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Effective September 2019

This Privacy Policy (the "Policy") covers the privacy practices of Ascensus Group, LLC and its affiliated companies (individually and/or collectively, "Ascensus" or "we" or "our" or "us"), and describes Ascensus' practices relating to the collection and use of personal information collected through (a) websites Ascensus maintains (the "Sites"), or (b) websites maintained by our affiliated services companies, listed at <https://www2.ascensus.com/our-family-of-companies>, which may be updated from time to time (each an "Ascensus Affiliated Company"). For more information, including information specific to privacy laws in your state, please visit our homepage at <https://www2.ascensus.com/> and look for the Privacy Management hyperlink on the bottom of the page.

Although this Policy covers Ascensus' general practices, each Ascensus Affiliated Company's privacy practices may vary. Refer to the specific Ascensus Affiliated Company website or privacy policy literature for information relating to the privacy policies specific to your applicable services, plan or account.

What is Personal Information?

As used in this Privacy Policy, "personal information" means data identifiable to any person, including, among other things, your name and address, Social Security or taxpayer identification number, date of birth, assets, income, account balances, investment activity, and accounts at other institutions.

Information Collected

Information you provide to us.

We obtain information you, or someone on your behalf, provides to us in writing or by telephone, such as when you, or your employer acting on your behalf, signs up for services with Ascensus; contacts Ascensus' customer service staff members; and/or inputs information through our Site(s). This information includes items such as your name, address, birthdate, telephone number, location, social security number, credit card numbers and/or other financial account information such as account numbers.

Information we receive from third parties.

We obtain information about you from third parties, including our business clients, partners, and Ascensus Affiliated Companies, or public sources. This information includes, among other things, information about your purchases with Ascensus Affiliated Companies, information about your transactions and account activity with us.

Information we collect automatically.

When you access a page of a Site via a browser, application, or handheld device, our web servers automatically record certain information, known as "log information." This log information includes information such as the web page you are coming from or going to, terms you search, pages you view on a Site or mobile application, your interaction with a Site, application or online service provider, your IP address, mobile device ID, browser type, browser language, device type, and data contained in one or more Cookies (discussed in more detail, below) that uniquely identifies your browser, your computer, your device and/or your Ascensus account. This log information is collected to allow us to deliver services or information you have requested, better understand user behavior on our Sites, assist in troubleshooting problems, and improve the quality of our service. Please be aware that in some cases your IP address will be used to determine your general location.

Additionally, if you allow your browser and/or mobile device provider to send information to us, we shall receive your location, mobile device ID, publicly available demographic data, and information used (i) to comply with regulatory or contractual requirements, (ii) to ensure the accuracy of data, (iii) to better understand your likely interests and/or (iv) to prevent fraud.

Use of Cookies and Other Tracking Technology to Collect Information

A "Cookie" is a small string of text that is sent to your computer or mobile device when you use our Site(s).

Ascensus uses Google Analytics to automatically collect certain types of usage information when you visit our Sites, read our emails, or otherwise engage with us. We send one or more Cookies to your computer or other device and also use other similar technologies such as tracking pixels, tags, flash objects, web beacons, or similar tools when you visit our Site(s) or open an Ascensus email. We also work with third party providers to employ technologies, including the application of statistical modeling tools which attempt to recognize you across multiple devices. Among other things, this usage information allows us to understand how you use the Site(s) and/or mobile applications, what products and services may be of interest to you and increase the ease of using our Site(s). For more information on Google Analytics' processing of your information, please see "How Google uses data when you use our partners' Services or apps" located at www.google.com/policies/privacy/partners/.

If you would prefer not to accept Cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a Cookie, which lets you choose whether or not to accept it; (ii) disable existing Cookies; or (iii) set your browser to automatically reject Cookies. Please note that if you are an existing customer of Ascensus or an Ascensus Affiliated Company you will not be able to turn off Cookies and use the Site as those Sites must be capable of identifying and authenticating you to maintain the security of the information contained within them. Additionally, depending on your device and/or operating system, you may not be able to delete or block all Cookies. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it. Deleting Cookies does not delete local storage objects, such as Flash objects and HTML5.

We also use Cookies and tracking technologies for advertising purposes.

Use of Personal Information

Ascensus uses the personal information to develop, offer, deliver and improve our products and services, to fulfill legal, regulatory and/or contractual requirements, and as otherwise permitted by applicable law.

For example, we use the information to:

- Operate the Sites and services;
- Deliver products and services to people who use our Sites and services;
- Understand how visitors use our Sites, and determine whether the content on the Sites is effective;

- Improve our Sites and services offerings;
- Personalize your experience when you use our Sites and services and customize the communications and advertisements you receive from us and our affiliates and others;
- Deliver advertisements and other information about products, services and applications offered by Ascensus via email, and when you visit or use third-party sites;
- Let us know which emails have been opened by recipients to understand the effectiveness of our marketing and other communications and to make those communications more useful and interesting to you;
- Communicate with you, including via email, text message, push notifications, and/or telephone calls;
- Remember your information so that you will not have to re-enter it during your next visit;
- Identify you across different devices that you use;
- Diagnose or fix technology problems.

If you do not wish to receive marketing messages from Ascensus, you may indicate your preferences by clicking the "Unsubscribe" link in the email.

Our Information Sharing Practices

Information about our customers, website visitors, and mobile application users, if applicable, is an important part of our business. **We never sell your personal information, and we do not share your personal information except as permitted or required by law or contract, including as provided below:**

- **Ascensus Affiliated Companies.** We provide personal information about you to Ascensus Affiliated Companies pursuant to a contractual obligation and to the extent permitted by applicable law. These Affiliated Companies may use personal information to market to you their products and services.
- **Sharing Information with Nonaffiliated Third parties.** We do not share your personal information with nonaffiliated third parties except as permitted or required by law, including as provided below:
 - **Agents and Service Providers.** In order to provide our products and services, we share personal information about you with agents and service providers to perform functions on our behalf, such as to send email and postal mail, analyze data, provide marketing services, and service accounts. When we use these third parties, we disclose some of the personal information that we collect, although we give them only the personal information reasonably necessary to perform the service.
 - **Maintain and Service your Ascensus Account.** We disclose personal information about you to third parties as reasonably necessary to maintain and service your Ascensus account, including to facilitate transactions.
 - **Protection of Ascensus and Others.** We disclose personal information about you to third parties when we believe such disclosure is appropriate to comply with a legal requirement, such as a law, regulation, court order, subpoena or search warrant, or in the course of a legal proceeding.
 - **Business Transfers.** If there is a change of control in Ascensus' business (whether by merger, sale, or otherwise), your information could be sold as part of that transaction and your personal information potentially could be used by the purchaser.
 - **With your consent.** We also share your personal information with a third-party if you consent to the sharing.

Ascensus does not share personal information with nonaffiliated institutions to enable them to market their products and services directly to you.

Ascensus may share with third parties, including nonaffiliated, non-financial institutions, information that does not personally identify you for any reason Ascensus deems necessary or desirable.

How We Store and Protect Your Information

Data storage and transfer. Your information collected through our Sites is stored and processed in the United States or any another country in which we and our services providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that differ from U.S. laws, please note that we transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which we or our service providers maintain facilities and the use and disclosure of information about you as described in this Policy.

Keeping your information safe. We care about the security of your information and have implemented and continue to maintain physical, administrative, and technological safeguards intended to preserve the integrity and security of all information collected through our Sites. However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%.

How can I access and update my Ascensus data?

You may access and update information stored in your account profile by visiting the applicable Site. Please keep your contact, account, and preference information up-to-date.

We will retain your information for as long as we reasonably deem it necessary to provide you services, comply with our legal or other obligations, resolve potential disputes, audit our records and/or enforce our rights and obligations. If you no longer want us to use your information to provide you services, you will need to take the appropriate steps to terminate your relationship with Ascensus and/or the applicable Ascensus Affiliated Company(ies). However, legal or other obligations may require us to retain your information even if you request that we delete it.

Collection of Information from Children

Ascensus does not knowingly collect or solicit any information from anyone under the age of 13 on the Sites. In the event that we learn that we have inadvertently collected personal information from a child under age 13, we will promptly delete that information. If you believe that we might have any information from a child under 13, please contact us using the contact information listed below.

Changes to this Online Privacy Policy

Please note this privacy policy may change from time to time. If we materially change this privacy policy or our information-handling practices as described in this Policy, we will notify you by email and/or through a notice on our Site(s) prior to their implementation.

Contacting Ascensus about this Online Privacy Policy

If you have any questions about this policy, our information-handling practices, or other aspects of privacy at Ascensus, contact us by privacy@ascensus.com or 200 Dryden Road, Suite 4000, Dresher, PA 19025 (Attn: Compliance Department).