

EQUITY FOR HIRE'S PRIVACY POLICY

Last Updated: July 28, 2020

1. OVERVIEW

This Privacy Policy (this “**Policy**”) addresses all activities regarding the information collected from Users (also “**you**” or “**your**”). The Equity for Hire Web Application (the “**App**”) is provided and run by AURATIC DEVELOPMENT, LLC (hereinafter as “**AURATIC**” or “**us**” or “**we**” or “**our**”) to users. When you use the App, we collect certain personally identifiable and non-personally identifiable information from you. This Policy further discloses how we collect, use, share, and secure this information as collected through the App. AURATIC is your Data Processor with our principal place of business located at Torrence, CA, United States of America.

By accessing the App and submitting personally identifiable information (“**Personal Information**”), you represent to AURATIC that you have read the entire disclosures in this Policy and that you agree to our collection, use, and the sharing (collectively “**Processing**”) of your information as described hereof. If you do not agree to this Policy, we are sorry, but you may not use the App.

We reserve the sole right, in our discretion, to modify, update, or change (“**Updates**”) a section or provision of this Policy, with or without notice to you. The Updates shall commence when we change the Effective Date above. Nevertheless, if we are to notify you of any Updates to this Policy, it shall be communicated through the email address you submitted to us. Therefore, we encourage you to submit a valid email address.

2. INFORMATION COLLECTION

When you access or use the App, we collect certain categories of information. This information includes;

a. Registration Information that you share: When you opt-in to use the services provided by the App, we collect some Personal Information from you. Depending on whether you are a partner or a product owner, we collect Personal Information such as your first and last name, phone number, email address, payment method (credit/debit card or PayPal), profession, timezone, skills, and your country of residence. This category of information is termed “Personal Information” and it can be used to directly identify you.

b. Automatically collected information: When you access the App, even without registering for a user account, our software is programmed to automatically collect certain information about you known as “Non-Personal Information.” This information includes but is not limited to Internet Protocol Address (IP address), device type, browser information,

general location, device operating system (OS) and your Internet Service Provider (ISP). This set of information cannot be used to directly identify who you are.

c. Social Media Information: We collect social media information such as Facebook, Google, and LinkedIn when you log in or sign up through any of the social media plugins available on the App. Social media plugins facilitate easy access to your user account when you connect through any one of them.

d. Third Party Information: We collect information from third party sources such as the government. This information is collected through Trulioo (a Third Party Service Provider) when they conduct background checks on you.

3. REASONS FOR INFORMATION COLLECTION

Any information collected, either directly or automatically, is necessary to fulfill our obligations to you. We do not collect information for other purposes other than for the provision of the App. We collect information from you for the following reasons:

- Registration information such as your name is used to identify you from other users;
- Contact information such as email address and phone number are used to respond to your request and contact you if needed. We also use your email address to send you marketing emails in the form of offers, promotions, and Updates to our Terms and Conditions, the App, or this Policy (“**Marketing Emails**” or “**Newsletters**”);
- Payment information such as credit/debit card or PayPal helps us process your payments. Please, note that Braintree, on our behalf, handles all activities regarding payments, including without limitation, the storage of your payment method on their database;
- Profession and skills information helps us to set up your product profile and match you with the right partner;
- Timezone and country information permits us to identify what country you are using the App from;
- Non-Personal information such as IP Address, ISP, device OS, and browser information helps us to enforce our Terms and Conditions and abide by applicable local, state, and federal laws;
- Social media information enhances easy access to the App; and
- We collect third party information in order to conduct background checks to ascertain that you are who you claim to be.

4. INFORMATION DISCLOSURES

Although we do not disclose or sell any information we collect from you to third parties, there are some certain circumstances where the disclosure of your information is required. These circumstances include;

a. Disclosures to Third Party Service Providers: We use Third Party Service Providers such as TinyPNG (image processor), Trulioo (global background checks), Twilio (messaging API),

MailChimp (email marketing service), and Braintree (payment processor) (collectively, “**Service Providers**”) to carry out some tasks on our behalf. For these Service Providers to successfully carry out the task we have given to them, they may need some of your Personal Information. For example, Braintree as a payment gateway needs your PayPal address before they can facilitate your payments through PayPal. Another example is MailChimp, which performs email marketing services for us. For MailChimp to send marketing emails on our behalf, we may need to share your email address with them. Nevertheless, Service Providers have a contract with us only to use users’ information that we share with them for carrying out the task we have contracted with them.

b. Disclosures under the Law or to Protect Rights: We may share Personal Information in situations where sharing it helps us with investigating or preventing any form of illegal or criminal activities such as frauds or other wrongful acts. We may share your Personal Information if sharing it will protect our rights, other users’ right, and any third party. We may share it to comply with laid down laws by enforcement agencies. We may share it when we need to enforce our Terms and Conditions and other agreements set by us. We may share it when it is requested by court order, subpoena, or other investigative summonses by the government. And finally, we may share it if sharing would prevent us against legal claims. Sharing your Personal Information in response to a court order will never happen unless it is signed in writing.

c. Disclosures under a Business Transfer: Business transfer can be in the form of a merger, acquisition, or consolidation of AURATIC. We reserve the full right to transfer or share your Personal Information to any entity we are involved with in a merger, acquisition, or consolidation.

5. COOKIES AND OTHER TRACKING SOFTWARE

Cookies are pieces of data that are sent by our programmed software to your device so that we can track some preferences about you when you use the App. We use the session type of cookies, which enables us to remember you when you navigate from one page to another on the App. It also enables us to remember your preferences, such as your login information. The session cookies, as the name sounds, is for a browsing session and closes when you leave the App.

Nevertheless, some browsers permit you to deactivate cookies through the browser settings. However, be aware that deactivating cookies may not allow us to provide some features to you. You are liable for any malfunction of the App due to your deactivation of cookies.

We also use other third party tracking software (Google Analytics) offered by Google Inc. Google Analytics gives us insights into how and where users navigate to the App from. It also helps us track ROI for our online marketing. You may read more on Google Analytics at <https://analytics.google.com/analytics/web/provision/?authuser=0#/provision>.

6. INFORMATION RETENTION

AURATIC will not keep your Personal Information on our server for longer than is necessary. We will keep your Personal Information with us for as long as you use the App. Once your participation in the App is terminated, we shall delete all the Personal Information and other information about you from our database. However, we may retain some Non-Personal Information such as IP Address, Device Type, and ISP. This is to enforce our Terms and Conditions and abide by set laws.

7. INFORMATION SECURITY

AURATIC cares about your privacy. We take sophisticated measures available in order to ensure your Personal Information is safe from unauthorized access or use, and we do not share any information with affiliates for marketing purposes. We employ both physical and technical methods of securing information. We employ the services of Firebase Firestore (powered by Google) for the storing of all Personal Information. In addition, we use technical measures such as the introduction of reCAPTCHA, security questions, and enforcing strict rules for password strength.

However, note that no matter how strong or sophisticated the measures and technologies we employ for the security of your Personal Information, it may not be enough since technology advances daily. AURATIC cannot guarantee that there will not be unauthorized access and use of your Personal Information by hackers. We, therefore, shall not be liable to you for any loss of privacy you may suffer as a result of theft.

We also encourage you to maintain a strict confidentiality of your login details and other sensitive information. If you believe or perceive any unauthorized access to your account, you should immediately reach out to us to take action.

8. INTERNATIONAL TRANSFER

AURATIC principally provides the App from the United States, where we process your Personal Information from. Meanwhile, we use certain Service Providers that are based in countries outside the United States. For example, Trulioo principally provides its services from Vancouver, BC, Canada. By operating from Canada, we will be required to transfer some of your Personal Information to them in order to conduct global background checks on you. However, we will only transfer your Personal Information to Service Providers outside the United States only if the country has an “adequate” law on data protection. By submitting Personal Information to us, you agree that your Personal Information may be transferred to Service Providers outside the United States.

9. YOUR RIGHTS

When you submit Personal Information to us, you have the following rights;

- The right to demand access to the information we hold about you to ascertain that we are lawfully Processing it;
- The right to update or modify the information we hold about you. Modification can be done either by going through your user profile or by reaching out to us via our email address at support@equityforhire.com ;
- The right to request for deletion or erasure the Personal Information we hold about you;
- The right to unsubscribe or opt-out of our Marketing Emails. You may unsubscribe from receiving Marketing Emails by clicking on the “unsubscribe” link or button in any email sent to you by AURATIC;
- The right to report AURATIC to any Data Law Enforcement Agency in your location if you believe we are wrongfully Processing your Personal Information.

10. CHILDREN POLICY

The App is intended for users who have attained the age of majority (18 in the United States, 16 in most European Countries). We do not knowingly collect Personal Information from users who are below the age of majority. If AURATIC becomes aware that you are below the age of majority, we shall take the necessary steps to have your account terminated and your information deleted from the App.

11. GOVERNING LAW; JURISDICTION

This Policy shall be governed and construed by the laws of the State of California and the Federal laws of the United States as a whole without regards to conflict of law and its principles. You now agree to the jurisdiction as stated in our Terms and Conditions.

12. CONTACT INFORMATION

For inquiries, questions, feedback, or concerns regarding this Policy, our Terms and Conditions, or the App; please, reach out to AURATIC through the contact information below:

Auratic Development, LLC
Torrance, CA
support@equityforhire.com