Privacy Policy

http://customtru.com/ is provided by Customtru Limited. (Customtru)

Customtru values your privacy and appreciates your trust in us. This Privacy Policy explains how we use, share and protect the personally identifiable information (PII) that we collect about you and the choices you have.

"Personally Identifiable Information" means any information (i) that identifies or can be used to identify, contact, or locate the person to whom such information pertains, or (ii) from which identification or contact information of an individual person can be derived. If you see an undefined term in this Privacy Policy, it has the same definition as outlined in our terms and conditions.

This Privacy Policy governs the manner in which Customtru Limited (Customtru) collects, uses, maintains and discloses information collected from users (each, a "User") on the website ("Site"). This Privacy Policy does not relate to other websites to which we link.

By visiting our website, you agree to this Privacy Policy

This Site is not directed at you if we are prohibited by any law of any jurisdiction from making the information on this site available to you and is not intended for any use that would be contrary to local law or regulation.

1. Information We Collect

There are two categories of information that we collect. We collect a variety of information from our Users and visitors to the website. As described below some information is automatically collected when you visit our website, and some you provide to us when registering or filling out a form, or communicating with us.

- 1.1.<u>Information Collected Automatically</u>: Whenever you visit our website, our web servers automatically collect non-personal information such as the domain name of the internet access provider, the internet protocol address used to connect the computer to the internet, the average time spent on our Website, pages viewed, information searched for, access times, and other relevant statistics.
- 1.2.<u>Information You Provide Us</u>: If you provide us with personal information by, registering for an account or contacting us, we collect that personal information. For example, if you register on our website, we collect your name, e-mail address and password. If you contact us, you may also provide us with personal information that we collect.
- 2. Using Your Personally Identifiable Information

"Personally Identifiable Information" means any information (i) that identifies or can be used to identify, contact, or locate the person to whom such information pertains, or (ii) from which identification or contact information of an individual person can be derived.

Personal Data about our Users is an important part of our business and we shall only use your personal data for the following purposes and shall not keep such personal data longer than is necessary to fulfil these purposes:

- To help us verify your identity;
- To help us identify and manage accounts you could have with us from time to time;
- To respond to requests that you make of us;
- Enable us operate, protect, improve, and optimize the Site by carrying out marketing analysis and user profiling (including transactional information), conduct research, including creating statistical and testing information;
- Personalize or otherwise customize your experience by, among other things, ranking search results or showing ads based on your search, and preferences.
- Provide customer service;
- Send you service or support messages, such as updates, security alerts, and account notifications;
- Verify or authenticate information or identifications provided by you (such as to verify your address or compare your identification photo to another photo you provide);
- To help us to administer and to contact you about improved administration of any accounts and services we have provided in the past;
- To help prevent and detect fraud or loss;
- · Conduct investigations and risk assessments;
- Comply with our legal obligations;
- To allow us to contact you in any way (including e-mail, telephone, visit, and text or multimedia messages) about the services offered by us unless you have previously asked us not to do so.

We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance. We shall not disclose your personal data to any third party except in accordance with this privacy policy.

3. Non-personal identification information

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and

technical information about Users means of connection to our Site, such as the operating system and other similar information.

4. Web browser cookies

Our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

5. Age Restriction

You affirm that you are over the age of majority and have the right to contract in your own name, and that you have read the above authorization and fully understand its contents.

6. Disclosures

- 6.1.We will not sell, publish, disclose, or rent to third parties your personally identifiable information collected at our website, through our servers or otherwise obtained by us, other than to provide our services and as set forth in this privacy policy. We may share generic aggregated demographic information not linked to any personally identifiable information regarding visitors and users with our business partners, trusted affiliates, professional advisers and advertisers for the purposes outlined above. We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.
- 6.2. We may request information about you from third parties to provide our services.
- 6.3.We will notify you as soon as we become aware of a harmful data breach which may result in a risk of your rights and freedom.
- 6.4. You have the right to request an erasure of your data at any time.
- 6.5. We will notify you if we are transferring your data.
- 6.6.You may request at any time that we halt further dissemination of your data or cease to use your data.
- 6.7. If you submit content in a public forum or social media post, or use a similar feature on the Site, that content is publicly visible.
- 6.8. If required by law or in the good faith belief that such action is necessary to (a) conform with the requirements of the law or comply with legal process served on us, or (b) act in urgent circumstances to protect the personal safety of users of our service or members of the public.

To the extent practicable and legally permitted, we will attempt to advise you prior to any such disclosure, so that you may seek a protective order or other relief limiting such disclosure.

7. Communications from Our Site

Pursuant to you registering on our site, you will receive emails that confirm specific actions you requested. You will receive notifications confirming your registration, the successful verification of email addresses and bank accounts, if required, and confirmation of successful applications. You will also receive progress updates on the status of your application. These are notifications that you cannot opt out of receiving, as they are in place to protect the security of your account and your personal information. We may also send you responses to emails you send us, if appropriate or applicable. From time to time, we will also send user surveys, requests for user feedback regarding user experience and site operations or marketing offers from us or from us on behalf of our marketing partners. The completion of these surveys or requests for feedback or acceptance of any offer is strictly voluntary. If you do not wish to receive these offers, surveys or user feedback emails, please opt out in any offer email you receive from us.

8. Access or Change to Personal Data

Upon request, Customtru will provide you with information about any of your personal information in our possession. If your personal data changes, you may correct, update, or amend by making the change on our member information page or by sending an email to <u>info@customtru.com</u>. If you wish to delete or deactivate your account or choose to no longer receive emails from us, please e-mail us at <u>info@customtru.com</u>.

9. Website Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures such as secure sockets layer (SSL) to safeguard and secure the information we collect online. Customtru also uses encryption tools when transmitting and accepting delicate visitor information through the Site.

In addition to our own substantial efforts, you can take several precautions to protect the security of your computer and personal information. For instance, when you are creating an account, endeavour to use a well-chosen password. You should avoid using any information that others can easily learn about

you, such as a family member's name or birthday, and you can also use special characters in place of letters. You may change the password as often as you wish by going to "Manage Profile" and entering the new password. We also recommend that you change your password frequently. You can also install and regularly update antivirus and firewall software to protect your computer from external attacks by malicious users. When you are finished with a session on our site, be sure that you log out and close the browser window.

Customtru authorizes only those persons who need to know your personal information to administer your account, to provide or inform you about products and services, or to maintain, improve or administer our website to access your personal information.

10. The Data we Retain

We will retain your information for as long as your account is active or as needed to provide you with our services, comply with our legal and statutory obligations or verify your information with a financial institution.

Customtru is statutory obligated to retain the data you provide us with in order to process transactions, ensure settlements, make refunds, identify fraud and in compliance with laws and regulatory guidelines applicable to us, our banking providers and credit card processors.

Therefore, even after closing your Customtru account, we will retain certain data to comply with these obligations.

11. Links to Other Websites

- 11.1. Our Service may contain links to third-party websites or services that are not owned or controlled by Customtru.
- 11.2. Customtru has no control over, and assumes no responsibility for, the content, privacy policies, or practices of any third-party websites or services. You further acknowledge and agree that Customtru shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such web sites or services.
- 11.3. We strongly advise you to read the terms and conditions and privacy policies of any third-party web sites or services that you visit.

12. Limitation of Liability

Customtru exercises reasonable efforts to safeguard the security and confidentiality of your personal data; however, Customtru will not be liable for unauthorized disclosure of personal data that occurs

through no fault of ours including, but not limited to, errors in transmission, access to your account by anyone uses your user ID and password, and your failure to comply with your security obligations.

13. Problem Signing In

Our sign-in process is designed to help protect your privacy. If you have trouble signing in to our Website, please ensure that you are using your registered e-mail address and/or correct password. If you are using your registered e-mail address and correct password, and you continue to have trouble signing in to our site, please send an e-mail to <u>info@customtru.com</u>.

14. Changes to This Privacy Policy

Customtru has the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our Site. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

15. Your Acceptance of these Terms

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

16. Contacting us

If you have any questions about this Privacy Policy, the practices of this Site, or your dealings with this Site, please contact us at <u>info@customtru.com</u>.