

LEGAL

Privacy Policy

Esperline

RVU Review, LLC — an Ohio limited liability company

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Your privacy is important to us. Accordingly, RVU Review, LLC d/b/a Esperline, and its affiliates and subsidiaries (collectively “Esperline”, “us”, “we”, or “our”) have developed a privacy policy that covers our use, collection, transfer and storage of your information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint or request. Please take a moment to familiarize yourself with our privacy practices.

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1. Information We Collect & Process

Depending on how you interact with us and our services, we may collect the following personal information about you:

- **Personal Details:** We may collect your name, mailing address, phone number, email address, the company you work for or are affiliated with, and contact preference.
- **General Location Information:** We may also use and store information about the approximate location of your device, such information obtained from your device ("Location Data"). This data is used to provide features, to improve, and customize our website. You can enable or disable location services when you use our website at any time by way of your device settings.
- **Commercial and Transactional Information:** If you engage our services, we collect and maintain records related to the services we perform for you, and we (or the payment processor who processes payment for us) may collect your billing information, including payment card number, method of payment, and other payment details. In some states, certain personal information in this category may be considered sensitive.
- **Account Information:** We may collect certain account information such as your username and password (or anything else that identifies you) that you use to log in and access our online services, platforms, or software. In some states, certain personal information in this category may be considered sensitive.
- **Internet and Electronic Network Activity Information:** We may collect certain internet and electronic network activity data including information about the browser you are using, and your browsing history. We may also collect information about your operating system, Internet Service Provider (ISP) information and IP addresses and other device identifiers, such as mobile device identifiers. In addition, we may collect information about your use of our services, including through use of tracking technologies such as cookies and similar technologies.
- **Other Information:** We may collect any other information you share with us when contacting or interacting with us, including whether through our website, email, phone, or any such other forms of communication.
- **Inferences:** We may use the above information to create a consumer profile showing preferences, interests, and behavior.

Certain personal information is necessary for us to provide our products and services, process your requests, and comply with legal obligations. If you do not provide this information, we may be limited in our ability to assist you or provide the requested services.

2. How We Collect Personal Information

We may collect personal information from you in a variety of ways, including but not limited to:

- Your use of our services;
- When we perform services;
- Contact information collected through our website;
- When you contact us;
- Through our data analytics providers;
- Your continuing relationship with us;
- When you voluntarily provide information to us through other means such as contact box or otherwise;
- If you participate in an online survey;
- Your internet protocol (IP) address and other network activity;
- Our use of cookies and other technology; or
- Through your interaction with our social media posts and ads.

3. Cookies & Other Technologies

Our website, online services, and advertisements may use “cookies” and other technologies. These technologies are generally used to provide analytics regarding what other sites you have visited, products you have looked at, how you were directed to our site, how long you have visited each site or page and to possibly respond with banner ads. Other tracking technologies, including, beacons, tags and scripts, are also used to collect and track information and to improve and analyze our website.

Cookies are small packets of data that a website stores on your computer’s hard drive and are primarily used for your computer to “remember” information about your visit and your interactions with our website, but are also used in order for our website to function properly. There are various types of cookies, including some that are essential to the functionality of our website and others that are non-essential but serve other purposes like improving our website and the user’s experience. Generally, the most common types of cookies are:

- **Strictly Necessary and Functional Cookies:** These are cookies that are necessary for you to be able to access and use our website. They ensure that the site works properly and the pages are displayed correctly, as well as are essential for remembering your preferences and login information.

- **Analytics Cookies:** These types of cookies help analyze and measure website usage, testing, and performance. They give the capability to estimate traffic, assess how often services and features are used, understand how visitors and customers interact with digital platforms, identify errors, and evaluate how well a website functions and operates.
- **Marketing Cookies:** These cookies are primarily used to track your online behavior and direct personalized ads based on your interests. They may be set by us or advertising partners and used to build a profile of your interests to promote advertisements and other marketing messages across other platforms.

We and third parties, including those providing advertisement services for us, may use these cookies and other technologies to collect information about your interactions online over time, across third-party websites and devices, and while using our online services, to enhance and tailor your experience with us.

How to Control and Delete Cookies:

You may be able to opt out of certain cookies by making a request under our [Do Not Sell or Share My Personal Information] page. You may also choose to disable cookies through your web browser settings. For example, in Google Chrome, you can select “Block third-party cookies” in the privacy and security settings. If you use a different browser, please refer to that browser’s help or settings section for instructions. Please note that if you disable cookies, some features or parts of our website may not function properly.

4. Our Purpose for Collecting Personal Information

The personal information we collect is used for a variety of business purposes including the following:

(A) Performance of Services & Delivery of Product

- Performance of our services and/or to fulfill a contractual obligation for which we were hired to complete;
- Opening or creating an account; and
- Assisting and providing customer services, with respect to our services and products.

(B) Communication Purposes

- Communicating with you about our services or products;
- Keeping you posted about the latest product announcements and upcoming events using our e-mail (which shall be acknowledged and provide the opportunity to express your preferences or unsubscribe); and
- Addressing product or service concerns, and for loss prevention and anti-fraud purposes.

(C) Improving Our Services and Products

- Creating, developing, operating, delivering, and improving our products, services, content and advertising; and
- For internal purposes such as auditing, data analysis, and research to improve Esperline's products, services, and customer communications.

(D) Remarketing/Targeted Advertising

- Esperline may use remarketing services, also referred to as targeted advertising, to advertise on third party websites to you after you visit our website.

(E) Legal Obligations

- Subject to certain applicable laws and regulations, we may collect your personal information in order to fulfil and comply with our legal obligations.

(F) Other Business Reasons Subject to Your Consent

- Without you providing certain personal information and/or us being able to obtain it, we may be prevented from or limited in the performance of certain of our services.

We do not collect, use, or disclose "Sensitive Personal Information" beyond the purposes permitted by applicable law. Accordingly, we only use and disclose sensitive personal information as reasonably necessary and for the purpose: (i) to perform our services requested by you; (ii) to help ensure security and prevent, detect, and investigate security incidents; (iii) to comply with legal obligations; (iv) to our service providers who perform services on our behalf or work; and (v) for purposes in connection with the services you requested.

We do not sell or share your personal information with third parties for monetary purposes, nor beyond disclosure for a business purpose. We only share your information as described in this Policy or as otherwise communicated to you at the time we collect your information. However, some privacy laws may define a "sale" to include sharing personal information with third parties for "valuable consideration", such as for targeted advertising purposes. Please refer to "Your Privacy Rights" to learn more.

We may de-identify your personal information or receive information about you that has already been de-identified. We may use or share this information in accordance with applicable law. Any de-identified information, we will keep in that form and will not attempt to re-identify it except as permitted or required by applicable law.

Our Use of Artificial Intelligence

We may use AI tools to assist in providing and improving our services. Any processing of personal information through AI technologies will be conducted in accordance with this Privacy Policy and applicable law, as well as subject to appropriate security and privacy safeguards.

5. Children's Privacy

We understand the importance of taking extra precautions to protect the privacy and safety of children. Unless shared by you, with your consent, in accordance with our services, we do not knowingly collect, use, or disclose personal information from children under the age of 13 or the equivalent age as specified by law in your jurisdiction. If we become aware that a child's personal data was collected without appropriate authorization, we will delete that information from our records. Additionally, we do not knowingly sell or share information about our customers under the age of 18 for targeted advertising. If you are a parent or guardian and believe we may have collected information about your child, please contact us right away using the details in the "Contact Us" section of this Policy.

6. How We Share Your Information

(A) To Affiliates, Service Providers, and Other Third Parties

We may share your personal information with the following:

- Our affiliates;
- Third parties approved by you, including third-party payment providers;
- Our insurers and brokers;
- Our bank;
- External auditors; and
- We may employ or contract with third party companies and individuals to provide services on our behalf, including the following services: payment processing, website and data hosting, product and service delivery, customer service, advertising and marketing services, ensuring compliance with industry standards, analytics services, professional advisors, processing or fulfilling orders and transactions, verifying customer information, security and performance monitoring, maintaining and service accounts, auditing and data processing, and other such business related purposes.

These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. We only allow our services providers to handle your personal information if we are satisfied that they have taken appropriate measures to protect your personal information, including entering into certain agreements that include non-disclosure obligations.

(B) For Analytics and Advertising Providers

We may contract with third-party providers to track and provide analytics about our website and its visitors, and for purposes of optimizing and serving ads based on your past visits to our website.

You can opt-out of having made your activity on the website available to such third-party providers by going to our [Do Not Sell or Share My Personal Information] page.

(C) For Corporate Transactions

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

(D) To Law Enforcement

Under certain circumstances, Esperline may be required to disclose your personal information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

(E) Legal Requirements

Esperline may disclose your personal information in the good faith belief that such action is necessary to:

- To comply with a legal obligation,
- To protect and defend the rights or property of Esperline,
- To prevent or investigate possible wrongdoing in connection with the website,
- To protect the personal safety of users of the website or the public, and/or
- To protect against legal liability.

(F) Through Consent

We may share personal information about you with other persons or companies for such business purposes if you give us permission or direct us to share the information.

7. Your Privacy Rights

(A) Privacy Rights in the United States

Under applicable law, you may have certain rights provided to you, including the following below. You may make a request to exercise your rights (please see “How to Exercise Your Rights” below), to which our response will be consistent with and in accordance with the relevant law.

- **Right to Access, Know & Request a Copy:** You may have the right to confirm whether we hold any personal information about you, and if so, to know (i) which categories of personal information we have collected, (ii) from which sources it was or is collected, (iii) the business or commercial purposes for disclosing your personal information; and (iv)

categories of third parties to whom we disclose personal information to, including a specific list of those third parties in which we have disclosed such information to.

You may also have the right to request access to or copies of such data. You may have the right to receive, or have someone else (authorized by law) to receive, a copy provided to you in a structured, commonly used technological format of your personal information that we have stored.

Please also note that under California law, residents may only make a data access or data portability disclosure request twice within a 12-month period.

- **Right to Correct Inaccurate Information:** You may have the right to request the correction of any inaccurate, incomplete, or outdated applicable personal information about you.
- **Right to Request Deletion:** Subject to certain exceptions by law, you may have the right to deletion of personal information that was previously provided by or obtained from you.
- **Right to Restriction:** You may have the right to request the restriction of the collection, processing, or use of your personal information.
- **Right to Opt-out:** Though we do not sell your personal information for money, to the extent that our sharing of your information with third parties, specifically with advertising partners, may be deemed a “sale” or “sharing” under state privacy laws and/or for processing for targeted advertising purposes. You may have a right to opt-out of the selling or sharing of your personal information by going to [Do Not Sell or Share My Personal Information] or reaching out via the contact information below. If such information is processed through and done in connection with the use of cookies, you may also be able to exercise this right through managing your cookie preferences through your web browser settings. We also honor and process opt-out requests submitted using an opt-out preference signal as required by applicable law.
- **Right to Appeal:** You may have the right to appeal our decision with respect to a request you previously submitted. Subject to applicable law, you may contact us via the contact information provided below.
- **Sensitive Personal Information:** We do not collect, process, or disclose sensitive personal information for the purpose of inferring characteristics about you or for any purpose other than permitted under applicable law. Because of this, we are not required by law to offer consumers any right of limitation to the use or disclosure of sensitive personal information.
- **Protection Against Retaliation:** You have the right to not be retaliated against by us because you exercised any of your rights.

We will not discriminate nor retaliate against you for exercising any of your applicable rights. We reserve the right to deny your request if we cannot verify your identity or if an exception applies under applicable law.

(B) Additional Privacy Rights for California Residents

California residents may have additional rights beyond just those listed in “Your Privacy Rights in the United States”, including the following:

(1) Right to Opt-out of Sales or Sharing: California residents have the right to opt out of the disclosure of their personal information for consideration and the sharing of personal information with respect to targeted advertising purposes. You have the right to opt-out of the selling or sharing of your personal information by going to [Do Not Sell or Share My Personal Information] or reaching out via the contact information below.

(2) Do Not Track: Some web browsers include a “Do Not Track” feature that sends a signal to websites indicating your preference not to have your online activity tracked. At this time, we do not respond to Do Not Track signals because a uniform technological standard for handling such signals has not yet been established. We continue to monitor developments in this area and may adopt a standard once one is established.

(C) Unsubscribe from Email Communications

You may opt out of receiving any, or all, of any promotional emails from us by following the unsubscribe link or the instructions provided in any email we send. If you opt-out of receiving these emails from us, we may still send communications to you about your orders and transactions, and any accounts you have with us.

8. Transfer of Data

Your personal information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

Esperline will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

9. Retention of Data

We take the security of your information very seriously. To that end, we attempt to limit the collection and sharing of information we collect about you and limit our collection as set forth in this Privacy Policy. Although we cannot guarantee the absolute security of your information, we

attempt to prevent any unauthorized access or breach of our systems by following industry standard practices.

Esperline will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies. Esperline will also retain data related to your usage of the website for internal analysis purposes. This type of data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our website, or we are legally obligated to retain this data for longer periods.

When you use any of the social media platforms that may be linked to this site, the information and content you share is visible to other users and can be read, collected, or used by them. You are responsible for the information you choose to share or submit in these instances, and we have no ability or obligation to protect it in any way.

10. Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

11. Links to Other Sites

Our website may contain links to other websites that are not associated with Esperline. Information collected about you on any such other website is covered by the privacy notice on that website, and not this Privacy Policy. We encourage you to review the privacy notice on that website before using or entering any personal information on that website, and to fully consider the risks associated with using or entering your personal information on that website. We are not responsible for the content, use, or the privacy policies or practices of those websites not affiliated with us.

12. How to Exercise Your Rights

Under applicable law, if you would like to exercise any of your rights, you can do so by reaching out to us via the contact information provided below or by going to our [Do Not Sell or Share My Personal Information] page.

If you choose to contact us directly, 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.

13. Changes to this Privacy Policy

This Privacy Policy may be updated from time-to-time and without prior notice to you. We will notify you of any changes by posting the new Privacy Policy on this page. We will indicate at the top of the Policy the date at which it was most recently updated. If at any point we decide to use information we collect from you in a manner different than stated at the time it was collected, we will notify you by way of an email and by updating this notice. You will have a choice as to whether or not we continue using your information in this new manner. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

14. Contact Us

If you have any questions about this Privacy Policy, or if you would like to exercise your rights under the applicable privacy laws identified in this Policy, please contact us:

- By email: Support@Esperline.com.
- By visiting this page on our website: [Esperline.com](https://esperline.com)