

## **UFA PRIVACY POLICY**

Updated: November 15, 2024

This Privacy Policy governs the manner United Freedom Alliance, LLC DBA United Freedom Alliance or UFA or its subsidiaries or affiliates, (“UFA”, “we”, “us”) collects, uses, maintains, and discloses information collected from You at <https://unitedfreedomalliance.org> website (“Site”).

### **Personal Identification Information**

This policy applies to the Personal Information you provide to us or that we collect through our websites or our partners websites, and through other online services, websites, applications, and related services adhering to this Privacy Policy (collectively with the Site, the “Services”). We may collect personal identification information from You in a variety of ways, including, but not limited to, when You visit our site, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. You may be asked for, as appropriate, name, email address, phone number. You may, however, visit our Site anonymously. We will collect personal identification information from You only if you voluntarily submit such information to us. You may refuse to supply personal identification information. Services may not be available without providing personal Information.

Note. The Services are often accessed or connected through other third-party service providers and their related applications and services (“Service Provider Application(s)”), and this Privacy Policy only covers the information UFA collects and shares to third party service providers. This policy does not include or encompass the use of your Personal Information from any Third Party or their services.

### **Non-personal Identification Information**

We may collect non-personal identification information about You, whenever you interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about You, means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

### **Web Browser Cookies**

Our Site may use “cookies” to enhance Your experience. Your web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. You may choose to set your web browser to refuse cookies or to alert you when cookies are being sent. If you do so, note that some parts of the Site may not function properly.

We collect and use Personal Information and Transactional Data that you provide directly to us, or our third parties, to utilize the Services. This could include your name, phone number, email address, physical address, credit card number and other Personal Information when you utilize our Services. When you communicate to Us directly, we collect the information of that communication, including email address, subject matter, call time, call duration, and contents of the telephone call.

Information from Other Sources. To utilize our other Services, we may collect, directly from You or from other Third-Party Sources, We may collect Personal Information listed above as well as Personal Data in connection with any Banking or Credit Card Transaction, including time, transaction amount and current, and details related to you or another party.

We may collect information automatically from:

**Social media:** We may collect Personal Data via social media tools, widgets, or plug-ins to connect you to your social media accounts. These features may allow you to sign in through your social media account, share a link, or post directly to your social media account. When you visit a website that contains such tools or plugins, the social media or other service provider may learn of your visit. Your interactions with these tools are governed by the privacy policies of the corresponding social media platforms.

#### **How We Use Collected Information**

We utilize and retain Your Personal Information to fulfill our legal and regulatory obligations and for our business Purposes to fulfill our obligations under the Services you have selected. We will maintain Personal Information to the maximum extent required by Law and We may retain Personal Information for an extent longer than required by law if it is in our legitimate business interest and within the current legal and regulatory allowance.

#### **We will use the Personal Information we collect from you:**

- To provide, maintain, improve, and enhance our Services;
- To verify your identity, which is required to give you access to our Services;
- To verify your accounts and establish the requested Service with the service provider(s) of your choice, including financial institutions, brokerage houses, technology providers, payment providers and credit card companies;
- To provide you with certain information that we derive from your Personal Information, such as your income based on your pay checks;
- If you subscribe to a Service requiring payment, to process the initial payment and all subsequent payments;
- To help us improve and personalize the content and functionality of our Services;
- To help us understand your usage of the Services to improve the Services;
- To communicate with you regarding customer service matters, questions and other various comments you may send to us;
- To inform you about products, services, offers, and events we offer or sponsor, and to provide news and other information we believe may interest you;
- To communicate various technical and administrative messages regarding the Services, including notices of technology updates;
- To generate de-identified and/or aggregated data that we may use for any lawful purpose;
- To offer you the option to participate in contests or surveys regarding the Services;
- Auditing related to a current interaction with the consumer and concurrent transactions;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration;
- To maintain legal and regulatory compliance;
- To enforce compliance with our Terms and Conditions and Policies; and
- For any other purpose disclosed to you at the time we collect or receive the Personal Information, or otherwise with your consent.

We may use the email address to send You information and updates pertaining to your services. It may also be used to respond to your inquiries, questions, and/or other requests.

#### **How We Protect Your Information**

We adopt appropriate data collection, storage, processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

#### **We Do Not Share Your Personal Information**

We do not sell, trade, or rent Your personal identifying information to others. We may share generic aggregated demographic information not linked to any personal identifying

information regarding visitors with our business partners, trusted affiliates and advertisers for the purposes outlined above. We may use third-party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

We provide services to or utilize third-party services that may have access to your Personal Information for a variety of business purposes. We only provide your Personal Information to a third party after such third party has signed a confidentiality agreement with us, and we provide your Personal Information to such third parties only for our business purposes. The Personal Information you provide to us will be shared in the following circumstances:

- With your consent and at your discretion;
- With Service Provider Applications or our approved partners with whom you have enrolled for services;
- With third-party service providers that we employ to provide marketing, security, development, or other business processes, or to provide services on our behalf;
- When we reasonably believe such disclosure is required to comply with the law, an investigation, or other legal process, such as a court order or a subpoena; or
- To service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.

We may use, share, or publicly disclose or otherwise process your information that has been de-identified, anonymized and/or, aggregated (so that it does not identify you personally) for any purpose permitted under applicable law, including for research and the development of new products.

### **Electronic Newsletters**

If a You decide to opt-in to our mailing list, they will receive emails that may include company news, updates, related product, or service information, etc. If at any time the You would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email. We may use third-party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

### **Third-party Websites**

You may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

### **Changes to this Privacy Policy**

United Freedom Alliance, LLC has the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our Site. We encourage You to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

## **California Residents**

If You are a resident of California, additional rules and information required by California Law may be found in our California Privacy Policy, below for more information.

## **European Residents and Great Britain Residents**

If You are located within Europe or Great Britain, you have additional rights in relation to the utilization of Your Data. Please see the GDPR policy below, for more information.

## **CHILDREN'S PRIVACY**

You must be 18 years or older to utilize our Pay in and Pay Out Services. We do not knowingly direct or target anyone under 18 years old ("Minors") for the use of any Pay In or Pay Out services. Nor do we knowingly collect, use, or disclose Personal Information about Minors who use our Pay In and Pay Out services. When utilizing those Services, you represent and warrant you are at least the age of majority under the laws of the jurisdiction of Your place of residence. If you believe a Minor has provided us with Personal Information, please alert us at support@unitedfreedomalliance.org. If we learn that we have collected Personal Information from a Minor, we will promptly take steps to delete such information.

## **Your Acceptance of These Terms**

By using this Site, you signify your acceptance of this policy. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

## **California CCPA Consumer Rights Policy**

This CCPA Consumer Rights Policy describes how we will manage requests from Consumers regarding their rights under the CCPA (collectively, "Requests"). These rights include a Consumer's right to request access to their Personal Information compiled within the last twelve months; request that their Personal Information be deleted; and request that their Personal Information not be sold.

**"Personal Information"** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked—directly or indirectly—with a particular Consumer or household.

**"Consumer"** means the natural person, who is a resident of California, to whom the Personal Information relates.

**Logging.** We will log the receipt and disposition of each Request, regardless of how received, and will retain such logs for at least 24 months. Such logs will include the date of Request, the nature of Request, the manner in which the Request was made, the date of our response, the nature of the response, and the basis for the denial of the Request if the Request is denied in whole or in part. After 24 months, the data logs may be deleted as needed.

## **Verification.**

**Requests to Know and Requests to Delete.** Where Consumer does not provide sufficient information in the initial Request for us to reasonably verify: (i) the identity of the Consumer, (ii) that the Consumer is a California resident, and (iii) the nature of the information within the scope of the Request, we may seek additional information or clarification from Consumer through reasonable means.

**Requests to Delete Information.** For Requests to Delete information where we are not able to reasonably verify the identity of the Consumer, California residency, and the information within the scope of the Request, we will maintain a log of the Request and send the requestor a response indicating that their request cannot be fulfilled because they have failed to verify their identity, but we will take no further action with respect to that Request.

**Requests to Know Specific Information.** For Requests to Know Specific Information, if the requestor's responses to verification questions are insufficient, we will review the request as if it is a Request to Know Categories of information. If the information is still insufficient to verify

the requestor's identity, it can be denied. If it is sufficient, we will treat it as a Request to Know Categories of Information and follow the steps below.

**Assessing Requests and Drafting Responses.** After verification of a Request, we will assess the merit of the Request and draft appropriate responses.

If we conclude that the Request does not need to be granted for reasons permitted by the CCPA, then we will reject the Request, as appropriate, including the reasons for doing so in the response to the Consumer.

If we conclude that the Request be granted, in whole or in part, we will draft a response to the Consumer and internally direct such action as may be appropriate to that particular Request (e.g., compile the Personal Information, flag Personal Information as not for sale, delete the Personal Information, etc.).

### **Requests to Know Specific Information**

In our responses to Requests to Know Specific Information, we will describe the following types of information with sufficient particularity but without actually disclosing:

- a. Social Security numbers;
- b. Driver's license or other government-issued ID numbers;
- c. Financial account numbers;
- d. Health insurance or medical identification numbers;
- e. Account passwords;
- f. Security questions and answers; or
- g. Unique biometric data generated by measurements or technical analysis of human characteristics.

If our assessment of a request determines that a verified request to know specific pieces of information will be denied in whole or in part due to conflict with federal or state law (including the CCPA), we will inform the requestor of the basis for denial (unless legally prohibited from doing so).

Requests to Know reports shall be compiled by going back 12 months from the date a verified request was received.

### **Requests to Know Categories of Information.**

We will provide individualized responses to consumers and will only refer the consumer to our general practices as outlined in our Privacy Policy if our response would be the same for all consumers and the policy discloses all information otherwise required in a response.

A response shall include:

- a. Categories of personal information the business collected about the consumer in the preceding 12 months;
- b. Categories of sources from which the personal information was collected;
- c. The business or commercial purpose for which we collected or sold the personal information;
- d. Categories of third parties to whom we sold a particular category of personal information;
- e. Categories of personal information we disclosed for a business purpose in the proceeding 12 months; and
- f. For each category of information disclosed for a business purpose, the categories of third parties to whom it was disclosed.

We will identify categories of personal information, sources of personal information, and third parties to whom we sold or disclosed personal information in a manner that gives consumers a meaningful understanding of the categories.

Requests to Know reports shall be compiled by going back 12 months from the date a verified request was received.

## **Requests to Delete**

If a request to delete is verified, We will take the following steps:

- a. Permanently and completely erase the personal information on our existing systems with the exception of short-term archived or back-up systems;
- b. De-identify the personal information; or
- c. Aggregate the personal information.

Information on archive and back-up systems should be deleted when the data on the system is restored to an active system or is next accessed or used for a sale, disclosure, or commercial purpose.

We will draft a response informing the requestor whether or not we have complied with the deletion request, and shall inform the consumer that we will maintain a record of the request as required by § 999.317(b).

If we determine we will deny a request, we shall:

- a. Inform the consumers we will not complete the request and describe the basis of the denial (including conflict with federal or state law or an exception in the CCPA);
- b. Delete the consumer's personal information that is not subject to the exception(s); and
- c. Not use any retained information for a purpose other than what was identified in the exception(s) provided to the requestor.

We shall determine whether service providers may have Personal Information within the scope of the Consumer's Request; if so, we will also send notice of such Request to those entities.

## **Response.**

We will use reasonable security measures when transmitting any personal information to requestors. Our responses will be sent by reasonable means, such as to the Consumer account email on file, with any Personal Information responsive to the Request contained in a password-protected ZIP file with password to be transmitted separately.

## ***Requests to Know and Requests to Delete.***

After assessment of a Request, our responses to the Consumer, service providers, or third parties (if any) will normally be sent within forty-five (45) days from the date receipt of the Request, which may be extended by up to forty-five (45) additional days where necessary, taking into account the complexity and number of the requests, for a maximum total of ninety (90) days from the day the request is received. We shall inform the Consumer of any such extension within 45 days of receipt of the Request, together with the reasons for the delay. If requests from a Consumer are manifestly unfounded or excessive, in particular because of their repetitive character, we may either charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the Request and notify the Consumer of the reason for refusing the Request. We shall demonstrate that any verified Consumer Request is manifestly unfounded or excessive before taking such action.

## **QUESTIONS**

If you have any questions regarding this CCPA Consumer Rights Policy, please contact [admin@unitedfreedomalliance.org](mailto:admin@unitedfreedomalliance.org).