



PRIVACY NOTICE

DealDefenders and its subsidiaries, including without limitation TelFinance LLC, TelFinance EU LLC and TxtFinance LLC, (collectively "DealDefenders Companies") provides this privacy notice ("Privacy Notice") to describe our practices regarding the collection, storage, use, disclosure and other processing of Personal Information as defined below.

1. Types of Personal Information Collected. We only maintain relationships and accounts with corporations, limited liability companies, and other business and governmental entities. However, we do collect certain personal information ("Personal Information") about individual representatives ("Representatives") of our Customers. Personal Information may include, without limitation:

- Work contact details: name, work address, telephone numbers, email address, and online contact details.
- Company relationship data: titles, positions held, and voting rights.
- Authentication data: passport, driver's license, other governmental identification information, home address and telephone number, documents that verify address, date of birth, country of domicile, documents that verify employment, and signature authorization.
- Financial data: certain financial relationships.
- Background check data: background check information including credit and criminal checks and screening, to the extent required or permitted by law.

Collectively, the above categories of data constitute "Personal Information." We may collect Personal Information directly from the Representative, Customers, private lists, and publicly available sources. Failure to provide this information may result in DealDefenders Companies being unable to provide or continue to provide the requested services to the Customer.

2. Purposes of Collection and Use. The purposes of collection and use of Personal Information are:

- To provide the services requested by our Customers, perform obligations under our agreements, assist in security, and carry out related business functions, including performing data and transaction processing, confirming identity, preventing fraud, conducting credit checks, handling Customer inquiries, and managing the Customer relationship.
- To comply with legal obligations and regulations applicable to DealDefenders Companies and its Affiliated Entities (defined below) , obligations to and of our depository banks and Customers, in relevant jurisdictions, including but not limited to "know your customer"/ "AML" obligations based on applicable anti-money laundering and anti-terrorism requirements,

economic and trade sanctions, customer due diligence, suspicious activity, foreign exchange and international trade, tax reporting and other applicable laws, regulations, ordinances, and obligations.

- To confirm a person's authority as a representative or agent of a Customer with which DealDefenders Companies or their Affiliated Entities have entered or intend to enter into various arrangements.
- To conduct recordkeeping and otherwise manage our businesses.

3. Disclosure of Personal Information. DealDefenders Companies may disclose Personal Information as follows.

- **Affiliated Entities.** DealDefenders Companies has affiliated entities, including TelFinance LLC, TxtFinance LLC and TelFinance EU LLC and may create other subsidiaries and affiliates ("Affiliated Entities") (collectively, DealDefenders Companies and our Affiliated Entities are the "DealDefenders Group"). DealDefenders Companies may disclose Personal Information to any of the other DealDefenders Companies and to our Affiliated Entities, and such affiliates may use the data, for the purposes described in Section 2.
- **Beneficiaries, counterparties, and other parties related to a transaction.** The DealDefenders Group may disclose Personal Information to beneficiaries, counterparties, or other parties related to a transaction to prevent fraud, resolve disputes, provide the services requested by our customers and to comply with legal obligations and regulations.
- **Service providers.** The DealDefenders Group may disclose Personal Information to independent external auditors, attorneys, accountants or other service providers. Such service providers will be subject to any necessary contractual obligations regarding the protection and processing of such Personal Information.
- **Legal requirements.** Subject to applicable law, the DealDefenders Group may disclose Personal Information if required or permitted by applicable law or regulation, including laws and regulations of the United States and other countries, or in the good faith belief that such action is necessary to: (a) comply with a legal obligation or in response to a request from law enforcement or other public authorities wherever the DealDefenders Group may do business; (b) protect and defend the rights or property of any DealDefenders Group entity; (c) act in urgent circumstances to protect the personal safety of Representatives, Customers, and contractors/employees of any DealDefenders Group entity or others; or (d) protect against any legal liability. In addition, the DealDefenders Group may share your Personal Information with U.S. regulators and with other self-regulatory bodies to which we are subject, wherever the DealDefenders Group may do business.
- **Business transfers, combinations and related activities.** As we develop our business, the DealDefenders Group might sell, buy, restructure or reorganize businesses or assets. In the

event of any actual or proposed sale, merger, reorganization, restructuring, dissolution or any similar event involving our business or assets, Personal Information may be shared with the relevant entity or may be part of the transferred assets.

The recipients of Personal Information identified in this Section 3 may be located in the United States and other jurisdictions that may not provide the same level of data protection as your home country. As needed, we will take steps to establish appropriate data transfer agreements (including agreements based on the EU Model Contractual Clauses with respect to Personal Information from Europe) or otherwise address cross-border data transfer restrictions.

4. Consents. To the extent that consent is required by applicable law and our collection, use, disclosure, or other processing of Personal Information is not otherwise permitted by applicable law, by providing Personal Information to the DealDefenders Group or authorizing our Customer to provide such information to us, you consent to the collection, use, disclosure (including cross-border transfer), and other processing of Personal Information as described in this Privacy Notice. You expressly waive the bank secrecy or confidentiality laws and obligations, if any, of the country or countries where you and the accounts are located to the extent permitted by applicable law.

You may revoke consent at any time by notifying us at the address provided in Section 7 of this Privacy Notice. Prior uses and disclosures will not be affected (unless required by applicable law), and we may otherwise continue to process Personal Information as permitted or required by law.

5. Information Management and Security Control Measures. The Personal Information will be safely stored in the databases of DealDefenders Companies. Appropriate measures are taken so that Personal Information can be kept accurate, and up-to-date, which will be in accordance with the applicable security requirements. In an effort to prevent the loss, misuse, unauthorized access, disclosure, alteration or destruction of Personal Information, DealDefenders Companies will take commercially reasonable legal, organizational and technical measures to protect Personal Information.

While registering with our websites or any mobile applications (each, a "Site"), we may provide you with a unique identification and password for accessing our products and services. We encourage you to choose your password wisely such that no intruder or third party can obtain any unauthorized access to the Site. We also encourage you to keep your password confidential and not have any written or other record of the password that can be accessible by an intruder or third party.

6. Access and Correction, Choice for Marketing Materials, and Other Legal Rights.

- **Access and Correction.** Representatives have the right to access and correct any Personal Information held about them. Requests to access or correct any Personal Information held about a Representative must be submitted by the Representative in writing to the address

listed in the Customer Inquiries section below. After we have verified the Representative's identity, we will endeavor to provide the information and take the other actions requested as specified by local law, and, where permitted by law, we may charge an appropriate fee to cover the costs of responding to the request.

- **Choice for Marketing Materials.** If you do not want to receive marketing and sales materials from DealDefenders Companies by direct mail, telephone or email, please follow the "unsubscribe" instructions provided in those communications or submit a written request to the address listed in the Customer Inquiries section below. We will comply with your request within a reasonable period of time after receiving it.

- **Other Legal Rights.** You may have other rights under the laws applicable to our collection of your Personal Information, such as the deletion of your Personal Information. Contact us in writing with requests to exercise such rights at the address listed in the Customer Inquiries section below and we will honor such rights in accordance with law. The provision of your personal data is voluntary. However, if you do not provide your personal data we will not be able to perform our services.

7. Customer Inquiries Please direct all requests relating to access, correction, and other legal rights regarding Personal Information, or any questions regarding this Privacy Notice to Attn: Legal, DealDefenders LLC, 1000 N West Street, Wilmington, DE 19801, USA.

8. Modifications This Privacy Notice may be modified as a result of amendments to the law or regulations or due to other reasons. In such case, an amended Privacy Notice will be posted on our website at <http://www.dealdefenders.com>.

9. Cookies Cookies are pieces of data stored on your device. Browser cookies are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server. Mobile applications may also use cookies. We use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our site; and anti-fraud and information security purposes.

- **Do you have to accept cookies?** You may be able to set your browser to reject browser cookies. However, if you choose to reject cookies, you cannot access your DealDefender Group accounts and services. Therefore, if you set your browser options to disallow cookies, you will limit the functionality we can provide when you visit our Sites. Internet browsers provide cookie management tools, such as the ability to delete or reject cookies. We recommend that you refer to information supplied by browser providers for more specific information, including how to use these tools.

- **Additional cookies.** Cookies is a term also used to describe other locally stored objects, such as cookies stored in an Adobe folder on your device. These cookies will not be deleted when you clear cookies from your browser. We may use this technology for purposes such as information security and fraud prevention. We do not use this technology for online

behavioral advertising purposes. Please refer to information provided by Adobe for information on how to disable and control Flash objects. If you choose those options, you may limit the functionality we can provide when you visit our Site.

Acknowledgement and Consent I understand that the DealDefenders Companies will collect, use, process, and transfer Personal Information as described in this Privacy Notice. By signing below or clicking the accept button, if acknowledged electronically, I confirm my consent to the collection, use, processing, storage, and transfer of Personal Information in accordance with the terms and conditions contained in this Privacy Notice. I also consent to the transfer of my Personal Information outside my country of residence as described in this Privacy Notice. I agree that this Privacy Notice and Consent supersede any prior notice on this subject and shall cover all Personal Information collected or maintained by DealDefenders Companies in connection with my role as representative of DealDefenders Companies's Customer. I understand that I may decline to provide my Personal Information but this may prevent DealDefenders Companies from providing certain services described in this Privacy Notice.

I confirm that I have read and understood this Privacy Notice. Where the personal data was/is collected by me or from third party sources, I confirm and agree that:

(i) The relevant consents for the purposes notified in the Privacy Notice have been procured by me from all relevant individuals to whom the personal data relates; and (ii) I will provide all relevant individuals with copies of the International Privacy Notice for their review.