



## PRIVACY POLICY

Date: April 7, 2021

Alta Solutions AZ, LLC (hereinafter “ALTA” “we,” “our,” or “us”) is committed to safeguarding and handling your Personal Information in a responsible and secure manner.

This Privacy Policy (“Policy”) describes how we process your Personal Information as you use our website located at <http://whatisalta.com/> and any services, tools, technology, products, features, and mobile apps (together, the “Services”) provided, operated or owned by ALTA. When we collect, access, use or do anything with your Personal Information, we are “processing” your Personal Information.

Please read our ALTA Token User Agreement (“User Agreement”) before accessing our Services. By accepting the User Agreement, you agree with our privacy practices as described in this Policy. If you cannot agree with this Policy, User Agreement, or other policies, please do not access or use our Services.

We may modify this Policy at any time, without prior notice, and changes may apply to any Personal Information we already hold about you, as well as any new Personal Information collected after the Policy is modified. If we make changes, we will notify you by revising the date at the top of this Policy. We will provide you with advanced notice if we make any material changes to how we collect, use or disclose your Personal Information or that impact your rights under this Policy. If you continue to access or use our Services after receiving the notice of changes, you acknowledge your acceptance of the updated Policy.

In addition, we may provide you with real time disclosures or additional information about the Personal Information handling practices of specific parts of our Services. Such notices may supplement this Policy or provide you with additional choices about how we process your Personal Information.

### Section 1 – Information We Collect Through Your Use of the Services

Personal Information is any information that identifies you or makes you identifiable. We collect different types of Personal Information when you’re accessing or using our Services, including:

- 1. Information you provide to us.** In connection with the Services, we may ask you to provide these categories of Personal Information:
  - **Account Information:** Information you provide about yourself and your business to access our Services, including name, email address, phone number, mailing address, business identification numbers, and password, so that we may communicate with you and provide you with the Services.
  - **Payment Information:** In order to use our Services, you will need to open an account with one of our partner financial institutions and you will need to provide us



with payment, billing or transaction related information, including billing information such as your billing address, phone number, and account number.

- **Voluntary Information:** Information you provide to us voluntarily by completing web forms, participating in polls, or contributing to blogs, postings, contacting ALTA’s customer service, and other mediums constitutes Voluntary Information.

**2. Usage Information automatically collected.** When you use the Services, we automatically collect information about the Services you use and how you use them (“Usage Information”), as described below.

- **Service Data:** We collect information about your interactions with the Services, such as the pages or other content you view, and other actions you perform while using the Services.
- **Log Data:** We automatically collect log information when you use the Services. This might include your IP address, access times, hardware and software information, device information, device event information (e.g. crashes, unsuccessful logins, browser type), the web page you’ve viewed or engaged with before or after using the Services, and other relevant information. We collect and monitor this data in order to keep track of the security and privacy of your account.
- **Cookies and Similar Tracking Technologies:** We may use various tracking technologies to collect and store information about your use of our Services. We use these tools to ensure that you receive a personalized experience, to provide you with certain functions on our Services, to keep your account safe, and to improve and optimize our Services. Please refer to the “Cookies and Similar Tracking Technologies” section below for more information.
- **Mobile Device Information:** If you access or use our Services through your mobile devices, we will automatically collect identifiers about your device, location, and session.

**3. Information from third parties.** From time to time, ALTA may allow you to connect or transfer your information to or from a third-party application or service. If you choose to participate, we may collect Personal Information about you from the third party. Once the Personal Information has been transferred to ALTA from a third party, you may or may not be able to rescind or remove the information.

## Section 2 – How We Use Your Information

Your Personal Information can be used for various purposes, including:

- **To Provide Our Services.** When you access or use our Services, we process certain Personal Information about you to be able to provide you with our Services. Some examples of how we process your Personal Information in our Services include, but are not limited to:
  - To pay for the Services,
  - To analyze or predict certain characteristics or needs within your account, and



- To coordinate and communicate about logistics and tracking of your armed car pick up.

We cannot provide you with our Services without such processing of your Personal Information.

- **To Communicate With You.** When you sign up for our Services, you will receive Service-related communications. Our Service-related communications are transactional messages about your account, billing information, your results, surveys, support, customer service, research you may be interested in or are participating in, policy changes, or other Service-related notifications. You can manage your email preferences and opt out of certain communications. However, service-related communications are necessary for us to continue to provide our Services to you.
- **To Advertise to You.** We may also use your Personal Information for marketing or promotional related communications and initiatives, including to target specific digital advertisements to you based on your interests, Service use, and other information processed about you.
- **To Enforce our Terms, Agreements, or Policies.** To maintain a safe, secure, and trusted environment for you when you use the Services, we use your Personal Information to make sure our terms, policies, and agreements with you (and any third parties) are enforced. We actively monitor, investigate, prevent, and mitigate any suspected or actual prohibited activities on our Services. We are required to process your Personal Information for this purpose to provide our Services.
- **For Product Research and Development.** We want to ensure our Services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we may process your Personal Information to improve, optimize, or expand our Services or features of our Services. We do so by processing information about your use of the Services, any information you provide to us, and by measuring, tracking, and analyzing trends and usage in connection to your use or the performance of our Services. Without processing your information for such purposes, we may not be able to ensure your continued satisfaction when using our Services.
- **To Comply With Applicable Laws.** We may be required to process your Personal Information under certain laws and regulations, such as tax or financial laws. We will also process any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (including, but not limited to, a judicial proceeding, court order, or government inquiry) or obligations that we may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the User Agreement and ALTA's policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of ALTA, its employees, its users, its clients, and the public. We cannot provide the Services to you without such processing.



### Section 3 – How We Share Your Information

We may share your Personal Information as follows:

1. **Third-Party Service Providers.** We may use third parties to perform certain services on our behalf in connection with the Services such as:
  - to process and store data, including your Personal Information;
  - to track, analyze, and modify our Services;
  - for Service-related logistics such as transport and delivery;
  - for marketing, advertising, and distribution;
  - to assist us in providing you with customer support; and
  - to support our IT and security efforts.

**Google Analytics.** Google Analytics is as a website analytics service provider. Learn more about how Google collects and uses data [here](#). To opt out of Google Analytics Advertising Features please use [Google Ad Settings](#). To opt out of Google Analytics entirely please use [this link](#).

Certain third-party service providers, such as payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your Personal Information will be handled by these providers. In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

2. With Banks and Financial Institutions as required. We may, from time to time, share Personal Information with banks as required to enable our Services and comply with applicable laws and regulations.
3. **Merger, Bankruptcy, or Corporate Reorganization.** We may disclose and transfer your Personal Information to a subsequent owner, co-owner, or operator of ALTA or the Services, or in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets (i.e., a bankruptcy proceeding), or other corporate change. We will notify you with any choices you may have regarding your Personal Information when we are engaged in a merger, bankruptcy, or corporate reorganization.
4. **Legal Obligations and Safety.** We may share your Personal Information if it is reasonably necessary to:



- Comply with a valid legal process (e.g., subpoenas, warrants, court orders, etc.);
- Comply with requests or investigations by public authorities;
- Comply with applicable laws or regulations;
- Enforce or apply the ALTA policies or policies of our business partners;
- Protect the security or integrity of the Services; or
- Protect the rights, property, or safety of ALTA, our employees or users, partners and affiliates, or other natural persons.

5. **For any other purpose, with your consent.** We may share your Personal Information on your behalf or at your request. We will only do so with your specific consent. If you provide your consent to share your information, you may withdraw your consent at any time. Withdrawing your consent will not undo or reverse the lawfulness of any previous processing, and in some cases Personal Information may not be retrieved once shared. Contact us at [support@whatisalta.com](mailto:support@whatisalta.com) if you would like to withdraw your consent.

#### **Section 4 – Cookies and Other Tracking Technologies.**

We use cookies and similar tracking technologies to collect Usage Information about your use of our Services. Cookies are small files, typically comprised of letters and numbers, that your computer or mobile device saves when you visit certain websites. When you return to the websites that save cookies on your device—or visit other websites that use the same cookies—the websites recognize such cookies and your browsing device. Generally, we use first-party and third-party cookies for the following purposes:

- To make our Services function properly;
- To provide a secure browsing experience during your use of our Services;
- To collect Usage Information about your use of our Services to help us improve and optimize our Services; and
- To remember your preferences for your convenience.

Cookies set by us are called "first party cookies," while cookies set by parties other than ATLA are called "third party cookies." The parties that set third party cookies can recognize your computer both when it visits the ALTA Services and when it visits certain other websites or mobile apps. We do not control how third-party cookies are used. You should check the third party's website for more information about how they use cookies. Some cookies are associated with your account and Personal Information (as defined in the Privacy Statement), while others are not. Both first party and third-party cookies can be serve a number of different functions, such as analytics, marketing and advertising.

#### **Types of Cookies on Our Services**

We use the following types of first- and third- party cookies on our Services:

1. **Strictly Necessary Cookies:** These cookies are essential because they enable you to move around and use our Services. For example, strictly necessary cookies allow you to access secure areas on our Services. Without these cookies, some services cannot be



provided. These cookies do not gather information about you for marketing purposes. This category of cookies is essential for our Services to work and they cannot be disabled.

2. **Performance or Analytic Cookies.** These cookies collect Usage Information about how you use our Services. For example, the cookies will collect information about the pages you view or click on while using our Services or if you get an error message from certain pages. We use the information collected by such cookies to improve and optimize our Services. We do not use these cookies to target you with online marketing.
3. **Functional Cookies.** We use functional cookies to remember your choices so we can tailor our Services to provide you with enhanced features and personalized content. For example, these cookies can be used to remember your name or preferences on our Services. We do not use functional cookies to target you with online marketing. While these cookies can be disabled, this may result in less functionality during your use of our Services.
4. **Advertising Cookies.** These cookies are used to deliver advertisements that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They remember that you have visited a website and this information may be shared with other organizations such as advertisers. This means after you are done using our Service you may see some advertisements about our Services elsewhere on the Internet.

You can enable, disable, or delete cookies through the browser you are using to access our Services. Many browser manufacturers provide helpful information about cookie management, including, but not limited to:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

Please note, if you set your browser to disable cookies, you may not be able to access secure areas of our Services, and/or parts of the Services may not work properly for you. You can find more information about how to change your browser cookie settings at <https://www.allaboutcookies.org>.

## Section 5 - Your Choices



1. **Your Account.** You may access your ALTA Account Information by going to the “Your Account” page. You can edit your Account Information as necessary, such as your email address, phone number and more. When you update your Account Information, we may request additional information or documentation from you, as we deem appropriate, to verify the information you have updated and we will keep a copy of your previous account details for our records and to prevent fraud or other activities that violate our terms, policies and agreements.
2. **Self-Reported and Voluntary Information.** You may choose not to provide us with some of your Personal Information. For example, you are not required to complete any survey we send to you. In some instances, you may be able to edit your answers to forms, surveys or features you submit to us. If you cannot find the information you are looking for in your account, please contact us at [support@whatisalta.com](mailto:support@whatisalta.com) with your request.
3. **Communication Preferences.** If you do not want to receive emails from us, please adjust your communication preferences or click the unsubscribe link within the email you received from us. You will not be able to unsubscribe from Service-related communications as they are necessary for us to continue offering you the Services.
4. **Account Closure.** You may close your ALTA account at any time in accordance with our User Agreement. Closing your account will not result in the deletion of your Personal Information. We are required by law to retain your information for no less than 5 years following your account closure. If you wish to close your account, please contact us at [support@whatisalta.com](mailto:support@whatisalta.com).

## Section 6 - Third-Party Services

You may find links to other websites, third party applications, and widgets on our Services that we do not own or control. When you click on links in our Service, they may direct you away from our Website. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements. Once you leave our Service or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website’s Terms of Service.

## Section 7 - Security

To protect your Personal Information, we take reasonable precautions and follow industry standard practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

You should be aware that, unfortunately, no system can be 100% secure. There will always be a risk that your Personal Information gets compromised. We also depend on you to keep your Account Information secure by keeping your password confidential and taking precautions to keep others from accessing your account. Please notify us immediately at [support@whatisalta.com](mailto:support@whatisalta.com) if you become aware of any unauthorized access to or use of your account.



## **Section 8 – Children’s Privacy**

The Services are not intended for or directed at minors. By using this site, you represent that you are at least eighteen years of age. Please contact us if you believe we have collected Personal Information about a child without consent from their parent or guardian so we can take action to prevent such access and to delete their Personal Information from our Services.

## **Section 9 – Notice to Individuals in California**

**Marketing.** California law permits California residents to ask us for a notice that identifies the categories of Personal Information that we share with our affiliates and/or third parties for marketing purposes, and that provides contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to us at the address provided under the “Contact Information” section.

**Do Not Track.** As noted above, we may collect information about your online activity using Cookies and Other Tracking Technologies. Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer’s online activities over time and across third-party web sites or online services (e.g., browser “Do Not Track” signals). Currently, we do not monitor or take any action with respect to these Do Not Track signals or other mechanisms, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

## **Section 10 – Changes to this Privacy Policy**

We reserve the right to modify this Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this Policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

If ALTA is acquired or merged with another company, your information may be transferred to the new owners so that you can continue to use the Services.

## **Section 11 - Questions & Contact Information**

If you would like to: submit questions, close your ALTA account, register a complaint, or simply want more information contact us at [support@whatisalta.com](mailto:support@whatisalta.com) or by mail at:

ALTA  
Re: Compliance Officer  
2398 E Camelback Road STE 1010  
Phoenix, AZ 85016