ARCHITECT FINANCIAL TECHNOLOGIES INC.
PRIVACY POLICY

Last Updated: June 05, 2023

This Privacy Policy describes how Architect Financial Technologies Inc., and its affiliates and subsidiaries (collectively, “Architect,” “we,” or “us”) collect, use, and disclose information about you. This Privacy Policy applies to information we collect when you access or use our website (located at https://www.architect.xyz), and other online or internet-connected products and services (collectively, our “Services”), or when you otherwise interact with us directly, such as through our customer support channels or on social media pages. We may provide different or additional notices of our privacy practices with respect to certain products or services, in which case this Privacy Policy will not apply.

Limited Scope of Privacy Policy
Some of our Services allow you to collect and process information from your own customers or individuals with whom you directly interact through our Services. Importantly, this Privacy Policy does not apply to your privacy practices and how you collect and use any information from others through our Services, which shall be governed by your privacy policy, to the extent applicable.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy. We may also provide you with additional notice (such as by adding a statement to the Services or sending you a notification), such as in connection with making material changes to this Privacy Policy. We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

CONTENTS
Collection of Information
Use of Information
Sharing of Information
Analytics
Transfer of Information to the United States and Other Countries
Your Choices
Contact Us

COLLECTION OF INFORMATION

Information You Provide to Us
We collect information you provide directly to us. For example, we collect information directly from you when you fill out a form, make a purchase, communicate with us via third-party platforms, request customer support, or otherwise communicate with us. The types of information about you that we collect include your:

- Name
- Email address
- Postal address
- Phone number
• Financial account information
• Any other information you choose to provide.

Additionally, if you make a purchase, we work with a third-party payment processor to collect and process your payment information.

*Employment application:* We also collect personal information such as your name, address, e-mail, and phone number when you apply for employment with us through our website. In addition, we may collect information relating to your education and employment history when you submit that information as part of an employment application. Not all requested information is required, however, and we specifically indicate what information is required in order to submit your employment application.

**Information We Collect Automatically**

We automatically collect certain information about your interactions with us or our Services, including:

• **Activity Information:** We collect information about your activity on our Services, such as the web pages you visit and whether you use our Services in compliance with our policies and Services related agreements.

• **Purchase Information:** When you make a purchase or engage in other Services made available via our website, we collect information about your purchase or use of the Services, such as product or offering details, purchase price, and the date and location of the purchase or use of such Services.

• **Device and Usage Information:** We collect information about how you access our Services, including data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, unique device identifiers, browser type, and app version. We also collect information about your activity on our Services, such as access times, pages viewed, links clicked, and the page you visited before navigating to our Services.

• **Information Collected by Cookies and Similar Tracking Technologies:** We (and those who perform work for us) use tracking technologies, such as cookies and web beacons, to collect information about your interactions with the Services. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that we use on our Services and in our emails to help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies and how to disable them, see the *Your Choices* section below.

**Information We Collect from Other Sources**

We obtain information from other sources. For example, we may collect information from identity verification services, and data analytics providers.

**Information We Derive**

We may derive information or draw inferences about you based on the information we collect. For example, we may make inferences based on your IP address or infer that you are interested in other products based on your usage of the current offerings.
USE OF INFORMATION
We use the information we collect to track site usage and compliance with our license and/or Services related agreements. We also use the information we collect to:

- Provide, maintain, improve, and develop new products and services, including to debug and repair errors in our Services;
- Process transactions and send you related information, including but not limited to confirmations, receipts, invoices, and customer surveys;
- Personalize your experience with us;
- Send you technical notices, security alerts, support messages and other transactional or relationship messages;
- Respond to your comments and questions and provide customer service;
- Communicate with you about products, services, and events offered by Architect and others and provide news and information that we think will interest you (see the Your Choices section below for information about how to opt out of these communications at any time);
- Monitor and analyze trends, usage, and activities in connection with our products and services;
- Consider you for employment;
- Detect, investigate, and help prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and help protect the rights and property of Architect and others;
- Comply with our legal, regulatory, and financial obligations; and
- Carry out any other purpose described to you at the time the information was collected.

DISCLOSURE OF INFORMATION
We disclose personal information in the following circumstances or as otherwise described in this policy:

- We disclose personal information with vendors, service providers, and other third-parties that access personal information in order to perform functions on our behalf.
- We may disclose certain information to our integration partners.
- We may disclose your information in connection with an employment application to verify the information you provide.
- We may disclose personal information if we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.
- We may disclose personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of Architect, our users, the public, or others.
- We disclose personal information to our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- We may disclose personal information in connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
- Personal information is disclosed between and among Architect and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership.
- We disclose or share personal information with your consent or at your direction.
ANALYTICS

We may choose to engage others to provide analytics services across the web. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked, and conversion information. This information may be used by Architect and others to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity.

TRANSFER OF INFORMATION TO THE UNITED STATES AND OTHER COUNTRIES

Architect is headquartered in the United States and we have operations and vendors in the United States and other countries. Therefore, we and those that perform work for us may transfer your personal information to, or store or access it in, jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. Where required by law, we provide adequate protection for the transfer of personal data in accordance with applicable law, such as by obtaining your consent, relying on the European Commission’s adequacy decisions, or executing Standard Contractual Clauses.

YOUR CHOICES

Account Information

You may update, correct certain account information, or deactivate your account at any time by contacting us at support@architect.xyz. Please note that we may retain certain information as required by law, our regulatory requirements, or for our legitimate business purposes.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Services.

Communications Preferences

You may opt out of receiving promotional emails from Architect by following the instructions in those communications or by emailing us at privacy@architect.xyz. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at privacy@architect.xyz.