

ComplyTrust Privacy Policy.

Effective Date: October 13, 2021

Last Reviewed on: October 13, 2021

Introduction

ComplyTrust Inc. (Hereinafter referred to as “**ComplyTrust**,” “**we**,” “**us**,” or “**our**”) values the privacy of individuals who use our websites and related services (collectively, our “**Services**”). This Privacy Policy (“**Policy**”) explains how we collect, store, use, and share personal information when you visit our website or use our **Services**.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Children

Our **Services** are not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Site. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at privacy@complytrust.com.

Third-Party Links

Our **Services** may contain links to other websites, products, or services that we do not own or operate. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. We encourage you to read the privacy policy of every website you visit.

The Data We Collect About You

Personal information means any information about an individual from which that person can be identified directly or indirectly.

We may collect, use, store and transfer different kinds of personal information about you, which we have grouped together as follows:

- **Identity Data** includes name, billing or mailing address, unique personal identifier, online identifier, IP address, email address, Social Security number, driver's license number, passport number, government ID number, bank account number, citizenship, phone number, or other similar identifiers.
- **Contact Data** includes name, billing or mailing address, email address and telephone numbers.
- **Financial Data** includes payment information such as credit card details and bank account numbers.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Profile Data** includes your username and password.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

Where we need to collect personal information by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract with you or provide you with our Services. In this case, we may have to cancel the Services you have with us.

How is Your Personal information Collected?

We use different methods to collect personal information from and about you including through:

- **Direct interactions:** You may give us your name, billing address, shipping address, payment information, including credit card numbers, email addresses, and phone numbers.
- **Automated technologies or interactions:** We may collect data, such as IP Addresses, through the use of cookies we set on your device as you navigate through our Services.

How We Use Your Personal Information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where you have given consent.

Purposes for Which We Will Use Your Personal Information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful Basis for Processing
To register you as a new customer.	<ul style="list-style-type: none"> a) Identity b) Contact c) Financial 	Performance of a contract with you
To provide our Services including: <ul style="list-style-type: none"> a) Manage payments, fees, and charges b) Customer support 	<ul style="list-style-type: none"> a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary for our legitimate interests
To manage our relationship with you which will include: <ul style="list-style-type: none"> a) Notifying you about changes to our Terms of Service or Privacy Policy 	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Marketing and Communications 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary for our legitimate interests
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical 	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	<ul style="list-style-type: none"> a) Technical b) Usage 	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

<p>To make suggestions and recommendations to you about goods or services that may be of interest to you.</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing and Communications 	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
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Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information, please see our Cookie Policy.

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of Your Personal Information

We do not share your personal information with third parties unless we have your permission or are required by law to do so.

We may disclose your personal information without your permission to the extent that it is required to do so by European Union or National law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

International Transfers

Whenever we transfer your personal information out of the European Economic Area (“EEA”), we ensure a similar degree of protection is afforded to it by using standard contractual clauses approved by the European Commission, which give personal information the same protection it has in Europe.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Your Legal Rights

As the subject of the personal information, you have rights related to the personal information that we hold about you. At any time, you have the right to:

Access	Provide the personal information you have about me.
Rectify	Correct the personal information you have about me.
Delete	Delete the personal information you have about me.
Object	Object how my personal information is used.
Restrict Processing	Request that we restrict the processing of your personal information.
Portability	Transfer of your personal information to you or to a third party.

If you wish to exercise any of the rights set out above, please complete a GDPR Request Form and email it to privacy@complytrust.com with the subject line “GDPR Rights Request.”

Your California Privacy Rights.

If you are a California resident, please visit our Privacy Policy for California Residents for additional information about our processing of personal information and your California privacy rights.

No Fee Usually Required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to Our Privacy Policy

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the updated Policy on the Site and update the Policy's effective date. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

Contact Details

If you have any questions about this Privacy Policy, please contact us at:

- **Phone:** 858-766-2173
- **Email:** privacy@complytrust.com
- **Postal Address:**
ComplyTrust Inc. (CTI)
5755 Oberlin Drive, Suite 301
San Diego, CA 92121
United States

If you need to access this Policy in an alternative format due to having a disability, please contact us at privacy@complytrust.com.

Thank you for reviewing our Privacy Policy.