

ACTON International, Ltd (“ACTON”) Privacy Policy

This privacy policy explains what personal information ACTON processes.

Background. ACTON processes and brokers personal information gathered from its clients (data owners) located in the European Union, Switzerland, Canada, Asia and Australia. ACTON’s clients comply with all pertinent privacy regulations and handle inquiries from the data subjects. ACTON has no contact with the data subjects contained within the brokered data, but will work with our clients to respond to all inquiries. ACTON does not gather data through the use of cookies or through the use of any other collection methods. ACTON’s customers include data brokers and identity verification providers that may use the personal information for the purposes listed in Section 3 (Legitimate Business Interests) of this Privacy Policy.

-1- Brokered Information. Personal identifying information is used only for the legitimate business interests (defined below in Section 3) of ACTON’s customers. Personal information may include the data subject’s name, address, cell phone, DOB, marital status, occupation, income, dwelling type and the existence of children within the home. ACTON does not broker sensitive information such as personal data that reveals: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health or sex life.

-2- ACTON is a Processor on Behalf of our Clients. ACTON provides computer services designed to help its clients manage their information more effectively and to increase profitability of their marketing efforts. In this capacity, ACTON does not own or control any of the information it processes on behalf of its clients. 2 All processed information is owned and controlled by ACTON’s clients. ACTON receives information transferred from the EU, Switzerland, Canada, Asia and Australia solely as a processor on behalf of ACTON’s clients. When ACTON acts as a processor on behalf

of its clients, the policies outlined below apply to all data processing operations concerning personal information that has been transferred from the EU, Switzerland, Canada, Asia and Australia. Before starting any processing, ACTON will enter into a processing contract with its Client to ensure the data controller will be in compliance with all applicable data protection laws. Any data processed by ACTON will not be further disclosed to third parties except where permitted or required by the processing contract, Privacy Shield or the applicable Member State Data Protection law. Any information ACTON's Client identifies as sensitive, will be treated accordingly. The processing contract will also specify that the processing will be carried out with appropriate data security measures. ACTON has in place measures to protect personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction. As a data processor on behalf of ACTON's Clients (who are the EU or Swiss data controllers), ACTON is not in a position to apply other Privacy Shield Principles applicable to data controllers with respect to the personal information received for processing from our clients.

-3- Legitimate Business Interests. ACTON's customers may use the brokered data for any of the following legitimate business interests: (1) identity verification; (2) electronic directory assistance; (3) fraud detection; (4) background screening; (5) collection of unpaid bills; (6) anti-terrorism; (7) designing analytical models to develop market segmentation codes; and (8) 3 direct marketing.

-4- Right to Access Personal Data. Data subjects may at any time access their personal data (e.g. correct, delete, amend personal data) found in ACTON's brokered databases by sending an email to ACTON requesting its correction or removal (bwilson@acton.com).

-5- Right to Limit the Use and Disclosure of Personal Data. Data subjects may at any time limit the use and disclosure of their personal data found in ACTON's brokered databases by sending an email to ACTON requesting the limitation of its use or the opting out of its use.

-6- ACTON's Disclosure of Personal Information and its Purpose for Doing So. ACTON discloses personal information to third parties such as data brokers, advertising agencies and companies within the financial services industry. ACTON's purpose for disclosing personal information is to help its clients determine the identity of its customers and to improve the efficiency of its customers' direct marketing efforts.

-7- Security. ACTON uses industry-standard encryption technology when receiving and transferring data from its clients and customers.

-8- EU-US Privacy Shield and Swiss-US Privacy Shield. ACTON complies with the EU-U.S. Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. ACTON has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy 4 Shield program, and to view our certification, please visit <https://www.privacyshield.gov/> These Privacy Shield programs were designed to provide companies on both sides of the Atlantic with a mechanism to comply with EU and Swiss data protection requirements when transferring personal data from the European Union and Switzerland to the United States in support of trans-Atlantic commerce. The Privacy Shield Frameworks provide a set of robust and enforceable protections for the personal data of EU and Swiss individuals. The Frameworks provide: transparency regarding how participating companies use personal data, strong U.S. government oversight, and increased cooperation with EU and Swiss data protection authorities (DPAs). The Privacy Shield Frameworks offer EU and Swiss individuals access to multiple avenues to address any concerns regarding participants' compliance with the Frameworks, including free dispute resolution. The Frameworks ensure a continuing level of protection consistent with Privacy Shield Principles when personal data collected under the Frameworks are transferred to third parties. The

Frameworks also make it easier for EU and Swiss individuals to understand and exercise their rights.

-9- Arbitration and Oversight. As further explained in the Privacy Shield Principles, a binding arbitration option is available to data subjects in order to address residual complaints not resolved by other means. To learn more about binding arbitration refer to:

<https://www.privacyshield.gov/article?id=ANNEX-I-introduction>. ACTON is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

-10- Onward Transfer Liability. ACTON is liable for any onward transfer of personal data to any third party vendors or service providers that ACTON may use in the provision of its services. 5

-11- Disclaimers. While ACTON has safeguards in place to prevent unauthorized access or interception, there is no absolute guarantee of security. In the event of an interception or unauthorized access, ACTON shall not be responsible for such interception or unauthorized access, or any direct, indirect, special, incidental, or consequential damages (including lost profits) suffered by a data subject, even if ACTON has previously been advised of the possibility of such damages. ACTON does not warrant, either expressly or impliedly, that the information provided by a data supplier shall be free from interception or unauthorized access, and does not provide any implied warranties of merchantability or fitness for a particular purpose.

-12- Cooperation with Law Enforcement. ACTON cooperates with inquiries from law enforcement agencies and will assist when ACTON is required by law to do so, or when ACTON in the exercise of its judgment, determines it is necessary to protect itself, its data suppliers and its customers.

-13- Independent Recourse Mechanism for Privacy Shield Complaints. In compliance with the Privacy Shield Principles, ACTON commits to

resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact ACTON via email: bwilson@acton.com or by mailing a letter to: ACTON International, Ltd, P.O. Box 5266, Lincoln, NE 68505 USA Attention: Privacy Officer Bruce Wilson. ACTON has further committed to refer unresolved Privacy Shield complaints to the ANA's Privacy Shield Program, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgement of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit the ANA for more information or to file a complaint. The services of the ANA are provided at no cost to you. 6 ANA Privacy Shield Program, 1333 Broadway, Suite 301 New York, NY 10018. <https://thedma.org/resources/consumer-resources/privacyshieldconsumers/>

-14- Changes to the Privacy Policy. ACTON may, at any time and without notice, add to, change, update or modify this Privacy Policy, simply by posting such change, update or modification on our website. If ACTON decides to change its Privacy Policy, the changes will be posted on the website so that you are always aware of what information is collected, how it is used, and under what circumstances it will be disclosed. Any such change, update or modification will be effective immediately upon posting on the website.

-15- ACTON's Contact Information. ACTON's postal address is: ACTON International, Ltd, Post Office Box 5266, Lincoln, NE 68505 USA. Attn: Privacy Officer.
ACTON can also be reached via e-mail: bwilson@acton.com

We share your data or derivatives of your data with third party independent data controllers and processors, including resellers and distributors, for the purposes of identity verification. These third parties provide identity verification services, such as the verification and/or validation of the identity of individuals for the purposes of, but not limited to, anti-money laundering

regulations, age verification, anti-fraud processes and pre-employment checks.

Last updated: June 13, 2023.