



VALUCOMPASS PRIVACY POLICY

Our Commitment to You:

ValuCompass Software ("ValuCompass" or "we") respects the privacy of our customers and online visitors. This Privacy Policy is to inform you of our online information practices, our practices concerning the collection, storage, processing, transfer, and use of personal information and the choices available regarding the collection and use of your personal information.

By submitting your personal information to ValuCompass through this website or accessing or using our services, you thereby give your consent to the handling of your personal data in the manner described in this policy.

What We Collect and How We Collect It:

For each visitor browsing our websites, our web server automatically recognizes and stores the visitor's IP address (the Internet protocol address of the visitor's computer) to determine which areas of our website are being visited and how long each visitor spends there. This information helps us to understand visitors' traffic patterns through our websites so that we can enhance the overall usability of our websites. Your computer provides this information automatically each time you log on, unless you have activated blocking technology available in some browsers.

If you are not a current ValuCompass subscriber, we do not generally require that you provide us with personally identifiable information ("personal information") in order to visit and use our website. If you wish to communicate with us without being a subscriber, we may ask you to provide us with limited personal information such as your email address and name. The submission of your personal information is voluntary if you choose not to purchase ValuCompass products or services.

If you subscribe to or otherwise receive the subscription benefits of the ValuCompass products or services, then we may require you to provide us with certain expanded

personal information such as your email address, name, mailing address, telephone number, credit card number, demographic information, persistent identifier (such as user name and password) which is associated with individually identifiable information, and other information that we request. Once you have been granted access to our products and services, then in addition to the personally identifiable data and information associated with your account, we may also collect non-identifying information from you, such as information about you and your company (e.g., revenues, industry, and so forth). We may incorporate this non-identifying information into our application, algorithms, statistical tools and analytics to improve our products and services.

As part of your subscription, we may give you access to online storage areas where you may store, view and otherwise manage documents and other materials that you upload to the ValuCompass products and services. You acknowledge that we may make those documents and materials available to the advisors and other third parties, if any, designated on your account. In certain cases we (or our service providers) may access and view those documents and materials as necessary to provide you with support, to answer your questions, or to otherwise provide our services to you, but we will not use or share those documents and materials in any other manner.

We do not require you to provide sensitive personal information (such as information about your health, political or religious beliefs, criminal offenses alleged or committed, sexual orientation), and request that you do not provide us with such information. Any such information you do provide to us of your own volition will be used only in accordance with this policy.

We may also use your information to comply with laws or to defend ourselves in claims under such laws, or where necessary to exercise ValuCompass's legitimate business interests and needs.

Cookies:

Like many websites today, we may employ a standard technology called cookies to collect information about how you use our site in order to provide you with a better experience by measuring which areas of our website are of greatest interest or to remember you when you return to visit us. Most browsers will allow you to erase cookies from your computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You can choose to set your browser to notify you when you receive a cookie, giving you the choice of rejecting or accepting the cookie. Cookies may also be used by third parties that provide services on our website.

What We Do with Personal Information:

The personal information you provide may be used to support your customer relationship with ValuCompass. We want to use this data to tailor your experience at our website and with the company generally. If you provide us with personal information, then unless you instruct us otherwise (as described below), we will send you information about our various product upgrades, special offers and other new products and services from ValuCompass that we feel may be of interest to you. Only ValuCompass (or agents working on behalf of ValuCompass) will send you these direct mailings. If you do not want to receive such mailings, simply tell us when you give us your personal information. At any time should you choose to, you can opt-out of receiving future promotional mailings by contacting ValuCompass; see the opt-out section below.

We use personally identifiable information you supply to us via our website or through the services to provide you with the merchandise, product, service, and/or content you have requested. Unless otherwise specified on the service, we may sell or share information about you and your computer, mobile or other device, including without limitation personally identifiable information, with our parent, subsidiaries, and affiliates and with carefully selected companies who we think may offer services and/or products that may be of interest to you. In addition, we reserve the right to use the information we collect about your computer, mobile or other device (including its geographic location), which may at times be able to identify you, for any lawful business purpose, including without limitation to help diagnose problems with our servers, to gather broad demographic information, analyze trends, track user movements around our web site and the services, and to otherwise administer the services.

Your information may be shared with agents or contractors of ValuCompass for the purpose of performing services for ValuCompass. For example, if we need to ship something to you, we must share your name and address with a shipping company. We use reasonable efforts to only provide third party agents or contractors with the minimum amount of information needed to complete the requested service or transaction. Your information may also be disclosed to third parties where we are legally obliged or entitled to do so, for example in response to a request from a government or regulatory authority or in connection with potential legal proceedings. Without limiting the foregoing, ValuCompass is not responsible for the actions of any government with respect to your information or data.

If we merge with, or any part of the ValuCompass company is acquired by, another business (or enter into discussions concerning the same) we may share your

information with such a business and its advisers, but if we do so we will ensure steps are taken so that your rights in relation to your information continue to be protected.

Inquiries or Questions - Your rights:

If you have questions or concerns about ValuCompass policies and practices for handling personal information received through this website, please contact support@valucompass.com.

In connection with said processing of your personal data please also be aware that:

1. You have the right to obtain confirmation as to whether or not your personal data are processed.
2. You have the right to be informed:
 1. of the source of your personal data;
 2. of the purposes and methods of the processing;
 3. of the data controller's identity;
 4. of the entities or categories of entities to whom or which the personal data may be communicated.
3. You have the right to obtain:
 1. updating, rectification or integration of your data;
 2. erasure, anonymization or blocking of your data if processed unlawfully.
4. You have the right to object, in whole or in part,
 1. on legitimate grounds, to the processing of your personal data, even though they are relevant to the purpose of the collection;
 2. to the processing of your personal data, where it is made for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

You understand that if we are required to remove your personal information from our system for any reason (including due to a formal removal request from you) then we may terminate your account if we determine that providing the products and services without your personal information would be impossible or burdensome.

Linked Websites:

Other sites which are linked to/from our website may have different policies. Except as otherwise provided herein, ValuCompass does not share any personal information collected with those sites and is not responsible for any information or content of such websites. We encourage you to review the privacy policies posted on those sites

for details. ValuCompass does not embrace any information given on any website controlled by legally independent entities.

Security Measures:

We use commercially reasonable measures to protect the personal information you share with us. At ValuCompass, access to your personal information is limited to people who need it to do their job. In addition, it is our policy to maintain the integrity of any personal information within our possession. ValuCompass uses many security techniques, such as SET or industry-standard Secure Socket Layer (SSL) encryption for transmission of credit card information or wherever personal information is required on all web pages, to protect any personal information from unauthorized access by users; however, we cannot and do not guarantee perfect security on the Internet.

How to Opt-Out of Our Use of Your Personal Information:

If you do not subscribe, and have not subscribed in the past, to any ValuCompass products or services, then you may, at any time, opt-out of our use of your personal information by contacting ValuCompass as described below. We will remove your personal information from our database(s) as soon as reasonably possible.

If you currently subscribe to or receive the subscription benefits from any ValuCompass products or services, then you may opt-out of our use of your personal information for marketing and promotional purposes by contacting ValuCompass as described below. You acknowledge that ValuCompass cannot remove or delete your personal information while you are a current customer.

If you subscribed to or received the subscription benefits from any ValuCompass products or services in the past but are no longer a ValuCompass customer, then you may, at any time, opt-out of our use of your personal information by contacting ValuCompass as described below. We may retain copies of your personal information for our recordkeeping, audit and other internal purposes, but we will not use your personal information for any marketing purpose or share it with third parties (except as may be required by law).

Use and Disclosure of Anonymous Aggregated Information:

ValuCompass may also collect, aggregate and maintain anonymous information about our customers and the online visitors to our website. This data can then be used to tailor ValuCompass website content to deliver a better experience for our visitors. In addition, ValuCompass may also share such aggregate information about our visitors with business partners, sponsors, and other third parties.

Policy Governs Use; Changes to Privacy Policy:

The terms of this policy will govern the use and any information collected while it is in place. ValuCompass reserves the right to change this policy at any time and we therefore encourage you to check back on our website from time to time. Changes to this privacy policy are effective at the time they are posted to our website. Last update: December 2024.

Questions and Contact Information:

For any questions or comments regarding this ValuCompass privacy policy or website, or to opt-out of our use of your personal information (subject to the limitations described above), please contact us at:

support@valucompass.com