# One Technologies – Privacy Policy

Last updated: December 22, 2023

### OUR COMMITMENT TO YOUR PRIVACY

We use the terms "you" and "your" to include any person who accesses the Sites, as defined in the <u>Term and Conditions</u>, or purchases any product or service offered on the Sites (the "Products") for any amount of time. We use the terms "we", "us", and "our" to refer to One Technologies, LLC (the "Company"), which owns and/or operates this website, and our employees, members, officers, directors, partners, affiliated entities, representatives, attorneys, and agents.

We understand how important your privacy is to you, so we are committed to protecting your privacy. This page outlines the steps we take to protect your privacy, and what we do with the information that you provide to us through our website.

### What Information Do We Collect?

In order to provide you with our Products, we collect two types of information about and from our users: Personally Identifiable Information and Non-Personally Identifiable Information.

Personally Identifiable Information ("Personal Information"): This refers to information that lets us know the specifics of who you are. When you engage in certain activities on this Site, such as registering for a membership, ordering a product or service, or sending us feedback, we may ask you to provide certain information about yourself by filling out and submitting an online form. It is completely optional for you to engage in these activities. If you elect to engage in these activities, however, we may ask that you provide us Personal Information, such as your first and last name, mailing address (including ZIP code), Social Security number, email address, telephone number, mobile telephone number, assets, liabilities, and other personal identifying information. When ordering products or services on the Site, you may be asked to provide a credit card number. Depending upon the product or service, if you do not provide the requested information, you may not be able to obtain the product or service you want. You should be aware that if you enter any Personal Information during the information request process and then click the "submit" or any other button on that page, the information you have entered will be transmitted to us, even if you do not complete the order process on subsequent pages. Products or services you request may also contain additional Personal Information about you such as information from your credit report.

Non-Personally Identifiable Information: This refers to information that does not by itself identify a specific individual. We gather certain information about you based on your interactions with our Sites in several ways. This information is compiled and analyzed on both a personal and an aggregated

basis. This information may include the website's Uniform Resource Locator ("URL") that you just came from, which URL you go to next, what browser you are using, and your Internet Protocol ("IP") address. A URL is the global address of documents and other resources on the World Wide Web. An IP address is an identifier for a computer or device on a Transmission Control Protocol/Internet Protocol ("TCP/IP") network, such as the World Wide Web. Networks like the Web use the TCP/IP protocol to route information based on the IP address of the destination. In other words, an IP address is a number that is automatically assigned to your computer whenever you are browsing the web, allowing web servers to locate and identify your computer. Computers require IP addresses for users to communicate on the Internet.

The chart below outlines the categories of Personal Information (defined under applicable laws) that we have collected and/or disclosed for a business purpose about you in the preceding twelve months. Certain identifiers may include Personal Information considered Sensitive Personal Information under applicable law. The examples of Personal Information are included to help you understand what the categories mean. Although we may not collect every example or identifier listed, we may collect Personal Information from that category. In some instances, an identifier can be a part of two or more categories, such as a Social Security number.

While we do not sell Personal Information in exchange for monetary consideration, in limited circumstances we share Personal Information that may benefit third parties and be deemed a "sale," or "sharing" under applicable laws. This Personal Information may include name, address, email address, and IP address. We do not share Sensitive Personal Information except where it is necessary to provide the Products you have requested.

Categories of Personal Information	Collected in the last 12 months:	the last 12			Shared for a business purpose, based on category of third party
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Identifiers such as a real name, alias, mailing address, unique personal identifier, online identifier, Internet Protocol address, email address, phone number, account name, Social Security number, driver license/state identification number, passport number, signature, physical characteristics or description, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information or other similar identifiers	Yes	No	Yes	Third parties with whom we have marketing and similar arrangements.	
Characteristics of protected classifications (e.g., race or gender)	No	No	No	No	No
<b>Commercial information</b> , including records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies	No	No	No	No	No
Biometric information (e.g., call recordings)	Yes	No	No	No	Customer Service     Companies

					<ul> <li>Service Providers</li> <li>Other third parties         <ul> <li>(including government agencies) as required</li> <li>by law</li> </ul> </li> </ul>
Internet or other electronic network activity information including, but not limited to, browsing history, search history, interactions with a website, email, application, or advertisement	Yes	No	No	No	<ul> <li>Data suppliers</li> <li>Customer Service         Companies     </li> <li>Information Security         Providers     </li> <li>Payment Processing         Providers     </li> <li>Service Providers</li> <li>Third parties with         whom we have         marketing and similar         arrangements     </li> <li>Other third parties</li> <li>(including government</li> <li>agencies) as required</li> <li>by law</li> </ul>
Geolocation data	Yes	No	No	No	<ul><li>Data Suppliers</li><li>Information Security Providers</li><li>Service Providers</li></ul>

					<ul> <li>Third parties with whom we have marketing and similar arrangements</li> <li>Other third parties (including government agencies) as required by law</li> </ul>
Sensory data (such as audio, electronic, visual, thermal, olfactory, or similar information)	Yes	No	No	No	<ul> <li>Customer Service Companies</li> <li>Service Providers</li> <li>Other Third Parties (including government agencies) as required by law</li> </ul>
Professional or employment-related information	No	No	No	No	No
Non-public educational information as defined in Family Educational Rights and Privacy Act	No	No	No	No	No
Inferences drawn from the above information about your predicted characteristics and preferences	Yes	No	No	No	No

Jurisdictions differ in what is considered Personal Information, but generally, it does not include:

- Publicly available information, which includes information that is lawfully made available from federal, state, or local government records, or
  information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely
  distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not
  restricted the information to a specific audience;
- De-identified or aggregated consumer information.

Some of the data we collect may fall outside the scope of state privacy laws under limited circumstances, for example:

- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data
- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CalFIPA), and the Driver's Privacy Protection Act of 1994 (DPPA)

## **Protecting Your Information**

We use SSL-encryption technology when transferring and receiving consumer data on our websites to protect your Personal Information. We have partnered with Symantec, or other equally reliable encryption services, to protect against the loss, misuse, or alteration of information that we have collected from you. The servers on which we store Personally Identifiable Information are kept in a secure environment. However, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personally Identifiable Information, you acknowledge that there are security and privacy limitations of the Internet that are beyond our control; the security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed; and any such information and data may be viewed or tampered with in transit by a third party. We make no warranty, express, implied, or otherwise, that we will prevent unauthorized access to your private information.

#### **How Do We Use Information We Collect?**

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- Fulfill or meet the reason for which the information is provided. For example, verifying your identity, and to provide you with your credit reports and scores, monitoring, and credit offers
- Provide you with email alerts and other notices or communications concerning our Products

- Collection of consumer feedback and review of our products
- For testing, research, analysis, and product improvement/development, and for any purpose subject to the limitations set forth in applicable law and this notice
- As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others
- Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred
- Auditing, quality control, customer service, risk management, and legal compliance
- Detect and protect against security incidents
- Display, optimize, and provide personalized advertisements
- Advertising and marketing products

We will use Personally Identifiable Information to enhance the operation of our Site, fill orders, improve our marketing and promotional efforts, statistically analyze Site use, improve our product and service offerings, and customize our Site's content, layout, and services. We may use Personally Identifiable Information to deliver information to you and to contact you regarding administrative notices. We may also use Personally Identifiable Information to resolve disputes, troubleshoot problems, and enforce our agreements with you, including our Terms and Conditions and this Privacy Policy. Your information may also be used by us or by third parties to whom we transfer it to provide the products or services you have requested.

Some of our products may include alert emails that are sent on a daily, weekly, or monthly basis. These emails are part of your membership and cannot be disabled. To receive the most up-to-date notifications and alerts, your email address must be accurate in your profile.

Some of our products may include text alert messages that are sent on a daily, weekly, or monthly basis. These texts are optional, and you can change your settings at any time in your member profile. To receive the most up-to-date notifications and alerts, your mobile telephone number must be accurate in your profile.

When you use our Site, we will store cookies on your computer to facilitate and customize your use of our Site. A cookie is a small data text file which a website stores on your computer's hard drive (if your web browser permits) and can later be retrieved to identify you to us. The cookies make your use of the Site easier, make the Site run more smoothly, and help us maintain a secure Site. Additionally, certain cookies help us measure the performance of the Site and products and features presented to you. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. If your browser permits, you may optout of certain performance-based cookies, but some parts of our Site may not work properly if you do.

When you visit our Site and/or enroll in our Products, contact our Customer Care team through the phone or through our online chat feature, we may record these audio or digital sessions for quality assurance purposes, and to ensure Product operability and performance. You are consenting to this audio or digital session recording when proceeding with your Site visit or phone call, including when our service providers conduct this recording on our behalf.

We may use a third-party ad service company to display banner advertisements on our Site. As part of their service, they will place a separate cookie on your computer. We and our third-party ad server may collect and use information about you, such as your IP address, browser type, the server your computer is logged onto, the area code and ZIP code associated with your server, and whether you responded to a particular ad.

We use the Google Analytics and Remarketing tool to serve up personalized advertising and track conversion rates. This is a form of interest-based advertising. Third-party vendors, including Google, use cookies and/or device identifiers (i.e., pixels) to serve our ads based on a consumer's past visit to our website. We do not use Sensitive Personal Information and the data is not able to identify a specific user. We do not pass Personal Information to Google, except email address for matching/retargeting our product offerings to you. In addition to the choices available to you in Cookie Settings, you may opt out of Google's use of cookies by visiting Google's Ad Settings & Personalization and making your choices. You may also visit the Network Advertising Initiative website for additional choices.

# **Managing Cookies and Trackers**

Most browsers automatically accept cookies, but settings for each browser can be found in the links below:

<u>Chrome</u>
<u>Microsoft Edge</u>
<u>Safari Desktop</u> and <u>Safari Mobile</u>
Firefox

# **Mobile Device Privacy Settings**

Mobile device operating systems can use device-level information to serve you ads based on Personal Information. To learn about your privacy choices for mobile devices, visit NAI Mobile Opt-Out page.

#### Do We Share Your Information?

We may transfer your Personally Identifiable Information to others in order to fulfil your request for Products. We provide the products and services offered on our website through contractual arrangements with affiliates, service providers, and other third parties. We and such third parties use your Personally Identifiable Information to operate our Sites and to deliver their products and services. For example, we must release your credit card information to the card-issuing bank to confirm payment for products and services purchased on this Site, release your Personal Information to the third party that will provide our products or services that you ordered, and provide order information to third parties that help us provide customer service. You may not opt out of this sharing as it is necessary to provide you the Products requested. In cases where your Personal Information is shared for a third party's benefit, the use of your Personal Information is not subject to this policy and is governed by the applicable third-party policy. Please find more information below.

We may also provide Non-Personally Identifiable Information about our customers' sales, traffic patterns, and related Site information to third-party advertisers, but these statistics do not include any Personal Information.

As noted above, we may share limited amounts of Personal Information such as your email or physical address with third parties in order to offer products you may be interested in or have requested from third parties. If you reside in a jurisdiction that provides you a right to opt out of this type of data sharing, you may opt out on our Sites.

Occasionally we may be required by law enforcement or judicial authorities to provide Personal Information to the appropriate governmental authorities. We will disclose Personal Information upon receipt of a court order or subpoena, or to cooperate with a law enforcement investigation. We fully cooperate with law enforcement agencies in identifying those who use our Products for illegal activities. We reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful.

As necessary, employees and independent contractors access both Personal Information and Non-Personally Identifiable Information to operate our business and provide the services and products that you have requested.

If you unsubscribe from marketing email communications, or request we not share your Personal Information, we may share your email address with our compliance vendor and/or approved marketing partners to honor your request and prevent you from receiving additional offers.

# **Privacy Policies of Third Parties**

When you sign up for independent products and services offered by third parties when visiting our Site, that third party's privacy and security policies apply. Except as otherwise discussed in this Privacy Policy, this document only addresses our use and disclosure of information we collect from you. Other sites accessible through our Site, and companies from whom your information is collected, have their own privacy policies and data collection, use, and disclosure practices. Please consult each site's privacy policy. We are not responsible for the policies or practices of third parties. Please note that unsubscribing on our Sites, or opting out of data sharing where applicable, will not automatically unsubscribe you from all third-party marketing activities.

## **Updating Your Account Information**

Corrections or updates to your account information, including your email address, mailing address, and credit card information, can be made through the "My Account" section of your member profile. If necessary, other corrections or updates to your information can be made by contacting a Customer Care representative during our Customer Care hours.

#### **Business Transitions**

As we continue to develop our business, we might sell or buy assets. In such transactions, customer information (both Personal Information and Non-Personally Identifiable Information) may be one of the transferred business assets. Also, in the event that we, or substantially all of our assets, are acquired, such customer information will be included within the transferred assets.

## **Opting Out of Email Marketing**

If you no longer wish to receive our newsletter or promotional offers, you may "opt out" of receiving these communications by opting out on our unsubscribe page or by clicking here to <u>unsubscribe</u>. Our membership products may include alert emails or other informational emails that are sent on a daily, weekly, or monthly basis. These transactional emails are part of your membership and cannot be disabled for persons who are members of these products.

# **Surveys and Contests**

From time to time, our Site requests information via surveys or contests. Participation in these surveys or contests is completely voluntary and you may choose whether or not to participate and therefore disclose this information. Information requested may include contact information (such as name and mailing address) and demographic information (such as ZIP code and age). Contact information will be used to notify the winners and award prizes. Survey information will be used for the purposes of monitoring or improving the use and satisfaction of our Site and Products, and can be used in and for publicity, advertising, and/or printed and online publications.

# **Changes to Our Policy**

We may find it necessary or be legally obligated to update this Privacy Policy from time to time, so please review it frequently. When we do, we will post those changes in this document and update the effective date so that you are always aware of the information we collect, how we use it, and under what circumstances we disclose it. You acknowledge that this Privacy Policy is part of our Site Terms and Conditions, and by accessing or using our Site, you agree to be bound by all its terms and conditions. If you do not agree to these terms, please do not access or use this Site. You acknowledge and agree that it is your responsibility to maintain a valid email address as a registered user, review this Site and this Policy periodically, and to be aware of any modifications. Your use of the Site after such modifications will constitute your acknowledgment of the modified Policy, and your agreement to abide and be bound by the modified Policy.

### Miscellaneous/Contact Information

You must be at least 18 years old to use this Site. We do not knowingly collect, use, or disclose Personally Identifiable Information about visitors who are under 18 years of age.

If you have any questions about this Privacy Policy, the practices of this Site, or your dealings with this Site, please contact us at:

Attn: Compliance Dept 8144 Walnut Hill Lane, Suite 600 Dallas, TX 75231

The Customer Care team is available to answer your questions via phone or online chat seven days a week.

Live representatives are available during the following hours: Monday through Friday, 8AM to 8PM CT Saturday, 8AM to 5PM CT Sunday, Noon to 6PM CT

### **NOTICE FOR CALIFORNIA RESIDENTS**

**Access to Specific Information and Data Portability Rights** 

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected about you;
- Our business or commercial purpose for collecting that Personal Information;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we collected about you.

## **Deletion Request Rights**

You have the right to request that we delete any of your Personal Information we have collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- 1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our obligations under our agreement with you;
- 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities:
- 3. Debug products to identify and repair errors that impair existing intended functionality;
- 4. Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law;
- 5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- 6. Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the business's deletion of the information is likely to render impossible, or seriously impair, the ability to complete such research, if you have provided informed consent;

- 7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided the information;
- 8. Comply with a legal obligation.

## **Data Correction and Right to Limited Use and Disclosure**

You have the right to correct Personal Information we have collected from you and retained. Once we receive and confirm your verifiable consumer request, we will correct your personal information in our records in a reasonable amount of time. Alternatively, you may update certain Personal Information in your member profile at any time, or by contacting our Customer Care team during hours of operation.

# **Right to Opt Out of Sharing of Personal Information**

Although we do not sell Personal Information for monetary consideration, where applicable, you have the right to opt out of the sharing of your Personal Information when shared for a third-party benefit. Please use the "Do Not Sell/Share My Personal Information" link on the home page of our Sites to submit your request. Once we receive and confirm your verifiable consumer request, we will not share your Personal Information unless it is necessary to operate our business and provide the Products you have requested.

# Exercising Access, Data Portability, Data Correction, Data Deletion, and Opt-Out Rights

To exercise the access, data portability, deletion, and opt-out rights described above, please submit a verifiable consumer request to us by either:

- Calling us toll-free at 1-844-243-6638; or
- Making a request at <a href="mailto:privacy@onetechnologies.net">privacy@onetechnologies.net</a>.
- For <u>Do not Share My Information requests</u>, <u>please click here</u>.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide MemberID (where applicable), first name, last name, and email address;
- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- If your request is to know specific pieces of information, you will also be required to submit a signed declaration under penalty of perjury that you are the consumer whose Personal Information is the subject of the request. If you do not provide the requested information, we will not be able to complete your request.
- If your request is to delete or correct information, you may be required to submit a signed declaration under penalty of perjury that you are the consumer whose Personal Information is the subject of the request.

Before assessing your request, we may request additional information to verify your identity. If you do not provide the requested information and, as a result, we are unable to identify you, we may refuse to act on your request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and authority to make the request and confirm the Personal Information relates to you.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We are required to maintain a copy of signed declarations as part of our record-keeping obligations.

# **Response Timing and Format**

We will consider and respond to a verifiable consumer request within forty-five (45) days of its receipt. However, if we require more time (up to 90 days), we will inform you of the reason and extension period in writing. For Do Not Share My Information requests, we will respond within fifteen (15) days of its receipt.

Any disclosures we provide will only cover the 12-month period preceding the receipt of a verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will provide requested Personal Information in a structured, commonly used, and machine-readable format and enable it to be transferred to you or another organization, where it is technically feasible.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your California Consumer Privacy Act (CCPA) rights, including:

- Denying you goods or services;
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Providing you a different level or quality of goods or services;
- Suggesting that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

## NOTICE FOR VIRGINIA, COLORADO, CONNECTICUT, AND UTAH RESIDENTS

You have the ability to exercise the following rights:

- To confirm the processing of your Personal Information and to access such information;
- To correct inaccuracies in your Personal Information;
- To delete Personal Information provided by, or obtained about, you;
- To obtain a copy of your Personal Information that you previously provided to us, in a portable manner; and
- To opt out of the processing of your Personal Information for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.

# **Exercising Your Rights**

To exercise data access, data portability, data deletion, and opt-out rights described above, or to appeal a decision related thereto, please submit a verifiable consumer request to us by either:

- Calling us toll-free at 1-844-243-6638; or
- Making a request at <u>privacy@onetechnologies.net</u>.

Only you may make an authenticated consumer request related to your Personal Information. Once we receive and confirm your authenticated consumer request, we will process your request, unless an applicable exception applies.