## **VERFID LLC Privacy Policy**

Last Revised: May 6, 2020

VERFID LLC (collectively with its subsidiaries, "Company," "we," "us," and "our,") respects your privacy and is committed to protecting your privacy through our compliance with this VERFID Privacy Policy (the "Policy"). This Policy should be read in conjunction with our VERFID Terms of Use, into which this Policy is incorporated by reference.

## This Policy describes:

- The types of information we collect from you or that you may provide when you visit our website available at: <a href="https://verfidpet.com/">https://verfidaccount.com/</a> (our "Website"), as well as our mobile application (the "Mobile App", and together with the Website, the "VERFID Technology").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

Please read this Policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use VERFID Technology. By using VERFID Technology, you agree to the terms of this Policy. This Policy may change from time to time (see below, "Changes to this Policy"). Your continued use of VERFID Technology after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

#### What We Collect and How We Collect It

To ensure that we provide you with the best possible experience, we will store, use, and share information about you in accordance with this Policy.

#### Information You Provide to Us

Personal Information is any information that can be used to individually identify you from a larger group, such as data including, but not limited to, your:

- first and last name
- email address
- telephone number
- date of birth
- credit card information
- home and billing addresses
- reasonable accommodation requests for assistance animals
- geographic location
- information relating to your pet

comments or messages provided in free text boxes

You may provide us Personal Information when you:

- request information
- send us messages
- subscribe to our emails
- register yourself with VERFID Technology.

The information that you provide in each case will vary. In some cases, we may ask you to create a username and password that should only be known to you. If you provide us with credit card information, it will be stored and processed by a PCI-DSS compliant third-party partner, such as Stripe.

#### Automated Information Collection

In addition to the information that you provide to us, we may also collect information about you during your visit to our Website. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Website. Some of the tools we use to automatically collect information about you may include:

- (a) <u>Cookies</u>. A "cookie" is a small data file transmitted from a website to your device's hard drive. Cookies are usually defined in one of two ways, and we may use both of them:
  - (1) session cookies, which do not stay on your device after you close your browser, and
  - (2) persistent cookies, which remain on your device until you delete them or they expire.
  - Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser's settings. However, by disabling cookies on your device, you may be prohibited from full use of the Website's features or lose access to some functionality.
- (b) <u>Google Analytics</u>. The Website sends aggregated, non-Personal Information to Google Analytics for the purpose of providing us with the ability to conduct technical and statistical analysis on the Website's performance. For more information on how Google Analytics supports the Website and uses information sent from the Website, please review Google's privacy policy available at

https://policies.google.com/technologies/partner-sites.

(c) <u>Third-party Websites and Services</u>. We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing campaigns we are contracting them to provide. The information collected can be gathered on our VERFID Technology and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third-party websites.

# **Your Choices and Selecting Your Privacy Preferences**

We want to provide you with relevant information that you have requested.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or service-oriented messages are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

We will not intentionally send you email newsletters and marketing emails unless you consent to receive such marketing information. After you request to receive these emails, you may opt out of them at any time by selecting the "unsubscribe" link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided.

Text Messaging. You may have the opportunity to receive SMS or "text" messages, pre-recorded voice messages or auto-dialed phone calls from the Company, its affiliates and related entities as well as third parties. Such messaging may be used to authenticate your identity or mobile device, as well as provide you informational updates about services or products you may have requested. In providing your mobile device number or cell phone number to the Company, you knowingly consent to such communications from the Company or for the Company to use your cell phone number or mobile device number in accordance with the Company's Terms of Use. In providing your number, you represent that you have the authority to agree to receive text messages at the telephone number that you provide to the Company, or from which you sent the text message request to us. You further acknowledge that no purchase is required to opt into this service, and you may opt out at any time by following instructions from the Company and as described in the Terms of Use.

To discontinue receiving SMS messages from the Company at any time, reply STOP or text STOP to 937-490-9356 or call 937-490-9356. For help, reply HELP or text HELP to 937-490-9356 or call 937-490-9356.

Any such communications you receive from us will be administered in accordance with your preferences and this Policy.

# Accuracy and Access to Your Personal Information

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

Where we can provide you access to your Personal Information in our possession, we will always ask you for a username and password to help protect your privacy and security. We recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

To view and change the Personal Information that you have provided to us, you can log in to your account and follow the instructions on that webpage, or contact us directly for assistance.

### **Information of Minors**

We do not intentionally seek to gather information from individuals under the age of eighteen. We do not target VERFID Technology to minors, and would not expect them to be engaging with VERFID Technology or services. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any Personal Information that we have collected about minors, we will take steps to securely remove it from our systems.

#### How We Use Your Information

The information we gather and that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- Assisting you with items such as personalized experiences, facilitation of product usage, and enforcement of Terms of Use.
- Preventing malicious activity and providing you with a secure experience.
- Providing service and support for services you request.
- Providing marketing communications that are effective and optimized for you.
- Keeping you up-to-date with the latest benefits available from us.
- Preventing unwanted messages or content.

- Measuring the performance of our marketing programs.
- Contacting you about services and offers that are relevant to you.

#### **How We Share Your Information**

We do not sell or lease your information to any third party. In order to provide our services to you, we may disclose your Personal Information to our trusted third-party business partners in accordance with this Policy. We work with a number of partners that help us process your requests, deliver customer service and support, send email marketing communications, and provide experiences that you have come to expect from us. We will share your Personal Information with these third parties in order to fulfill the service that they provide to us. These third-party partners are under contract to keep your Personal Information secure and not to use it for any reason other than to fulfill the service we have requested from them.

Except as described in this Policy, we will not share your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- Responding to duly authorized information requests from law enforcement or other governmental authorities.
- Complying with any law, regulations, subpoena, or court order.
- Investigating and helping prevent security threats, fraud, or other malicious activity.
- Enforcing or protecting the rights and properties of Company or its subsidiaries.
- Protecting the rights or personal safety of Company's employees.

There are circumstances where Company may decide to buy, sell, or reorganize its business in selected countries. Under these circumstances, it may be necessary to share or receive Personal Information with prospective or actual partners or affiliates. In such circumstances, Company will ensure your information is used in accordance with this Policy.

### **Third-party Websites**

This Policy <u>does not</u> apply to websites or other domains that are maintained or operated by third parties or our affiliates. VERFID Technology may link to third-party websites and services, but these links are not endorsements of these sites, and this Policy does not extend to them. Because this Policy is not enforced on these third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or site and providing any information.

### **Your California Rights**

Pursuant to California Civil Code Section § 1798.83, we will not disclose or share your Personal Information with third parties for the purposes of third-party marketing to you without your prior consent.

Other than as disclosed in this Policy, the VERFID Technology does not track users over time and across third-party websites to provide targeted advertising. Therefore, the VERFID Technology does not operate any differently when it receives Do Not Track ("DNT") signals from your internet web browser.

## **VERFID Technology Users From Around the World**

We do not warrant or represent this Policy or VERFID Technology's use of your Personal Information complies with the laws of any jurisdiction. Furthermore, to provide you with our services, we may store, process, and transmit information in the United States, United Kingdom, Canada, and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

# For VERFID Technology Users in the United Kingdom and European Union ("EU")

Under the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or "GDPR"), and the United Kingdom's Data Protection Act of 2018, individuals in the UK and EU are afforded specific rights with respect to their Personal Information, or "personal data" as defined under the GDPR. For the purposes of this Policy, Company operates as a data controller. Any personal data we collect from you is processed in the United States and under the terms of this Policy.

Any personal data we collect from you is processed in the legitimate interest of our business and providing our services to you as the lawful means of such processing. You may always withdraw your consent to our use of your personal data as described below. We will only retain your personal data for the time necessary to provide you the information and services to which you have consented, to comply with the law and in accordance with your rights below.

The Data Controller is:

NAME: VERFID LLC

ADDRESS: 11807 Allisonville Road #562, Fishers, IN 46038, USA

EMAIL ADDRESS: customersupport@verfidpet.com

You can exercise any of the following rights, subject to verification of your identity, by notifying us as described below:

- Access. You may email us at <u>customersupport@verfidpet.com</u> to request a copy of the personal data our VERFID Technology databases currently contain.
- Automated Processing and Decision-Making. You may email us at <u>customersupport@verfidpet.com</u> to request that we stop using your personal data for automated processing, such as profiling. In your email, please explain how you wish us to restrict automated processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.
- <u>Correction or Rectification</u>. You can correct what personal data our VERFID Technology database currently contains by accessing your account directly, or by emailing us at <u>customersupport@verfidpet.com</u> to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause information to be incorrect. Where applicable, we will ensure such changes are shared with trusted third parties.
- Restrict Processing. When applicable, you may restrict the processing of your personal data by submitting a request via email to <a href="mailto:customersupport@verfidpet.com">customersupport@verfidpet.com</a>. In your email, please explain how you wish us to restrict processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- Object to Processing. When applicable, you have the right to object to the
  processing of your personal data by submitting a request via email to
  customersupport@verfidpet.com. When such objections are not possible, we will
  advise you accordingly. You can then choose to exercise any other rights under
  this Policy, to include withdrawing your consent to the processing of your
  personal data. Where applicable, we will ensure such changes are shared with
  trusted third parties.
- <u>Portability</u>. Upon request and when possible, we can provide you with copies of your personal data. You may submit a request via email to <a href="mailto:customersupport@verfidpet.com">customersupport@verfidpet.com</a>. When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent. Where applicable, we will

ensure such changes are shared with any trusted third parties.

- Withdraw Consent. At any time, you may withdraw your consent to our processing of your personal data through this VERFID Technology by notifying us via email at <a href="mailto:customersupport@verfidpet.com">customersupport@verfidpet.com</a>. Using the same email address associated with your VERFID Technology account, simply type the words "WITHDRAW CONSENT" in the subject line of your email. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- <u>Erasure</u>. If you should wish to cease use of our VERFID Technology and have your personal data deleted from our VERFID Technology, then you may submit a request by emailing us at <u>customersupport@verfidpet.com</u>. Upon receipt of such a request for erasure, we will confirm receipt and will confirm once your personal data has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties.
- <u>Submit Complaints or Questions</u>. If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. If you reside in a European Union member state, you may also lodge a complaint with the supervisory authority in your country.

# Changes to this Policy

If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the "Last Revised" block above. You can get to this page from any of our webpages by clicking on the "Privacy Policy" link (usually at the bottom of the screen).

### Safeguarding the Information We Collect

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information through the proper use and security of any online credentials used to access your Personal Information, such as a username and password. If you believe your credentials have been compromised, please change your password. Please also notify us of any unauthorized use.

#### **How to Contact Us**

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please contact us at <a href="mailto:customersupport@verfidpet.com">customersupport@verfidpet.com</a>.