

Privacy Policy for California Residents

This Privacy Policy for California Residents is an adaptation of the general Privacy Policy for compliance with the California Consumer Privacy Act ("CCPA").

This Privacy Policy statement is made by the Wiser Retire consisting of all the entities listed [here](#) (collectively, "Wiser Retire", "we", "us" or "our") and is effective as of 1st January 2020. It applies to all our divisions: Wiser Retire, Man

Scope of this Privacy Policy

This Privacy Policy applies to all Wiser Retire websites that link to it. It also applies to the products and services provided by Wiser Retire through these websites, our mobile applications, and applications posted by Wiser Retire on Wiser Retire's online marketplace and in other third-party online marketplaces. This Privacy Policy does not apply to any of our websites, products or services that have a separate privacy policy.

This Privacy Policy is divided into three parts:

Part I – Information Wiser Retire collects and processes as a business

This part deals with how Wiser Retire collects and uses information about website visitors, potential customers, users of Wiser Retire's products and services, and others who contact Wiser Retire through forms or email addresses published on or linked to our websites.

Part II – Information that Wiser Retire processes as a service provider

This part deals with how Wiser Retire handles data that you entrust to Wiser Retire when you use our products and services, or when you share any personal or confidential information with us while requesting customer support.

Part III – General

This part deals with topics that are relevant to both Parts I and II, and other general topics such as Wiser Retire's security commitments and how we will inform you when we change this Privacy Policy.

Part I – Information Wiser Retire collects and processes as a business

	Categories of Personal Information	Collection		Disclosure		Sale	
		Does Wiser Retire collect?	Collected in past 12 months	Disclosure for a business purpose	Disclosure for a business purpose in past 12 months	Does Wiser Retire sell?	Sold in past 12 months
A	Identifiers	YES	YES	YES	YES	NO	NO

B	Categories of PI described in Section 1798.80(e)	YES	YES	YES	YES	NO	NO
C	Characteristics of protected classifications under California or federal law	NO	NO	NO	NO	NO	NO
D	Commercial information	YES	YES	YES	YES	NO	NO
E	Biometric information	YES	YES	NO	NO	NO	NO
F	Internet or other electronic	YES	YES	YES	YES	NO	NO

	network activity information						
G	Geolocation data	YES	YES	YES	YES	NO	NO
H	Audio, visual or similar information	YES	YES	YES	YES	NO	NO
I	Professional or employment related information	YES	YES	YES	YES	NO	NO
J	Non-public education information (as per the Family Educational	NO	NO	NO	NO	NO	NO

	Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99))						
K	Inferences drawn from other personal information to create a profile about a consumer.	NO	NO	NO	NO	NO	NO

What information Wiser Retire collects

We collect information about you only if we need the information for some legitimate purpose. Wiser Retire will have information about you only if (a) you have provided the information yourself, (b) Wiser Retire has automatically collected the information, or (c) Wiser Retire has obtained the information from a third party. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

Personal information collected by us in the 12 months preceding this Privacy Policy's last update are also consistent with the following.

Information that you provide us

- i. *Account signup* : When you sign up for an account to access one or more of our services, we ask for information like your name, contact number, email address, company name and country to complete the account signup process. You'll also be required to choose a unique username and a password for accessing the created account. You may also provide us with more information such as your photo, time zone and language, but we don't require that information to sign up for an account. After signing up, you will have the option of choosing a security question and an answer to the security question — if you provide these, they will be used only while resetting your password.
- ii. *Event registrations and other form submissions*: We record information that you submit when you (i) register for any event, including webinars or seminars, (ii) subscribe to our newsletter or any other mailing list, (iii) submit a form in order to download any product, whitepaper, or other materials, (iv) participate in contests or respond to surveys, or (v) submit a form to request customer support or to contact Wiser Retire for any other purpose.
- iii. *Payment processing* : When you buy something from us, we ask you to provide your name, contact information, and credit card information or other payment account information. When you submit your card information, we store the name and address of the cardholder, the expiry date and the last four digits of the credit card number. We do not store the actual credit card number. For quick processing of future payments, if you have given us your

approval, we may store your credit card information or other payment information in an encrypted format in the secured servers of our Payment Gateway Service Providers.

iv. *Testimonials* : When you authorize us to post testimonials about our products and services on websites, we may include your name and other personal information in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at Suupport@wiserretire.com

v. *Interactions with Wiser Retire* : We may record, analyze and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, for improving our interactions with you and other customers.

Information that we collect automatically

i. *Information from browsers, devices and servers* : When you visit our websites, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our websites.

ii. *Information from first party cookies and tracking technologies* : We use temporary and permanent cookies to identify users of our services and to enhance user experience. We embed unique identifiers in our downloadable products to track usage of the products. We also use cookies, beacons, tags,

scripts, and other similar technologies to identify visitors, track website navigation, gather demographic information about visitors and users, understand email campaign effectiveness and for targeted visitor and user engagement by tracking your activities on our websites. We only use first-party cookies and do not use third-party cookies or other third-party tracking technologies on our websites. You can learn more about the cookies used on our websites [here](#). We also use first-party Local Storage Objects (LSOs) such as HTML5 to store content information and preferences to provide certain features.

iii. *Information from application logs and mobile analytics* : We collect information about your use of our products, services and mobile applications from application logs and in-house usage analytics tools, and use it to understand how your business use and needs can improve our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilized, user settings and configurations, and devices used to access and their locations.

Information that we collect from third parties

i. *Signups using federated authentication service providers* : You can log in to Wiser Retire Services using supported federated authentication service providers such as LinkedIn, Microsoft and Google. These services will authenticate your identity and give you the option to share certain personal information with us, such as your name and email address.

ii. *Referrals* : If someone has referred any of our products or services to you through any of our referral programs, that person may have provided us your

name, email address and other personal information. You may contact us at support@wiserretire.com to request that we remove your information from our database. If you provide us information about another person, or if another person gives us your information, we will only use that information for the specific reason for which it was provided to us.

iii. *Information from our reselling partners and service providers* : If you contact any of our reselling partners, or otherwise express interest in any of our products or services to them, the reselling partner may pass your name, email address, company name and other information to Wiser Retire. If you register for or attend an event that is sponsored by Wiser Retire, the event organizer may share your information with us. Wiser Retire may also receive information about you from review sites if you comment on any review of our products and services, and from other third-party service providers that we engage for marketing our products and services.

iv. *Information from social media sites and other publicly available sources* : When you interact or engage with us on social media sites such as Facebook, Twitter, Google+ and Instagram through posts, comments, questions and other interactions, we may collect such publicly accessible information, including profile information, to allow us to connect with you, improve our products, or better understand user reactions and issues. We must tell you that once collected, this information may remain with us even if you delete it from the social media sites. Wiser Retire may also add and update information about you, from other publicly available sources.

Purposes for using information

In addition to the purposes mentioned above, we may use your information for

the following purposes:

- To communicate with you (such as through email) about products that you have downloaded and services that you have signed up for, changes to this Privacy Policy, changes to the Terms of Service, or important notices;
- To keep you posted on new products and services, upcoming events, offers, promotions and other information that we think will be of interest to you;
- To ask you to participate in surveys, or to solicit feedback on our products and services;
- To set up and maintain your account, and to do all other things required for providing our services, such as enabling collaboration, providing website and mail hosting, and backing up and restoring your data;
- To understand how users use our products and services, to monitor and prevent problems, and to improve our products and services;
- To provide customer support, and to analyze and improve our interactions with customers;
- To detect and prevent fraudulent transactions and other illegal activities, to report spam, and to protect the rights and interests of Wiser Retire, Wiser Retire's users, third parties and the public;
- To update, expand and analyze our records, identify new customers, and provide products and services that may be of interest to you;
- To analyze trends, administer our websites, and track visitor navigations on our websites to understand what visitors are looking for and to better help them;
- To monitor and improve marketing campaigns and make suggestions relevant to the user.

Your choice in information use

Opt out of non-essential electronic communications : You may opt out of receiving newsletters and other non-essential messages by using the

'unsubscribe' function included in all such messages. However, you will continue to receive notices and essential transactional emails.

Disable cookies : You can disable browser cookies before visiting our websites. However, if you do so, you may not be able to use certain features of the websites properly.

Optional information : You can choose not to provide optional profile information such as your photo. You can also delete or change your optional profile information. You can always choose not to fill in non-mandatory fields when you submit any form linked to our websites.

Who we share your information with

All Wiser Retire other entities may have access to the information covered in Part I. We do not sell any personal information. We share your information only in the ways that are described in this Privacy Policy, and only with parties who adopt appropriate confidentiality and security measures.

Employees and independent contractors : Employees and independent contractors of all Wiser Retire entities have access to the information covered in Part I on a need-to-know basis. We require all employees and independent contractors of Wiser Retire entities to follow this Privacy Policy for personal information that we share with them.

Third-party service providers : We may need to share your personal information and aggregated or de-identified information with third-party service providers that we engage, such as marketing and advertising partners, event organizers, web analytics providers and payment processors. These service providers are authorized to use your personal information only as necessary to provide these services to us.

Reselling partners : We may share your personal information with our authorized reselling partners in your region, solely for the purpose of contacting you about products that you have downloaded or services that you have signed up for. We will give you an option to opt out of continuing to work with that partner.

Other cases : Other scenarios in which we may share the same information covered under Parts I and II are described in Part III.

Your rights with respect to information we hold about you as a business
You have the following rights with respect to information that Wiser Retire holds about you. Wiser Retire undertakes to provide you the same rights no matter where you choose to live.

Right to access : You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared.

Right to rectification : You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.

Right to erasure : You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

Right to restriction of processing : You may also have the right to request to restrict the use of your information in certain circumstances, such as when

you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Right to data portability : You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.

Right to object : You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

Your rights under CCPA

CCPA provides you five rights, of which two are covered as part of the rights listed above. These two are: right to access of personal information and right to request deletion of personal information. The third is the right to opt-out of sale, which is redundant since we promise not to sell or monetize your data in any way. The fourth right available to you under CCPA is the right against discrimination because you exercised the rights available to you and the fifth is the right to protection against waiver of rights.

You can exercise the rights described above, by sending an email to Support@wiserretire.com or by writing to: Privacy Team, Wiser Retire Corporation, 1980 Festival Plaza Drive, Ste 460 Las Vegas, NV 89135. Only you, or an agent authorized to make a request on your behalf, may make a request related to your personal information.

We cannot respond to your request if, (i) we cannot verify your identity; or (ii) your request lacks sufficient details to help us handle the request. We

endeavor to comply with a request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you, in writing, the reason for the delay.

Any information we provide will only cover the 12-month period preceding the request's receipt. We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Retention of information

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

Part II – Information that Wiser Retire processes as a service provider

Information entrusted to Wiser Retire and purpose

Information provided in connection with services : You may entrust information that you or your organization (“you”) control, to Wiser Retire in connection with use of our services or for requesting technical support for our products. This includes information regarding your customers and your employees or data

that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services. The data may either be stored on our servers when you use our services, or transferred or shared to us as part of a request for technical support or other services.

Information from mobile devices : When you elect to allow it, some of our mobile applications have access to the camera, call history, contact information, photo library, and other information stored on your mobile device. Our applications require such access to provide their services. Similarly, when you elect to provide access, location-based information is also collected for purposes including, but not limited to, locating nearby contacts or setting location-based reminders. This information will be exclusively shared with our mapping providers and will be used only for mapping user locations. You may disable the mobile applications' access to this information at any time by editing the settings on your mobile device. The data stored on your mobile device and their location information to which the mobile applications have access will be used in the context of the mobile application, and transferred to and associated with your account in the corresponding services (in which case the data will be stored on our servers) or products (in which case the data will remain with you unless you share it with us).

(All the information entrusted to Wiser Retire is collectively termed “service data”)

Ownership and control of your service data

We recognize that you own your service data. We provide you complete

control of your service data by providing you the ability to (i) access your service data, (ii) share your service data through supported third-party integrations, and (iii) request export or deletion of your service data.

How we use service data

We process your service data when you provide us instructions through the various modules of our services. For example, when you generate an invoice, information such as the name and address of your customer will be used to generate the invoice; and when you use our campaign management service for email marketing, the email addresses of the persons on your mailing list will be used for sending the emails.

Push notifications

If you have enabled notification on our desktop and mobile applications, we will push notifications through a push notification provider such as Apple Push Notification Service, Google Cloud Messaging or Windows Push Notification Services. You can manage your push notification preferences or deactivate these notifications by turning off notifications in the application or device settings.

Who we share service data with

Wiser Retire and third party sub-contractors : In order to provide services and technical support for our products, the contracting entity within the Wiser Retire engages other groups or entities

Employees and independent contractors : We may provide access to your service data to our employees and individuals who are independent contractors of the Wiser Retire entities involved in providing the services

(collectively our “employees”) so that they can (i) identify, analyze and resolve errors, (ii) manually verify emails reported as spam to improve spam detection, or (iii) manually verify scanned images that you submit to us to verify the accuracy of optical character recognition. We ensure that access by our employees to your service data is restricted to specific individuals, and is logged and audited. Our employees will also have access to data that you knowingly share with us for technical support or to import data into our products or services. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the Wiser Retire.

Collaborators and other users : Some of our products or services allow you to collaborate with other users or third parties. Initiating collaboration may enable other collaborators to view some or all of your profile information. For example, when you edit a document that you have shared with other persons for collaboration, your name and profile picture will be displayed next to your edits to allow your collaborators to know that you made those edits.

Third-party integrations you have enabled : Most of our products and services support integrations with third-party products and services. If you choose to enable any third-party integrations, you may be allowing the third party to access your service information and personal information about you. We encourage you to review the privacy practices of the third-party services and products before you enable integrations with them.

Other cases : Other scenarios in which we may share information that are common to information covered under Parts I and II are described in Part III.

Retention of information

We hold the data in your account as long as you choose to use Wiser Retire Services. Once you terminate your Wiser Retire user account, your data will eventually get deleted from active database during the next clean-up that occurs once in 6 months. The data deleted from active database will be deleted from backups after 3 months.

Part III – General

Children's personal information

Our products and services are not directed to individuals under 16. Wiser Retire does not knowingly collect personal information from children who are under 16 years of age. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you believe that a child under 16 years has provided personal information to us, please write to support@wiserretire.com with the details, and we will take the necessary steps to delete the information we hold about that child.

How secure is your information

At Wiser Retire, we take data security very seriously. We have taken steps to implement appropriate administrative, technical & physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of the information you entrust to us. If you have any concerns regarding the security of your data, we encourage you to check our [Security Policy](#) or write to us at security@WiserRetirecorp.com with any questions.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our management of your personal information in accordance with this Privacy Policy. If you have any questions or concerns about our privacy practices with respect to your personal information, you can reach out to our Data Protection Officer by

sending an email to support@wiserretire.com or by writing to: Data Protection Officer, Wiser Retire 1980 Festival Plaza Drive Ste 460 Las Vegas, NV 89135

Locations and international transfers

We share your personal information and service data within the Wiser Retire. By accessing or using our products and services or otherwise providing personal information or service data to us, you consent to the processing, transfer, and storage of your personal information or Service Data within the United States of America, the European Economic Area (EEA) and other countries where Wiser Retire operates.

Data processing addendum

To enable you to be compliant with the data protection obligations under the CCPA as a business using our services, we are prepared to sign a Data Processing Addendum (DPA). You can request a DPA from Wiser Retire by requesting a form by email at support@wiserretire.com. Once we get your request, we'll forward the DPA to you for your signature.

Do Not Track (DNT) requests

Some internet browsers have enabled 'Do Not Track' (DNT) features, which send out a signal (called the DNT signal) to the websites that you visit indicating that you don't wish to be tracked. Currently, there is no standard that governs what websites can or should do when they receive these signals. For now, we do not take action in response to these signals.

External links on our websites

Some pages of our websites may contain links to websites that are not linked to this Privacy Policy. If you submit your personal information to any of these third-party sites, your personal information is governed by their privacy policies. As a safety measure, we recommend that you not share any

personal information with these third parties unless you've checked their privacy policies and assured yourself of their privacy practices.

Blogs and forums

We offer publicly accessible blogs and forums on our websites. Please be aware that any information you provide on these blogs and forums may be used to contact you with unsolicited messages. We urge you to be cautious in disclosing personal information in our blogs and forums. Wisser Retire is not responsible for the personal information you elect to disclose publicly. Your posts and certain profile information may remain even after you terminate your account with Wisser Retire. To request the removal of your information from our blogs and forums, you can contact us at support@wiserretire.com

Social media widgets

Our websites include social media widgets such as Facebook "like" buttons and Twitter "tweet" buttons that let you share articles and other information. These widgets may collect information such as your IP address and the pages you navigate in the website, and may set a cookie to enable the widgets to function properly. Your interactions with these widgets are governed by the privacy policies of the companies providing them.

Disclosures in compliance with legal obligations

We may be required by law to preserve or disclose your personal information and service data to comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements.

Enforcement of our rights

We may disclose personal information and service data to a third party if we believe that such disclosure is necessary for preventing fraud, investigating any suspected illegal activity, enforcing our agreements or policies, or

protecting the safety of our users.

Business Transfers

We do not intend to sell our business. However, in the unlikely event that we sell our business or get acquired or merged, we will ensure that the acquiring entity is legally bound to honor our commitments to you. We will notify you via email or through a prominent notice on our website of any change in ownership or in the uses of your personal information and service data. We will also notify you about any choices you may have regarding your personal information and service data.

Compliance with this Privacy Policy

We make every effort, including periodic reviews, to ensure that personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to this Privacy Policy or the manner in which your personal information is used, kindly write to us support@wiserretire.com. We'll contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

Notification of changes

We may modify the Privacy Policy at any time, upon notifying you through a service announcement or by sending an email to your primary email address. If we make significant changes to the Privacy Policy that affect your rights, you will be provided with at least 30 days' advance notice of the changes by email to your primary email address. If you think that the updated Privacy Policy affects your rights with respect to your use of our products or services, you may terminate your use by sending us an email within 30 days. Your continued use after the effective date of changes to the Privacy Policy will be

deemed to be your agreement to the modified Privacy Policy. You will not receive email notification of minor changes to the Privacy Policy. If you are concerned about how your personal information is used, you should check back at periodically.