

# PRIVACY POLICY

Effective as of December 12, 2022

This Privacy Policy, including the Data Processing Addendum, describes the privacy practices of Finicast, Inc. (“**Finicast**,” “**we**,” “**us**” or “**our**”) and how we handle personal information that we collect through our digital properties that link to this Privacy Policy, including our website collectively, the “**Service**”). The Data Processing Addendum is incorporated by reference and published at [finicast.com/dpa](https://finicast.com/dpa).

At Finicast, we provide a business intelligence and financial planning and analysis platform to users. This Privacy Policy does not apply to personal information that we handle on behalf of our users while providing our services to them. Our use of such information is restricted by our agreements with those users.

## PERSONAL INFORMATION WE COLLECT

**Information you provide to us.** Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Communications** that we exchange with you, including when you contact us with questions or feedback, through the Service, social media, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- Public sources, such as public records and social media platforms.
- **Data providers**, such as information services and data licensors that provide demographic and other information.
- Marketing partners, such as joint marketing partners and event co-sponsors.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer’s or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our marketing emails or clicked links within them.

**Cookies and similar technologies.** Like many online services, we use the following technologies:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating analytics and online advertising. Refer also to Cookie Settings section below.
- **Local storage technologies**, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.

**Data about others.** Users of the Service may have the opportunity to refer contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

## HOW WE USE YOUR PERSONAL INFORMATION

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery.** We may use your personal information to:

- provide, operate and improve the Service and our business;
- process your payments and complete transactions with you;
- facilitate your invitations to friends who you want to invite to join the Service;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Marketing and advertising.** We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

**Direct marketing.** We may send you Finicast-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the Opt-Out of Marketing section below.

**Interest-based advertising.** We may engage third-party advertising companies and social media companies to display ads on our Service and other online services. These companies may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) over time across the Service, our communications and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the Advertising Choices section below.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

## HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

**Affiliates.** Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

**Subprocessors.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, user support, email delivery, marketing, and website analytics) are disclosed by name, function, and location at [finicast.com/subprocessors](https://finicast.com/subprocessors).

**Advertising partners.** Third-party advertising companies for the interest-based advertising purposes described above.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations and diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Finicast or our affiliates (including, in connection with a bankruptcy or similar proceedings).

## YOUR CHOICES

You have the following choices with respect to your personal information.

**Opt-out of marketing communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails. If you receive marketing text messages from us, you may opt out of receiving further marketing text messages from us by replying STOP to our marketing message.

**Advertising choices.** You can limit use of your information for interest-based advertising by:

- Browser settings. Blocking third-party cookies in your browser settings.
- Privacy browsers/plug-ins. By using privacy browsers or ad-blocking browser plug-ins that let you block tracking technologies.
- Platform settings. Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising:
  - Google: <https://adssettings.google.com/>
  - Facebook: <https://www.facebook.com/about/ads>
- Ad industry tools. Opting out of interest-based ads from companies participating in the following industry opt-out programs:
  - Network Advertising Initiative: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)
  - Digital Advertising Alliance: [optout.aboutads.info](http://optout.aboutads.info).
  - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.

You will need to apply these opt-out settings on each device from which you wish to opt-out.

Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked to above.

**Do Not Track.** Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

**Third-party platforms.** If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

## COOKIE SETTINGS

Website visitors may control their cookie preferences by navigating to the Cookie Preferences link at the bottom of each webpage of Finicast.com. Our cookies are classified as follows:

**Storage Preferences.** When you visit websites, the sites may store or retrieve data in your browser to load content. This storage is often necessary for the basic functionality of the website. The storage may be used for marketing, analytics, and personalization of the site, such as storing your preferences. Privacy is important to us, so you have the option of disabling certain types of storage that may not be necessary for the basic functioning of the website. Blocking categories may impact your experience on the website.

**Essential Cookies.** These items are required to enable basic website functionality.

**Marketing Cookies.** These items are used to deliver advertising that is more relevant to you and your interests. These may also be used to limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns. Advertising networks usually place them with the website operator's permission.

**Personalization Cookies.** These items allow the website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. For example, a website may provide you with local weather reports or traffic news by storing data about your current location.

**Analytics Cookies.** These cookie items help the website operator understand how its website performs, how visitors interact with the site, and whether there may be technical issues. This storage type usually doesn't collect information that identifies a visitor.

**Do Not Sell.** Pursuant to CCPA/CPRA, a cookie will be logged indicating your preference to neither sell nor transfer your personal data to third-parties when you visit this website.

## OTHER SITES AND SERVICES

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

## SECURITY

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all Internet and information technologies and we cannot guarantee the security of your personal information. Please refer to [finicast.com/resources/security](https://finicast.com/resources/security) for more detailed information.

## INTERNATIONAL DATA TRANSFER

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country. Please check the current List of Authorized Subprocessors including the function and location where user data may be transmitted: [finicast.com/subprocessors](https://finicast.com/subprocessors).

## CHILDREN

The Service is not intended for use by children under 13 years of age. If we learn that we have collected personal information through the Service from a child under 13 without the consent of the child's parent or guardian as required by law, we will delete it. We encourage parents or guardians with concerns to contact us.

## CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

## HOW TO CONTACT US

- **Email:** [legal@finicast.com](mailto:legal@finicast.com)
- **Mail:** 1850 Gateway Drive, Suite 150, San Mateo, CA 94404
- **Phone:** (650) 431 - 5371