

Avibra, Inc.

Privacy Policy

Introduction

This privacy policy (this “**Privacy Policy**” or “**Policy**”) governs the manner in which Avibra, Inc. (“**Avibra**”, “**we**”, “**our**,” “**us**” and similar terms) collects, uses, maintains and discloses information collected from users who register on or through its proprietary software or mobile applications and/or websites, including the Avibra application (collectively, the “**Service**”). Avibra respects the privacy of every individual and has taken extensive precautions to create a process that maintains individual privacy.

- We are committed to providing a secure environment for the Service.
- We use the information provided to us to enable your use of the Service, provide you with customer service, and authenticate your website visits and usage.
- All information you provide to us is encrypted in transit and at rest and is kept on a secure server.
- We do not sell, lease, or rent personal information to anyone under any circumstances.

This Privacy Policy is designed to inform Avibra users about how we gather and use personal information collected by us in connection with your use of the Service. We will take reasonable steps to protect user privacy consistent with the guidelines set forth in this Policy and with applicable U.S. state and federal laws. WE TAKE THESE PRECAUTIONS IN AN EFFORT TO PROTECT YOUR INFORMATION AGAINST SECURITY BREACHES. HOWEVER, THIS IS NOT A GUARANTEE THAT SUCH INFORMATION MAY NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF SUCH FIREWALLS AND SECURE SERVER SOFTWARE. BY USING THE SERVICE, YOU ACKNOWLEDGE THAT YOU UNDERSTAND AND AGREE TO ASSUME THESE RISKS.

In this Policy, “**user**” or “**you**” means any individual using the Service. This Policy forms part of and is incorporated into our Terms of Service published at www.avibra.com/Avibra_TermsOfService.pdf (the “**Terms of Service**”).

BY ACCESSING OR USING THE SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND BY THIS PRIVACY POLICY AND OUR TERMS OF SERVICE. IF YOU DO NOT AGREE TO THESE TERMS, DO NOT USE THE SERVICE.

What Information Do We Collect?

Limited Personal Information: We may collect certain personal information about you in connection with the Service, including: (a) when you register to use the Service, we may collect the personal information through our online registration form, such as your first name, last name, email address, phone number, photograph, age, gender, height, weight, username, password and other information detailed therein; (b) other personal information typically required by insurance providers for underwriting purposes, including information about your employer, family, income, assets, net worth and your existing life, automobile, health and other insurance coverages; (c) if you pay your fees by credit card, we (or a third party payment processor acting on our behalf) will collect the name, expiration date and credit card number for the relevant card; and (d) if you communicate with us by email but do not otherwise register to use the Service, we will collect your email address. You may also choose to provide us with photographs of you and/or your beneficiary. All of this information is referred to in this Policy as “**Personal Information**”. If you contact Avibra or another user and disclose additional personal information, we may store that Personal Information. We encrypt all Personal Information you provide to us, both in transit and at rest.

User Data. “**User Data**” means all data—other than Personal Information—that users provide us regarding or related to themselves or their use of or access to the Service. As described in the Terms of Service, we store User

Data and correlate User Data with third party data in order to provide the Service. If User Data includes any personally identifiable information, we will collect, store, use and disclose that information in the same way that we collect, store and use any Personal Information.

Web Tracking Information: We, and our third party service providers, may use web tracking technologies such as cookies, pixel tags and clear GIFs in order to operate the Service efficiently and to collect data related to usage of the Service. Such collected data (“***Web Tracking Information***”) may include the address of the websites you visited before and after you visited the Service, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Service you visit and what links you clicked on, whether you opened email communications we send to you, and your operating system. In order to collect Web Tracking Information and to make your use of the Service more efficient, we may store cookies on your computer. We may also use web tracking technologies that are placed in web pages on the Service or in email communications to collect information about actions that users take when they interact with the Service or such email communications, and Avibra’s Contractors (as hereinafter defined) may also do so. We do not correlate Web Tracking Information to individual user Personal Information. Some Web Tracking Information may include data, such as IP address data, that is unique to you. We use this information not to identify individual users, but to analyze trends, administer the Service, track users’ movements around the Service, and gather demographic information about our user base as a whole which provides us with the ability to determine aggregate information about our user base and usage patterns. You may be able to modify your browser settings to alter which web tracking technologies are permitted when you use the Service, but this may affect the performance of the Service.

Cookies: The Avibra website also uses cookies to enhance the browsing experience. A cookie is a small text file or record that is stored on a user’s computer when you visit our website, which collects information about your activities on the website. The cookies transmit this information back to the computers at Avibra or our third-party distributors of banners and newsletters; these computers are, generally speaking, the only computers which are authorized to read such information. The information captured makes it possible for us to: (i) speed navigation, and provide you with custom tailored content; (ii) remember information you give to us, so you don’t have to reenter it each time you visit the website; (iii) monitor the effectiveness of our marketing campaigns; and (iv) monitor total number of visitors, pages viewed, and the total number of banners served. You can choose to have your browser warn you every time a cookie is being sent to you or you can turn off cookie placement. Also, by not using cookies, your overall internet browsing experience will be affected.

How Do We Use the Information We Collect?

Personal Information and User Data: We will use and store your Personal Information and User Data to deliver the Service and analyze and enhance the operation of the Service, and for no other purpose, except as expressly permitted in this Policy. We may also use your Personal Information and User Data for the internal operational and administrative purposes of the Service.

Web Tracking Information: We use Web Tracking Information to administer the Service and to understand how well our Service is working, to store your user preferences, and to develop statistical information on usage of the Services. This allows us to determine which features visitors like best to help us improve our Service, to personalize your user experience, and to measure overall effectiveness.

Aggregate and De-Identified Information: We will also create statistical, aggregated and/or de-identified data relating to our users and the Service for analytical and commercial purposes. Aggregated and/or de-identified data is derived from Personal Information and User Data but in its aggregated and/or de-identified form, it does not duplicate or reveal any User Data or relate to or identify any individual. This data is used to understand our customer base and to develop, improve and market our services.

Customer Testimonials: We may post user testimonials to the Service, including on our website, and may use testimonials in other formats consistent with consent received. Testimonials may contain personally identifiable information. We may use your Personal Information to contact you to obtain a testimonial and obtain your

consent via email or agreement sent via fax, pdf or mail prior to using such testimonial and/or using your name along with your testimonial.

Legal Exception: Notwithstanding the above, we may in any event store and use Personal Information and User Data to the extent required by law or legal process, to resolve disputes, to enforce our agreements (including this Privacy Policy and the Terms of Service) with you, or if in our reasonable discretion use is necessary to protect our legal rights or to protect third parties.

Email Communications: If you register and provide your email address, we will send you administrative and promotional emails. If you wish to opt out of promotional emails, you may do so by following the “unsubscribe” instructions in the email, or by editing your account settings as described below. All users receive administrative emails, and so you cannot opt out of them while you remain registered.

Account Closure: If any of your account information appears to be incorrect, please contact us and let us know. If you close your account, we will delete any Personal Information associated with your account, but other information you submitted that is not associated with you personally may not be deleted.

What Information Do We Disclose to Third Parties?

Personal Information and User Data: We will not disclose your Personal Information or User Data to any third parties under any circumstances, except as follows:

(i) We may disclose to our insurance carrier (the “*Carrier*”) that underwrites the life insurance policy made available to Avibra users (the “*Insurance Policy*”), your first name, last name, email address, phone number, photograph, age, gender, height, weight, and other information relevant to the Insurance Policy, including your employer, family information, income, assets, net worth and your existing life, automobile, health and other insurance coverages. The Carrier may use such Personal Information only to the extent necessary to provide the Insurance Policy to you.

(ii) To third party contractors engaged to provide services on our behalf (“*Contractors*”), such as performing payment processing, marketing, analyzing data and usage of the Service, hosting and operating the Service or providing support and maintenance services for the Service, or providing customer service. We enter into agreements with all Contractors that require Contractors to use the Personal Information they receive only to perform services for us.

(iii) When we have your consent to share the information.

We will not sell, lease, or rent your Personal Information to anyone under any circumstances.

Web Tracking Information: We disclose Web Tracking Information to Contractors, in order to analyze the performance of the Service and the behavior of users, and to operate and improve the Service.

Aggregate and De-Identified Information: We may disclose aggregated and/or de-identified data that does not contain Personal Information or User Data to any third parties, such as Contractors, potential customers, business partners, marketers, and funding sources, in order to describe our business and operations or to notify you about products and services that may be relevant to you.

Network Operators: Use of the Service may involve use of the services of third party telecommunications carriers. Such carriers are not our contractors, and any information that a carrier collects in connection with your use of the Service is not “Personal Information” and is not subject to this Privacy Policy. We are not responsible for the acts or omissions of telecommunications carriers.

Additional Disclosures: We reserve the right to disclose any information we collect in connection with the Service, including Personal Information, to: (a) any successor to our business as a result of any merger, acquisition, asset sale or similar transaction; and (b) any law enforcement, judicial authority, or governmental or regulatory authority, to the extent required by law or if in our reasonable discretion disclosure is necessary to enforce or protect our legal rights or to protect third parties.

Privacy Settings/Opt Out

If you would like your name and email address permanently removed from our database, please contact us at compliance@avibra.com. We will promptly delete your name and email address and you will no longer receive email from Avibra. Your removal from the mailing list or database will not remove data you have submitted to us or records of past use of the Service, nor delete information stored in our data backups and archives. Such data will be maintained and/or deleted in the ordinary course of Avibra's business.

General

Security: We use reasonable security precautions to protect the security and integrity of your Personal Information in accordance with this Policy and applicable law. Such precautions include encrypting any Personal Information you provide to us, both in transit and at rest. However, no Internet transmission is completely secure, and we cannot guarantee that security breaches will not occur.

Without limitation of the foregoing, we are not responsible for the actions of hackers and other unauthorized third parties that breach our reasonable security procedures.

Links and Third Party Services: The Avibra Service may contain links to other websites. Avibra is not responsible for the privacy practices or the content of those websites or any Third Party Services (as defined in the Terms of Service). Users should be aware of this when they leave our Service and review the privacy statements of each third party website or Third Party Service. This Privacy Policy applies solely to information collected by the Service. We encourage our users to read the privacy policies of these other websites and Third Party Services before proceeding to use them.

Amendments: Avibra may modify or amend this Policy from time to time. If we make any material changes, as determined by Avibra, in the way in which Personal Information is collected, used or transferred, we will notify you of these changes by email. Notwithstanding any modifications we may make, any Personal Information collected by Avibra from you will be treated in accordance with the privacy policy in effect at the time information was collected, unless we obtain your consent otherwise.

Children: Avibra does not knowingly collect or maintain personally identifiable information from persons under 13 years of age, and no part of the Service is directed at persons under 18. If you are under 18 years of age, then please do not use the Service. If Avibra learns that personally identifiable information of persons less than 13 years of age has been collected without verifiable parental consent, then Avibra will take the appropriate steps to delete this information. To make such a request, please contact us at compliance@avibra.com.

Service Visitors from outside the United States: Avibra and its servers are located in the United States and are subject to the applicable state and federal laws of the United States. If you choose to access the Service, you consent to the use and disclosure of information in accordance with this Privacy Policy and subject to such laws.

Information for California Residents: This section provides additional disclosures required by the California Consumer Privacy Act (or "CCPA"). In the last 12 months, we collected the following categories of personal information: identifiers (such as name, contact information and device identifiers), internet or other electronic network activity information (such as browsing behavior), approximate geolocation data, inferences (such as approximate location or product interests) and other personal information (such as payment method information, user credentials or health-related information). We collect this information for the business and commercial

purposes and to provide best service to our customers. Subject to certain limitations and exceptions, the CCPA provides California consumers the right to request to know more details about the categories and specific pieces of personal information, to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights.

We do not “sell” the personal information we collect (and will not sell it in the future).

California consumers may make a rights request by emailing us at hello@avibra.com. We will verify your request by asking you to provide information that matches information we have on file about you. Consumers can also designate an authorized agent to exercise these rights on their behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

Effective date of this Policy: January 1, 2020