Privacy Policy

Last Modified: March 24, 2020

We at Techfino are committed to protecting your privacy and utilizing technology that gives you the most powerful and safe online experience. This Privacy Policy applies to both our website (Website), including www.techfino.com, and our Subscription Service (the Subscription Service), including our associated CleanSweep NetSuite applications (SuiteApps) owned and controlled by Techfino. This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. By using the Website or the Subscription Service, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use the Website or the Subscription Service.

Important Information

Changes to this Privacy Policy

We may update this Privacy Policy from time to time by posting a new version online. Techfino LLC encourages you to periodically review this page occasionally to review any changes. If we make any material changes we will notify you by posting the revised Privacy Policy on our Websites and, if you subscribe to our Subscription Service, providing notice via email. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. Your continued use of the Websites, the Subscription Service, and/or continued provision of Personal Information to us will be subject to the terms of the then-current Privacy Policy.

EU – U.S. Privacy Shield

Techfino submitted its self-certification to the US Department of Commerce on March 24, 2020. Once we've been added to the list available on their website, we'll update this Privacy Policy with a link.

Techfino participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Techfino is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List at https://www.privacyshield.gov/list.

Techfino is responsible for the processing of personal data it receives under the Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. Techfino complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Techfino is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Techfino may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

You may direct any inquiries or complaints related to our Privacy Shield compliance to privacy@techfino.com. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you may contact our U.S.-based third party dispute resolution provider (free of charge) at

https://feedback-form.truste.com/watchdog/request.

Under certain conditions, more fully described on the <u>Privacy Shield website</u>, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Information We Collect

Collection of your Personal Information

Techfino collects personally identifiable information "Personal Information", such as your e-mail address, name, home or work address or telephone number. Techfino LLC also collects anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences, interests and favorites.

There is also information about your computer hardware and software that is automatically collected by Techfino LLC. This information can include: your IP address, browser type, domain names, access times and referring Web site addresses. This information is used by Techfino LLC for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Techfino LLC Web site.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through Techfino LLC public blog or discussion boards, this information may be collected and used by others. Note: Techfino LLC does not read any of your private online communications.

Techfino LLC encourages you to review the privacy statements of Web sites you choose to link to from Techfino LLC so that you can understand how those Web sites collect, use and share your information. Techfino LLC is not responsible for the privacy statements or other content on Web sites outside of the Techfino LLC and Techfino LLC family of Web sites.

How We Use Information We Collect

Use of your Personal Information

Techfino LLC collects and uses your Personal Information to operate and deliver services on the Techfino LLC Web site, and provide the Subscription Services. Techfino LLC also uses your personally identifiable information to inform you of other products or services available from Techfino LLC and its affiliates. Techfino LLC may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

Techfino LLC does not sell, rent or lease your Personal Information to third parties. Techfino LLC may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, Techfino LLC may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from

using your Personal Information except to provide these services to Techfino LLC, and they are required to maintain the confidentiality of your information.

Techfino LLC does not use or disclose sensitive Personal Information, such as race, religion, or political affiliations, without your explicit consent.

Techfino LLC keeps track of the Web sites and pages our customers visit within Techfino LLC, in order to determine what Techfino LLC services are the most popular. This data is used to deliver customized content and advertising within Techfino LLC to customers whose behavior indicates that they are interested in a particular subject area.

Techfino LLC Web sites will disclose your Personal Information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Techfino LLC or the site; (b) protect and defend the rights or property of Techfino LLC; and, (c) act under exigent circumstances to protect the personal safety of users of Techfino LLC, or the public.

Customer Testimonials and Comments

We post customer testimonials and comments on our Websites, which may contain Personal Information. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

Use of Cookies

The Techfino LLC Web site use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize Techfino LLC pages, or register with Techfino LLC site or services, a cookie helps Techfino LLC to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Techfino LLC Web site, the information you previously provided can be retrieved, so you can easily use the Techfino LLC features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Techfino LLC services or Web sites you visit.

Security of your Personal Information

Techfino LLC secures your Personal Information from unauthorized access, use or disclosure. Techfino LLC secures the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When Personal Information (such as a credit card number) is transmitted to other Web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Contact Information

Techfino LLC welcomes your comments regarding this Statement of Privacy. If you believe that Techfino LLC has not adhered to this Statement, please contact Techfino LLC at privacy@techfino.com. We will use commercially reasonable efforts to promptly determine and remedy the problem.

Opting Out and Unsubscribing

Reviewing, Correcting and Removing Your Personal Information

Upon request Techfino will provide you with information about whether we hold any of your Personal Information. If you provide us with your Personal Information, you have the following rights with respect to that information:

- To review the user information that you have supplied to us
- To request that we correct any errors, outdated information, or omissions in user information that you have supplied to us
- To request that your user information not be used to contact you
- To request that your user information be removed from any solicitation list that we use
- To request that your user information be deleted from our records
- To opt out of being solicited by Techfino or third parties

To exercise any of these rights, please contact us at privacy@techfino.com or by mail to Techfino, LLC, 1900 Market Street, 8th Floor, Philadelphia, PA 19103 USA, Attention: Techfino Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, or by sending us email us at privacy@techfino.com or by mail to Techfino, LLC, 1900 Market Street, 8th Floor, Philadelphia, PA 19103 USA, Attention: Techfino Privacy. Customers cannot opt out of receiving transactional emails related to their account with us or the Subscription Service.