

Center ID Privacy Policy and Notice at Collection

Last updated: February 11, 2025

Center ID Corp. together with its affiliates and wholly owned subsidiaries, unless expressly stated otherwise, (“Company,” “we,” “us,” or “our”) is committed to privacy and data protection. This Privacy Policy and Notice at Collection (“Notice”) describes the privacy practices that Company follows when collecting and using personal information collected from you through our products, services, mobile apps, this website <https://www.getcenter.com/>, and the websites under the control of Company that link to this Notice (collectively our “services”)

This Notice explains who we are; what personal information we collect about you; how we use it (including who we share that personal information with) and your rights and choices regarding personal information about you. You can download a printable copy of this Notice [here](#).

Any questions or concerns regarding Company’s privacy and data protection practices can be directed to our Data Protection Lead at legalnotices@getcenter.com.

NOTICE AT COLLECTION

1. WHAT INFORMATION DOES COMPANY COLLECT ABOUT ME AND WHY?

We collect information that identifies, describes, or is reasonably capable of being associated with you (“personal information”). The following discusses the categories of personal information we collect and have collected in the preceding 12 months, the sources we collect information from, and the business or commercial purposes use of personal information about you.

We may collect the following categories of personal information:

- *Identifiers.* Such as a real name, date of birth, place of birth, postal address, phone number, unique personal identifier, Internet Protocol address, email address, account name, unique identifier of device, or other similar identifiers.
- *Sensitive Personal information.* Such as nation identification numbers, social security numbers, passport numbers, drivers’ license or similar identification card numbers.
- *Customer Records.* Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, signature, address, telephone number, passport number, driver’s license or state identification card number, employment, bank account number. Some personal information included in this category may overlap with other categories.
- *Protected Classification Characteristics.* Such as age (40 years or older), national origin, citizenship, sex (including gender, gender identity, gender expression), veteran or military status.
- *Your opinions or other information.* For example, if you review the services you have purchased from us or provide information about services, and the brands and services you use.
- *Financial information.* Such as your bank account numbers, social security number, income, assets, transaction history, ownership percentage, history of income and losses, last four digits of payment card number, cvv, billing address, and related financial information. This may be considered sensitive personal information in some jurisdictions.
- *Commercial information.* Records of services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- *Geolocation Data.* Such as physical location or movements. We collect your IP address and infer location such as city or postcode therefrom.
- *Inferences drawn from other personal information.* Such as a profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- *Internet or other similar network activity.* As described in more detail in our [Cookie Policy](#), if you use our Services, we automatically collect information about your browsing and search history, interaction with the features of our Services, and responses to advertisements.

- *Professional or employment-related information.* Such as current or past job history.

We may use these categories of personal information for the following purposes:

- **To provide you with the services that you have requested** - To administer our relationship with you and to carry out our obligations arising from the relationship between you and us, internal accounting and administrative purposes, verify personal information, manage performance of assets, evaluate viability of acquisition, to process applications for purchases or services; to process applications for the extension of credit; to book travel, to manage your corporate expenses, to process payment for purchases or services, and to create and manage your account.

To provide you with services we may collect and process: Identifiers; Your opinions or other information; Customer records; Commercial information; Financial information; Professional or employment-related information; Sensitive Personal information. We collect this information on the following lawful bases: consent, performance of a contract with you, compliance with our legal obligations, and pursuing our legitimate interests.

- **For analytics purposes** - For example, we may analyze personal information including your location, services requested, age, time zone, IP address and URL visited, against our wider customer base for internal business purposes, such as generating statistics and developing marketing plans, to improve our services and the website. We may also aggregate and de-identify your information to create customer segments and share with our affiliates and partners.

To perform analytics, we may collect and process: Identifiers, Your opinions and other information, Commercial Information, Geolocation data, Internet and other similar network activity, and Inferences drawn from other personal information. We collect this information on the following lawful bases: pursuing our legitimate interests.

- **To provide you with marketing communications that you might be interested in** - If you choose to receive marketing communications from us, we may use personal information about you to keep you informed about the business of Company, up to date with our latest products, services, surveys, announcements, upcoming events, investment opportunities, contests and other promotions via our newsletters, emails, or other communications. If you no longer wish to receive these marketing communications, details of how to opt out are described in the section below marked "How do I stop receiving marketing communications?"

To provide marketing communications we may collect and process: Identifiers, Your opinions and other information, and or Commercial information. We collect this information on the following lawful bases: pursuing our legitimate interests.

- **For non-marketing communications** - We may use personal information about you to communicate with you about important information in relation to the product or service you have requested or other non-marketing communications. This includes: (i) to process and respond to your questions and/or inquiries; (ii) emailing you to verify your identity ; (iv) notifying you that a particular service has been suspended for maintenance or terminated; (v) letting you know that we have updated this Notice or our Terms of Use; (vi) letting you know about any services that you have requested or purchased; or (vii) providing updates regarding the status of investments. We will never contact you to ask for your password or credit card information, please be careful if you receive any communications from people requesting this information.

To provide non-marketing communications we may collect and process: Identifiers. We collect this information on the following lawful bases: performance of a contract with you, compliance with our legal obligations, and pursuing our legitimate interests.

- **For site optimization and management** - For example we may use personal information provided to us to:
 - administer the website;
 - ensure the security of our networks and of your information;
 - customize your future visits to the website based on your interests to ensure the most user-friendly online navigation experience;

- improve the website and our other digital offerings (including to fix operational problems such as pages crashing and software bugs); and
- provide services to our partners such as tools, analyses, data and insights to see how their website or mobile applications are used.

To support site optimization and management we may collect and process: Internet and network information. We collect this information on the following lawful bases: pursuing our legitimate interests.

- **For product development, product improvement, and business development purposes** - For example, we will use information we collect from you to verify the quality and effectiveness of services and compliance, improve our services, and develop new services.

To support product development, product improvement, and business development we may collect and process: Identifiers; Commercial information; Financial information; or Internet and network information. We collect this information on the following lawful bases: pursuing our legitimate interests.

- **For tailored advertising** - We, or with third party vendors, may use your personal information to provide you with tailored advertising on third party sites, including Social Sites (defined below in section 8) “What if I access or use a social network or public forum through the Services?”. These advertisements are either: (i) “contextual” (meaning they are presented due to the webpage that you are viewing); or (ii) “behavioral advertising” or “interest-based advertising” (i.e. where advertisements are shown to you based upon your interests which we have inferred from your information including demographic, geographic and interest-based data). We may use tailored advertising to specifically include or exclude individuals who have registered for our products to ensure that you are provided with information about those products that are most relevant to you. To do this, we may track your browsing activity across different websites, different Devices and/or different applications. We may match your browsing activity on one Device, such as your mobile phone, with your browsing activity on another Device, such as your tablet, to ensure our advertising is tailored to you. If you no longer wish to see tailored advertising, you can manage your cookie preferences and choose to opt out of those cookies by clicking, Cookies Settings. In addition, some third-party sites allow you to stop seeing advertisements from specific advertisers on that site, so you should also check your preferences on those websites. For more information on how Company uses cookies please review our [Cookie Policy](#).

To provide tailored advertising we may collect and process: Identifiers; Commercial Information; and/or Internet and Network Information.

You can also learn more about our current Advertisers and review your opt-out options on their websites: Google: adssettings.google.com/authenticated?hl=en

If you would like more information about Advertisers’ practices, please see www.optout.aboutads.info. You can generally opt-out of receiving personalized ads from third-party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance’s Self-Regulatory Principles for Online Behavioral Advertising (DAA) by visiting the opt-out pages on the NAI website (www.optout.networkadvertising.org) and DAA website (www.aboutads.info/choices/).

- **For and push notifications** - When you sign up to receive push notifications from us through our mobile app, we may send you information regarding your purchases and purchase confirmations.

To provide SMS communications we may collect and process: Identifiers and/or Commercial Information.

- **For fraud prevention and detection purposes and to protect and defend the rights and property of Company, our employees, and business partners.**

For example, we will use information we collect from you to detect security incidents and comply with service obligations, laws, and regulations. To support fraud prevention and detection we may collect and process: Identifiers, Customer Records, Financial information, or Internet or other electronic network activity information. We collect this information on the following lawful bases: compliance with our legal obligations and pursuing our legitimate interests.

- **For employment application purposes** - For example, if you contact us in relation to your employment prospects, we will use personal information about you to consider you for current and future employment opportunities and to contact you with respect to employment opportunities at Company that you have expressed an interest in.

To support our employment application process, we may collect and process: Identifiers; Protected classification characteristics; or Professional or employment-related information. We collect this information on the following lawful bases: performance of a contract with you, compliance with our legal obligations, and pursuing our legitimate interests.

- **To verify your identity** - For example, we may use personal information to verify your identity when you make a request for information or if you have lost or forgotten your login credential, your card, or for card support.

To verify your identification, we may collect and process: Identifiers or Sensitive Personal information. We collect this information on the following lawful bases: compliance with our legal obligations and pursuing our legitimate interests

- **Information that we collect automatically.** When you engage with Company, we may use cookies and similar tracking technology to collect the following information about you automatically (for further information please see our [Cookie Policy](#)):

- *Internet or other electronic network activity information.* Such as browsing history, search history, information on your interaction with a website, application, or advertisement.
 - For example, when you visit the website, engage with Company content or with us digitally, we may collect certain information from your computer, tablet or mobile phone (“Device”) such as your IP address, Device type (i.e. make and model), unique device identification numbers, browser-type and time zone settings
 - We may also collect information about how your Device has interacted with us including: the pages accessed and links clicked; how you navigate to and from the website (such as how you scroll over the site, which parts you click and how long you spend on each page); your preferences, what you have viewed or searched for on the website; and crashes, download errors and response times.
- *Geolocation Data.* Such as physical location or movements. We collect your IP address and infer location such as city or postcode therefrom.
 - For example, when you visit the website, engage with Company content or with us digitally, we may collect your broad geographic location (e.g. country or city-level location) from your Device.
- *Inferences drawn from other personal information.* Such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
 - For example, when you visit the website, we may use the personal information indicated above to provide you with tailored advertising, content and services that we think you may like. This is described in further detail in the section below marked “How does Company use personal information?”.

We collect this information on the following lawful bases: pursuing our legitimate interests.

Use of Non-Personally Identifiable Information

We may use non-personally identifiable information, such as anonymized and/or aggregated website usage and investment data, in any manner that does not identify individual users for the purpose of improving the operation and management of the Services, including to develop new features, functionality, and services, to conduct

internal research, to better understand usage patterns, to resolve disputes, to troubleshoot problems, to fulfill user requests, to assess success of investments, or for security and compliance purposes. Any non-personally identifiable information that is combined with personal information will be treated by us as personal information.

Change of Purpose

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use personal information about you for an unrelated purpose, we will notify you and we will explain the business purpose which allows us to do so.

Please note that we may process personal information about you without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

2. DO WE SELL OR SHARE PERSONAL INFORMATION?

We may disclose personal information about you to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed the categories of third parties indicated in the chart below.

We may sell or share personal information about you to third parties, subject to your right to opt-out of those sales. Our personal information sales do not include information about individuals we know are under age 16. In the preceding twelve (12) months, Company has sold the following categories of personal information to the categories of third parties indicated in the chart below. To opt-out of personal information sales or sharing, visit [Do Not Sell or Share My Personal Information](#).

Categories of Third Parties

Personal Information Category	Business Purpose Disclosures	Third Party Sales	Third Party Sharing
Internet or other similar network activity	Marketing, delivery services, customer relationship management, web hosting, or data storage	Remarketing, retargeting, and advertising providers	Google AdWords
Geolocation information	Marketing, customer relationship management, web hosting, or data storage	Remarketing, retargeting, and advertising providers	Google AdWords

3. HOW LONG DOES COMPANY KEEP PERSONAL INFORMATION?

We retain personal information in identifiable form only for as long as necessary to fulfill the purposes for which the personal information was provided to us or, if longer, to comply with legal obligations, to resolve disputes, to enforce agreements and similar essential purposes. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we process personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

4. FOR WHAT BUSINESS PURPOSE CAN COMPANY USE PERSONAL INFORMATION ABOUT ME IN THIS WAY?

We are required to satisfy one or more of the reasons set out by applicable data privacy law before we can collect and use personal information.

Generally, our business purpose for collecting and using the personal information described above will depend on the personal information involved and the specific context in which we collect it. However, we will normally rely on the following reasons to collect and use personal information:

- **Performance of a contract**

Using your information may be necessary for us to perform our obligations under a contract with you or with a view to entering into such a contract. For example, where you have: (i) used our services to record an expense, we will need to use your information to track expenses you have recorded; and (ii) approached us in relation to employment opportunities, the collection and use of personal information is necessary to enable us to offer you the job role, process your acceptance of the offer, on-board you as an employee and fulfil our obligations as an employer.

- **Compliance with our legal obligations**

The collection and use of personal information may be necessary to enable us to meet our legal obligations. For example, to verify your identity or evaluate a potential investment or acquisition and undertake necessary due diligence checks.

- **Pursuing our legitimate interests**

Where such processing is not overridden by your interests or fundamental rights, we are permitted to use personal information where it is necessary in order to pursue our legitimate interests, for example to operate the website, to improve our services, or to undertake marketing. We may have other legitimate interests and if appropriate we will make this clear to you at the relevant time.

- **Consent**

In some limited circumstances, we may rely on your consent to collect and use personal information. For example, we may rely on consent: (i) where you have approached us in relation to employment opportunities and have provided us with sensitive personal information, such as information in relation to your racial and ethnic origin, sexual orientation, religion, physical and mental health, disabilities or trade union membership; or (ii) in relation to the sending of e-marketing or communications.

- If we rely on consent, this will be made clear to you at the time we request your information. You can withdraw your consent at any point by using the mechanism provided at the time, or by contacting us using the contact details provided in the section “How do I contact Company?” of this Notice.

You may not always be required to provide the personal information that we have requested. However, if you choose not to provide certain information, you may not be able to take advantage of some of our services. Any information that is so required is clearly marked as mandatory. If you would prefer that we not collect certain personal information from you, please do not provide us with any such information, or opt out of providing this information where applicable.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of personal information is mandatory or not (as well as of the possible consequences if you do not provide personal information).

If we collect and use personal information in reliance on our legitimate interests (or those of any third party), these interests will normally be as set out in this Notice; however, if this changes we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions or need further information concerning the business purpose on which we collect and use personal information about you, please contact us using the contact details provided in the section below marked "How do I contact Company?"

5. DOES COMPANY SHARE PERSONAL INFORMATION ABOUT ME WITH ANYONE?

In addition to the third parties identified under the "Do we Sell or Share Personal Information" section, during the past 12 months, we may have disclosed the categories of personal information listed in the section marked "what categories of personal information does Company collect about me?" to the following categories of recipients:

- **With your employer** – As part of our spend management services our customers (which may be your employer) can see and manage corporate expenses made by their employees. This includes your employer's finance administrators, who see all the payments made by you on corporate cards or as otherwise submitted by you through our services.
- **With our subsidiaries or affiliates** – We may make personal information available to Company affiliated companies to allow us to provide our services to you, for the purposes described in this Notice, or as notified to you when we collect personal information about you.
- **With third parties for marketing purposes** - Certain promotions and events may offer you the opportunity to consent to receive marketing communications from our business. If you have given your **consent**, personal information about you may be used by such third party for the purposes stated at the point you enter the event and/or sign-up to receive the promotional updates.
- **With our service providers and business partners** - We engage third party service providers and business partners to perform functions on our behalf (for example, to support the website). This includes but is not limited to sharing information with the following types of service providers or business partners:
 - *advertising providers* - including companies that provide: (i) advertising space for Company; (ii) the provision of advertising related services, including agencies instructed to make advertising purchases on our behalf, providers of ad-exchanges (a digital marketplace to buy and sell advertising space) and providers of a demand-side platform (software used to purchase advertising in an automated fashion), such as Message Media from Google;
 - *providers of marketing and customer relationship management databases and data management platforms* – that enable Company to manage your information in a safe and efficient manner;
 - *data analysis firms* –that provide insights and help us to analyze trends using the data that we and they hold;
 - *customer support specialists* –that provide customer support services on our behalf for Company services;
 - *web-hosting companies* – to enable us to manage and improve the website;
 - *information technology and related infrastructure providers;*
 - *providers of information technology, administration, and human resource services;*
 - *email delivery providers;* and
 - *audit and professional service providers.*
- **As part of a business transfer** – Company may disclose personal information to an actual or potential buyer (and its agents and advisers) in relation to any actual or proposed divestiture, merger, acquisition, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding.
- **To comply with laws** – Company may disclose personal information to any competent law enforcement body, regulatory, government agency, regulators and public authorities who regulate our activities, fraud

and crime prevention agencies, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; and

- **To any other person with your consent to the disclosure.**

6. WHAT ARE MY DATA PROTECTION CHOICES AND RIGHTS?

State and country specific consumer privacy laws may provide their residents with additional rights regarding our use of personal information. The following Section applies to individuals who reside in specific jurisdictions that provide additional privacy rights.

6.1 Your Rights and Choices

Right to Access Specific Information and Data Portability Right. You have the right to request that we disclose certain information to you about our collection and use of personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed personal information for a business purpose, the business purpose for which personal information was disclosed, and the personal information categories that each category of recipient obtained.

Right to Correct Information. You have the right to request we update personal information about you that is incorrect in our systems.

Right to Delete. You have the right to request that we delete any personal information about you that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) the personal information from our records, unless an exception applies.

Right to Limit Sensitive Personal Information Use. You have the right to limit the use of sensitive personal information regarding you.

Non-Discrimination. We will not discriminate against you for exercising any of your rights.

6.2 How to Exercise these Rights

To submit a request to exercise these rights you may use one of these two methods:

- **Email:** legalnotices@getcenter.com
- **[Submit a Request](#)**

For all requests, please clearly state that the request is related to “Your Privacy Rights,” indicate which type of request you are making, and provide your name, street address, city, state, zip code and an e-mail address or phone number where we may contact you. We are not responsible for notices that are not labeled or sent properly or that do not include complete information.

To appeal a decision regarding a consumer rights request, please submit your appeal using one of the two methods above. Your appeal should include an explanation of the reason you disagree with our decision. Within 60 days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Only you, or a person registered with the applicable Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to personal information about you. You may also make a verifiable consumer request on behalf of your minor child.

You may only make such a request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative and describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide the personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

6.3 Opt-out Preference Signals

Our website honors General Privacy Control ("GPC") opt-out preference signals when such signals are configured through your browser. For more information on GPC opt-out preference signals please visit: <https://globalprivacycontrol.org/>.

6.4 Personal Information Sales and Sharing Opt-Out

If you are age 16 or older, you have the right to direct us to not sell personal information about you at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years old, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 15 years old, or the parent or guardian of a consumer less than 13 years old. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link: Do Not Sell or Share My Personal Information.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales.

6.5 California Shine the Light Law

California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with "California Privacy Rights" in the subject line to legalnotices@getcenter.com. or write us at: Center ID Corp., Attention: Privacy Inquiries, 500 108th Avenue NE., Floor 11, Bellevue WA, 98004.

7. THE EU AND UK GENERAL DATA PROTECTION REGULATION ("GDPR")

Company is the controller of the personal information collected through the Services. Any questions or concerns regarding Company's privacy and data protection practices can be directed to our Data Protection Officer at legalnotices@getcenter.com.

Residents of the EU and UK may be entitled to other rights under the GDPR. These rights are summarized below. We may require you to verify your identity before we respond to your requests to exercise your rights. If

you are entitled to these rights, you may exercise these rights with respect to personal information about you that we collect and store:

- the right to withdraw your consent to data processing at any time (please note that this might prevent you from using certain aspects of the Services);
- the right of access;
- the right to request a copy of personal information about you;
- the right to correct any inaccuracies in personal information about you;
- the right to erase personal information about you;
- the right to data portability, meaning to request a transfer of personal information about you from us to any other person or entity as chosen by you;
- the right to request restriction of the processing of personal information about you; and
- the right to object to processing of personal information about you.

You may exercise these rights free of charge. These rights will be exercisable subject to limitations as provided for by the GDPR. Any requests to exercise the above listed rights may be made to: legalnotices@getcenter.com. If you are an EU or UK resident, you have the right to lodge a complaint with a Data Protection Authority about how we process personal information about you at the following website: https://edpb.europa.eu/about-edpb/board/members_en or <https://ico.org.uk/>.

International Transfers of Personal Information

Whenever we transfer personal information about you out of the EEA, we ensure a similar degree of protection is afforded to it by using a solution that enables lawful transfer of personal data to a third country in accordance with Article 45 or 46 of the GDPR (including the European Commission Standard Contractual Clauses).

For additional information on the mechanisms used to protect personal information about you, please contact us at legalnotices@getcenter.com.

8. WHAT IF I ACCESS A THIRD-PARTY SITE THROUGH THE WEBSITE?

The website may contain links to or from third party sites. Please be aware that we are not responsible for the privacy practices of such third parties. This Notice applies only to the personal information we collect as described above. We encourage you to read the privacy policies of third-party sites you access from links on the website or otherwise visit.

9. WHAT IF I ACCESS OR USE A SOCIAL NETWORK OR PUBLIC FORUM THROUGH THE SERVICES?

Our website may facilitate easy access to certain social networking sites and other websites or services with user-generated content features, such as LinkedIn ("Social Sites"). You understand that we do not control such services and are not liable for the manner in which they operate. Please review the Social Sites' privacy policies if you would like more information about how they collect, use and share personal information, your privacy rights and how to change your privacy settings.

10. HOW DO I STOP RECEIVING MARKETING COMMUNICATIONS?

We will only send you marketing communications if you have agreed to this, or if we are otherwise permitted by law. If at any time you decide that you no longer wish to receive marketing communications from us, you may opt out by clicking on the relevant 'unsubscribe' link in the emails you receive, or by contacting us using the details found in the section "How do I contact Company."

Please note, while we will honor your request to stop receiving marketing communications, we will continue to send you service-related communications such as emails confirming purchases through the website.

11. DOES COMPANY TRANSFER PERSONAL INFORMATION ABOUT ME TO OTHER COUNTRIES?

To provide our services, we may need to transfer and process personal information internationally (including to destinations outside the country in which you are located).

As a result, your information may be transferred to and/or processed in countries which may not guarantee the same level of protection for personal information as the country in which you reside. However, we have taken appropriate safeguards to ensure that personal information will remain protected in accordance with this Notice.

Further information can be provided on request: please contact us using the details found in the section "How do I contact Company?" We have also implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

12. HOW DOES CENTER SECURE PERSONAL INFORMATION?

We understand that you care how personal information is used and/or shared with others, and we value your trust and seek to safeguard personal information.

We implement appropriate technical and organizational security measures, including physical, administrative and technical safeguards to protect personal information from unauthorized access, use and disclosure.

The measures we use to protect personal information are designed to provide a level of security appropriate to the risk of processing personal information. However, please be aware that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures that we have in place to safeguard personal information will never be defeated or fail, or that those measures will always be sufficient or effective.

13. HOW OLD DO I HAVE TO BE TO USE THE COMPANY SITES OR OTHER DIGITAL OFFERINGS?

You must be aged 18 or over to use the Company sites and our other digital offerings.

We take your privacy very seriously and we understand the importance of taking extra precautions to protect the privacy and safety of children who use our services. We do not solicit or knowingly collect personal information from children under the age of 13. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

California Minors: If you are a California resident who is under age 18 and you are unable to remove publicly available content that you have submitted to us, you may request removal by contacting us using the contact methods in the Section titled "How to Exercise These Rights." When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. Removal of personal information from the Services does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

14. DOES THIS NOTICE EVER CHANGE?

We may update or modify this Notice from time to time in response to changing legal, technical or business developments. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws. The date of the most recent version of this Notice will appear at the top of the page.

When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. For example, we will notify you of any changes to this Notice by posting a new Notice and

updating the "last modified" date at the top of this page or by sending the new Notice to you via email, where appropriate.

15. HOW DO I CONTACT COMPANY?

If you have any questions or comments about this notice, the ways in which we collect and use your information described in this Notice, or your choices and rights regarding such use please do not hesitate to contact us at:

E-mail: legalnotices@getcenter.com

Postal Address: Center ID Corp., Attention: Privacy Inquiries, 500 108th Avenue NE., Floor 11, Bellevue WA, 98004