



# VAULTER PRIVACY POLICY

**Date: October 23, 2023**

This Privacy Policy describes how Vaulter, L.L.C. and our subsidiaries and affiliated companies (collectively, “**Vaulter**,” “**we**,” or “**us**”) may collect, use, and disclose information about you. This Privacy Policy applies to information we collect when you access or use our websites, mobile applications, and other online products and services (collectively, our “**Services**”), or when you otherwise interact with us, such as through our customer support channels, or on social media pages. We may provide different or additional notices of our privacy practices with respect to certain products or services.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy. We may also provide you with additional notice (such as by adding a statement to the Services or sending you a notification), such as in connection with making material changes to this Privacy Policy. We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

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## COLLECTION OF INFORMATION

### Information You Provide to Us

We collect information you provide directly to us. For example, we collect information directly from you when you create an account, fill out a form, submit or post content through our Services, make a purchase, communicate with us via third-party platforms, participate in a contest or promotion, request customer support, or otherwise communicate with us. The types of information about you that we collect

may include your name, email address, postal address, phone number, payment information a form of identification, and any other information you choose to provide. Additionally, if you make a purchase, we work with a third-party payment processor to collect and process your payment information.

## Information We Collect Automatically

We automatically collect certain information about your interactions with us or our Services, including:

- **Transactional Information:** When you make a transaction, we collect information about the transaction, such as product and/or service details, and the amount of the transaction.
- **Device and Usage Information:** We collect information about how you access our Services, including data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, unique device identifiers, browser type, and app version. We also collect information about your activity on our Services, such as access times, pages viewed, links clicked, and the page you visited before navigating to our Services.
- **Information Collected by Cookies and Similar Tracking Technologies:** We (and those who perform work for us) use tracking technologies, such as cookies and web beacons, to collect information about your interactions with the Services. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that we use on our Services and in our emails to help deliver cookies, count visits, and understand usage and campaign effectiveness.

## Information We Collect from Other Sources

We obtain information from other sources. For example, we may collect information from identity verification services, advertising networks, data analytics providers. Additionally, if you create or log into your Vaulter account through a third-party platform (such as Facebook or Google), we will have access to certain information from that platform, such as your name, birthday, and profile picture, in accordance with the authorization procedures determined by such platform.

## Information We Derive

We may derive information or draw inferences about you based on the information we collect. For example, we may make inferences about your approximate location based on your IP address.

## USE OF INFORMATION

We may use the information we collect to administer your account. We also may use the information we collect to:

- Provide, maintain, improve, and develop new products and services, including to debug and repair errors in our Services;

- Personalize your experience with us;
- Send you technical notices, security alerts, support messages and other transactional or relationship messages;
- Communicate with you about products, services, and events offered by Vaulter and others and provide news and information that we think will interest you (see the [Your Choices](#) section below for information about how to opt out of these communications at any time) in accordance with applicable law;
- Monitor and analyze trends, usage, and activities in connection with our products and services;
- Facilitate contests, sweepstakes, and promotions and process and deliver entries and rewards;
- Detect, investigate, and help prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and help protect the rights and property of Vaulter and others;
- Comply with our legal and financial obligations;
- Create de-identified, anonymized or aggregated information; and
- Carry out any other purpose described to you at the time the information was collected.

## DISCLOSING INFORMATION

We may disclose personal information in the following circumstances or as otherwise described in this policy:

- We may disclose personal information to vendors, service providers, contractors and consultants that access personal information to perform work for us, such as companies that assist us with web hosting, payment processing, fraud prevention, customer service.
- If you provide a product review or otherwise share content on our Services, we may disclose this information publicly and to other users of our Services.
- If you choose to use integrations we offer on our Services we may disclose certain information with the integration partners.
- We may disclose personal information if we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.
- We may disclose personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of Vaulter, our users, the public, or others.
- We may disclose personal information with our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- We may disclose personal information in connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.

- Personal information may be disclosed between and among Vaulter and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership.
- We may disclose personal information with your consent or at your direction.

We also may disclose aggregated or de-identified information that cannot reasonably be used to identify you.

## **YOUR PRIVACY RIGHTS AND CHOICES**

You have certain choices with respect to your personal information, as described below.

### **Data Subject Requests**

Depending on where you reside, you may have the right to: (1) know more about and access the personal information we collect, use, and disclose about you and to receive your data in a portable format, (2) delete your personal information, (3) correct inaccurate personal information, and (4) object to, or request that we restrict, certain processing. You may make these requests by calling (480) 609-1200 or emailing [info@vaulterup.com](mailto:info@vaulterup.com). We will verify your request by asking you to provide information sufficient to confirm your identity, such as your name, email address, and information about your interactions with us.

### **Location Information**

When you first launch any of our mobile apps that collect precise location information, you will be asked to consent to the app's collection of this information. If you initially consent to our collection of such location information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. You may also stop our collection of this location information by following the standard uninstall process to remove all of our mobile apps from your device.

### **Cookies**

Most web browsers are set to accept cookies by default. If you prefer, you can usually adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Services.

### **Communications Preferences**

You may opt out of receiving promotional communications from us or request changes to your communication preferences by following the instructions in those communications or by managing your communication preferences in your account. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

### **Mobile Push Notifications**

With your permission, we may send push notifications to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [info@vaulterup.com](mailto:info@vaulterup.com)