

## **PRIVACY POLICY**

This Privacy Policy sets out the terms of how we, **DINERAZO FINANCIAL LLC**, a Florida limited liability company (we may refer to ourselves as “We”, the “Company”, or “Dinerazo”) use and protect any personal information that you provide us when you use our website, or when you create an account with **www.dinerazo.com** (which we may refer to as the “Site” in this policy). We are committed to ensuring that your privacy and personal information is protected, and should we ask you to provide us certain information while using our Site, you can be assured that it will only be used as stated in this policy. We may revise our policy from time to time in order to better comply with new laws or changes to our services, but we will always inform you of these changes before they affect you personally, and we will only subject your personal data to the new rules once you give us your personal consent. If you do not consent to this privacy policy, we will not collect or store any of your personal information for any reason, but usage of the Site may be limited and certain features may be unavailable for use. This policy is effective as of **September 1st, 2021**.

### **I. Website Registration**

A. In order to use our Site and services as intended, we will require you to register as a user on our Site. This registration will require you to submit some of your personal information, which we will store on our servers located in the United States. During registration, the subscriber is required to give certain information (such as name and email address), and in addition may be asked to submit certain authentication information as part of our fraud prevention and “Know Your Customer” activities. This information is used to activate additional features of the Site, to perform the core functions of our business, to view secure content, to comply with federal and state regulations, and to improve your user experience. Without this information we cannot effectively perform or provide our services to you or other customers, you will be unable to use our services, and have limited access to the Site.

B. From time-to-time our Site may request information via surveys or contests. Participation in these surveys or contests is optional and completely voluntary; if you decline to participate it will have no negative effect on your use of our services. Information requested may include contact information, such as name and address, along with other personal information. Information from any surveys or contests will be stored on our personal servers and will not be sent to any third parties.

C. In addition to the information we collect when you register, we may ask you for personal information at other times, such as when you contact our technical support team, for the purpose of verifying your identity and providing assistance for any issues you may have with the Site. When you send e-mail or other communication to Dinerazo, we may retain the communications in order to process your inquiries, respond to your requests, and improve our services.

D. You may delete or end your registration at any time by selecting the profile management tab. Deletion of your profile will automatically remove all of your information from our servers, but it may take us some time to process. Please be aware that if you delete your profile, we will be unable to restore your profile if you change your mind, and your user information will be lost. However, we will be required to retain certain records to comply with state and federal regulations and IRS reporting requirements.

E. If you are registering for our robo advisor services, you will be required to make additional disclosures of personal and financial information, including bank account numbers, debit or credit card information, social security number and financial history. This information is necessary so that we can

verify your identity and ensure the suitability of our services. However, we will not collect these additional disclosures without informing you and allowing you the option to consent. If you refuse to make these additional disclosures, you will be unable to register on our Site.

## **II. What information do we collect?**

A. We may collect the following information:

- ◆ First name, last name
- ◆ Date of Birth
- ◆ Social Security Number
- ◆ Address
- ◆ Driver's License information
- ◆ Email
- ◆ Telephone number
- ◆ Username and password
- ◆ Location Information and Geographic Data
- ◆ Bank, debit or credit card account information
- ◆ Other information relevant to the proper functioning of the Site

B. We may need to eventually collect additional types of information, but we will only do so after updating our privacy policy, and only once you give us your consent. In addition, we may offer certain promotions or surveys which ask for additional categories of information, but these will be optional and we will always request your consent before offering them to you.

C. For all users we may request the right to collect location data and geographic data, as well as telephone numbers. This information may be necessary for us to prevent fraudulent activities on the Site, and to verify user credentials.

## **III. What may we do with the information we gather from our subscribers?**

A. We analyze the information to allow us to provide our goods and services to you and other users, and additionally, for the following reasons:

- ◆ Internal record keeping.
- ◆ Compliance with state and federal regulations
- ◆ To improve our products and services.
- ◆ To enable the services offered by the Site.
- ◆ To improve interaction between us and our users, including for better customer and tech support.
- ◆ To enable providers and customers to communicate with each other effectively and on a truthful basis.
- ◆ To verify the identity of providers for fraud prevention activities.
- ◆ To periodically send promotional emails regarding newsletters, new products, special offers or other information which you may find interesting, using the email address which you have provided.
- ◆ To customize the Site according to our user's interests.

## **IV. Site Security**

A. We are committed to ensuring that your information is secure. In order to prevent unauthorized access to disclosure of your personal information we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online. These include internal reviews of our data collection, storage, and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data. However, the Internet is an open system and we cannot provide absolute assurances that your data or communications can be intercepted or viewed by third parties. In the event that a data breach occurs for any reason, we will immediately inform you if any of your personal information has been compromised.

## **V. How we use cookies?**

A. A cookie is a small file which asks permission to be placed on your computer or mobile device's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The Site can tailor its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

B. We use traffic log cookies to identify which pages are being used. This allows us to analyze data about Site traffic and visitor trends in order to improve the Site and our services based on our users' needs. We only use this information for statistical analysis purposes and the information is only temporarily stored. Once we are done analyzing the statistical information the data is removed from our system.

C. Overall, cookies help us provide our users with a better website experience, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer, phone, or other hardware or any information about you, other than the data you choose to share with us.

D. You can choose to accept or decline cookies. Upon accessing our Site for the first time you will be given the option to enable cookies. If you do not enable cookies, we will not download a cookie into your browser for any purpose, but your usage of the Site may be limited. Once you create a user profile you may additionally disable or enable cookies at any time through the appropriate option on the user profile tab. Please be aware that declining cookies may prevent you from taking full advantage of the Site, and may in some cases prevent you from soliciting services from providers. Cookies can also enable us to track and target the interests of our users to enhance the experience on our Site. Cookies do not record any personal information, and the usage of a cookie will in no way allow us or any other person or company to access your personal information without your express consent.

## **VI. Links to Third Party Websites**

Our Site may from time to time contain links to enable you to visit non-affiliated third-party websites. However, by clicking on these third-party links, you will effectively be leaving our network, and we will be unable to assure the protection of any data you submit to any third-party site. Note that we do not have any control over the content contained in any third-party website featured on our Site. Please be aware that any information you submit on these sites may be subjected to other rules, and that you should review the third party's privacy policy prior to submitting any information. You should exercise caution in your use of any third-party site, and we urge you to take care before submitting any information.

## **VII. Controlling your personal information**

A. We will not sell or transfer your personal information to third parties unless we are required to by a court or government order. We do share certain information for the purposes of providing services for which you have elected to receive. This would include other financial institutions, such as our broker, custodian, bank providers, KYC processors, merchant providers and credit or debit card processors. We may from time to time request that you allow us to share your personal information with other companies or partners for the purpose of enhancing our products and services, or to introduce you to services you may find beneficial. However, except as provided for herein, we will never share any personal information without your consent, and if you decline to allow us to share your personal information it will not negatively impact your user experience. Other than as provided for above, we currently don't share your information with any other company or person (other than sharing basic information so that you can receive services from us), but if we ever do, we will first give you the name and contact information for the company or person. We will not offer to share your information with any third party which does not comply with the minimum protections of the California Privacy Rights Act.

B. Note that when you voluntarily disclose personal information online in a public forum or in private communications with other users (for example, through email, chatrooms, message boards, or social media) such information can be collected and used by others without our ability to control it. Therefore, if you post personal information online that is accessible to the public, it is possible that your information will not be protected and may be accessed by the general public. You may receive unsolicited messages from other parties in return, or may be subject to violations of privacy. Some of our services may offer the option to show your name, phone number and e-mail address. If you decide to show your name, phone number and e-mail address, in some instances it may be available for others over the Internet.

C. Please be aware that a core part of our services may require you to make certain disclosures of your identity and image, and we cannot absolutely guarantee that a third party will not gain access to such information illicitly or accidentally; however, we will not publish any of your personal information, and protect such information with the highest care.

D. The Company may release personal information to third parties if it is required or compelled to do so to (a) satisfy any applicable law, regulation, legal process, or enforceable governmental request like a court order or order by a government; (b) enforce applicable Terms of Service, including investigation of potential violations thereof, such as preventing disruptive behavior; (c) detect, prevent or otherwise address fraud, security, or technical issues, such as scammers or hackers; or (d) protect against imminent harm to the rights, property, or safety of the Company, its users, or the public as required or permitted by law. Such as to investigate threats of violence or harm to our users, employees, or any other person.

E. Please note that we operate mainly in the United States and all of our data servers and all saved data are located in the United States. If you are a non-resident of the United States, please be aware that your personal data will be saved in these U.S. servers and will be subject to U.S. laws and jurisdiction.

### **VIII. Disclaimer**

Except as otherwise provided for herein or by law, or in order to provide the services that we offer, We will never provide your information to a third party without your express consent, but if you have consented to us sharing this information, we cannot be held responsible for how these other parties use your information. While we safeguard your information and place certain restrictions on our

users and other parties with respect to the dissemination of your contact information, we have no control over what third parties do with data you have consented to share. In the event that such data is misused by such third party, we will not be responsible for such misuse or unauthorized dissemination of your personal information, and shall not be liable in any way for the actions of any person or company which may receive your contact information.

#### **IX. Changes to Our Privacy Policy:**

We reserve the right to make changes to our Privacy Policy from time to time. If we plan to make significant changes to any of our privacy policies or practices with respect to how we use personally identifiable information, we will require that you read and agree to our new policy prior to using any of the Site's services. If you do not agree to consent to the new privacy policy, we will not collect any of your personal information, but we will be unable to provide any of our services until you agree to consent to the privacy policy. Even if you do not consent to the new privacy policy you may still manage your personal information under the profile tab of your account. Our privacy policy is current as of **September 1st, 2021**.

**This Privacy Policy should be read in conjunction with our Terms and Conditions. In the event of a discrepancy between our Privacy Policy and our Terms and Conditions, this Privacy Policy will govern. If you feel that we are not abiding by this Privacy Policy or our Terms and Conditions, you should contact us via email immediately at [info@dinerazo.com](mailto:info@dinerazo.com).**

#### **QUESTIONS**

Questions regarding our Terms and Conditions, our Privacy Policy or other policies can be directed to our support staff by emailing **[info@dinerazo.com](mailto:info@dinerazo.com)**.

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