

*Last Modified: \_\_\_[DATE]\_\_\_\_\_*

Our website located at capwize.com ("Website") is operated by Currency Kings, LLC, a Colorado limited liability company ("Currency Kings" or "we" or "our"). Currency Kings wants to make your online experience pleasant, convenient and safe. Your privacy is very important to us. This privacy policy ("Privacy Policy") describes the information we collect about you and how we use this information.

### **What Kind of Information Does CapWize Collect?**

Our primary goal in collecting information from you is to provide you with a positive experience while you use our Website, to hear your comments, to respond to your inquiries, and to provide you with access to our services. CapWize may collect both Personal Information and information about your use of the Website ("Browsing Information"). Personal Information includes your name, company, address, phone number, website, number of employees, number of extensions and email address. Browsing Information includes: 1) technical information, such as the date and time you access the Website, and your Internet protocol address, and browser name; and 2) service usage information, such as records and history about transactions and preferences, and the demographic, geographic, and psychographic information, and other feedback you supply to us. Also, when you contact customer service, participate in our surveys, or send us testimonials, feedback or submissions, you are providing us with your personal information.

### **How Does CapWize Use My Information?**

When we collect information from you, such information will be used for one or more of the following reasons:

process and complete any Website transactions.

identify your product/service preferences so that we can notify you of new or additional products/services (offered by us or third parties) that might be of interest to you.\*

notify you about new products/services, features, promotions and special offers that CapWize or its affiliates thinks you will find valuable.\*

respond to your inquiries.

customize the products/services you see.

permit you to participate in social sharing, including live social media feeds; conduct research.

help us understand Website usage/activity and improve your use of our Website

collect aggregated site-visitation statistics.

alert you to service outages, issues, upgrades, and/or improvements.\*

to invite you to participate in a survey about your experience with customer service in order to improve service offerings and customer service.\*

help us prevent fraud and minimize credit risk.

\* = denotes an activity that will only be conducted with your affirmative consent, which you may withdraw at any time by contacting us at the address provided in this policy.

On rare occasions we may be required to disclose your information as is required by law pursuant to lawful requests such as subpoenas, court or agency orders, or as we may reasonably determine to be necessary to protect our rights or the

rights of others, to avert harm to persons or property, or to enforce this Privacy Policy.

### **Does CapWize Share My Information With Third Parties?**

We share certain Personal Information and Browsing Information we collect about you with third parties who perform services for us or with whom we contract for the purposes described in this Privacy Policy. For example: we use third parties to host our Website or data, operate certain features, send e-mails, print or mailings, and analyze data and our advertising effectiveness.

We share Browsing Information with select third parties on an anonymous basis (that is, in a way that does not connect your Browsing Information to any Personal Information we collect).

If CapWize, or substantially all of our assets, are sold, or CapWize reorganizes or merges into another company, then customer information, including Personal Information, will likely be one of the transferred assets.

On rare occasions, we may be required to disclose your Personal Information as required by law and as necessary to comply with a judicial proceeding, court order, or legal process served on us. Or we may need to do so to protect our customer's rights.

### **Cookies**

We utilize cookies. Cookies are small files that we transfer to your computer's hard drive through your web browser to enable us to function our Website more effectively. We use cookies to recognize you when you return to our website, which enables us to provide you a personalized experience while you browse our Website. We use cookie and web beacon technology to track and collect Browsing Information, such as which pages on our sites our visitors view, IP address, and browser language preference. We use a third party analytics providers and an ad network, which tracks your online activities over time while you access third party websites, which is obtained through automated means.

Most Internet browsers permit you to erase or block cookies. If you configure your browser to remove or reject cookies, though, you will not be able to enjoy the full functionality of our Website.

### **Is My Information Secure With CapWize?**

CapWize uses security measures to protect the privacy of your Personal Information. However, transmissions over the Internet are not completely secure, and any information you send to or through our Website may be accessible by others. CapWize cannot guarantee our security measures.

You are responsible for maintaining the secrecy of your user name, password, and any account information. It is important for you to be responsible and protect your user name, password, and device against unauthorized users. It is important to sign off when you have completed using a device accessible by others.

### **How does CapWize Protect Kids' Privacy?**

We are concerned about the safety of children when they use the Internet and will never knowingly request personally identifiable information from anyone under the age of 13 or classified as a minor under applicable law. Users of our Website

must be at least 13 years old. If you are under 18 years old or otherwise classified as a minor, you should not provide information to us without the involvement of a parent or guardian. If a child has provided us with personal information, that child's parent or guardian should contact us (see below) to delete such information from our records.

### **Sensitive Information**

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health or medical condition or criminal background) on or through the Website or otherwise to us.

### **Notification of Changes**

CapWize may make periodic changes to this privacy policy, and we will post the changes on the Website. Please take a look at the "Last Updated" legend at the top of this page to see when this Privacy Policy was last revised. We may also notify you by e-mail if there is a material change in our privacy practices or policies. Your continued use of our Website will constitute your acceptance of any such amendment.

### **How You Can Access, Change or Suppress Your Personal Information?**

To review, correct, update, suppress, delete, or otherwise limit our use of your Personal Information that you previously provided us, please email, call, or write us using the contact information listed below in the "Contact Us" section and clearly describe your request.

In your request, please make clear what information you would like to have changed, whether you would like to have your Personal Information suppressed from our database, or otherwise let us know what limitations you would like to put on our use of your Personal Information. We will try to comply with your request as soon as reasonably practicable. Note that despite our efforts, there may be residual information that will remain within our databases and other records that will not be removed or changed.

### **Contact Us**

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

You may email us at: \_\_\_\_\_

2. You may call us at \_\_\_\_\_

### **European Union Data Rights**

The European Union's ("EU") General Data Protection Regulation ("GDPR") requires that certain information be provided to data subjects when personal data is collected from a data subject:

The Controller of your personal data is Currency Kings CLEC, Inc., 135 Triple Diamond Blvd., North Venice, FL 34275.

Personal data is processed for the purposes detailed in this Privacy Policy. The legal basis for the processing that is set forth herein is by your consent or where you purchase a license to use our products, the legal basis for processing your personal data is by contract and consent.

We provide personal data to our third party service providers and law enforcement as detailed in this Privacy Policy.

Your personal data is stored until you contact us to request deletion of your information.

Where personal data is deemed mandatory to provide or otherwise required in order to gain access to a function of the Website, this data is necessary for the specific Website function to operate properly. If you choose against providing us with the required personal data, you will not be able to utilize the Website function.

Individuals located within the EU have certain data rights, including:

The right to request access to and rectification of your personal data. You have the right to request erasure of your personal data or for a restriction of processing as it concerns you. You have the right to object to processing and a right to data portability.

You have the right to lodge a complaint against us with a supervisory authority.

To the extent the processing of your personal data is based upon your consent, you have the right to withdraw your consent and exercise your data rights at any time by contacting us at the address below.

#### *Transfers of Personal Data*

CapWize is located within the United States. To the extent any transfer of personal data might be transferred to a third country or international organization, CapWize will conduct such transfers in accordance with applicable data protection laws, including ensuring the execution of Standard Contractual Clauses approved by the EU Commission.

SLK\_SAR:#361782v1