

## Privacy Policy

Effective Date: November 17, 2020

ConsultXprt, LLC (“ConsultXprt”, or “adendo.com”, or “adendo”) hereinafter also referred to as, “we”, “our”, “ours”, “ourselves” or “us”, whether or not capitalized, provides software programs and services to allow independent consultants or advisors to connect to customers through an online market (collectively, “Services”). This Privacy Policy explains how we collect, use, and disclose information from users of our websites, mobile applications, Services, or otherwise interact with us. The terms, “you”, “your”, “yours”, or “yourself”, whether or not capitalized, applies to the person(s) to whom this Privacy Policy applies.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.

**This privacy policy applies to the data we collect from and about individuals or entities that set up accounts with us to provide services, that we refer to as “advisors,” individuals or entities that set up accounts with us to purchase or receive services or products, that we refer to as “customers,” as well as individuals or entities that visit our website or communicate with us. Please note that advisors may maintain online resources, including those that may be linked from adendo.com or are independently operated by the advisors providing them. We do not control advisors and we are not responsible for their privacy practices.**

### Collection of Information

#### Information You Provide to Us

When you create an account with us, we collect information about you. For example, we ask you to provide your name, email address, postal address, phone number, and other basic contact information as well as payment information. We also collect information about online resources linked to your account, such as URLs. You may also choose to provide information about social network accounts that you want to connect with your account. We may collect additional information when you participate in any interactive features of the Services, fill out a form, communicate with us via third party social media sites, request customer support or otherwise communicate with us.

#### Automatically Collected Information

When you access or use our Services, we automatically collect information about you, including:

- **Log Information:** We collect log information about your use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies and how to disable them, please see “Your Choices” below.

### **Information We Collect from Other Sources**

We may obtain information from other sources and combine that with information we collect through our Services. For example, we may collect information about you from third parties, including but not limited to identity verification services, credit bureaus, mailing list providers and publicly available sources.

### **Use of Information**

We use the information we collect to provide, maintain, and improve our Services, such as to administer your account and to administer payments. We also use the information we collect to:

- Send you technical notices, updates, security alerts and support and administrative messages and to respond to your comments, questions and customer service requests;
- Communicate with you about products, services, and offers and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect our rights and property and that of others; and
- Carry out any other purpose described to you at the time the information was collected.

### **Sharing of Information**

We may share information about you as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;
- In response to a request for information if we believe disclosure is advisable or required, including to comply with any law, legal process or a request by public authorities or third parties;
- If we believe your actions are inconsistent with our agreements or policies, or to protect our rights, property and safety or that of others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

### **Advertising and Analytics Services Provided by Others**

We may allow others to provide analytics services and serve advertisements on our behalf across the internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) or, if you are in the European Economic Area, [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

### **Data Retention**

We store the information we collect about you for as long as is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law.

### **Security**

To protect your privacy and information, we use multiple security procedures and practices to protect from unauthorized access, destruction, use, modification and disclosure of user information.

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot and do not guarantee its security. You acknowledge the potential for breaches, hacks, “phishing” and other actions of third parties to obtain information that you may provide to us. You acknowledge and agree that the benefits that You receive by providing such information to us exceeds the risk associated with the potential unauthorized disclosure of such information.

## **Transfer of Information to the U.S.A. and Other Countries**

We are based in the United States of America. As such, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it.

## **Your Choices**

### **Account Information**

You may update, correct or delete information about you at any time by logging into your online account or emailing us at [info@adendo.com](mailto:info@adendo.com). You may close your account through your online dashboard or by emailing us at [info@adendo.com](mailto:info@adendo.com) but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

### **Cookies**

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

### **Promotional Communications**

You may opt out of receiving promotional emails from us by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

### **Residents of the European Economic Area**

If you are a resident of the European Economic Area (“EEA”), you have certain rights and protections under the law regarding the processing of your personal data.

### **Legal Basis for Processing**

If you are a resident of the EEA, when we process your personal data we will only do so in the following situations:

- We need to use your personal data to perform our responsibilities under our contract with you (e.g., providing the services you have requested).
- We have a legitimate interest in processing your personal data. For example, we may process your personal data to send you marketing communications, to communicate with you about changes to our Services, to address issues related to your store or account, and to provide, secure, and improve our Services.

### **Data Subject Requests**

If you are a resident of the EEA, you have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to make any of these requests you can log into your online dashboard. Alternatively, you may contact us as indicated below.

### **Questions or Complaints**

If you are a resident of the EEA and have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)

### **California Consumer Privacy**

For supplemental information regarding compliance with the California Consumer Privacy Act (CCPA) and other laws that provide rights specific to California residents, please see: [California Consumer Privacy](#)

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us at: [info@adendo.com](mailto:info@adendo.com)