

Orbit Treasury Solutions, Inc.

PRIVACY POLICY

Effective Date:

We respect your privacy at Orbit Treasury Solutions, Inc. (OTS). This privacy policy (“Policy”) applies to our websites and services and explains how personal information is collected, used, disclosed, and protected by OTS. If you use our websites and services as part of an organization that has a client relationship with OTS (like your employer), the terms of that organization’s contract with OTS may restrict our collection or use of your personal information beyond what is described in this Policy.

EU-US Privacy Shield Program

OTS may store and process the personal information of non-US citizens, including citizens of the European Union (EU), in the United States. OTS complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. OTS has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principals shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit www.commerce.gov/privacyshield/.

Information Collected

We collect information from you or your employer in various ways when you use our websites and services. The following are the specific types of information we collect.

Information You Give Us. We collect information you give us on our websites. Examples include the following:

- ✓ Request a Demo – We collect your name and contact information when you request a demonstration of the Orbit TMS system.
- ✓ Sending an Email to an orbit-tms.com Address – We collect your email address and other information you provide when you contact us via email.
- ✓ Contact Us – We collect your name and contact information when you request us to contact you.

This information is collected for marketing purposes.

Information Your Employer Gives Us. If you are employed by an OTS client and your employer desires that you be a registered user of the Orbit TMS system, we collect some personal information directly from your employer. Specifically we collect your name and corporate email address. This is the only personal

information that we collect. If you do not wish to provide this personal information, your employer will not provide you access to the Orbit TMS system.

This information is used by your employer in the course of normal business operations.

Automatically Collected Information. We automatically receive certain types of information when you interact with our website pages, services and communications. For example, it is standard for your web browser to automatically send information to the websites you visit, including ours. This information may include your computer's IP address, access times, your browser type and language, and referring website addresses. We may also collect information about the operating system you use and files and pages accessed or used by you.

Cookies and Web Beacons. We may also use certain kinds of technology such as cookies and web beacons to collect information. Among other things, the use of cookies and web beacons enables us to improve our websites and emails by seeing which areas and features are most popular, to count the number of computers accessing our website, and to improve your experience. A cookie is a small amount of data which is sent to your browser from a website's computers and stored on your computer's hard drive. Most browsers automatically accept cookies as the default setting. You can modify your browser setting to reject our cookies or to prompt you before accepting a cookie by editing your browser options. However, if a browser is set not to accept cookies or if a user rejects a cookie, some portions of the Web site and services may not function properly. For example, you may not be able to sign in and access certain web page features or services. A web beacon is an electronic image, also called a "gif," that may be used on our web pages to deliver cookies, count visits and compile statistics on usage and campaign effectiveness or in our emails to tell if an email has been opened and acted upon.

Sensitive Information. OTS does not collect any sensitive information as defined by the Privacy Shield framework.

Use of Personal Information

In general, we use your personal information to provide you with information or services you request, to inform you about products or services, and to administrate and operate our websites and services. For example, we may use your personal information:

- ✓ To contact you about products and services we think will be of interest to you.
- ✓ To communicate with you to arrange a demonstration of the Orbit TMS system.
- ✓ If you are an Orbit TMS user, to associate you with your user account and account activity.
- ✓ If you are an Orbit TMS user, to perform after-sales services; anticipate and resolve problems with our service; respond to customer support inquiries; and, inform you of updates to products and services.
- ✓ To respond to your inquiries, requests or complaints.

Sharing of Personal Information

We will not give, sell, rent, share, or trade any of your personal information or any data that you store using our services to any third party except as outlined in this Policy or with your consent. We may disclose information to a third party to (a) comply with laws or respond to lawful requests by public authorities, including to meet national security or law enforcement requirements, (b) to protect OTS, agents, customers and others, including to enforce our agreements, policies and terms of use or (c) in the good faith belief that disclosure is needed to respond to an emergency or protect the personal safety of any person.

We may share personal information with affiliated entities or service providers for purposes of providing services to OTS.

We may share personal information in connection with an acquisition, merger, or sale of all or a substantial portion of our business, with or to another company.

In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, OTS is potentially liable.

Security

OTS takes reasonable steps to protect information we collect from you to prevent loss, misuse and unauthorized access, disclosure, alteration and destruction.

If you are employed by an OTS client and have an Orbit TMS user account, your personal information and access to our service is accessible only through the use of an individual user ID and password. To protect the confidentiality of personal information you must keep your password confidential and not disclose it to any other person. Please advise your system administrator immediately if you believe your password has been misused. In addition, always logout and close your browser when you finish your session.

Accessing, Correcting, Updating and Deleting Your Personal Information

OTS acknowledges the right of individual's to access their personal data. If your personal information changes in any way, we invite you to access, correct, update or delete your information as soon as possible. If you are employed by an OTS client and have an Orbit TMS user account, your system administrator can update your profile information at your request. For non-users of

Orbit TMS, you can request access to correct, update or delete your personal information by contacting us using the methods provided below in the “Contacting Us” section.

Choice/Opt-Out

OTS may send you communications regarding our websites and services including but not limited to (i) client-related messages, and (ii) promotional information and materials regarding our products and services. You may opt-out of receiving promotional emails from us by following the opt-out instructions provided in those emails. You may also opt-out of receiving promotional emails and other promotional communications from us at any time by contacting us using the methods provided below in the “Contacting Us” section.

If we desire to use your personal information for any purpose which is incompatible with the purpose(s) for which it was originally collected or subsequently authorized, you may opt-out of such additional uses. Opt-out requests will not apply to client-related messages.

If you do not wish to provide your name and/or email address, your employer will not provide you access to the Orbit TMS system.

Enforcement/Dispute Resolution

In compliance with the EU-US Privacy Shield Principles, OTS commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact OTS at:

Email: privacy@orbit-tms.com

Telephone: +1 877-672-4886

Write us:

ATTN: Privacy Officer Orbit Treasury Solutions, Inc. 700 Larkspur Landing Circle, Suite 199 Larkspur, CA 94939

OTS has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

OTS is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC)

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

Changes to This Policy

OTS reserves the right to modify this Privacy Policy from time to time without notice. If we make any changes to this Policy, we will change the "Last Updated" date above. If there are material changes to this Policy, we may notify you more directly but we are not obligated to do so.

Contacting Us

Questions about this Policy and any privacy-related contacts should be submitted via any of the following methods:

Email: privacy@orbit-tms.com

Telephone: +1 877-672-4886

Write us:

ATTN: Privacy Officer Orbit Treasury Solutions, Inc. 700 Larkspur Landing Circle, Suite 199 Larkspur, CA 94939