

AZ Trust Company

Privacy Policy

Effective date: September 15, 2023

At AZ Trust Company, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

You may print a copy of this Privacy Policy by clicking [here](#).

Privacy Policy Table of Contents

What this Privacy Policy Covers

Personal Data

Categories of Personal Data We Collect

Categories of Sources of Personal Data

Our Commercial or Business Purposes for Collecting Personal Data

How We Share Your Personal Data

Tracking Tools, Advertising and Opt-Out

Data Security and Retention

State Law Privacy Rights

Changes to this Privacy Policy

Contact Information

What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control, or people we don’t manage. Our Services are not directed to anyone located outside of the United States of America. By using or continuing to use our Services, you are confirming that you are located within the United States and agreeing that you will not provide us Personal Data, or otherwise visit, access, or use our Services, if you are located outside of the United States. We do not monitor the behavior of persons (data subjects) located outside of the United States. If, through fraud, deceit, or other unauthorized or inadvertent use or disclosure, we receive information pertaining to individuals located outside of the United States, such individuals

should contact us at contact@aztrustco.com. Upon verifying the information, we will immediately delete the unauthorized information from our systems and records.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
Profile or Contact Data	● First and last name ● Email ● Mailing address and other associated addresses ● Unique identifiers such as passwords	● Service Providers ● Business Partners
Identifiers	● Social security number ● Driver's license number ● Passport number ● Country of citizenship ● Permanent residence status in the United States	● Service Providers ● Business Partners
Payment Data	● Bank account information ● Billing address	● Service Providers ● Business Partners
Online Identifiers	● Unique identifiers such as account name and password	● Service Providers ● Business Partners
Device/IP Data	● IP address ● Device ID ● Type of device/operating system/browser used to access the Services	● Service Providers ● Analytics Partners ● Business Partners
Consumer Demographic Data	● Age / date of birth ● Zip code ● Gender	● Analytics Partners ● Business Partners
Geolocation Data	● IP-address-based location information	● Analytics Partners ● Business Partners

Sensory Data	• Photos (e.g., selfie images), videos or recordings of you and/or your environment	• Business Partners
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Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
 - When you provide such information directly to us.
 - When you create an account or use our interactive tools and Services.
 - When you send us an email or otherwise contact us.
 - When you provide information through responses to surveys or questionnaires.
- **Public Records**
 - From the government or other sources.
- **Third Parties**
 - Service Providers & Business Partners, such as banks and other financial institutions, identify management service providers, etc.
 - For example, you may directly submit certain information and data to a business partner who in turn shares the data with AZ Trust Company.
 - Other Vendors
 - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
 - We may use vendors to obtain information to generate leads and create user profiles.
 - Advertising Partners
 - We may receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
 - Where applicable, a company that engaged AZ Trust Company to make the Services available to you as contemplated herein.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**

- Creating and managing your account or other user profiles.
- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Services.
- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws.
- **Marketing the Services**
 - Marketing and selling the Services.
 - Marketing and selling (whether alone or jointly with others) related services and product partnerships, including those offered by our business partners.
- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about AZ Trust Company or the Services.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property or safety of you, AZ Trust Company or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Share Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Security and fraud prevention consultants, including identity management services providers.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
 - Companies that track how users found or were referred to the Services.
 - Companies that track how users interact with the Services.
- **Business Partners.** These parties partner with us in offering various services. They include:
 - Businesses that you have a relationship with.
 - Companies that we partner with to offer Services or to facilitate related services, joint promotional offers or opportunities, including banks and other financial institutions, etc.
- **Parties You Authorize, Access or Authenticate**
 - Third parties you access through the services.
 - Other users.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices, including, without limitation, by posting notice on our website.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time. To find out more about “Do Not Track,” you can visit www.allaboutdnt.com. We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

State Law Privacy Rights

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of any Personal Data that we have collected or will collect about you. You can exercise this right by submitting a verifiable request to us in writing to AZ Trust Company, 5032 East 57th Street, Room #E10 Sioux Falls, SD 57108 with the heading “Nevada Do Not Sell Request,” or via email at contact@aztrustco.com with the subject line “Nevada Do Not Sell Request,” and providing us with your name, address, and, if available, the email address associated with your account. We may follow up with you to verify your identity in connection with your request. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

Changes to this Privacy Policy

We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time. We will alert you to any such changes and update the Effective Date above. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- www.aztrustco.com
- contact@aztrustco.com
- Address: 5032 East 57th Street, Room #E10 Sioux Falls, SD 57108