

## **DAMA FINANCIAL PRIVACY POLICY**

This Privacy Policy applies to “Company Information” about individuals and businesses that we receive from persons that are applying for an account managed by Dama Technology, Inc. (“we,” “Dama” or “Dama Financial”) for business or commercial purposes. This Policy also applies to Company Information we receive from the holders of Accounts managed by Dama.

### **Information We Collect**

For purposes of this Policy, “Company Information” means any information about a commercial customer from which the customer could be identified, whether obtained directly from the customer or from another source. Company Information may include, but is not limited to, (i) company name, (ii) physical address, including street name and the name of the relevant city or town, (iii) email address or other electronic contact information, (iv) telephone number, (v) tax identification number, (vi) credit history, (vii) bank or credit card account number, (viii) financial statements, (ix) information about officers, directors, key employees, owners and other control persons and any other information from or about a commercial customer.

The following is not considered Company Information: (i) aggregated or anonymous information that does not identify a customer and (ii) information that we obtain from a public source (or that we know to be available from a public source).

### **How We Collect Company Information**

We may collect and retain Company Information about our commercial customers from the following sources:

- Account Applications and other forms that they and persons associated with them provide to us;
- Financial account activity (such as payment histories, account balances and account usage);
- Credit and background information from credit reporting agencies and others;
- Information from website visits (such as cookies, usage and transaction history and other technical data that we use for security purposes and to enhance user’s online experience; and
- Information we receive from third parties such as data providers and independent researchers.

### **How We Share Company Information**

We may share Company Information with non-affiliated third parties in order to offer our commercial customers additional products and services. You have the right to opt-out of this sharing.

We may also disclose Company Information to non-affiliated third parties for routine business purposes. For example, we may disclose Company Information to service providers and other third parties as necessary to facilitate a transaction requested by a commercial customer or to report to credit bureaus and government agencies. We may also disclose Company Information to non-affiliated third parties in response to a subpoena, warrant or other court order, or as otherwise required or advisable pursuant to applicable law. We may also disclose Company Information to any banking, securities or other regulators without prior notice and any restrictions on further disclosure. You may not opt-out of this sharing.

We may collect certain information about individuals and businesses associated with our commercial customers, such as business owners, directors, officers, vendors and key employees. We will not use such information for any purpose other than facilitating the commercial transaction for which the information was originally provided without the consent of the person providing such information.

Personal Information provided for purposes other than to apply for an account is used and disclosed solely to respond to your inquiries or requests.

We may aggregate or de-identify personal or Company Information and then use or disclose that aggregated or de-identified information to evaluate our Site's effectiveness, to improve our products or services or for other activities to the extent permitted by law.

We may also de-identify, aggregate or anonymize our commercial customer's payment information. We may share that de-identified, aggregated or anonymized payment information with third parties for marketing or other purposes, to the extent permitted by law.

## **Security**

We maintain administrative, technical and physical safeguards designed to protect the Company and other Information provided to us against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Encryption technologies are used on our Site when users are asked to enter confidential information as part of an application. You can tell you have entered an encrypted session in several ways. Whenever you see an unbroken key or a locked padlock icon on the bottom of your browser screen, you have entered an encrypted session. In addition, when your session changes from "http" to "https," you are in an encrypted session.

## **Children**

We do not knowingly collect or use personal information from children under 18 years of age. We are not responsible for the data collection and use practices of non-affiliated third parties to which our Site may link.

## **Links to Other Websites**

We are not responsible for the information collection practices of third-party links you click to from our Site. We cannot guarantee how these third parties use cookies or whether they place cookies on your computer that may identify you personally. We urge you to review the privacy policies of each of the linked websites you visit before you provide them with any personal information.

## **Use of Cookies and Web Beacons**

"Cookies" are alphanumeric identifiers in the form of text files that are inserted and stored by your browser on your device. Web beacons are small pieces of data that are embedded in images on the pages of websites. We and certain third parties may set and access cookies or web beacons to track and store information about you.

We use two types of cookies, namely "persistent cookies" and "session cookies." Session cookies will normally expire when you close your browser, while persistent cookies will remain on your device after you close your browser, and can be used again the next time you visit our site.

We may also allow our business partners to place web beacons on our site or to place cookies on your device for advertising or other purposes.

Third parties that use cookies and other tracking technologies to deliver targeted advertisements on our platform or third-party sites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#).

## **Disabling Cookies and Do-Not-Track**

While you may disable the usage of cookies through your browser settings, we do not change our practices in response to a "Do Not Track" signal in the HTTP header from your browser or mobile application. We track your activities if you click on advertisements for our services on third-party platforms such as search engines and social networks and may use analytics to track what you do in

response to those advertisements. We may also use web beacons and tracking URLs in our messages to you to determine whether you have opened a certain message or accessed a certain link.

### **Questions/How to Change Your Privacy Options**

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If you have questions about this Privacy Policy or about which privacy policy applies to you, please contact us at: [Privacy@DamaFinancial.com](mailto:Privacy@DamaFinancial.com). You can also contact us at this address to change your preferences regarding our sharing of your information. Note that you cannot opt-out of all of our sharing practices. Our systems will be updated to reflect a permitted change in your sharing practices within 30 days of a request therefor.