# **Website Privacy Policy**

Last modified: August 2, 2023

# **Introduction**

We at Revalue, LLC ("**Company**" or "We") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website https://www.revalueinvesting.com/ (our "**Website**") and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by the Company or any third party such as Calendly; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your only choice is to not use our Website. By clicking the acceptance button when prompted, or accessing or using this Website, you agree to this Privacy Policy. Please note, this policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## Not Intended For People Under the Age of 18

Our Website is not intended for people under 18 years of age. No one under age 18 may provide any information to the Website. We do not knowingly collect Personal Information from persons under the age of 18. If you are under 18, do not use or provide any information on this Website or through any of its features, register on the Website, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received Personal Information from a person who is younger than 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 18, please contact us at the contact details provided at the end of this document.

## DO NOT SUBMIT FINANCIAL INFORMATION VIA OUR WEBSITE OR EMAIL

You agree not to submit your sensitive financial information to us via our website or email. Email and our Website are not appropriate means through which you will submit financial information such as bank account numbers, investment account numbers, or income information. We do not collect or store personal financial information directly from you through our website or through email. Instead, should you proceed to work with Revalue you will go through an onboarding process provided by a trusted third-party dedicated to accepting, archiving, and securing this sensitive information. You agree that you will only submit this information during the onboarding process to our trusted third parties which include Typeform, RightCapital, and SharePoint.

## Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, or telephone number ("**Personal Information**");
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and other information collected through cookies and other tracking technologies.
- From third parties, for example our business partners.

## Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time you request to be contacted, register with our mailing list or request more information. We may also ask you for information when you enter a contest or promotion sponsored by us and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Your responses to surveys that we might ask you to complete for research and customer satisfaction purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.

All information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such Personal Information. We do not process highly sensitive information on our Website, although we may process transaction related financial information for the purposes of completing the transaction.

## Information We Collect Through Automatic Data Collection Technologies

We automatically collect certain information when you visit, use or navigate our Website. This information does not necessarily reveal your specific identity (like your name or contact information) but may include device and usage information such as your IP address, browser and device characteristics, operating system, language preferences, referring URLS, device name,

country, location, information about how and when you use our website and other technical information. This information is primarily needed to maintain the security and operations of our website, as well as for our internal analytics and reporting purposes.

The information we may collect includes:

- Log and Usage Data. Log and usage data is service-related diagnostic, usage, and performance information our servers automatically collect when you access or use our website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity on the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions which you take such as which features you use), device event information (such as activity, error reports, and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet or other device you use to access our website. Depending on the device, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, internet service provider and/or mobile carrier, operating system and system configuration information.
- *Location Data.* We collect data related to your device's location. This may be precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the website. For example, we may use GPS and other technologies to collect geolocation data indicating current location based on your IP address. You can opt out of allowing us to collect this information either by refusing access to the information or by disabling location settings on your device.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Please contact us using the contact information at the bottom of this policy for information on opting out of or exercising other choices as to behavioral tracking.

The information we collect automatically may include Personal Information, or we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

• **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain

parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- Web Beacons. Pages of our Website (and our emails) may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.

## How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- To improve our Website.
- In any other way we may describe when you provide the information.
- To respond to user inquires/offer support.
- To save or protect your vital interests, such as to prevent harm.
- To allow you access to the Collaborative, a third party forum which is not hosted by the Company.
- For any other purpose with your consent, such as if you want to participate in the Collaborative.

We may also use your information to contact you about our own services(\*\*\* how about just referring to services? again, removing what's blatantly inapplicable could be helpful\*\*\*) that may be of interest to you. If you do not want us to use your information in this way, please notify us of the same. For more information, see Choices About How We Use and Disclose Your Information.

## Who We May Disclose Your Personal Information With

We may disclose aggregated information about our user's Personal Information that we collect, or you provide, as described in this privacy policy:

- To independent contractors, service providers, and other third parties we use to support our business (with appropriate contracts in place) such as those that provide data analytics services, payment processing, performance monitoring tools, securing and archiving data and sensitive personal information, and sales and marketing tools.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Discretionary Retainer Agreement, Non-Discretionary Retainer Agreement, Investor Guidance Agreement, Website Terms of Use, and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Revalue, LLC, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the Personal Information you provide to us. These mechanisms are intended to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of the Website may then be inaccessible or not function properly.
- **The Collaborative.** The Collaborative is a third-party forum where users can interact with other users to talk about finances. We will not share your information with the third-party hosting the Collaborative unless you explicitly give us permission to.

## Personal Information Retention Timing

We will only keep your Personal Information for long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business needs to process your Personal Information, we will securely store your Personal Information and isolate it from further processing until deletion is possible.

## Accessing and Correcting Your Information

You may send us an email at inquire@revalueinvesting.com to request access to, correct or delete any Personal Information that you have provided to us through our Website (this does not include information provided to trusted third party service providers such as Typeform and RightCapital). We may not accommodate a request to change information if we believe the change would violate any legal requirement or cause the information to be incorrect.

Residents of other countries and certain states, such as California, Nevada, Colorado, Virginia, and Utah may have additional personal information rights and choices.

## Data Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. However, the safety and security of your information also depends on you. As a general rule, do not share your Personal Information with others.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

We also utilize certain tools such as Calendly and Google Analytics to help render our services. Please see their respective privacy policies for more details on their security measures. We will not be exporting any data or Personal Information provided to these third parties to the extent we are not using them to provide our services. We are not responsible for any loss, alteration, or unauthorized use or access to your Personal Information as a result of a breach of these websites.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify through a notice on the home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active email address for you, and for periodically reviewing this privacy policy to check for changes.

## Additional Information for Foreign Users

## If you are in the EU or UK, this section applies to you.

While we are not actively targeting or soliciting users from the European Union or United Kingdom, we understand that users from those countries may end up visiting our Website. The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your Personal Information. As such, we may rely on the following legal bases to process your Personal Information:

- **Consent**. We may process your information if you have given us permission (i.e., consent) to use your Personal Information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract**. We may process your Personal Information when we believe it is necessary to fulfill our contractual obligations to you, including providing our services or at your request prior to entering into a contract with you.
- Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process information for some of the purposes described in order to:
  - Send users information about special offers and discounts on our service
  - Analyze how our website is used so we can improve them to engage and retain users
  - Support our marketing activities
  - Diagnose problems and/or fraudulent activities.
- Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with law enforcement or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which you are involved.
- **Vital Interests**. We may process your information where we believe it is necessary to protect your vital interest or the vital interests of a third party.

## If you are in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your Personal Information for a specific purpose or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interest of an individual and consent cannot be obtained in a timely way.
- For investigations and fraud detection and prevention.
- For business transactions provided certain conditions are met.
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim.
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.

## **Sharing your Personal Information**

We may disclose your Personal Information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your Personal Information for our own business purpose, such as for undertaking internal research. This is not considered to be "selling" of your Personal Information.

We have not sold any Personal Information to third parties for a business or commercial purpose in the preceding twelve months nor do we intend to in the future.

#### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at: Revalue, LLC 220 W Michigan Ave Ypsilanti, MI 48197 Email: inquire@revalueinvesting.com Phone Number: (888) 642-2728