

## CuraFi Privacy Policy

**Last Updated:** September 29, 2023

This Privacy Policy is designed to help you understand how Cura Financial, Inc. (“**CuraFi**,” “**we**,” “**us**,” or “**our**”) collects, uses, and shares your personal information, and to help you understand and exercise your privacy rights.

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY
2. PERSONAL INFORMATION WE COLLECT
3. HOW WE USE YOUR PERSONAL INFORMATION
4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION
5. YOUR PRIVACY CHOICES AND RIGHTS
6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION
7. RETENTION OF PERSONAL INFORMATION
8. CALIFORNIA SHINE THE LIGHT LAW
9. SUPPLEMENTAL POLICY FOR NEVADA RESIDENTS
10. CHILDREN’S INFORMATION
11. OTHER PROVISIONS
12. CONTACT US

### 1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us, including on our website located at <https://curafi.com/> (the “**Site**”) operated by CuraFi.

**An Important Note:** This Privacy Policy does not apply to any of the personal information that our customers may collect and process using CuraFi’s products (“**Customer Data**”). Our customers’ respective privacy policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Policy. Any questions or requests relating to Customer Data should be directed to our customer.

**Changes to our Privacy Policy.** We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Site after the new Privacy Policy takes effect.

### 2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Site, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Site, and information from other sources such as third-party services and organizations, as described below.

#### **A. Personal Information You Provide to Us Directly**

We may collect personal information that you provide to us.

- **Your Communications with Us.** We may collect personal information, such as your first and last name, email address, role, when you request information about CuraFi or our Site, register for our newsletter, request support, or otherwise communicate with us.

- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services (referred to herein as “User Content”) will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Site. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

## **B. Personal Information Collected Automatically**

We may collect personal information automatically when you use our Site.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Site, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Site, such as pages that you visit before, during and after using our Site, items that you search for via the Site, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Site.
- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Site, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect information through your use of our Site.
  - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
  - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Site that collects information about engagement on our Site. The use of a pixel tag allows us to record, for example, that a user has visited, a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies may fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Site, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Site, including as part of our analytic practices to help us understand how individuals use our Site (*see Analytics below*);

- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Site. This may include identifying you when you sign into our Site or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Site or on third-party digital properties.

See “[Your Privacy Choices and Rights](#)” below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Site. These Technologies allow us to better understand how our digital Site are used and to continually improve and personalize our Site.
  - **Google Analytics.** For more information about how Google uses your data (including for its own purposes, e.g. for profiling or linking it to other data), please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your information, please click [here](#).
- **Social Media Platforms.** Our Services may contain social media buttons, such as LinkedIn, which might include widgets such as the “share this” button or other interactive mini programs. These features may collect your IP address and which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

### C. Personal Information Collected from Other Sources

**Third-Party Websites and Sources.** We may obtain personal information about you from other sources, including through third-party websites and organizations. For example, if you access our Site through a third-party application, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

## 3. [HOW WE USE YOUR PERSONAL INFORMATION](#)

We use your personal information for a variety of business purposes, including to provide our Site, for administrative purposes, and to market our products and Site, as described below.

### A. Provide Our Site

We use your personal information to fulfill our contract with you and provide you with our Site, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Site;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Site, and policy changes;
- Processing applications if you apply for a job we post on our Site; and
- Allowing you to register for events.

### B. Administrative Purposes

We use your personal information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research, and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Site;
- Improving, upgrading, or enhancing our Site;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Site;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

### **C. Marketing and Advertising our Products and Services**

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we may market to you include email campaigns, text messages, custom audiences advertising, “personalized advertising” and “targeted advertising,” including through cross-device tracking.

If you have any questions about our marketing practices, you may contact us at any time as set forth in [“Contact Us”](#) below.

### **D. With Your Consent**

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

### **E. Other Purposes**

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about how you use the Site, information about the device from which you access our Site, or other analyses we create. De-identified and/or aggregated information is not personal information, and we may use, disclose, and retain such information as permitted by applicable laws including, but not limited to, for research, analysis, analytics, and any other legally permissible purposes.

## **4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

We disclose your personal information to third parties for a variety of business purposes, including to provide our Site, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

### **A. Disclosures to Provide our Site**

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Site. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our corporate affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Site to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising,” “personalized advertising,” or “targeted advertising.”
- **APIs/SDKs.** We may use third-party Application Program Interfaces (“APIs”) and Software Development Kits (“SDKs”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in [“Contact Us”](#) below.

#### **B. Disclosures to Protect Us or Others**

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

#### **C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers**

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

### **5. YOUR PRIVACY CHOICES AND RIGHTS**

**Your Privacy Choices.** The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Site you have requested. We may also send you certain non-promotional communications regarding us and our Site, and you will not be able to opt out of those communications (e.g., communications regarding our Site or updates to our Terms or this Privacy Policy).
- **Text Messages.** You may opt out of receiving text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us.
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

- **Cookies and Personalized Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Site may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

**Your Privacy Rights.** In accordance with applicable law, you may have the right to:

- **Access to and Portability of Your Personal Information**, including: (i) obtaining access to or a copy of your personal information; and (ii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine-readable format (also known as the “right of data portability”);
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information;
- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

## 6. [INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION](#)

All personal information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your personal information consistent with the requirements of applicable laws.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

For more information about the safeguards, we use for international transfers of your personal information, please contact us as set forth below.

## 7. [RETENTION OF PERSONAL INFORMATION](#)

We store the personal information we collect as described in this Privacy Policy for as long as you use our Site, or as necessary to fulfill the purpose(s) for which it was collected, provide our Site, resolve disputes,

establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To determine the appropriate retention period for personal information, we may consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means.

#### **8. [CALIFORNIA SHINE THE LIGHT LAW](#)**

The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

#### **9. [SUPPLEMENTAL POLICY FOR NEVADA RESIDENTS](#)**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in “[Contact Us](#)” below.

#### **10. [CHILDREN’S INFORMATION](#)**

The Site is not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our Site without your consent, you may contact us as described in “[Contact Us](#)” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account, if applicable.

#### **11. [OTHER PROVISIONS](#)**

**Third-Party Websites/Applications.** The Site may contain links to other websites/applications and other websites/applications may reference or link to our Site. These third-party websites are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

**Supervisory Authority.** If your personal information is subject to the applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe our processing of your personal information violates applicable law.

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner’s Office \(ICO\)](#)

## 12. [CONTACT US](#)

CuraFi is the controller of the personal information we process under this Privacy Policy.

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

Cura Financial, Inc.  
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Suite 120  
South San Francisco, California, 94080  
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