

InvestinUS Privacy Policy

Last Updated: July 30, 2024

This Privacy Policy is designed to help you understand how INVESTINUS LLC (“InvestinUS,” “we,” “us,” and “our”) collect, use, and share your personal information and to help you understand and exercise your privacy rights. InvestinUS is the data controller for the personal information we process. For information on how to contact us, please refer to Section 13 below.

1. SCOPE
2. PERSONAL INFORMATION WE COLLECT
3. HOW WE USE YOUR INFORMATION
4. WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION
5. HOW WE SHARE YOUR INFORMATION
6. YOUR PRIVACY CHOICES AND RIGHTS
7. SECURITY OF YOUR INFORMATION
8. RETENTION OF PERSONAL INFORMATION
9. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS
10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS
11. CHILDREN’S INFORMATION
12. OTHER PROVISIONS
13. CONTACT US

1. SCOPE

This Privacy Policy applies to personal information processed by us, including on our website and other online or offline offerings (collectively, the “Services”). We may modify this Privacy Policy from time to time. The date of change will be shown next to “Effective Date” at the top of this page. We encourage you to read this Privacy Policy periodically to ensure you have up-to-date knowledge of our privacy practices. Whenever material changes to this Privacy Policy are made, if we have your email address, we will provide you with notice before the modifications are effective by sending a message to the email on file. Otherwise, this Privacy Policy will be revised by updating a new version dated as of the date it takes effect. By continuing to access or use the Services after changes to this Privacy Policy become effective, you agree to be bound by the revised Privacy Policy. If any changes are unacceptable to you, you may stop using the Services.

If you are a European Economic Area (“EEA”) resident, this whole Privacy Policy applies to you. However, EEA residents should see Section 8 below, which will inform you in detail about the personal information we process, how we process it, for which purposes we process it, with whom we share it, on what legal basis we process and transfer your personal information and which rights you have regarding the processing of your personal information.

2. PERSONAL INFORMATION WE COLLECT

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

A. Information You Provide to Us Directly

We may collect the following personal information that you provide to us:

- **User Information.** If you sign up to join our Services or for a mailing list, we will collect your email address and first name. We will also collect additional information you provide, including via surveys. For more information about how to unsubscribe from our email list, please see Section 3(C) below.
- **Your Communications with Us.** We may collect personal information, such as your name and email address, when you complete the “Contact Us” form on our main website or register for our mailing list and other information you may provide when you apply for a job or otherwise communicate with us.
- **Interactive Features.** We and others who use our Services may have access to personal information that you submit or make available through our interactive features (e.g., forums, blogs, and social media pages). Any information you provide on these features will be considered “public”, unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. Please exercise caution before revealing personal information to strangers via our Services. For more information about third party websites, please see Section 12 below.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **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 Services. If you reply to one of these postings by submitting your application, CV and/or cover letter to us, we will collect and use your information to assess your qualifications.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, cookie identifiers, information on bugs and crashes browser or device information, general location information (including approximate location derived from IP address), and hardware information such as your GPU (type and clock speed), CPU (type and clock speed), system memory, OS locale, and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, 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 Services.
- **Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through your use of our Services.

C. Cookies

- *What are Cookies:* Cookies are small text files that are used to store small pieces of information. They are stored on your device when the website is loaded on your browser and uniquely identify your browser. These cookies help us provide a better user experience, understand how the website performs and to analyze what works and where it needs improvement. In addition to the cookies we use on this website, we also use tracking technologies in some emails and

push notifications which enable us to understand whether you have opened the email and how you have interacted with it. If you have enabled images, cookies will be set on your device and will also be set if you click on any link within the email.

- *How we use Cookies:* As most of the online services, our website uses cookies for several purposes. We use first-party cookies for understanding how the website performs, how you interact with our website and all in all providing you with a better and improved user experience and help speed up your future interactions with our website.
- *Cookies We Use:*
 - *Essential:* Some cookies are essential for you to be able to experience the full functionality and accessibility of our site.
 - *Functional:* These cookies allow our website to remember choices you make when you use our website, such as remembering your language preferences, remembering your login details and remembering the changes you make on other parts of our website which you can customize. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our website or use our Services.
 - *Statistics and analytics:* These cookies store information like the number of visitors to the website, the number of unique visitors, which pages of the website have been visited, the source of the visit, etc. These data help us understand and analyze how well the website performs and where it needs improvement. For instance, Google Analytics is a web analytics tool that helps us understand how users engage with the website. Like many services, Google Analytics uses first-party cookies to track user interactions, as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our website. The reports disclose website trends without identifying individual visitors.
- *Cookie Preferences:* Should you decide to change your preferences, different browsers provide different methods to block and delete cookies used by websites. You can change the settings of your browser to block/delete the cookies.

D. Information Collected from Other Sources

We may obtain information about you from other sources, including from other users and through third-party services and organizations.

3. HOW WE USE YOUR INFORMATION

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

A. Provide Our Services

We use your information to provide you with our Services, such as:

- Managing your information and accounts, as applicable;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support; and
- Communicating with you about your account, activities on our Services, and policy changes.

B. Administrative Purposes

We use your information for various administrative purposes listed below where we have a legal basis to do so, such as:

- Product research and development (including marketing research);

- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading or enhancing our Services;
- Developing new products and Services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions and other compliance activities;
- Enforcing our agreements and policies;
- To create aggregated analytics information, such as information about the device from which you access our Services; and
- Processing applications if you apply for a job we post on our Services.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements.

We market to you in the following ways: via email campaigns, targeted on-line advertisements on social media and at trade shows and other events.

If you have any questions about our marketing practices or if you would like to withdraw consent of the use of your personal information for marketing purposes, you may contact us at any time as set forth in Section 13 below.

D. Other Purposes

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

- **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.
- **To promote safety, integrity and security.** We use the information we collect to verify activity, combat harmful conduct, detect and prevent bad experiences, maintain the integrity of our Services, and promote safety and security.
- **Complying with our legal obligations.** We may process personal information as needed to comply with our legal obligations, including if we have a good faith belief that the law requires us to do so or when we have a good-faith belief it is necessary as described in Section 5B below.

4. WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION

- as necessary to fulfill our applicable terms of service, end user license agreement, and provide the Services;
- consistent with your consent, which you may revoke at any time;
- as necessary to comply with our legal obligations;
- occasionally to protect your vital interests or those of others;
- as necessary in the public interest; and
- as necessary for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

5. HOW WE SHARE YOUR INFORMATION

We share your information to third parties for the following business purposes: to provide our Services, 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. To Provide our Services

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

- **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, marketing and related services. By using our Services, you acknowledge that your personal information may be transferred to such third-party service providers.
- **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 to business partners with whom we jointly offer products or services.
- **APIs/SDKs.** We may use third-party Application Program Interfaces (“APIs”) and software development kits (“SDKs”) as part of the functionality of our Services.

B. To Protect Us or Others

We may access, preserve, and disclose information 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. 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 contract.

6. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information 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 Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications. We process requests to be removed from email marketing lists.
- **“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.

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

- Access personal information about you, including: (i) confirming whether we are processing your personal information; and (ii) obtaining access to or a copy of your personal information;
- Request correction of your personal information where it is inaccurate, incomplete or outdated;
- Request deletion or anonymization of your personal information;
- Request restriction of our processing of your personal information;

- Right to object to our processing of your personal information for direct marketing purposes or where we are processing data based on our legitimate interests;
- Withdraw your consent to our processing of your personal information – if you refrain from providing personal information or withdraw your consent to processing, some features of our Service may not be available;
- Request data portability and receive an electronic copy of personal information that you have provided to us; and
- Be informed about third parties with which your personal information has been shared.

If you would like to exercise any of these rights, please contact us as set forth in Section 13 below.

7. SECURITY OF YOUR INFORMATION

We take steps to ensure that your personal information is treated securely and in accordance with this Privacy Policy. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well. By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides California residents with the right to know what categories of personal information InvestinUS has collected about them and whether InvestinUS disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected by InvestinUS	Category of Third Parties Information is Disclosed to for a Business Purpose
<p>Identifiers. An alias, online identifier, Internet Protocol address, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Service providers • Dependent services used to operate the website
<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name or other similar identifiers as listed above.</p>	<ul style="list-style-type: none"> • Service providers • Dependent services used to operate the website
<p>Internet or other electronic network activity Information on a consumer’s interaction with an internet website or application.</p>	<ul style="list-style-type: none"> • Service providers

Professional or employment-related information (job applicants only)

Current or past job history or performance evaluations.

- Service providers

-
- The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth above in “Personal Information We Collect” and “How We Use Your Information” above.

“Sales” of Personal Information under the CCPA

For purposes of the CCPA, InvestinUS does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 13 years of age.

Additional Privacy Rights for California Residents

If you are a California resident, subject to certain exceptions and applicable law, you may have certain rights in relation to information we process about you.

- **Right to Know.** In relation to your right to access described above, you may request that we disclose to you the categories and specific pieces of personal information that we have collected about you in the preceding 12 months, the categories of sources from which your personal information is collected, the business or commercial purpose for collecting your personal information, the categories of personal information that we disclosed for a business purpose in the preceding 12 months, the categories of third parties with whom we have shared your personal information, and the business or commercial purpose for each disclosure.
- **Right to Delete.** In relation to your right to delete as described above, you may request that we delete any personal information that we have collected from you.
- **Non-Discrimination.** You have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.
- **Authorized Agent.** Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us as set forth in Section 13 below.
- **Verification.** To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include your name, or email address.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in Section 13 below. We will process such requests in accordance with applicable laws.

10. SUPPLEMENTAL NOTICE 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 Section 13 below.

11. CHILDREN'S INFORMATION

The Services are 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 wish to review information collected from your child, or have that information modified or deleted, you may contact us as described in Section 13 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 and/or revert them to the underage experience, as applicable.

12. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services 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. You may have the right to lodge a complaint with your local supervisory authority if you believe our processing of your personal information violates applicable law including in the EU and UK.

13. CONTACT US

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:

InvestinUS, LLC
301 Central Avenue
Hilton Head, SC, 29926 USA
connect@investinus.group