

BASIS POINT PLUS, LLC

PRIVACY POLICY

At Basis Point Plus, LLC (“BasisPoint+”) your privacy is important to us, so we strive to be transparent about how we collect, use and share information about you. This policy is intended to help you understand:

- 1. WHAT INFORMATION WE COLLECT**
- 2. HOW WE USE INFORMATION**
- 3. HOW WE SHARE INFORMATION**
- 4. HOW WE STORE INFORMATION**
- 5. HOW TO ACCESS AND CONTROL YOUR INFORMATION**
- 6. ADDITIONAL IMPORTANT PRIVACY MATTERS**
- 7. HOW TO CONTACT US**

Please take a moment to read this privacy policy carefully so that you can understand your rights and our responsibilities regarding your information. This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

When we refer to “BasisPoint+” “we” or “us” in this Privacy Policy, we mean Basis Point Plus, LLC, developer and operator of the BasisPoint+ website and related services (the "Services"). Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Service.

1. WHAT INFORMATION WE COLLECT

Information You Share with Us

We require certain information to provide our services to you. For example, you must have an account in order to purchase or interact with the Services. When you choose to share the information below with us, we collect and use it to operate our Services.

Account Information. When you use the Services, you will provide information that could be personal information, such as your username, password, telephone number and email address.

User Content. The Services may include publicly accessible blogs, community forums, or private messaging features. The Services may also contain links and interactive features with various social media platforms (e.g., widgets). If you already use these platforms, their cookies may be set on your device when using our Services or other services. You should be aware that personal information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by third parties for any number of purposes.

Payment Information. When you make purchases through the Services, we process your payments through a third-party application. The third-party application may collect payment information, including your credit or debit card number, card expiration date, CVV code, and billing address, in order to purchase offerings provided as part of our Services.

Information We Collect Automatically

We automatically receive and record information from your use of the Services, including app usage, your IP address and cookie information. This information is used to optimize your user experience. Generally, the Services automatically collect usage information, such as the number and frequency of users of the Services. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally. This type of aggregate data enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.

Cookies. Cookies are pieces of text that may be provided to your computer through your web browser when you access a website. Your browser stores cookies in a manner associated with each website you visit. We use cookies to enable our servers to recognize your web browser and tell us how and when you use the Services. Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave cookies active, because they enable you to take advantage of the most attractive features of the Services.

Pixel Tags / Web Beacons. A pixel tag (also known as a web beacon) is a piece of code embedded on the Site that collects information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. Advertisements served through the Services may be targeted to users who fit a certain general profile category and may be based on anonymized information inferred from information provided to us by a user, including Personal Information (e.g., gender or age), may be based on the Services usage patterns of particular users, or may be based on your activity on Third Party Services. We do not provide Personal Information to any ad networks for use outside of the Services. To increase the effectiveness of ad delivery, we may deliver a file (known as a "web beacon") from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network's servers, these companies can view, edit or set their own cookies, just as if you had requested a web page from their site.

Social Media Widgets. Our Website includes social media features such as the LinkedIn "Like" button that might include widgets such as the "Share this" button or other interactive mini-programs. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

Analytics. We use Google Analytics, a service provided by Google, Inc. ("Google"), to gather information about how users engage with our Services. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google's collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Aggregate Information. We collect statistical information about how both unregistered and registered users, collectively, use the Services ("Aggregate Information"). Some of this information is derived from

personal information. This statistical information is not personal information and cannot be tied back to you, your account or your web browser.

2. HOW WE USE THE INFORMATION

While we consider the collection and processing of your information to be in our legitimate business interests we take your privacy rights seriously. We use information about you for a number of purposes. Below are the specific purposes for which we use the information we collect about you.

To provide the Services and personalize your experience. We use information about you to provide the Services to you, including to process payment transactions with you, authenticate you when you log in, provide customer support and operate and maintain the Services.

For research and development. We are always looking for ways to make our Services smarter, faster, more secure, integrated and useful to you. To that end, we use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services.

To communicate with you about the Services. We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages.

To market, promote, and drive engagement with the Services. We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying ads on other companies' websites and applications, as well as on platforms like LinkedIn and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, events and other information we think may be of interest to you. We also communicate with you about new product offers, promotions and contests.

Conducting surveys and collecting feedback about our Services. We do this to pursue our legitimate interests to understand if the Services are helpful to you and to evaluate the effectiveness of any updates we provide.

Customer support. We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

For safety and security. We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

To protect our legitimate business interests and legal rights. Where required by law, where we believe it is in our legitimate business interest, or where it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

With your consent. We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

Additional purposes. We may process your information for any other purpose disclosed to you in connection with our Services from time to time. If we intend to process your personal data for a purpose other than that set out above, we will provide you with information prior to such processing and will obtain your consent where necessary.

Legal basis for processing (for EEA users): If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where: We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services; It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests; You give us consent to do so for a specific purpose; or We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

3. HOW WE SHARE INFORMATION

We may share your information with our third-party service providers, to comply with legal obligations, to protect and defend our rights and property, or with your permission. Below are the specific ways we share information we collect about you.

Communications with Us. As part of the Services, you may occasionally receive text, email and other communications from us, such as communications relating to your Account. In the event that we communicate with you through text, standard messaging rates apply.

User Profile Information. User profile information including your username and other information you enter may be displayed to other users to facilitate user interaction within the Services. We will not directly reveal user email addresses to other users.

Information Shared with Our Agents. We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our “Agents”). We may need to share personal information with our Agents in order to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use personal information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of personal information with our Agents.

IP Address Information. While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners, service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

Aggregate Information. We share Aggregate Information with our partners, service providers and other persons with whom we conduct business. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non-personal information about you that they have independently developed or acquired.

Interest-Based Advertising. We may allow third-party advertising partners to set tracking tools (e.g., cookies) to collect information regarding your activities (e.g., your IP address, page(s) visited, time of day). We may also share such de-identified information as well as selected personal information (such as demographic information and past purchase history) we have collected with third-party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit other websites within

their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We may allow access to other data collected by the Site to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to you.

Information Disclosed Pursuant to Business Transfers. In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

Information Disclosed for Our Protection and the Protection of Others. We also reserve the right to access, read, preserve, and disclose any information as it reasonably believes is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce these Terms of Service, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

Information We Share with Your Consent: We will share your personal information with any relevant party you have granted us permission to share with.

4. HOW WE STORE AND SECURE INFORMATION

Keeping your information secure is a top priority for us. To that end we comply with industry-standard best practices to secure your information. We use data hosting service providers in the United States to host the information we collect, and we use technical measures to secure your data. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

Account Information We retain your account information until you delete your account. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

Information You Share on the Services If your account is deactivated or disabled, some of your information and the content you have provided will remain.

Marketing information If you have elected to receive marketing emails from us, we retain information about your marketing preferences unless you specifically ask us to delete such information. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

5. HOW TO ACCESS AND CONTROL YOUR INFORMATION

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests.

Access and Update Your Information. Our Services and related documentation give you the ability to access and update certain information about you from within the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

Deactivate Account. You can deactivate your access the Services at any time.

Delete Your Information. Our Services and related documentation give you the ability to delete certain information about you from within the Service. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

Request That We Stop Using Your Information. In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is a delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.

Opt Out of Communications. You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings.

Send "Do Not Track" Signals. Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. We support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

Data portability. Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create on the spaces under your sole control.

7. ADDITIONAL IMPORTANT PRIVACY MATTERS

Minimum Age. The Services are not directed to individuals under 13. We do not knowingly collect personal information from children under 13. If we become aware that a child under 13 has provided us with personal

information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services.

Links to Other Sites. Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to this Privacy Policy. We will notify you when we change this Privacy Policy. We may change this Privacy Policy from time to time. If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will provide notice to you on the Services or by some other means, such as email or an in-app notice. Please review the changes carefully. If you agree to the changes, simply continue to use our Services. If you object to any of the changes to our terms and you no longer wish to use our Services, you may close your account(s). Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. Using our Services after a notice of changes has been communicated to you or published on our Services shall constitute consent to the changed terms or practices.

8. CONTACT US

Contacting us: If you have any questions, please don't hesitate to contact us at:

support@basispointplus.com

Please include your name, address, and/or email address when you contact us.

Effective Date: March 6, 2023