



AIVIA WEALTHTECH INC

PRIVACY POLICY

Updated March 20, 2021

Please read this Privacy Policy carefully before using this site. By accessing and using the AIVIA WEALTHTECH INC ("AIVIA") Web Site <https://aivia.io> and Materials, you acknowledge and agree to our privacy policy. If you do not agree to this privacy policy, do not use the AIVIA Web Sites

Privacy Notice

In particular, this Privacy Notice explains how our products, services and, technologies use your personal information. It applies to our use of personal information across our websites, products, online services, software, apps, tools, and other services and functionality we provide, online.

What Kinds of Information Do We Collect?

AIVIA collects information as part of its business operations, to provide services, to respond to requests and offer customer support, to fulfill legal and contractual obligations and to build its innovative products. You provide some of this data directly, such as when you visit aivia.io site, register on the site, request service, contact customer support, or register for an AIVIA event or publication. We also collect information through your interaction with AIVIA Services and our website, for example, using embedded product technologies and cookies. We also obtain data from third parties.

Information You Provide to AIVIA Voluntarily

When you subscribe to a newsletter, create an account, make a purchase or request information from AIVIA, we will ask for things like contact, billing and communication information, payment card or financial account data, and account ID or credentials in order to fulfil your request. If you contact us, you may also voluntarily provide similar information. Interactive features in some AIVIA Services may allow you to invite friends, follow others, comment on or make unique posts, or share photos, video or other personal content. When you affirmatively share this content, we may collect and use it in accordance with this Notice. Additionally, by way of your social engagement, we may receive information about you from another user, such as when your friend posts content that includes you. From time to time we engage in research, analysis, historical and scientific studies either alone or with partners. As part of such efforts we invite individuals to participate and voluntarily share information through an informed consent process. When we receive personal information from a third party for the purpose of such research we undertake processes to validate that the personal information has been collected in a responsible and lawful manner. If you submit any personal information about other people to us or to our service providers, you are responsible for making sure that you

have the authority to do so and to allow us to use their personal information in accordance with this Privacy Notice (for example, by your asking for their consent).

Device and Product Operation

If you download and use certain AIVIA Service like software or an app, we may track and collect usage data, such as when the software or app accesses our servers, what information and files have been downloaded through the use of the software or app, and how you interact with the software or app during use. Some of this data may be protected as personal information under applicable data protection laws. We collect this information to understand how you interact with AIVIA Services and provide you the best experiences. We may also use this information for security purposes. We may associate the information we collect from more than one device that you use with other information that we have collected about you or your other devices. In addition, most computing devices include embedded technology like processing chips that collect information about how the device is operating. This information may include: Type and version of operating system, hardware version, device settings, software types, battery and signal strength, screen resolution, device manufacturer and model, language, and Internet browser type and version. The name and version of any AIVIA (such as the app) you are using is also collected. Geographic locations, such as through GPS, Bluetooth, or WiFi signals. Connection information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address. Access to this information by other applications and transmission of this information from the device to AIVIA or other service providers may be controlled by the operating system or other software running on the device. Some AIVIA Services may allow you to use biometric information for identification or authentication or to take advantage of specific features. Biometric data may include your fingerprint, facial features, voice or similar unique physical characteristics. AIVIA Services can also collect geographic location information, such as location inferred from your IP address or GPS, and information about how you engage with and use AIVIA Services, for example where you have chosen to activate location-enabled services on the device with which you access these services. We collect information from and about a wide variety of technologies where AIVIA Services are used. The kind of information collected depends on the technology, the use, and the device and personal settings. Examples of these technologies might include computers, phones and tablets.

Information from Third Parties

We obtain information through partners, vendors, suppliers and other third parties. The parties from whom we obtain information are typically corporate enterprises (although some may also be educational or public enterprises) and they may be located in any of the locations in which

we do business. These enterprises largely fall into the following categories: Advertising and marketing companies, data set and information vendors, public database providers, social media platforms, partners, providers of products or services, hosts or vendors at events or trade shows, research partners, enterprises that deploy the AIVIA Services or third party offerings that include AIVIA Services. We take steps to confirm that information we receive from these third parties has been collected with your consent or that these parties are otherwise legally permitted to disclose your personal information to us. We might also obtain information through a partner, or co-create datasets with a partner, as part of our business operations. This kind of data is used for work like improving algorithms and data models, product testing and improvement, enhancing existing products and developing new capabilities and features. In some cases we combine personal information about individuals that we receive from multiple sources, including directly collected from you or through your use of the AIVIA Services.

Through our Website & Services

We collect information about how you interact with our website and some through the use of cookies, pixel tags, and similar technologies. Please view our Cookies and Similar Technologies Notice for more information on our use of cookies and similar technologies, how you can manage cookies and how we respond to Do Not Track signals. How We Use Information We use information that we collect for lawful purposes associated with the growth, maintenance and management of our business while also respecting your privacy. These uses include our internal operations and administration, communicating with you and fulfilling your requests for the AIVIA Services, for advertising and marketing, to monitor and maintain functionality and security of AIVIA Services and to improve, develop, enhance and otherwise provide the AIVIA Services.

To Communicate

We use contact information to send messages; to ship products and process payments; to respond to customer service requests; to provide alerts such as security updates or changes in our policies or about subscriptions that are ending; and to send marketing or informational materials like newsletters or white papers, in accordance with your communication preferences. We occasionally conduct surveys, offer contests or sweepstakes or do focused research or studies which may require you to voluntarily share personal information in order to participate. These activities typically have additional notices that provide more information about the use of your personal information and to which you may be asked to consent. Some AIVIA Services may allow you to send messages to a “friend” or other contacts you provide or to “like” or post on social media. For information about managing the use of your contact data and to manage subscriptions and promotional communications.

For Business Operations

We use information to operate our business; for example, to perform accounting, auditing, billing, reconciliation, and collection activities. Other business purposes that depend on use of your personal information include crime or fraud monitoring and prevention, protecting our legal rights, and performing contractual obligations. We also use personal information to contact you to advertise, market and sell AIVIA Services in accordance with your communications preferences.

For Functionality, Development and Improvement

We use information to provide, offer, personalize and improve AIVIA Services. Some information, like your IP address, is used to communicate with your device to provide network connectivity, measure usage levels of AIVIA Services, diagnose server problems and provide security features. Other business purposes that depend on use of your information include data analysis related to testing, modifying, improving or developing new products, services and technologies and to identify trends. We may collect the physical location of a connected device using satellite, telecommunications tower, and WiFi signals to provide you with personalized location-based AIVIA Services and content if you are using location-enabled AIVIA Services. We use cookies to make our websites operate, work more efficiently, and provide analytic information. Technologies similar to cookies, such as pixel tags are also used in connection with some AIVIA Services. For more information on AIVIA's use of cookies, please read our AIVIA Cookies and Similar Technologies Notice.

For Product Updating and Reporting

The AIVIA Services may use information to provide software updates and reports and to check that they are working properly. Update functions may automatically check your system to see whether files need to be refreshed, updated, or modernized in order to provide you with the up to date security, versions, features, options and controls associated with your systems or devices. We rely on information to analyze performance and improve and maintain AIVIA Services.

For Advertising and Marketing

We may use your device's physical location, combined with information about what advertisements you viewed and other information we collect, to enable us to provide personalized content and to study the effectiveness of advertising and marketing campaigns. You may choose whether to allow or deny uses or sharing of your device's location by changing

your device settings, but if you choose to deny such uses or sharing, we may not be able to provide you with certain personalized AIVIA Services and content.

Automated Decision-Making

In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you. Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review which has legal or other significant effect. We use automated analysis to make predictions such as your level of interest in particular products or services, or automated decision making to prevent theft, fraud or other crime. AIVIA's artificial intelligence solutions may lead to automated processing of data in a variety of fields. In the event that our automated decision making would have a legal effect or significantly affect you we will implement measures to safeguard your rights, freedoms and interests, including performing privacy impact assessments to identify suitable measures to protect your rights, or obtain your explicit consent as required by applicable laws. When we make this kind of an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contact us using the contact details provided under the "How to Contact Us" section below.

Legal Basis for Our Use

(EEA Visitors Only) If you are in the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, where we have a legal obligation to do so or where the processing is in our legitimate interests (such as processing for administrative purposes, direct marketing, product development or improvement, preventing fraud or criminal acts and in support of information security) and not overridden by your data protection interests or fundamental rights and freedoms. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the time of collection. We will also tell you whether the requirement for that information is mandatory and explain any consequences to you if you do not provide the information. Similarly, if we collect and use your personal information based on our legitimate interests (or those of any third party), we will take reasonable steps to provide clear notice and describe our legitimate interests. AIVIA is the Data Controller of all personal information collected in the EEA, except where a supplemental privacy notice says otherwise. The contact details for AIVIA are set out in the

“How to Contact Us” section. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information for any specific processing activity, please contact us using the contact details provided under the “How to Contact Us” Section below. How We Share Information We work through our affiliates to provide some of the AIVIA Services. We also work with authorized suppliers and business partners. When we share your personal information with these companies, we put in place appropriate measures to limit the use of your information only for legal and authorized purposes that are consistent with this Privacy Notice, as well as appropriate confidentiality and security measures. For example, we rely on affiliates and partners, such as our resellers, to complete a purchase transaction or provide AIVIA Services, such as support, that you have requested. We also share information with third parties for advertising and marketing; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of AIVIA Services; and to protect our legal rights.

With Affiliates and Subsidiaries

For purposes limited to and consistent with this Privacy Notice, a list of the Affiliates and Subsidiaries we share personal information with is set out in the Deed Poll to AIVIA’s Corporate Privacy Rules available here. We also share non-personally identifiable information, such as anonymized or aggregated information, with suppliers for purposes such as analysis, identifying trends in the areas of our products and to help research and develop new AIVIA Services.

With Partners

We occasionally have relationships with third parties that are not suppliers or vendors but are working with us to offer certain opportunities such as sweepstakes, contests, and similar promotions, to enable joint products or research studies, or to facilitate services like message boards, blogs or other shared platforms. In these cases, additional terms or privacy notices may be provided. For third parties or uses not described in this Notice, we share your information only with a lawful basis to do so.

For Advertising and Marketing

We share your information with our third party company partners to prepare and deliver advertising and marketing content, to provide content services and to enable them to provide you with more personalized ads and to study the effectiveness of our campaigns. In particular, we use third-party companies to communicate regarding goods and services that may be of interest to you, in accordance with your preferences. You may receive this content by a variety of means such as email, phone or when you access and use the AIVIA Services and other websites. Content may be based on information obtained, for example, through prior purchases

or transactions, through your device's physical location, through information about what advertisements and content you have viewed, or through cookies and similar technologies relating to your access to and use of the AIVIA Services and other websites. Please read our AIVIA Cookies and Similar Technologies Notice for more information. You can choose whether to allow or deny uses and/or sharing of your device's location by changing your device settings, but if you choose to deny such uses or sharing, our partners may not be able to provide you with the applicable personalized AIVIA Services and content. AIVIA does not share your personal information with non-affiliated third parties for their own advertising or marketing use without your permission. For information about how to decline our advertising and marketing, please see the section entitled "Your Choices & Rights" below.

Research and Study

We may disclose personal information to collaboration partners to conduct research to improve our technology, or the use of our technology, in various fields of study and to identify new uses or design new products. With Your Consent AIVIA may disclose your personal information to any other person or entity where you consent to the disclosure. Your Choices & Rights AIVIA respects your rights in how your personal information is used and shared. You may request access or corrections to your personal data and make choices about the kinds of marketing materials you receive (or choose not to receive marketing from AIVIA at all). If you are in Europe, you may have additional rights under the GDPR. Additional choices and rights may be available to you depending on which AIVIA Services you use. Access,

Correction to or Deletion of Your Information

If you would like to correct or update your personal information, or to request access to or deletion of your personal information, you may contact us by: Visiting the specific product or service website; using the online Contact Us form; or sending a letter to one of the postal addresses listed in the "How to Contact Us" section below including your name, email address, account identification, and purpose of the request. If you request a change to or deletion of your personal information, please note that we may still need to retain certain information for recordkeeping purposes, and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the personal information provided until after the completion of such purchase or promotion). Some of your information may also remain within our systems and other records where necessary for compliance with applicable law. At your request and where the law requires us to do so, we will confirm what personal information we hold about you. You may also have a legal right to obtain a copy of your personal information. You can make such a request by making a written request in one of the ways described in the "How to Contact Us"

section below. We may charge a processing fee for this service where permitted by law and we will require evidence of your identity before fulfilling your request. Data Privacy Rights Specific to Residents of the European Economic Area If you are in the EEA, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. You can exercise these rights by making a written request in one of the ways described in the “How to Contact us” section below. Similarly, if we have collected your personal information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect (1) the lawfulness of any processing we conducted prior to your withdrawal, or (2) processing your personal information under other legal bases. If you believe we are using your personal information in a way that is inconsistent with this Privacy Notice or for more information about your rights, contact your local data protection authority (contact details for data protection authorities in the European Economic Area are available here.)

Advertising and Marketing Choices

We give you many choices regarding our use and disclosure of your personal information for advertising and marketing purposes. You may access or update your contact details and modify your communication preferences by using one of the following methods: Visiting the specific product or service website; using the “unsubscribe” link in a marketing communication; adjusting settings using the Contact Us form, or by sending a letter to one of the postal addresses in the “How to Contact Us” section below. Please also note that if you choose not to receive marketing from us, we may still send you communications related to your products or AIVIA Services, such as information about a security update, billing issue or product delivery. Some advertising content is delivered through the AIVIA Services’ (including our website) use of cookies and related tracking technologies. Our Cookie Notice available here includes more information on AIVIA’s use of such technologies and how you can modify or reject their use.

Other Privacy Related

Information Below you will find additional information you may find important such as how we communicate changes to this notice, our data retention practices, international compliance, working with minors’ personal information and information security.

Security

The AIVIA Services are designed to provide reasonable and appropriate administrative, technical and organizational security measures to protect your personal information against risks such as temporary or permanent loss, destruction, and unauthorized or unlawful access, alteration, use or disclosure. We require our suppliers and vendors to apply similar protections

when they access or use personal information that we share with them. Users of AIVIA Services must also do their part in protecting the data, systems, networks, and service they are utilizing. No technology, data transmission or system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that your password to any AIVIA account has been compromised), please immediately notify us by contacting us using the instructions in the “How to Contact Us” section below.

Personal Information of Minors

We comply with the Children’s Online Privacy Protection Act in the United States, and similar laws around the world, where applicable to AIVIA Services. We do not knowingly collect personal information from minors without proper consent from a parent or legal guardian. If you believe that we may have collected personal information from a minor without the requisite consent, please let us know using the methods described in the “How to Contact Us” section below and we will investigate and promptly address the issue. For these purposes, we define a "minor" to mean an individual who is under the age of majority in the territory in which they are resident. Minors, or their legal guardians, may change or revoke the consent choices previously made or request access to or removal of any personal information that they have provided or posted to AIVIA sites by contacting us using the information in the “How to Contact Us” section of this Notice. Within thirty days of such a request (unless another period is provided by law) AIVIA will anonymize, or remove from public view such content unless legally required to retain such content or information.

International Compliance

AIVIA is a global company with its headquarters in the United States. As such, we may transfer your personal information between the United States and our affiliates and subsidiaries in other countries. We may also transfer your personal information to our third party service providers, who may be located in a different country to you. We may also transfer your personal information to our major data centers for processing located in any country of our choice. These countries may change from time to time and AIVIA can provide a current list upon written request. We transfer information in order to operate efficiently, to improve performance, and to create redundancies in order to protect information in the event of an outage or other problem. We will process your personal information in a way that meets the commitments of this Notice and complies with the law wherever we transfer it. Whenever AIVIA transfers personal information beyond the country of origin, we will do so in accordance with applicable laws. For personal information originating in the European Economic Area (EEA) that is transferred to an AIVIA entity outside the EEA that does not have an “adequate level of protection” as determined by the European Commission.

Retention

We retain personal information for the period necessary to: Provide requested AIVIA Services, as needed to comply with legal obligations (e.g. maintaining opt-out lists to fulfill advertising and marketing choices or to comply mandatory record retention or legal hold requirements), as agreed in an individual consent, to resolve disputes, and to otherwise fulfill the purposes, rights and obligations outlined in this Privacy Notice. Retention periods can vary significantly based on the type of information and how it is used and our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When personal information is removed from our systems, it will be deleted or destroyed using appropriate security protocols so that it cannot be reconstructed or read.

Third Party Sites & Services

This Privacy Notice does not address, and we are not responsible for, the policies and practices of third parties or other organizations that are not operating on AIVIA's behalf, including policies and practices related to privacy and security, data collection, processing, use, storage, and disclosure. This includes: (a) any third party operating any site or service to which the AIVIA Services link – the inclusion of a link on the AIVIA site does not imply endorsement of the linked site or service by us or by our affiliates; or (b) any social media platform provider, operating system provider (such as Facebook, Apple, Google, Microsoft, LinkedIn, etc.) - including any personal information you disclose to other organizations through or in connection with the AIVIA or our corporate Social Media Pages.

Changes to This Policy

We may change this Privacy Notice from time to time so it accurately reflects our practices, the AIVIA Services and legal requirements. The "Last Revised" section at the top of this Notice states when this Privacy Notice was last amended and we update this date each time a revision is posted. Any changes to this Privacy Notice will become effective when we post the revised Privacy Notice on the AIVIA Services. You should check back regularly to stay informed of our privacy practices. If any change to our Privacy Notice materially affects the use of your personal information, we use reasonable efforts to notify you in advance, such as by sending an email or posting a prominent notice of the changes on our website, and give you a reasonable period of time to object to any changes. In some cases, objecting to changes may affect the availability or functionality of the AIVIA Services available to you. We will treat your continued use of the AIVIA Services after the effective date of any updated Privacy Notice as your acceptance of the changes we have made. However, we will seek your affirmative consent to any material

changes in our use of your personal information as described in an updated Privacy Notice if and where this is required by applicable data protection laws. We encourage you to periodically review this Privacy Notice to stay informed about how we collect, use, and share personal information.

How to contact us:

AIVIA WEALTHTECH INC

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