

KindredBox Privacy Policy

Effective: November 2023

This Privacy Policy describes how KindredBox, Inc. (“KindredBox” or the “Company”) collects, uses and discloses personal information and what choices you have with respect to that information. “Personal Information” refers to information that personally identifies or is identifiable to you, such as your name, mailing address, telephone number, email address and IP address, personal documents, and as otherwise defined by applicable privacy laws. If you have any questions please contact us at info@kindredbox.com.

We collect, use, and are responsible for certain Personal Information about you. When we do so, we are subject to various laws in the United States and the General Data Protection Regulation (the “GDPR”), which applies across the European Union (including the United Kingdom), and we are responsible as “controller” of that personal information for the purposes of those laws.

1. Applicability of this Privacy Policy

This Privacy Policy applies to KindredBox.com (the “Website”), the associated web platform and service for storing personal family and estate planning documents and information (the “Services”), and any other interactions (*i.e.*, customer service inquiries or social media) you may have with KindredBox. This Privacy Policy does not apply to any third party applications or software that integrate with the Services, or any other third party products, services or businesses.

2. Key Terms

We, us, our, or Company means KindredBox, Inc. You can contact us at info@KindredBox.com.

Personal Information means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household.

Sensitive Personal Information means Personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, and biometric information.

Biometric Information means an individual's physiological, biological, or behavioral characteristics, including information pertaining to an individual's deoxyribonucleic acid (DNA), that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

3. Changes to Our Privacy Policy

We may make changes to the Privacy Policy from time to time. We will notify you of any material changes by sending you an email, posting a notice on the homepage of the Website, or posting a notice in your account. If you receive notification of a change in our Privacy Policy, you should review the new policy carefully to ensure you understand our practices and procedures.

4. Information We Collect and Receive

KindredBox collects information about you when you sign up to use the Services or create an account, access or interact with the Website, or otherwise transmit information to us. We may also obtain information about you from

our affiliates and business partners and from publicly available information. The information KindredBox has collected in the preceding 12 months includes:

Contact and Account Information. When you create an account with KindredBox, you supply us with Personal Information including name, email address, phone number and payment information. We also collect information necessary for you to use the Services such as username, password and similar account details.

Services Information. The Services were built to help you store your important personal, family, and estate planning documents and information. That means you can input, upload, or store in the Services any text, images, documents, and other information that you choose. We also collect and store any preferences, contact information, information about additional users, and account settings and communications you set in your account or deliver to us.

Usage Information. As with most websites and technology services delivered over the Internet, our Website and Services automatically collect information when you access or use our Website or Services and record it in log files. This log data includes IP address, device information, browser type and settings, date and time the Services were used, information about browser configuration and plugins, and general usage information on actions taken on our Website or Services (such as page views and site navigation patterns).

Do Not Track Signals. The Website does not respond to Do Not Track (DNT) signals. Third party applications and plugins, such as social media integration, may treat DNT signals differently.

No Information From Children Under Age 13. Neither the Website nor the App is directed to children under the age of 13. If we learn that we have collected Personal Information from a child under the age of 13, we will promptly delete that information. If you believe we have collected Personal Information from someone under age 13, please email us at info@KindredBox.com.

5. How We Collect Information

Personal Information. We collect most of this Personal Information directly from you, via our Website. However, we may also collect information from the following categories of sources: Publicly accessible sources (e.g., property records); third parties (e.g., social networks, internet service providers, data analytics providers, and government entities); and Cookies on our Website (described in more detail below).

Cookies. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that website to recognize your browser. Cookies may store unique identifiers, user preferences, and other information. When you visit our Website we send one or more “cookies” to your computer or other device. You can set your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. We use cookies to operate the Website and Services, including account features, and to improve the quality of the Website and Services.

6. Why We Use Your Personal Information

We collect consumer Personal Information for the following business purposes: To provide the Services to you; to ensure the security and efficiency of our Website and Services; to protect against security threats, abuse, and illegal activity, including verifying users, maintaining accounts, troubleshooting the Services and maintaining, evaluating and improving the Website. We also use your Personal Information to communicate with you and with other users or individuals you have designated to receive your information.

7. Who We Share Your Personal Information With

In the preceding 12 months, we have shared consumers' personal information with: Our affiliates, including companies within the KindredBox group; Service providers we use to help deliver our products and/or services to you, such as payment service providers, warehouses and delivery companies; Other third parties we use to help us run our business, such as marketing agencies or website hosts; Third parties approved by you, including social

media sites you choose to link your account to or third-party payment providers; Credit reporting agencies; Our insurers and brokers; Our banks; and external auditors.

We only allow our service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers, contractors, and third parties to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

In the preceding 12 months we have not sold personal information to any third party.

8. Categories of Information We Store or Share

In the preceding 12 months, we have stored or shared the following categories of personal information:

- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, email address, telephone number, credit card number, and debit card number.

9. How We Share and Disclose Information

Disclosure at Your Request or Authorization. As part of the Services, you may designate third parties, including beneficiaries, agents, guardians, financial or legal advisers, partner organizations, or other persons to access some or all of your account or to receive information stored in your account, including Personal Information. We may disclose your Personal Information consistent with any such direction, account setting, request, or communication from you or initiated in your account.

Disclosure to Third Party Providers and Subprocessors. KindredBox engages third party service providers or data subprocessors to assist in providing analytics, data storage, and other services. For example, we process your payment information through a third-party provider, Stripe, www.stripe.com. We also use third-party service providers to provide, maintain, and improve the Website and Services.

Disclosure to Unaffiliated Third Parties. We may disclose your Personal Information to respond to legal requirements, to protect or enforce our rights and policies, to protect or enforce the rights of a third party, to prevent harm to a person or as required or permitted by law, including, without limitation, to comply with a subpoena or court order, or other laws and legal proceedings.

Disclosure of Non-Personal Information. We may disclose your aggregated or de-identified information to any party including potential business partners, advertisers, investors, users, and other third parties.

Disclosure to Corporate Affiliates and Successors. KindredBox may disclose Personal Information to its parent company, subsidiaries or other corporate affiliates, including, as necessary, to provide additional products and/or services. If KindredBox engages in a merger, acquisition, reorganization, sale of some or all of its assets, or similar transaction, or takes steps in contemplation of such transactions (e.g., due diligence), Personal Information may be shared or transferred with a new or prospective owner, subject to standard confidentiality obligations with such third parties.

Disclosure With Your Consent. In addition to the sharing described elsewhere in this Privacy Policy, we may share Personal Information with companies, organizations or individuals outside of KindredBox if we obtain your consent to do so.

10. Categories of Personal Information We Disclose for a Business Purpose

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose:

- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, telephone number, and email address.

11. Data Storage and Retention

Your Personal Information is stored by KindredBox on the servers of the cloud-based data storage providers it engages. KindredBox retains Personal Information while you have an account with us or for the duration of the user's business relationship with the Company. Thereafter, we will keep your Personal Information for as long as is necessary to respond to any questions, complaints, or claims made by you or on your behalf; to show that we treated you fairly; or to keep records required by law. We will not retain your Personal Information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

12. Your Rights under the GDPR

- *Right to Access.* You have the right to be provided with a copy of your personal information.
- *Right to Rectification.* You have the right to require us to correct any mistakes in your Personal Information.
- *Right to Be Forgotten.* You have the right to require us to delete your Personal Information in certain situations.
- *Right to Restriction of Processing.* You have the right to require us to restrict processing of your Personal Information in certain circumstances, e.g., if you contest the accuracy of the data.
- *Right to Data Portability.* You have the right to receive the Personal Information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations.
- *Right to Object.* You have the right to object:
 - at any time to your Personal Information being processed for direct marketing (including profiling);
 - in certain other situations to our continued processing of your Personal Information, e.g., processing carried out for the purpose of our legitimate interests.
- *Right Not to Be Subject to Automated Individual Decision-Making.* You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of these rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the GDPR.

13. Your Rights Under the CCPA/CPRA

You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

- *Disclosure of Personal Information We Collect About You.* You have the right to know and request disclosure of:
 - The categories of personal information we have collected about you, including sensitive personal information;
 - The categories of sources from which the personal information is collected;
 - Our business or commercial purpose for collecting, selling, or sharing personal information;
 - The categories of third parties to whom we disclose personal information, if any; and
 - The specific pieces of personal information we have collected about you.
 - Please note that we are not required to:
 - Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;
 - Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
 - Provide the personal information to you more than twice in a 12-month period.
- *Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose.* In connection with any Personal Information we may sell, share, or disclose for a business purpose, you have the right to know:
 - The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared; and
 - The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose.
 - You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.
- *Right to Limit Use of Sensitive Personal Information.*
 - You have the right to limit the use and disclosure of your sensitive Personal Information to the use which is necessary to:
 - Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services;
 - To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing

analytic services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business; and

- As authorized by further regulations
 - You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.
 - To limit the use of your sensitive personal information, visit our homepage and click on the "Limit the Use of My Sensitive Personal Information" link here:
info@kindredbox.com
- *Right to Deletion.* Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:
 - Delete your Personal Information from our records; and
 - Direct any service providers or contractors to delete your Personal Information from their records.
 - Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort.
 - Please note that we may not delete your personal information if it is reasonably necessary to:
 - Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
 - Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes;
 - Debug to identify and repair errors that impair existing intended functionality;
 - Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
 - Comply with the California Electronic Communications Privacy Act;
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
 - Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us
 - Comply with an existing legal obligation; or
 - Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

- *Right of Correction.* If we maintain inaccurate Personal Information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.
- *Protection Against Retaliation.* You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things:
 - Deny goods or services to you;
 - Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
 - Provide a different level or quality of goods or services to you; or
 - Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.
 - Please note that we may charge a different price or rate or provide a different level or quality of services to you, if that difference is reasonably related to the value provided to our business by your Personal Information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of Personal Information, the sale of Personal Information, or the retention of Personal Information.

14. How to Exercise Your Rights

If you would like to exercise any of your rights as described in this Privacy Policy, you may email us at info@kindredbox.com.

Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact us directly by website/email/in writing, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any Personal Information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

15. How to File a GDPR Complaint

We hope that we can resolve any query or concern that you raise about our use of your information. The GDPR also gives you the right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

16. Data Security

KindredBox takes the privacy of your information seriously. We use industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of Personal Information. However, since the Internet is not a 100% secure environment, we cannot guarantee the security of any information you transmit to us. Further, it is your responsibility to protect the security of your account and login information.

17. California Privacy Rights

Under California's "Shine the Light" law, California residents who provide Personal Information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us a calendar year information about the information we shared, if any, with other business for their own direct marketing uses. If applicable, this information would include the categories of information and the names and addresses of those businesses with which we shared information for the immediately prior calendar year (e.g. requests made in 2021 will receive information regarding 2020 sharing activities, if any).

While KindredBox only uses and discloses your information in accordance with this Privacy Policy, if you are a California resident who would like to send a "Shine the Light" request, please send an email message to info@KindredBox.com with "Request for California Privacy Information" on the subject line and the in the body of your message. We will provide the requested information (if any) to you at your email address in response. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

18. Third Party Websites

You may be able to access third party websites directly from the Website. This Privacy Policy does not apply when you access third party websites. We cannot control how third parties may use any information you disclose to them, so you should carefully review the privacy policy of any third party website you visit before using it or disclosing your information to its provider.

If we wish to disclose your information to a third party in a manner that is not set forth in this Privacy Policy, you will be notified so that you can make an informed choice about sharing your information with that third party.

19. Questions and How To Contact Us; Privacy Requests; Delete Requests

If you have any questions or concerns regarding our Privacy Policy or practices or would like to submit any opt-out or other privacy requests you may be entitled to under applicable law, please contact us by emailing info@KindredBox.com.