customer service, fulfilling transactions, verifying identity information, processing payments, and other services;
- K. Conducting internal research to develop and demonstrate technology;
- L. Conducting activity to verify, enhance, and maintain the quality or safety of services or devices which we may own, control, or provide;
- M. Other business purposes described in the "How We May Use The Information We Collect" Section.

We may also use the information we collect for our own or our service providers' other operational purposes, purposes for which we provide you additional notice, or for purposes compatible with the context in which the California Personal Information was collected.

Within the last 12 months, we have disclosed California Personal Information for our business purposes. To learn more about the categories of third parties with whom we share such information, please see the “Information We Share” Section.

Your California Privacy Rights

If you are a California consumer, you have certain rights related to your California Personal Information, including:

- The Right to know what California Personal Information we have collected about you, including the categories of personal information, the categories of California Personal Information, the categories of sources from which the California Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing California Personal Information, the categories of third parties to whom we disclose California Personal Information, and the specific pieces of California Personal Information we have collected about you.
- The right to correct inaccurate California Personal Information that we have collected about you.
- The right to delete California Personal Information that we have collected from you, subject to certain exceptions.
- The right to opt out of the sale or the sharing of California Personal Information.
- The right to limit the use or disclosure of your sensitive personal information.
- We do not use or disclose sensitive personal information for purposes that, under applicable law, require us to support the right to limit the use or disclosure of sensitive personal information.
- The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by applicable law, including the right not to be retaliated against for the exercise of your rights.

You may request to exercise these rights by:

Emailing us at contact@trupacta.com

As required under applicable law, we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide your first name, last name, email address, the amount of your last transaction and the date of your last transaction to verify your identity in response to exercising requests of the above type. We may limit our response to your exercise of the above rights as permitted under applicable law. When you submit a request to exercise your rights above, we will use the information you provide to process your request and to maintain a record of your request and our response, as permitted under applicable law.

Under California law, you may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. We will require the agent to provide proof of that written permission. To the extent permitted by law, we may require you to verify your own identity in response to a request, even if you choose to use an agent.

California Do Not Track

California Business & Professions Code Section 22575(b) (as amended effective January 1, 2014) provides that California residents are entitled to know how we respond to “Do Not Track” browser settings. We do not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed. However, we respond to the GPC signals as the opt out preference signal.

This California-specific addendum was last reviewed and updated as of January 1, 2023.

14. Your State Privacy Rights. Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- A. Confirm whether we process their personal information.
- B. Access and delete certain personal information.
- C. Data portability.
- D. Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- A. Correct inaccuracies in their personal information, taking into account the nature of the personal data and the purposes of the processing of the consumer's personal data.
- B. Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights or to appeal a decision regarding a consumer rights request, please email contact@trupacta.com.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: contact@trupacta.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.

15. Disputes. If you choose to visit the TruPacta Sites, your visit and any dispute regarding privacy is subject to this Privacy Policy and our Terms of Service Agreement, including limitations on damages, resolution of disputes, and application of the law of the State of Delaware.

16. Updates to this Privacy Policy. We may update this Privacy Policy to provide clarification or notice of changes to our practices. If we make changes, we will revise the date at the top of this Privacy Policy. We will provide you with additional notice of material changes by posting notice of the changes for thirty (30) days before we implement those changes.

17. How to Contact Us. If you have any questions or comments about this Privacy Policy, or if you would like us to update information we have about you or your preferences, please contact us by email at contact@trupacta.com.