

Privacy Policy

Last Updated July 8, 2021

This privacy policy (“**Privacy Policy**”) describes how ProCo Global, Inc. DBA Chartwell Compliance, (collectively “**we**” or “**us**”), collect, use, and disclose user (“**you**” or “**your**”) information.

This Policy applies to our websites and other online services that post or include a link to this Privacy Policy (collectively, the “**Chartwell Compliance Platforms**”). The Chartwell Compliance Platforms are owned or controlled by us.

By accessing or using our Chartwell Compliance Platforms, you agree to the terms of this Privacy Policy. The provisions contained in this Privacy Policy supersede all previous notices and statements regarding our privacy practices with respect to our Services. If you do not agree to every provision of the Privacy Policy, you may not access or use our Services.

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1. **What Information Do We Collect?** We may collect the following information about individuals or businesses (“**Information**”):
 - 1.1. “**Personal Information**” that may directly identify you, such as your name, address, telephone number, email address, and bank account or other financial information that you submit directly to us.
 - 1.2. “**Business Information**” such as a business’s name, physical address, phone number, legal entity type, industry, employer identification number or any other additional information that we may request.
 - 1.3. “**Usage and Device Information**” such as the hardware model, browser, and operating system that you are using, the URL or advertisement that referred you to the Chartwell Compliance Platforms, all the areas within the Chartwell Compliance Platforms that you visit, location information, and mobile network (if applicable), your IP address or other unique device identifier for any computer, mobile phone, or other device that is used to access the Chartwell Compliance Platforms. In some cases, we may directly collect location information through your device. You may be able to turn off the collection of location information through the settings on your device.

Business Information and Usage and Device Information are generally non-identifying, but if we associate it with a specific and identifiable user, we treat it as Personal Information.

2. How Do We Collect Your Information?

- 2.1. **From You.** We collect Information that you provide directly to us, both online and offline, in connection with an inquiry about our services, an application to obtain our services, or payments for our services made to us or our agents. The Information collected from you will vary depending on the product or service requested.
- 2.2. **Other Sources.** We may obtain Information about you from our affiliates and other third-parties such as merchants, recipients and senders of funds, data providers, identity verification providers, and credit bureaus, where permitted by law. that collect your information in order to submit your application to us. We may also use certain third parties to complete, validate, or verify Information that you have provided to us in order to assist you in your use of the Chartwell Compliance Platforms, in order to supplement information already provided by you, or in the prevention or identification of identity theft and fraud.
- 2.3. **Automatic Collection, Cookies, and other Internet Technologies.** We also use cookies, web beacons, other standard internet technologies, and certain third parties to collect Information from you, from your device, and about your activities on the Chartwell Compliance Platforms. We may automatically collect Information from your browser when you use the Chartwell Compliance Platforms.
- 2.4. **Cookies.** A cookie is a small text file that is stored on your computer for record keeping purposes. When you visit the Chartwell Compliance Platforms, we may assign your computer one or more cookies to facilitate your access, personalize your online experience, maintain continuity during your online sessions, and record information about your visit. Cookies may also be used for anti-fraud and information security purposes, Using a cookie, we also may automatically collect information about your online activity, such as the web pages visited, the links or advertisements clicked on, and other actions taken while using the Chartwell Compliance Platforms. We may use different kinds of cookies, including HTTP cookies (also known as browser cookies), Local Shared Objects such as Flash cookies, and other similar technologies, such as HTML5 local storage. Most browsers automatically accept cookies, but you can usually modify the browser setting to decline cookies. Flash Cookies, which by their nature are associated with Flash Player, may be removed by managing the settings with Adobe by visiting www.adobe.com. If you choose to decline cookies, please note that some of the features and services of the Chartwell Compliance Platforms may not function properly.
- 2.5. **Web Beacons.** Web beacons (also known as clear gifs, pixel tags, targeting and re-targeting pixels, third party pixels or web bugs) are small graphic images or other web programming code that may be included in our web pages and e-mail messages. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Chartwell Compliance Platforms, to monitor how you navigate the Chartwell Compliance Platforms, or to count how many e-mails that were sent were actually opened.

3. How Do We Use Your Information?

- 3.1. **Our Usage.** We may use your Information, to: i) process, review, determine eligibility, and approve or deny your application for products and services you request; ii) manage your customer relationship, respond to questions, and provide customer service; iii) develop and

display content and services tailored to your interests; iv) communicate with you via email, telephone, postal mail, and/or your mobile device about our products and services; v) operate, evaluate, and improve our business and the Chartwell Compliance Platforms, including to develop new products and services, to perform research, and for audit purposes; vi) analyze usage and performance of the Chartwell Compliance Platforms and improve your experience and the experience of other users; vii) to comply with legal obligations and regulations, enforce contractual obligations, verify your identity, and to help prevent or identify fraud, unauthorized or criminal activity, claims, and other liabilities; viii) market our products and services and the products and services of our affiliates and other third parties; and ix) perform functions as described to you at the time of collection. We will not sell your Personal Information, except in the event that all or a part of our business is merged, sold, or reorganized.

- 3.2. **Job Applicants.** If your Information is submitted when applying for a position with us, the Information will be used solely in connection with considering and acting upon your application. We may retain your Information for a period of time, but only for the purpose of considering your application for current or future available positions or as required by law.

4. **With Whom Do We Share Your Information?**

- 4.1. **Our Businesses.** We may share your Information with our affiliates and subsidiaries.
- 4.2. **Service Providers.** We may share your Information with third party service providers who provide services to us or on our behalf to assist in providing our services and to help us understand our users' use of our products. Service providers include the categories listed in this section 4, along with shipping vendors, billing and refund vendors, payment card processors, merchants, and other companies that help us operate and improve our products and services. Your Information may be stored and processed by our service providers in the United States or other locations where the service providers or we maintain facilities. Disclosure of your Personal Information to service providers is not a sale, and we do not allow our service providers to use or share your Personal Information for any purpose other than providing services on our behalf.
- 4.3. **Consumer and Credit Reporting Agencies.** We may provide your Information to consumer and/or credit reporting agencies and to third parties that provide identity verification and fraud detection.
- 4.4. **Marketing.** We may share your Information with select third parties so that they can send you promotional materials about goods and services (including special offers and promotions) on our behalf.
- 4.5. **Third-Party Advertising and Analytics Companies.** We may share your Information with network advertisers, ad agencies, and other advertising partners to serve our ads online. We may also use analytics providers to provide us with information regarding the use of the Chartwell Compliance Platforms and the effectiveness of our advertisements. You may see ads on the Chartwell Compliance Platforms, and those ads may be served by a third party. These third parties may set and access their own tracking technologies on your device (including cookies and web beacons), and they may otherwise collect or have access to Information about you. Some of these parties may collect Information (including Personal Information) over time when you visit the Chartwell Compliance Platforms or other online websites and services. We may share Information, including Information that has been de-identified, with third party advertising companies, analytics providers and other third parties, including for the purpose of serving you more relevant ads.

We may use a variety of companies to serve our advertisements. Some of these companies are members of the Network Advertising Initiative (“NAI”) or the Digital Advertising Alliance (“DAA”) Self-Regulatory Program for Online Behavioral Advertising and you may want to visit the following webpages, which provide “opt-out” mechanisms for participating companies: http://networkadvertising.org/managing/opt_out.asp; <http://www.aboutads.info/choices/>. You may also be able to opt-out from certain interest-based advertising through your mobile device settings or as described below in the Section titled “What Are Your Options Regarding Your Information.” Please note opting out through these mechanisms does not opt you out of being served advertising. You will continue to receive generic ads while online.

4.6. **Other Situations.** In addition to other sharing described in this section, we may also disclose your Information at our sole discretion: (i) in order to comply with laws or legal processes, including subpoenas or agency orders and investigations under appropriate circumstances; (ii) as we reasonably determine necessary or appropriate to protect property, our rights, or the rights of others; and (iii) to enforce our contracts, policies, and customer agreements. We may also transfer Information covered by this Privacy Policy, including Personal Information, in connection with a merger, sale, or acquisition (including transfers made as part of insolvency or bankruptcy proceedings) of all or part of our business or as part of a corporate reorganization, stock sale, or other change in control.

5. **How Do We Protect Your Information?** We maintain administrative, technical, and physical safeguards intended to protect against the loss, misuse, unauthorized access, and disclosure of Information, including your social security number. Although we take such precautions seriously, it is impossible for us to guarantee the safety and security of your Information. Our policies prohibit the unlawful disclosure of Personal Information. We share Personal Information externally only where federal and state law allows or requires it. Internally, it is our policy to limit the access, use, and disclosure of Personal Information to be in line with the job duties of our employees, as well as applicable law. Please note that we do not ensure or warrant the security of any Information that we collect, and you use the Chartwell Compliance Platforms and our services and provide us with your Information at your own risk.

6. **What Are Your Options Regarding Your Information?**

6.1. **Accessing and Correcting Personal Information.** You may request to access or update the Personal Information that we hold about you. You can access or update your Personal Information in the following ways:

6.1.1. If you have created an account on the Chartwell Compliance Platforms, you will be able to update your own contact and payment information, subject to certain limitations.

6.1.2. Contact us through one of the methods listed in the “How Can You Contact Us?” section within this Privacy Policy. Please include your current contact information, the information that you are interested in accessing, and your requested changes. After authenticating your request, we will provide you with the Personal Information that you requested or make your requested changes if i) the information is reasonably available; ii) the information does not infringe on the privacy of other individuals, and iii) the disclosure or changing of the information is not otherwise prohibited by law or our internal policies or procedures. For all requests, we will reasonably describe the types of Personal Information that we generally collect, how it is used, and with whom it is shared.

- 6.2. **Communications.** You may elect to opt-out of email and text communications from us by following the instructions provided in such communications or by contacting us as described in this Privacy Policy. Even after opting out, you may still receive service oriented, non-promotional communications from us and promotional communications from other third parties as a result of their own interactions or transactions with you. Please allow time for us to process requests. You should contact us should there be any concerns about your opt-out request.
- 6.3. **Targeted Advertising.** You may opt-out from many third parties who serve online advertising, including some who serve ads on the Chartwell Compliance Platforms and elsewhere online, by visiting http://www.networkadvertising.org/managing/opt_out.asp; or <http://www.aboutads.info/choices/>. Opting out does not mean you will not see any ads when using the Chartwell Compliance Platforms, but the ads that you see will no longer be customized to you based on your profile or interactions with us.
- 6.4. **“Do-Not-Track.”** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services that you visit. Like many websites and online services, the Chartwell Compliance Platforms do not alter their practices when they receive a “Do Not Track” signal from your browser. To find out more about “Do Not Track,” please visit www.allaboutdnt.com.
7. **How Can You Contact Us?** If you wish to contact us regarding your Information, this Privacy Policy, to designate a third party who may communicate with us on your behalf, or to request to access, change, or delete your Personal Information, you may contact us as described below. If you choose to contact us, please provide sufficient contact information to allow us to contact you. If you choose to contact us, we will verify your identity using an appropriate method of verification based on the type of request. These methods may include one or more of the following: email address verification, proof of residency displaying your name and principal residence address, or proof of identity using government issued identification.
- Write: support@grand.co**
8. **Will This Privacy Policy Change?** This Privacy Policy may be updated periodically to reflect relevant changes in our information practices. We will notify you of material changes by posting the changed or modified Privacy Policy on the Chartwell Compliance Platforms. We may also provide notice to you in other ways in our discretion, such as through contact information that you have provided. Any changes to this Privacy Policy will be effective immediately upon the posting of the revised Privacy Policy unless otherwise specified, and your continued use of the any of the Chartwell Compliance Platforms after the effective date of the revised Privacy Policy will constitute your consent to those changes. You may be required to consent to our new policies to continue to use the Chartwell Compliance Platforms and our services.
9. **Third Party Content and Sites.** The Chartwell Compliance Platforms may contain content, services, advertising, and other materials that link to websites operated by third parties. We have no control over those other websites, and this Privacy Policy does not apply to them. You should refer to the privacy policies of those websites.
10. **California Privacy Rights.** The California Consumer Privacy Act (CCPA) provides consumers residing in California with several rights concerning their personal information, including but not limited to the ability to request the personal information being collected and the option of deleting certain collected personal information.

Requests for access, deletion, and to know what we share with others should be submitted as described in the “What Are Your Options Regarding Your Information?” and “How Can You Contact Us” sections. Chartwell Compliance will attempt to respond to a verifiable consumer request within 45 days of its receipt.

We will not discriminate against California residents who exercise their rights under this section. Any such request will not result in the denial of any goods or services offered by Chartwell Compliance. It will not result in different prices, rates or quality of goods or services.

11. **Children’s Online Privacy Policy.** The Chartwell Compliance Platforms are not directed to children under the age of 13, and we do not knowingly collect, disclose, or sell Personal Information from children under the age of 13 through the Chartwell Compliance Platforms.