

Ocrolus Inc. and its affiliates (collectively, “Ocrolus,” “we,” and “us”) wants you to be familiar with how we collect, use and disclose information. This Privacy Policy (“Policy”) describes our practices in connection with information we collect through:

- Websites operated by us from which you are accessing this Policy, including www.ocrolus.com (the “Websites”);
- Software applications including dashboard.ocrolus.com, and any application programming interface (“API”) made available by us for use on or through computers (the “Apps”);
- Our social media pages and apps for [LinkedIn](#), [Twitter](#), [Facebook](#), [YouTube](#), and any other official Ocrolus social media pages (collectively, our “Social Media Pages”);
- HTML-formatted email messages that we send to you that link to this Policy or other communications with you; and
- Offline business interactions you have with us.

Collectively, we refer to the Websites, Apps, Social Media Pages, emails, and offline business interactions as the “Services.”

Any capitalized terms used and not defined in this Policy have the meaning given to them in the [Master Service Agreement](#). If you do not agree with this Policy, you should not use the Services. Where required under applicable law, we will separately seek appropriate consent to the collection, use, and disclosure of certain types of Personal Information.

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ABOUT OUR SERVICES

Our Services may require registering as a user on our system; other Services may involve certain fees or require separate agreements between you and Oculolus. Please reference our Master Services Agreement for more information on your rights as a user.

Oculolus' Apps enable clients to review financial account data (including: account numbers and account holder information, account transactions, account statements, account position and balance information) and information such as paystubs, W-2s, T4s and other tax-related forms, IDs, and invoices (together, "Records") from a variety of users, groups, advisors, clients, and other parties, submitted or retrieved from third party financial institutions, such as brokerages and banks, and parsed and summarized in a way that is searchable, verifiable and provides benefits to users. Oculolus will process any Personal Information provided in the Records in accordance with our agreement with our client.

PERSONAL INFORMATION WE COLLECT

"Personal Information" means information that alone or when in combination with other information may identify, relate to, describe, be reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, such as name, address, email address, financial account number, social security number, IP address, or phone number. Personal Information does not include information that has been anonymized, aggregated, or de-identified so that it does not identify a specific individual, which we may use for any legal purpose.

The Services collect Personal Information including:

- Name
- Email address
- Physical address
- Phone number
- Username and password
- IP address (we may also derive your approximate location from your IP address)

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services:**

- We collect Personal Information through the Services, for example when you sign up for a newsletter, register an account to access the Services, contact customer service, or provide information with us in connection with contests and promotions.
- If you apply to a job through our Services, you may submit Personal Information such as your full name, contact information, work experience, links to your work-related social media accounts, resume, and any other documents or information that you choose to upload and submit.

- **From Other Sources:**

- We receive your Personal Information from other sources, for example:
 - Publicly available databases.
 - If you apply for a job, we may also receive personal information from your references.

Choosing not to provide your Personal Information:

We need your Personal Information in order to provide the requested Services to you. If you do not provide this information when requested, we may not be able to provide you with the requested Services. We will tell you what information you must provide to receive a requested Service by designating it as required on the Services. To the extent Ocrolus processes data from

you in the role of a processor on your behalf, you will be responsible for obtaining the necessary permissions and authorizations for and maintaining the privacy and security of Personal Information you share with us.

HOW OCROLUS USES PERSONAL INFORMATION

Ocrolus and our service providers use Personal Information for the following purposes:

- **Providing the functionality of the Services and fulfilling your requests:**

- To provide the Services' functionality to you, such as arranging access to your registered account, displaying the information to you, delivering related content, and providing you with related benefits, special promotions, or customer service.
- To provide you with information that you request from us.
- To provide you with notices about your account/subscription, including expiration and renewal notices.
- We may send you information related to your account or our Services. We may send emails to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, system maintenance, and other Site-related purposes.
- To notify you about changes to our Service.

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- **Providing you with marketing materials and facilitating social sharing.**

- We may use Personal Information for marketing purposes, such as providing online advertising on the Site and sending you information we think may be useful or relevant to you. We use various marketing and targeting platforms to maintain Personal Information for such marketing purposes, including email marketing, or to target advertising.

We will engage in this activity with your consent or where we have a legitimate interest.

- **Analyzing Personal Information for business reporting and providing personalized services.**

- We may also track and analyze trends and usage information in connection with our Services, for example, to determine how many users have visited certain pages or opened messages or newsletters.

We will provide personalized services based on our legitimate interests, and with your consent to the extent required by applicable law.

- **Allowing you to participate in sweepstakes, contests or other promotions.**

- To process and deliver contest and promotion entries and rewards.
- Some of these promotions may have additional rules containing information about how we will use and disclose your Personal Information. Please read those additional rules before choosing to participate.

We use this information to manage our contractual relationship with you.

- **Aggregating and/or anonymizing Personal Information.**

- We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any reason, as it no longer identified you or any other individual.

- **Accomplishing our business purposes.**

- To help improve our Services in the future;
- For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;
- To protect our rights or property;
- To compare information for accuracy;
- To verify your identity as noted above;
- To investigate and prevent fraud or other illegal activities; and
- For compliance and safety assurance measures.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

DISCLOSURE OF PERSONAL INFORMATION

We disclose Personal Information:

- To our affiliates for the purposes described above.
 - You can consult the list and location of our affiliates below:
 - Ocrolus East Private Limited (our wholly-owned subsidiary) located in India.
- To third parties, to permit them to send you marketing communications on our behalf, consistent with your choices.
- To our third party service providers, to facilitate services they provided to us.
 - These can include promotional vendors we use to administer contests and promotions, IT service providers and related infrastructure provisions, such as our data hosting provider, other contractors and third parties we use for data analysis, payment processing, fraud prevention, customer service, email delivery, auditing, and other services.

Other Uses and Disclosures

We may also use and disclose your Personal Information as necessary or appropriate, in particular when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
 - *This may include laws outside your country of residence.*
- **To cooperate with public and government authorities.**
 - *To respond to a government or regulatory request or to provide information we believe is necessary or appropriate.*
 - *This may include laws outside your country of residence.*
- **To cooperate with law enforcement.**
 - *For example, when we respond to law enforcement requests and orders or provide information we believe is important.*

- **For other legal reasons.**

- *To enforce our Master Service Agreement; and*
- *To protect the rights, property, or safety of Ocrolus, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.*

- **In connection with a sale or business transaction.**

- *We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, divestiture, restructuring, reorganization, joint venture, assignment, dissolution or other sale or transfer of some or all of Ocrolus' business, assets, or stock, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding.*

INFORMATION SECURITY

We seek to use reasonable organizational, technical, and administrative measures to safeguard the security of Personal Information within our organization. The safety and security of Personal Information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, transmission of information via the Internet is not secure with absolute certainty. Although we do our best to protect Personal Information and provide transmission security in line with commercially-approved methods, we cannot guarantee the security of Personal Information. If you have reason to believe that your interaction with us is no longer secure, please immediately contact us in accordance with the Contact Information section below.

DATA RETENTION

We retain Personal Information for as long as needed or permitted for the purpose(s) for which it was obtained and consistent with applicable law. In addition, we retain Personal Information as required by our legal obligations, or as necessary to resolve disputes, defend our legal rights, and enforce our agreements.

The criteria used to determine our retention periods include:

- *The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);*
- *Whether there is a legal obligation to which we are subject (for example, certain laws*

require us to keep records of your transactions for a certain period of time before we can delete them); or

- *Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).*

JURISDICTION AND CROSS-BORDER TRANSFER

Ocrolus is headquartered in the United States and we store information in the U.S. and process information in the U.S. and other countries, which may have data protection rules that are different from those of your country of residence. We will take steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it. By using the Services, you understand that Personal Information you provide to us will be transferred to the United States and processed globally. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

ADDITIONAL INFORMATION REGARDING THE EEA: Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your Personal Information. You may obtain a copy of these measures by contacting us in accordance with the Contact Information section.

YOUR CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing communications:

You may opt out of receiving marketing-related emails from us. If you no longer wish to receive marketing related emails from us on a going-forward basis, you may opt out by clicking on a link at the bottom of each such email, or by contacting in accordance with the Contact Information section below.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing related emails from us, you may continue to receive service-related and other non-marketing emails, from which you cannot opt out.

How you can access, change, or delete your Personal Information:

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to or opt out of the processing of Personal Information, including if you gave us consent to post a testimonial on our Site, but wish to update or delete it, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may contact us in accordance with the Contact Information section below. We will respond to your request consistent with applicable law. If you are a California resident, please refer to the “Additional Information Regarding California” section at the end of this Policy for more information about the requests you may make under the CCPA.

In your request, please make clear what Personal Information you would like to have changed or whether you would like to have your Personal Information suppressed from our database. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

We will endeavor to complete your request(s) as soon as reasonably practicable. Please note that we may deny your deletion request if retaining the information is necessary for us for recordkeeping purposes and/or in accordance with applicable laws.

OTHER INFORMATION

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. The Services collect Other Information such as:

- Usage information about how you use the Site, including your access times, geographical location, and browser types.
- Device-specific information, including your hardware model, operating system and version, unique device identifiers, network information, and information about the device’s interaction with our Site.
- Information collected using cookies, pixel tags and other technologies.
- Information that has been aggregated in a manner such that it no longer reveals your specific identity.

Collection of Other Information

We and our service providers collect Other Information in a variety of ways, including:

- **Your browser or device.**

- Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.

- **Your use of the App.**

- When you download and use the App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

- **Cookies.**

- Cookies are alphanumeric identifiers or small data text files that are sent from a server during a browsing session. Cookies are small pieces of information that are stored directly on your computer when you visit certain websites. Find out more about the use of cookies on <http://www.cookiecentral.com/>. You can typically use your browser settings to block and delete cookies when you access the Site through a web browser. Depending on the browser that you are using, different instructions and adjustments are applicable (usually located within the “settings,” “help,” “tools,” or “edit” facility). Many browsers are set to accept cookies until you change your settings. If you block or do not accept cookies, the Services may not work properly and you may not be able to access all functionalities on the Services. We do not currently respond to browser do-not-track signals. To find out more about “Do Not Track,” please visit <https://allaboutdnt.com/>.
- We use cookies for the following reasons:
 - To improve your experience when navigating our website.
 - To remember some of your preferences or save some of your credentials for your next visit.

- To perform analytics and understand the pages and advertisements that you like, how you ended up on our website, and from what type of devices.
 - To do re-targeting and ensure that you are presented with relevant ads about our Services.
 - If you subscribe to our mailing list, we can use cookies to know if you opened your email and if so, from what device. If you click on an offer that we sent you by email, you will be redirected to our website and we will know that you visited our website through this communication. This will help us understand which promotions work better than others for you and allow us to send you more personalized offers.
- When you browse our website, different types of cookies are set on your hard disk or your device's storage space. Cookies can be installed by us or can be installed by third parties.
 - First-party cookies are those that are issued by our website domain, and they can only be set or retrieved by us. They are used for purposes specific to us, such as to personalize the website.
 - Third-party cookies are usually placed on the website via scripts or tags added to a web page. Sometimes, these scripts will also bring additional functionality to the site.
 - We use different categories of cookies, which we classified using the standard from the International Chamber of Commerce:
 - Strictly Necessary: These cookies are essential to enable you to navigate our website and use its features.
 - Performance Cookies: These cookies collect information about how visitors use a website, such as the pages that visitors go most often, and whether they get an error messages from our web pages. These cookies do not collect information that allow us to specifically identify you; it only provides aggregated information about our visitors. Most performance cookies are persistent.
 - Functionality Cookies: These cookies are used to allow certain functionality. For instance, these cookies allow our website to make remember the choices you made and provide enhanced or more personalized features.
 - Targeting Cookies: These cookies are used to deliver advertising more relevant to you and your interests, including by social media. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of a campaign. These cookies can remember that you visited a website and share this information with third parties for re-targeting purposes.
 - The above-described cookies can be session cookies or persistent cookies:
 - Session Cookies: These are cookies set temporarily on your device and deleted

once you close your browser. They are not stored nor transmitted to third parties. We use this type of cookies to ensure you have a user-friendly experience.

- Persistent Cookies: These cookies remain active on your device for some time, which may vary from a few days to two years after your visit on our website.
- Pixel tags and other similar technologies.
 - Pixel tags. Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.
 - Analytics. We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

THIRD-PARTY LINKS

This Policy does not address, and we are not responsible for, the security or privacy practices of non-Ocrolus sites, the products or services offered by such sites, or the content appearing at such sites. Likewise, the inclusion of a link on the Services does not imply endorsement of any of the products or services marketed at non-Ocrolus sites.

CHILDREN'S PRIVACY

The Services are not directed to individuals under the age of 18 and are not permitted to use the Services. In any event, we do not knowingly collect Personal Information from individuals under 16 years of age.

CHANGES TO THIS POLICY

The "*Last Updated*" legend at the top of this Policy indicates when this Policy was last revised. We will periodically review and update this policy if there are any substantive changes to our data collection and processing practices. Any changes will become effective when we posted the revised Policy on the Services.

CONTACT INFORMATION

Ocrolus Inc., located at 101 Greenwich St 23rd Floor, New York, NY 10006, is the company responsible for collection, use, and disclosure of your Personal Information under this Privacy

Policy. If you have any questions about this Privacy Policy, please contact us at privacy@ocrolus.com or:

Ocrolus Inc.
101 Greenwich St, Floor 23
New York, NY 10006
Tel: (646) 850-9090

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

ADDITIONAL INFORMATION FOR THE EUROPEAN ECONOMIC AREA

You may also:

- Lodge a complaint with an EU/EEA data protection authority for the country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. For contact details of your local Data Protection Authority in the EEA, please see: https://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

Pursuant to the California Consumer Privacy Act of 2018 (CCPA), we are providing the following additional details regarding the categories of Personal Information that we collect, use, and disclose about California residents. This section supplements the information provided in this Privacy Policy and applies only to California residents. If you have questions about your California privacy rights or the information provided in this section, please contact us at privacy@ocrolus.com.

Collection and Disclosure of Personal Information

While the information we may collect from you depends on your relationship and interactions with Ocrolus, the chart below is a summary of: (1) the categories of Personal Information, as listed in the CCPA, that we plan to collect and have collected and disclosed within the preceding 12 months; and (2) the categories of third parties to which we disclosed Personal Information for our operational business purposes within the preceding 12 months.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Purposes
Identifiers, such as name, alias, contact information, unique personal identifiers, IP address that can reasonably be linked or	affiliates; service providers; business

associated with a particular consumer or household, online identifiers, and government-issued identifiers (e.g., driver's license)	partners; marketing partners; contest sponsors; legal authorities
Personal information as defined in the California customer records law, such as name, contact information, signature; financial account number; insurance policy number; medical, insurance, financial, education and employment information; physical characteristics or description	affiliates; service providers; business partners; marketing partners; contest sponsors; legal authorities
Protected Class Information, such as characteristics of protected classifications under California or federal law, such as sex, age, gender, race, and marital status	affiliates; service providers
Commercial Information, such as transaction information and purchase history, including purchases considered	affiliates; service providers; business partners; marketing partners; contest sponsors
Internet or network activity information, such as browsing history, search history and interactions with our online properties or ads	affiliates; service providers; legal authorities
Geolocation Data, such as device location and approximate location derived from IP address	affiliates; service providers; contest sponsors; legal authorities
Audio/Video Data. Audio, electronic, visual, and similar information, such as call and video recordings	affiliates; service providers; legal authorities
Education Information subject to the federal Family Educational Rights and Privacy Act such as student transcripts, grade point average, grades, and disciplinary records	affiliates; service providers

Employment Information. Professional or employment-related information, such as work history and prior employer	affiliates; service providers
Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	affiliates; service providers

Under the CCPA, if a business sells Personal Information, it must allow California residents to opt out of the sale of their Personal Information. However, we do not “sell” and have not “sold” Personal Information in the past 12 months. For example, and without limiting the foregoing, we do not “sell” the Personal Information of minors under 16 years of age.

If you are a California consumer, you may make the following requests:

(1) “Request to Know”

You may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of Personal Information we have collected about you, and the categories of sources from which we collected such Personal Information;
- Specific pieces of Personal Information we collected about you;
- The business or commercial purpose for collecting Personal Information about you; and
- The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).

(2) “Request to Delete”

You may request that we delete Personal Information we collected from you.

To make a Request to Know or a Request to Delete, please contact us at privacy@ocrolus.com or in accordance with the Contact Information section above. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as your full name, geographical location, and email address, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. You may make a request on behalf of a child who is under 13

years old if you are the child's parent or legal guardian. If you make a Request to Delete, we may ask you to confirm your request before we delete your Personal Information.

If you want to make a Request to Know or a Request to Delete as an authorized agent on behalf of a California resident, you may use the submission methods noted above. As part of our verification process, we may require that you provide, as applicable, proof concerning your status as an authorized agent, which may include:

1. Proof of your registration with the California Secretary of State to conduct business in California;
2. Proof of a power of attorney from the resident pursuant to Probate Code sections 4121-4130.

If you are an authorized agent and have not provided us with a power of attorney from the resident pursuant to Probate Code sections 4121-4130, we may also require the resident to:

1. Verify the residents own identity directly with us; or
2. Directly confirm with us that the resident provided you permission to make the request.

Right to Non-Discrimination

You have the right to be free from discriminatory treatment for exercising your rights under the CCPA.

ADDITIONAL INFORMATION FOR NEVADA RESIDENTS

We do not sell Personal Information as defined under Nevada law. If you are a Nevada resident and have questions, please contact us according to the Contact Information section above.