

Effective Date: 8/12/2021

Welcome to the tEQuitable privacy policy. The goal of this policy is to help you understand what information we collect and how we use it. This privacy policy applies to www.tequitable.com and tEQuitable Inc. (the “tEQuitable services”). By using the tEQuitable services you consent to this policy.

Information We Collect

We collect two types of information. Personal information and anonymous information. We use the information we collect to provide the tEQuitable services and to improve the services we provide.

- Personal information is information that identifies (whether directly or indirectly) a particular individual, such as the individual’s name, postal address, email address, and telephone number. When anonymous information is directly or indirectly associated with personal information, the resulting information also is treated as personal information.
- Anonymous Information is information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual person.

How We Collect Your Information

- You provide us information when you use the tEQuitable service. For example you may provide us your email address.
- We collect information through a variety of technologies. Here are some of the types of information we collect.
 - Log Data: We receive information when you view content on or otherwise interact with the tEQuitable services, which we refer to as “Log Data”. Log Data includes information such as your IP address, browser type, operating system, the referring web page, pages visited, location, your mobile carrier, device information, and cookie information. We also receive Log Data when you click on, view, or interact with links on the tEQuitable services. We use Log Data to operate and improve the tEQuitable services and ensure their secure and reliable performance.
 - Device information: We may collect information about the device you’re using when you interact with the tEQuitable services, including the type of device, operating system, and settings.
 - Cookies: A cookie is a small piece of data that is stored on your computer or mobile device. Like many websites, we use cookies and similar technologies to collect additional website usage data and to operate and improve the tEQuitable services. Although most web browsers automatically accept cookies, many browsers’ settings can be set to

decline cookies or alert you when a website is attempting to place a cookie on your device. When your browser or device allows it, we may use both session cookies and persistent cookies to better understand how you interact with the tEQuitable services, and to monitor aggregate usage patterns.

- Google Analytics and Other Technologies: We use Google Analytics and other tracking technologies to track the usage of the tEQuitable services, and your use of and interaction with the tEQuitable services. Information collected may include your IP address; browser type and version; browser plug in types and versions; operating system and location.
- We collect information from our partners.

How We Use Your Information

We use your information for the legitimate purpose of providing the tEQuitable services and to improve the tEQuitable services. We do not sell or share your information for commercial purposes. We may share personal information to comply with legal requirements, or support the safety of individuals and property. We have implemented technical, administrative, and physical security measures that are designed to protect guest information from unauthorized access, disclosure, use, and modification. We regularly review our security procedures to consider appropriate new technology and methods. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable.

How Long Do We Keep Your Personal Information

We keep your personal information only so long as we need it to provide the tEQuitable services and fulfill the purposes described in this policy. This is also the case for anyone that we share your information with and who carries out the tEQuitable services on our behalf. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalize it so that we can't identify you.

Transferring Your Data

By using the tEQuitable services, you authorize us to transfer and store your information in the United States, and other countries and jurisdictions for the purposes described in this policy and providing the tEQuitable services. The privacy protections and the rights to access your personal information in such countries may not be equivalent to those of your home country. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. These steps may include implementing standard contractual

clauses where recognized by law, obtaining your consent, or other lawful means of transferring personal information.

Children

The tEQuitable services are not intended for children. Children under the age of 13 or children outside of the US that are not of the age at which they can legally provide consent are not allowed to use the tEQuitable services.

Links

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

EEA, UK and Switzerland Residents

If you are an EEA, UK or Switzerland resident, please see our EEA, UK and Switzerland Residents Privacy Notice.

California Residents

If you are a California resident, please see our California Residents Privacy Notice.

International Transfers of Personal Information

This section only applies to individuals who do not reside in the United States, the European Economic Area, Switzerland or the United Kingdom. We may store, process and transmit personal information in locations around the world, including locations outside of the country or jurisdiction where you are located. Such countries or jurisdictions may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. If you do not want your information transferred to or processed or maintained outside of the country or jurisdiction where you are located, you should not use our Services.

Changes to Our Privacy Policy

We may change this policy from time to time and if we do, we'll post any changes on this page. If you continue to use the tEQuitable services after those changes are in effect, you agree to the new policy. If the changes are significant, we may provide a more prominent notice or obtain your consent, as required by law.

Contact Us

tEQuitable, Inc.

1423 Broadway
PMB #220
Oakland, CA 94612
Email address: privacy@tequitable.com

CALIFORNIA RESIDENTS PRIVACY NOTICE

This notice to California residents is provided under California law, including the California Consumer Privacy Act (“CCPA”), Cal. Civ. Code 1798.100, et seq. This notice supplements our Privacy Policy by explaining your privacy rights if you are a California resident, providing our “notice at collection,” and providing certain mandated disclosures about our treatment of California residents’ information, both online and offline.

Notice of Collection of Personal Information

We may collect these categories of personal information when you interact with us: identifiers/contact information, demographic information (such as gender and age), commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above. We collect this information so that we can best serve you. California residents have the right to “opt out” of the “sale” of their “personal information” to “third parties” (as those terms are defined in the CCPA and described below). We do not sell your personal information for commercial purposes.

CCPA Disclosures

- We collected the following categories of personal information in the last 12 months: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.
- The sources of personal information from whom we collected are directly from our users, analytics tools, and third-party services that update or supplement information we hold about you.
- The legitimate business or commercial purposes for collecting personal information is to provide the tEQuitable services.
- We do not “sell” personal information.

Right to Access

If you are a California resident, you have the right to request, up to two times each year, access to categories and specific pieces of personal information about you that we collect, use, disclose, and sell.

Right to Delete

If you are a California resident, you have the right to request that we delete personal information that we collect from you, subject to applicable legal exceptions.

Right to Opt Out of Sale of Personal Information

If you are a California resident, you have the right to “opt out” of the “sale” of your “personal information” to “third parties” (as those terms are defined in the CCPA). We do not sell personal information.

Process to Make a CCPA Request

Before completing your request, we may need to verify your identity. We may request additional documentation or information solely for the purpose of verifying your identity. To make a CCPA request you can email or write to us at:

tEquitable, Inc.

1423 Broadway

PMB #220

Oakland, CA 94612

Email address: privacy@tequitable.com

Shine the Light Act

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by certain third parties.

EEA, UK, AND SWITZERLAND RESIDENTS PRIVACY NOTICE

This privacy notice should be read in conjunction with our Privacy Policy.

Your Rights

If you are in the EEA, UK, or Switzerland your rights in relation to your personal data processed by us as a controller specifically include:

- **Access.** You have the right to obtain access to your personal data.

- Rectification. You have the right to ask for incorrect, inaccurate, or incomplete personal data of yours to be corrected.
- Erasure. You have the right to request that your personal data be erased.
- Restriction on processing. You have the right to request the restriction of the processing of your personal data in specific cases.
- Objection to processing. You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
- Portability. You have the right to receive your personal data in a machine-readable format and send it to another controller.
- Withdrawal of consent. You have the right to withdraw consent from Schwab's direct marketing.
- Lodging a complaint with a Supervisory Authority. You have the right to lodge a complaint, as applicable, with the U.K.'s Information Commissioner's Office or a Supervisory Authority within your EEA member state.

In order to exercise any of your rights as to personal information controlled by tEquitable, or if you have any other questions about our use of your personal information, please send a request at the contact details specified in the How to Contact Us section of this Privacy Statement. Please note that we may request you to provide us with additional information in order to confirm your identity and ensure that you are entitled to access the relevant personal information. You also have the right to lodge a complaint to a data protection authority. For more information, please contact your local data protection authority.

Legal Basis for Processing Personal Data

We only use your information in a lawful, transparent, and fair manner. Depending on the specific personal data concerned and the factual context, when we process personal data as a controller for individuals in regions such as the EEA, Switzerland, and the UK, we rely on the following legal bases as applicable in your jurisdiction:

- As necessary for our contract: When we enter into a contract directly with you, we process your personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract (i.e., providing the tEquitable service).
- Consistent with specific revocable consents: We rely on your prior consent in order to utilize cookies to analyze our website usage. You have the right to withdraw your consent at any time by contacting us;
- As necessary to comply with our legal obligations: We process your personal data to comply with the legal obligations to which we are subject for the purposes of compliance with EEA laws, regulations, codes of practice, guidelines, or rules

applicable to us, and for responses to requests from, and other communications with, competent EEA public, governmental, judicial, or other regulatory authorities. This includes detecting, investigating, preventing, and stopping fraudulent, harmful, unauthorized, or illegal activity and compliance with privacy laws;

- To protect your vital interests or those of others: We process certain personal data in order to protect vital interests for the purpose of detecting and preventing illicit activities that impact vital interests and public safety; and
- As necessary for our legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal data: We process your personal data based on such legitimate interests to (i) provide you the tEQuitable services; (ii) develop, test, and improve the tEQuitable services; (iii) ensure authentication, integrity, security, and safety of your personal information and our service, including detect and prevent malicious conduct and violations of our terms and policies, prevent or investigate bad or unsafe experiences, and address security threats; and (iv) comply with non-EEA laws, regulations, codes of practice, guidelines, or rules applicable to us and respond to requests from, and other communications with, competent non-EEA public, governmental, judicial, or other regulatory authorities, as well as meet our corporate and social responsibility commitments, protect our rights and property and the ones of our customers, resolve disputes, and enforce agreements.

International Data Transfers

If we transfer personal information out of the EEA, we ensure a similar level of protection for your personal information by ensuring the country to which the personal information is transferred is considered by the EU Commission to provide an adequate level of protection, putting in place contractual clauses the EU Commission consider to provide the same level of protection. The services are hosted and operated in the United States ("U.S.") through tEQuitable and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the services, you acknowledge that any personal data about you, regardless of whether provided by you or obtained from a third party, is being provided to tEQuitable in the U.S. and will be hosted on U.S. servers, and you authorize tEQuitable to transfer, store and process your information to and in the U.S., in a manner that provides the same protection to personal information as granted in the EEA.

How to Contact Us.

tEQuitable Inc

1423 Broadway

PMB #220

Oakland, CA 94612

Email address: privacy@tequitable.com

Designated EU Representative:

Jack Baylor, Stealth Worker, Inc.

2 Ashton Place

Gardiner's Hill Cork, Ireland