

## PLUS DELTA PARTNERS

### PRIVACY

#### Privacy Policy

Last Updated: May 14, 2026

#### IMPORTANT – READ CAREFULLY

At Copper Reef Enterprises d/b/a Plus Delta Partners (“**Plus Delta**,” “**we**,” “**our**,” or “**us**”), we know you care about how your Personal Data is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy and how we collect, use, share, and protect the Personal Data that we collect through our Services, including the Plus Delta website at this URL and the products or services delivered to you via the internet (including all associated websites, webpages, subdomains, mobile applications, or downloadable software) (each and collectively, the “**Website**”). Throughout this Privacy Policy, we collectively refer to the Website and any products and services offered as the “**Services**.” By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and agree that we may collect, use, and share your Personal Data as described herein.

Remember that your access to and use of the Websites is also subject to our [Website Terms of Use](#) which incorporates this Privacy Policy by reference (“**Terms of Use**”), and the products and services offered by Plus Delta are subject to our [Terms and Conditions of Purchase](#), or such other written agreement agreed to by Plus Delta and you (in such capacity, a “**Client**”) (the Terms and Conditions of Purchase or any such agreement, a “**Services Agreement**”, which incorporates this Privacy Policy by reference). Any terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms of Use and/or the Terms and Conditions of Purchase. If you do not consent to this Privacy Policy or our Terms of Use, you should not use the Services or otherwise provide us with any Personal Data.

#### What does this Privacy Policy Cover?

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules, or regulations.

This Privacy Policy does not cover the practices of companies we do not own or control or people we do not manage who may have access to your Personal Data. To the extent that we provide your Personal Data to our agents or service providers (including sub-processors), we will take what we believe to be commercially reasonable steps to ensure that they safeguard such information and use it only for the intended purposes. However, we are not responsible for the practices employed by any Third-Party Site that we may link to, nor for the information or content

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contained therein. We encourage you to review the terms of use and privacy policies of such Third-Party Sites to understand their information practices.

#### Changes to this Privacy Policy

Plus Delta may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our Services or business practices. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, we will update the 'Last Updated' date at the top of this page. We may also alert you to changes by placing a notice on the Plus Delta website, by sending you an email, and/or by some other means. Please note that if you have opted not to receive legal notice emails from us (or you have not provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them.

If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

#### What Personal Data does Plus Delta Collect?

We collect Personal Data about you from you or third parties under the following circumstances:

- You:
  - when you provide such Personal Data directly to us, and
  - when Personal Data about you is automatically collected in connection with your use of our Services.
- Third parties, both when they provide us with Personal Data about you and when we seek out information for Profiles, as discussed below ("**Third Parties**"). Third Parties that share your Personal Data with us include:
  - Service providers. For example, we may use analytics service providers to analyze how you interact and engage with the Services, or third parties may help us provide you with Client support.
  - Other networks connected to the Services. If you provide any third-party account credentials to us or otherwise sign in to the Services through a third-party site or service (for example, using Salesforce, Blackbaud, or Ellucian), you understand some content and/or information in those accounts may be transmitted into your account with us.

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- Our Clients. When Personal Data about you is automatically or otherwise collected by our Clients in connection with the use of our Services.

If you provide us, our agents, or our service providers with any Personal Data relating to other individuals, you represent that you have the authority to do so, and where required, have obtained the necessary consent, and acknowledge that it may be used in accordance with this Privacy Policy. If you believe that your Personal Data has been provided to us improperly or want to exercise your rights relating to your Personal Data, please contact us at [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com).

Plus Delta collects Personal Data in the following categories.

|   | Category of Personal Data                              | Examples                                                                                                                  | What is the source of this Personal Data? |
|---|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| A | Personal Identifiers                                   | Name, email, postal address, phone numbers, job title and company information, IP address, Access Credentials, DiSC Style | You<br>Third Parties                      |
| B | Internet or other similar network activity information | Website & application usage, browser/platform/device used, search history                                                 | You<br>Third Parties                      |
| C | Geolocation data                                       | IP, location data (city, country, state)                                                                                  | You<br>Third Parties                      |

The following sections provide additional information about how we collect your Personal Data.

Information You Provide to Us. We receive and store any information you knowingly provide to us. For example, through the registration process and/or through your account and Profile settings, we may collect Personal Data such as your name, email address, phone numbers, job title and company information, and third-party account credentials (for example, your log-in credentials for Salesforce, Blackbaud, or Ellucian). If you provide your third-party account credentials to us or otherwise sign into the Service through a Third-Party Site or service (such as Salesforce, Blackbaud, or Ellucian), you understand some content and/or information in those accounts ("**Third Party Account Information**") may be transmitted into your account with us, and that Third Party Account Information transmitted to our Service is covered by this Privacy Policy.

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Certain information may be required to register with us or to take advantage of some of our features.

We may communicate with you if you've provided us with the means to do so. For example, if you've given us your email address, we may email you about your use of the Services or marketing related to other offerings we provide. Also, we may receive a confirmation when you open an email from us, which helps us improve our Services. If you do not want to receive marketing communications from us, please indicate your preference by contacting us at [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com). You may not opt out of Service-related communications.

Information Collected Automatically. Like many other commercial websites, we may also gather information in connection with your use of the Services through the use of cookies and other similar technologies such as server logs, pixel tags, web beacons, user website activity and JavaScript (collectively, "**Cookies**") to enable us to recognize your web browser or device and tell us how and when you visit and use our Service, to analyze trends, to learn about our user base, and to operate and improve our Service. Cookies are small pieces of data—usually text files—placed on your computer, tablet, phone, or similar device when you use that device to visit our Service. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s).

Do Not Track. While you may be able to control the use of cookies through your web browser as described in the "We use the following types of Cookies" section below, some web browsers may also give you the ability to enable a "Do Not Track" (DNT) setting that tells a website that a user does not want their online activity to be tracked. This DNT signal is different from disabling certain forms of tracking by declining cookies in your browser settings, as browsers with DNT enabled still have the ability to accept cookies. Our website does not currently respond to DNT. If we do so in the future, we will describe our approach in this Privacy Policy. For more information about DNT, visit [www.allaboutdnt.org](http://www.allaboutdnt.org).

We use the following types of Cookies.

**Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Service. Disabling these Cookies may make certain features and services unavailable.

**Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Service, maintain your preferences over time and recognize you when you return to our Service. These Cookies help us to personalize our content for you, greet you by name, and remember your preferences (for example, your choice of language or region).

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Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Service such as by collecting information about the number of visitors to the Service, what pages visitors view on our Service and how long visitors are viewing pages on the Service.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your computer. If you do this, however, you may have to manually adjust some preferences every time you visit a site, and this may cause some services and functionalities to not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

#### **How We Use Your Personal Data**

We process Personal Data to operate, improve, understand, and personalize our Services. We use Personal Data for the following purposes:

- To present our Website and its Content to you.
- To fulfill any purposes for which you provided it to us.
- To create and manage your account or other user profiles, including providing you notices about your account or responding to account verification requests.
- To communicate directly with you about the Services, including notification of changes to our Website, changes or updates to features of the Services, and other Service announcements, updates or offers.
- To allow you to participate in interactive features on the Website.
- To provide you with support and assistance for the Services.
- To respond to user inquiries and fulfill user requests.
- To market, administer, improve, and develop the Services, including troubleshooting, testing, research, analysis, and product development.

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- To protect against or deter fraudulent, illegal or harmful actions and for information security purposes, including to maintain the safety, security and integrity of our Services.
- To comply with our legal or contractual obligations, resolve disputes, and enforce our rights arising from any Services Agreement, including for billing and collection.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For any other business purpose stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (as amended, the “**CCPA**”).

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Certain of our Services may incorporate artificial intelligence features (“**AI Features**”). Users of our Services may submit data through AI Features, including data that may include your Personal Data (“**Inputs**”), and receive outputs generated by the AI Features based on those Inputs (“**AI Outputs**”). We process Inputs and AI Outputs solely to provide and deliver the Services. We do not use Inputs or AI Outputs to train, develop, or improve our artificial intelligence models.

In addition, we may collect and use aggregated, de-identified data reflecting access to and use of our Services (“**Usage Data**”) to develop, improve, operate, and support our products and services. Any Usage Data shared externally will be anonymized and aggregated such that it does not identify any individual user. For additional details, please refer to our Terms and Conditions of Purchase.

#### How We Share Your Personal Data

##### Disclosures of Personal Data for a Business Purpose.

We may disclose your Personal Data to service providers and other third parties for the following reasons:

- Performing Services on our behalf, including maintaining or servicing accounts, providing client service, processing transactions, verifying client information, providing analytic services, or providing similar services on behalf of the business or service provider.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

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- Debugging to identify and repair errors that impair existing intended functionality of the Services.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a Service or device that we own, manufacture, was manufactured for us, or we control.
- Responding to or participating in commercial disputes (e.g., lawsuits or investigations).
- Complying with applicable law, or exercising or performing a legal, ethical, contractual or other right or obligation, such as to enforce our Terms of Use or a Services Agreement, or to investigate potential violations thereof.
- For such lawful purposes as may be disclosed or evident at the time that you provide Personal Data to us,

We may disclose your Personal Data to the following categories of service providers and other third parties, who are located in the United States:

- Service providers, including:
  - Subscription management providers and payment processors
  - Hosting and other technology and communications providers
  - Analytics providers
  - Client relationship management and Client support providers
  - Other vendors who reasonably need your Personal Data to do their jobs so that we may provide you the Services
- Clients to whom we provide Services
- Parties who acquire your Personal Data in connection with a merger or other business combination or separation (including, but not limited to, a voluntary or involuntary change in our business or structure, or a reorganization, financing, change of control, sale of all or part of our stock or assets, spinoff, bankruptcy, dissolution, or any related to similar proceedings)
- Other parties at your direction
- Affiliates, including any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

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- Business partners
- Law enforcement or to meet other legal obligations
- In some cases, we may disclose information about your use of the Services to your employer or other users within your organization.

Over the past twelve months, other than as described above, we have not disclosed your Personal Data to service providers or other third parties for any purpose.

### Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using what we believe to be appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data, including but not limited to:

- The Website and Services use SSL technology (https) and Services require Two-Factor Authentication (2FA).
- Account passwords are salted and hashed when stored in our database.
- Plus Delta personnel use passwords and enable screen locking.
- Access to AWS and Payment Processors is limited on a need-to-know basis and requires 2FA.
- Databases are encrypted at rest and not publicly accessible from internet.

The safety and security of your Personal Data also depends on you. If you choose, or are provided with, a username and password to access our Services ("**Access Credentials**"), you must treat such information as confidential, and you must not disclose it to any other person or entity. You also acknowledge that your account is personal to you and agree not to provide any other person with access to all or part of the Services using your Access Credentials. You agree to notify us immediately of any unauthorized access to or use of your Access Credentials or any other breach of security. You also agree to ensure that you sign off from your account at the end of each session. You should use caution when accessing your account from a public or shared computer so that others are not able to view or record your password or other Personal Data.

Although we work to protect the privacy of your account and other Personal Data that we hold in our records, no security system is impenetrable, and unanticipated system failures or the efforts of malicious actors are an unfortunate reality on the Internet. Therefore, Plus Delta does not guarantee that Personal Data during transmission through the Internet or while stored on our



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systems or otherwise in our care will be absolutely safe from intrusion by others and disclaims any express or implied warranties, duties or conditions in that regard. If any applicable law imposes on us a duty with respect to these matters that cannot be disclaimed, you acknowledge and agree that our commercially reasonable precautions shall be considered to satisfy that duty unless (and only unless) we have engaged in willful misconduct.

In the event that the security of any Personal Data under our control is compromised, we will take reasonable steps to investigate and mitigate the situation, notify affected individuals and applicable regulatory authorities as required by applicable law, and take other steps in accordance with applicable laws and regulations and any applicable Services Agreement.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide the Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

#### **Sensitive Personal Information**

Certain categories of Personal Data may be considered "sensitive" under applicable state privacy laws, such as Social Security numbers, government-issued identification numbers, precise geolocation data, racial or ethnic origin, religious beliefs, biometric data, health information, and sexual orientation. Plus Delta does not knowingly collect sensitive Personal Data as defined under applicable state privacy laws. If we collect sensitive Personal Data in the future, we will update this Privacy Policy to disclose such collection and processing, and, where required by law, obtain your consent before processing such data or provide you with the ability to limit its use.

#### **Personal Data of Children**

As noted in the Terms of Use, the Services are offered and available to users who are 18 years of age or older. As such, we do not knowingly collect or solicit Personal Data from children under 16, and we have no actual knowledge of selling or sharing the Personal Data of children under 16. If you are a child under 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 without verification of parental consent, we will promptly take steps to delete that information as quickly as possible. If you believe that a child under 16 may have provided us Personal Data, please contact us at [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com).

#### **Exercising Your State Privacy Rights**

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Depending on where you live, you may have certain rights with respect to your Personal Data under your state's data protection law. Please see the "Exercising Your Rights" section below for instructions regarding how to exercise these rights. If there are any conflicts between this section and any other provision of this Privacy Policy and you are a resident of one of these states, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com) with the subject line "State Privacy Request".

#### Access.

You have the right to confirm whether we are processing your Personal Data and to request access to such Personal Data (including categories of Personal Data, sources, purpose, and categories of third parties to whom we disclose), including a copy in a portable and, to the extent technically feasible, readily usable format.

#### Deletion.

You have the right to request that we delete the Personal Data that we have collected from or about you, subject to certain exceptions provided by applicable law.

#### Correction.

If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.

#### Automated Decision-Making.

Certain state laws provide the right to know when you are subject to automated decision-making, the Personal Data used to render the decision, the principal factors and parameters involved, and to request human review of such decisions. Although certain of our Services may incorporate AI Features, Plus Delta does not currently engage in automated decision-making that produces legal or similarly significant effects concerning consumers.

#### Opt Out of Certain Processing.

Depending on your state of residence, you may have the right to opt out of: (a) the processing or sharing of your Personal Data for purposes of targeted advertising, (b) the sale of your Personal Data, and (c) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. Plus Delta does not currently sell your Personal Data, engage in targeted advertising, or engage in profiling that produces legal or similarly significant effects. If it does, Plus Delta will provide an opportunity for you to opt-out.

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Once you have submitted an opt-out request, we will not ask you to reauthorize the sale or sharing of your Personal Data for at least 12 months. However, you may change your mind and opt back in to Personal Data sales or sharing at any time by emailing us at [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com).

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com) with the subject line "California Privacy Request."

#### Exercising Your Rights.

To exercise the rights described above, you (or your authorized agent) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate, and respond to it. If a request is submitted by your authorized agent, they must also provide proof that you gave the agent written permission to submit the request. Each request that meets these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify you and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt (or such other time period required by applicable law) . We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive, or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You (or your authorized agent) may submit a Valid Request using the following methods:

Writing to us at: 30 S 15<sup>th</sup> St, Ste. 1550 PMB 33894, Philadelphia, PA 19102.

Emailing us at: [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com) with the subject line "State Privacy Request".

You may also exercise your opt-out rights by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We currently support and honor Global Privacy Control (GPC), a specification designed to allow internet users to notify businesses of their privacy preferences, such as whether or not they want to be tracked or have their personal information sold or shared with third parties for targeted advertising. GPC allows a user to set an extension in their browser or mobile device that acts as a mechanism that our website can use to honor your privacy settings.

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GPC is available for an increasing number of browsers and browser extensions, Click [here](https://globalprivacycontrol.org/) (<https://globalprivacycontrol.org/>) for more information and to view options.

#### Right to Appeal.

If we decline to take action on your privacy request, you may appeal our decision by contacting us at [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com) with the subject line "Privacy Rights Appeal." We will respond to your appeal within the time period required by applicable law. If your appeal is denied, we will provide you with information on how to contact your state attorney general to submit a complaint, if applicable.

#### We Will Not Discriminate Against You for Exercising Your Privacy Rights.

We will not discriminate against you for exercising your privacy rights. We will not deny you our Services, charge you different prices or rates, or provide you a lower quality of Services if you exercise your privacy rights. However, we may have different tiers of Services as allowed by applicable data protection laws (including, e.g., the CCPA) with varying prices, rates, or levels of quality of the Services you receive related to the value of Personal Data that we receive from you.

### GDPR Privacy Notice

#### European Union Data Subject Rights.

If you are a resident of the European Union ("EU"), United Kingdom, Liechtenstein, Norway, or Iceland, you may have additional rights under the EU General Data Protection Regulation (the "GDPR") or the United Kingdom General Data Protection Regulation (UK-GDPR) with respect to your Personal Data, as outlined below.

For this GDPR Privacy Notice, we use the terms "Personal Data" and "processing" as they are defined in the European Privacy Laws, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Plus Delta will be the controller of your Personal Data processed in connection with the Services. For purposes of this GDPR Privacy Notice, "Personal Data" includes (but is not limited to) Profile data, as defined above.

| Category of Data | Source of Data | Purpose of Processing | Grounds for Processing (e.g. contractual necessity, legitimate | Specific Legitimate Interest (if applicable) |
|------------------|----------------|-----------------------|----------------------------------------------------------------|----------------------------------------------|
|                  |                |                       |                                                                |                                              |

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|                                                                  |              |                                           | <b>interest,<br/>consent)</b> |                                                                                                                                                                                             |
|------------------------------------------------------------------|--------------|-------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Client Account Data (e.g. first last name, email, IP address)    | Data Subject | Analytics                                 | Legitimate Interest           | Monitoring and conducting analytics on website & app use, pages/links clicked, traffic demographics, patterns of navigation, on potential security/spam breach, on performance issues, etc. |
| Client Account Data (e.g. first last name, email, company)       | Data Subject | Client Success Communication              | Legitimate Interest           | Personalized service and communications related to the client's use of the product.                                                                                                         |
| Client Account Data                                              | Data Subject | Marketing Campaign (email, list creation) | Legitimate Interest           | Personalization, market research or direct marketing.                                                                                                                                       |
| Client Account Data (e.g. first last name, device type, browser) | Data Subject | Product Development                       | Legitimate Interest           | Improving performance, troubleshooting bugs, other internal development needs.                                                                                                              |
| Client Account Data (e.g. first last name,                       | Data Subject | Sales Communication                       | Legitimate Interest           | Targeted advertisement or direct marketing.                                                                                                                                                 |

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|------------------------------------------------------|--------------|---------------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| email, company)                                      |              |                           |                       |                                                                                                                                                                                                                                                                                                         |
| Client Account Data (e.g. first last name, email)    | Data Subject | Using Plus Delta Services | Contractual Necessity | Contractual Necessity                                                                                                                                                                                                                                                                                   |
| User Session Data (e.g. utms, logged in, xsrf token) | Data Subject | Using Plus Delta Services | Legitimate Interest   | Maintain logged-in state during a single browsing session. Maintain their logged in state across browsing sessions. Enable users to log back in when a new session is started. Prevent cross-site request forgery attacks. Product feature rollout, conducting analysis. Personalization of Web Content |

#### How and With Whom Do We Share Your Data?

We share Personal Data with vendors, third party service providers and agents who work on our behalf and provide us or you with Services related to the purposes described in this Privacy Policy, our Terms of Use, and any Services Agreement. These parties include:

- Payment processors
- Fraud prevention service providers
- Analytics service providers
- Staff augmentation and contract personnel
- Hosting service providers
- Marketing service providers
- Product development service providers

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- Client success providers

We also share Personal Data when necessary to complete a transaction initiated or authorized by you or provide you with a product or service you have requested. In addition to those set forth above, these parties also include:

- Third party business partners who you access through the Services

We also share Personal Data when we believe it is necessary to:

- Comply with applicable law or respond to valid legal processes, including requests from law enforcement or other government agencies.
- Protect us, our business or our users, for example to enforce our terms of service, prevent spam or other unwanted communications and investigate or protect against fraud.
- Maintain the security of our products and services.

We also share information with third parties when you give us consent to do so.

Last, if we choose to buy or sell assets, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party, and we would share Personal Data with the party that is acquiring our assets. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data as set forth in this policy.

How Long Do We Retain Your Personal Data? We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with the Service. In some cases we retain Personal Data for longer if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

#### What Rights Do You Have Regarding Your Personal Data?

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com) with the subject line "GDPR Privacy Request". Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some

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cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- Access: You can request more information about the Personal Data we hold about you and request a copy of such Personal Data by emailing [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com).
- Rectification: If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this Personal Data directly by emailing [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com).
- Erasure: You can request that we erase some or all of your Personal Data from our systems.
- Withdrawal of Consent: If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Service.
- Portability: You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- Objection: You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- Restriction of Processing: You can ask us to restrict further processing of your Personal Data.
- Right to File Complaint: You have the right to lodge a complaint about Plus Delta's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

Transfers of Personal Data. The Service is hosted and operated in the United States ("U.S.") through Plus Delta and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Service, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Plus Delta in the U.S. and will be hosted on U.S. servers, and you authorize Plus Delta to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S.



## **PLUS DELTA PARTNERS**

### **PRIVACY**

#### **How to Contact Us**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, or your choices and rights regarding such use, please do not hesitate to contact your Plus Delta representative or email us at [legal@plusdeltapartners.com](mailto:legal@plusdeltapartners.com).

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