



## InterPrice Privacy Policy

### Introduction

InterPrice Technologies, Inc. (“InterPrice” or the “Company”) is a financial technology company that empowers corporate Treasury teams to make financing decisions with accuracy and precision. InterPrice additionally enables better engagement of Corporate Treasury teams with their banking partners.

For more information about our services, please refer to our website:

[www.interpricetech.com](http://www.interpricetech.com)

### Company Information

**InterPrice Technologies, Inc.**

99 Wall Street, Suite 1007

New York, NY, 10005

This Privacy Policy is applicable to InterPrice Technologies, Inc. (“we”, “our” or “us”) as related to our services, which collectively include:

- the use of [www.interpricetech.com](http://www.interpricetech.com) (“Website”),
- the use of the application website [www.interpricetech.com](http://www.interpricetech.com) (“Application”),
- social media messages and marketing campaigns, and
- the use of our products and services.

This Privacy Policy sets out the essential details relating to your personal data relationships with InterPrice as:

- Website visitor
- End-user of the Application (“End User”)
- Prospective client
- Job applicant, and
- Partners

Clients contract the use of our Application and give access to their employees and other third parties, as solely decided by them, by creating users who access the Application with their email address and credentials. The Clients' administrators grant End Users roles, which result in different permissions and access rights to the information held in the Client account.

InterPrice Technologies, Inc. collects the following types of information about you:

#### Information you provide us directly:

We ask Users (individuals who utilize InterPrice for daily operations on behalf of their Company) certain information such as your username and/or email address and real name when you are registered in the InterPrice system or if you correspond with us. We may also retain any messages you send through the Service as part of normal business operations, and may collect information you provide to supply the InterPrice platform. We use this information to operate, maintain, and provide to you the features and functionality of the Service. Your username and your real name will not be publicly published.

#### Analytics information:

We may directly collect analytics data, or use third-party analytics tools and services, to help us measure traffic and usage trends for the Service. These tools collect information sent by your browser, including the pages you visit and other information that assists us in improving the Service. We collect and use this analytics information in aggregate form such that it cannot reasonably be manipulated to identify any particular individual User.

#### Cookies information:

When you visit the Service, we may send one or more cookies to your computer that uniquely identifies your browser and lets InterPrice help you log in faster and enhance your navigation through the site. Specifically, SAML/SSO enabled Users will require cookies to power the authentication service. A cookie may also convey information to us about how you use the Service for the purpose of analytics and optimization of our platform. These session cookies are temporary and disappear after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent.

#### Log file information:

Log file information is automatically reported by your browser each time you access the Service. When you use our Service, our servers automatically record certain log file information. These

server logs may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information.

#### Commercial and marketing communications:

We use the information we collect or receive, such as your email address, to communicate directly with you on a very limited basis. We may send you emails containing information on new product features. If you do not want to receive such email messages, you have the ability to communicate directly with the InterPrice team regarding your opt-out. We also use your information to send you other Service-related emails (e.g., account verification, technical and security notices). You may not opt out of Service-related emails.

#### Use of certain service type information we collect about you:

We use or may use cookies, and log files to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage patterns; (e) diagnose or fix technology problems; and (f) help you efficiently access your information after you sign in.

## Sharing of Your Information

**We will not rent or sell your information into third parties outside of InterPrice, except as noted below:**

- **Who can see User Content:** Any User Content that you voluntarily disclose with other parties on the platform (such as underwriting partners or issuers) becomes available to those specific parties on a limited basis. If you do not wish your content to be available to any other party, please do not share any requests or information on the InterPrice platform. Your username and if you choose to disclose it, your real name, will be shared with specific parties chosen by you if you choose to do so.
- **Who can see your IP address:** A selection of Trusted Administrators within InterPrice have the ability to review IP addresses of Users to reduce abusive behavior or security concerns.

#### What happens in the event of a change of control:

InterPrice and its partners retain the option to buy or sell/divest/transfer the company (including any shares in the company), or any combination of its products, services, assets and/or businesses. Your information such as customer names and email addresses, Content and other User information related to the Service may be among the items otherwise transferred in these types of transactions to maintain functional usage of the platform. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company.

#### Instances where we are required to share your information:

InterPrice will disclose your information when required to do so by law or subpoena, or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security, quality or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of InterPrice, our Users, or others.

## How We Store and Protect Your Information

#### Storage and Processing:

Your information collected through the Service may be stored and processed in the United States or any other country in which InterPrice or its subsidiaries, affiliates, or service providers maintain facilities. Information which you provide will never be used in any non-production environment. InterPrice may transfer information that we collect about you, including personal information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world.

#### Keeping your information safe:

InterPrice cares about the security of our clients' information, and uses commercially reasonable safeguards to preserve the integrity and security of all information collected through the Service. To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from InterPrice, at all times. However, InterPrice cannot ensure or warrant the security of any information you transmit to the Service or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed.

### Compromise of information:

In the event that any information under our control is compromised as a result of a breach of security, InterPrice will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

### How long we keep your private profile information:

Following termination of your User account, InterPrice may retain your profile information for a commercially reasonable time for backup, archival, or audit purposes. For the avoidance of doubt, any information that you choose to share with other parties on the Service may not be removable.

### Links to Other Websites and Services:

We are not responsible for the practices employed by websites or services linked to or from the Service, including the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and we do not control over any third-parties that you authorize to access your User Content. If you are using a third-party website or service and you allow such a third-party access to your User Content you do so at your own risk. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources other than through the Service.

## Legal disclosures

It is possible that we may need to disclose personal information when required by law, subpoena, or other legal processes as identified in the applicable legislation.

We attempt to notify our clients about legal demands for their personal data when appropriate in our judgment unless prohibited by law or court order or when the request is an emergency.

## Change in Control

We can also share your personal data as part of a sale, merger or change in control or in preparation for any of these events.

Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

## Your rights

We provide the same suite of Services to all of our Clients and End-Users worldwide.

We offer the following rights to all individuals regardless of their location or applicable privacy regulations.

For personal information we have about you, you can:

- **Access your personal information or request a copy**

You have the right to obtain information about what personal information we process about you or to obtain a copy of your personal information.

If you have provided personal information to us, you may contact us to obtain an outline of what information we have about you or a copy of the information.

If you are an End User of the Application, you can log in to see the personal information in the account or approach your employer for more information.

- **You have the right to be notified of what personal information we collect about you and how we use it, disclose it and protect it**

This Privacy Policy describes what personal information we collect and our privacy practices. We may also have additional privacy notices and statements available to you at the point of providing information to us directly.

- **Change or correct your personal information**

You have the right to update/correct your personal information or ask us to do it on your behalf.

You can edit your information through the user account in the Application or ask us to change or correct it by contacting an InterPrice Representative, Dane Huber, at [dane@interpricetech.com](mailto:dane@interpricetech.com).

- **Delete or erase your personal information**

You have the right to request deletion of your personal information at any time. We will communicate back to you within reasonable timelines the result of your request. We may not be

able to delete or erase your personal information, but we will inform you of these reasons and any further actions available to you.

- **Object to the processing of your personal information**

You have the right to object to our processing of your personal information for direct marketing purposes. This means that we will stop using your personal information for these purposes.

- **Ask us to restrict the processing of your personal information**

You may have the right to ask us to limit the way that we use your personal information.

- **Export your personal data**

You have the right to request that we export to you in a machine-readable format all of the personal information we have about you.

We do not process personal information through the use of automated means.

If you would like to exercise any of the rights described above, please contact an InterPrice Representative, Dane Huber, at [dane@interpricetech.com](mailto:dane@interpricetech.com).

You also have the right to lodge a complaint with the local organizations in charge of enforcing the privacy legislation applicable in your territory.

## Appendix

### A.1 For individuals based in European Union (EU), European Economic Area (EEA) and Switzerland:

If you are based in one of these jurisdictions, InterPrice is the controller of your personal data collected in the following instances:

- When you visit our Website: [www.interpricetech.com](http://www.interpricetech.com)
- When we process your personal data for sales and marketing purposes

InterPrice Technologies, Inc. is a processor of all personal data processed on the Application, on behalf of our Clients. We only process the personal data under their direction. Please contact your employer or the organization that granted you access to the Application for details on their privacy practices.

We only process personal data if we have a lawful basis for doing so. The lawful bases applicable to our processing as controller are:

- Consent - We will ask for your express and informed consent every time we collect your personal data on this legal basis.
- Contractual basis - We process the personal data as necessary to fulfill our contractual terms with you or our Clients.
- Legitimate interest - We process the names, contact details, job titles, companies of our existing and prospective clients for our marketing purposes, including market research and sales leads generation.

You have the following rights under the GDPR:

- Be informed about the collection and use of your personal data
- Access your personal data
- Correct errors in your personal data
- Erase your personal data
- Object to the processing of your personal data.
  - This right is also available to individuals whose personal data is processed by us for direct marketing purposes. If you object to the processing of your personal data for direct marketing purposes, we shall stop processing within 30 days of receipt of your request.
- Export your personal data
- Restrict our processing of your personal data for specific reasons, including any of the purposes supported by the legitimate interest legal bases. (see the section above).

We process personal data in AWS Northeast Region and share it with our service providers. We use standard contractual clauses as the data transfer mechanism of transferring EU data to countries subject to data transfer requirements.

You may contact an InterPrice Representative, Bryson Bargar, at [bryson@interpricetech.com](mailto:bryson@interpricetech.com) or you may contact our Chief Product Officer, Dylan Bargar, at [dylan@interpricetech.com](mailto:dylan@interpricetech.com).

You may also lodge a complaint with your local supervisory authority, EU Data Protection Authorities (DPAs) or Swiss Federal Data Protection and Information Commissioner (FDPIC). See their contact details here [National Data Protection Authorities](#).

## A.2 For individuals based in California:

This section provides additional specific information for consumers based in California as required by the California Consumer Privacy Act of 2018 ("CCPA").

### A.2.1 Collection and Use of Personal Information:

In the last 12 months, we have collected the following categories of personal information:

- Identifiers, such as your name, mailing address, email address, zip code, telephone number, or other similar identifiers.
- California Customer Records (Cal. Civ. Code § 1798.80(e)), such as username and password, company name, job title, business email address, and department.
- Internet/Network Information, such as your browsing history, log and analytics data, information about the device(s) used to access the Services and information regarding your interaction with our websites or Services and other usage data.
- Geolocation Data, such as information about your location (at country and city level) collected from your IP address.
- Sensory Information, the content, audio and video recordings of conference calls between you and us that we record where permitted by you and/or the law.
- Profession/Employment Information that you include in your CV, cover letter and send to us when applying for a position.
- Other Personal Information, such as personal information you provide to us in relation to a survey, comment, question, request, article download or inquiry and any other information you upload to our Application.

We collect personal information directly from you, from your browser or device when you visit our websites, from third parties that you permit to share your information or from third parties that share public information about you and as stated above.

See the section above, "How we use personal information," to understand how we use the personal information collected from California consumers.

#### A.2.2 Recipients of Personal Information:

We share personal information with third parties for business purposes. The categories of third parties to whom we disclose your personal information may include: (i) our service providers and advisors, (ii) marketing and strategic partners; (iii) ad networks and advertising partners; (iv) analytics providers; and (v) social networks.

Please see the "How We Share Information" section of the Privacy Policy above for more information.

#### A.2.3 California Privacy Rights:

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

- The Right to Know any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:
  - The specific pieces of personal information we have collected about you;

- The categories of personal information we have collected about you;
- The categories of sources of the personal information;
- The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
- The categories of personal information we have sold and the categories of third parties to whom the information was sold; and
- The business or commercial purposes for collecting or selling the personal information.
- The Right to Request Deletion of personal information we have collected from you, subject to certain exceptions.
- The Right to Opt-Out of Personal Information sales to third parties now or in the future. However, we do not sell your personal information.

You also have the right to be free of discrimination for exercising these rights.

Please note that if the exercise of these rights limits our ability to process personal information (such as a deletion request), we may no longer be able to provide you with our products and services or engage with you in the same manner.

#### A.2.4 How to Exercise Your California Consumer Rights:

To exercise your right to know and/or your right to deletion, please submit a request by contacting the InterPrice Representative, Bryson Bargar, at [security@interpricetech.com](mailto:security@interpricetech.com).

We will need to verify your identity before processing your request.

In order to verify your identity, we will generally require sufficient information from you so that we can match it to the information we maintain about you in our systems. Sometimes we may need additional personal information from you to be able to identify you. We will notify you.

We may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity or locate your information in our systems or as permitted by law.

You may choose to designate an authorized agent to make a request under the CCPA on your behalf. No information will be disclosed until the authorized agent's authority has been reviewed and verified. Once a request has been submitted by an authorized agent, we may require additional information (i.e. written authorization from you) to confirm the authorized agent's authority.

If you are an employee/former employee of an InterPrice Client that uses our application and services, please direct your requests and/or questions directly to your employer/former employer.

If you are a third party (auditor, business associate etc.), who was given access to the InterPrice application by an InterPrice Client, please direct your requests and/or questions directly to the InterPrice Client that gave you access.

## Minors Under Age 16

Our application and services are intended for business use and we do not expect them to be of any interest to minors. We do not intentionally collect any personal information of consumers below the age of 16. We do not sell the personal information of California consumers.