

## ONLINE PRIVACY STATEMENT

This Online Privacy Statement (“Privacy Statement”) applies to this and all websites or mobile applications of Spiritus Life, Inc. (its successors and assigns) (hereafter referred to as “Spiritus,” “we,” “us” or “our”) that link to this Privacy Statement (each a “Site,” and collectively, the “Sites”). We value the trust of visitors or users to our Sites (each hereinafter referred to as “you” and “your”), especially when you share your personal information with us. We understand that the privacy and security of that personal information is important to you (collectively, we call this information “data”). This Privacy Statement describes how Sites may collect, use, and share your data. In the event of any conflict or inconsistency between our Terms of Use, this Privacy Statement, or a Product-specific or state-specific consumer privacy notice, the terms of the following will prevail in the following order: (i) Product-specific or state-specific privacy notice; (ii) the Terms of Use; and (iii) this Privacy Statement.

The Sites are intended for persons located in the United States and is only subject to U.S. laws and regulations. The Sites are not intended to be accessed from outside the United States.

Note that, because you are interacting with us regarding viatical or life settlements (“life settlements”) and life settlement related services (collectively, “Product(s)”), your Product documentation may include additional privacy practices and disclosures that may also be applicable.

We will limit sharing of your data to the extent required by applicable law and in accordance with our privacy policies.

### WHAT DATA WE COLLECT ABOUT YOU AND HOW

#### Data We Collect Online

**Data You Provide.** We collect data that you provide to us at the Sites, through applications, online forms and calculators, surveys and other communications, including from third party individuals or entities you have requested or authorized to provide data to us in connection with a Product. For example, we collect your data at the Sites when you:

- request a quote or bid for or request information related to a Product;
- use Site tools and resources to submit information related to a Product or Product application;
- access other applications and services from this Site, such as applying for a job (note, some of these applications and services may have additional privacy disclosures);
- make data available to us via social networking logins, such as Facebook or X (formerly known as Twitter) (if applicable);
- participate in chats, web forums, or other interactive sessions (if applicable);
- subscribe to newsletters, blogs, or provide feedback (if applicable);
- participate in surveys, sweepstakes, or other promotions (if applicable);
- conduct searches through the Site;
- share data about yourself with the Site or authorize a third party to share such data about you with us; and/or
- request additional information or that we contact you.

This data may include, but is not limited to: name, address, telephone number, email address, date of birth, Product numbers, your profession, employment information, your IP address activity tracking from assistive technologies, geolocation data (to the extent provided by you or your device), data and/or information from mobile or wearable devices, or other similar technologies, and, where reasonably required to complete the request or transaction may include: health information, banking information, credit card number, Social Security number, driver’s license numbers, and other data (as applicable).

**Usage Metrics.** Data regarding your use of this Site may be collected and/or aggregated through the use of automated means and Data Technologies as defined below. This data may include:

- your IP address, and the type of browser and operating system you use;
- date and time you access the Site and the pages you visit, and, if you link from or to another website, the address of that website;
- email you open and links you click on within those emails;
- the duration of your use and the features and content you access; and/or
- data regarding your ISP or mobile carrier, and the type of handheld or mobile device that you use.

**Data Technologies.** Various technologies may be used to automatically collect information on the Site, such as cookies, web beacons and local shared objects. “Cookies” are small identifiers sent from a web server that are stored on your device for the purpose of identifying your browser or storing information or settings in your browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, connects web pages to web servers and their cookies. “Local shared objects,” sometimes known as Flash cookies, may be used to personalize your visit by storing your preferences or displaying content based upon what you have viewed on various websites. Anonymous advertising identifiers may be used on mobile devices and otherwise in a manner similar to cookies. We refer to these types of technologies generally as “Data Technologies,” which include today’s technologies and similar types of technologies as they evolve over time.

One or more Data Technologies may be used by us on this Site and other websites and mobile applications (including websites not operated by us). Third parties, who may have their own privacy policies, may also use Data Technologies to collect information on this or other websites.

When you download or use apps or mobile-optimized websites to access our Site or online services, we may receive information about your location and your mobile device, including a unique identifier for your device, device settings, analytical information about how you use your mobile device, and other information that may be stored on or accessed through your mobile device, including from apps not operated by us or from other devices connected to your mobile device. This information helps us provide you with location-based services, advertising, search results, and other personalized content, as applicable. Most mobile devices allow you to turn off location services by accessing the device’s settings menu.

**Publicly Posted Data.** Data that you make available to us and others via social media networks, forums, blogs, listserves, chat rooms, or similar functionality is data that we or others may share or use in accordance with applicable law.

#### **Data from Other Sources**

We may also collect data about you from third-party sources, including from commercially available sources, such as credit reporting agencies, data brokers or other companies that collect or analyze information about consumers or users. Examples of data we receive from third-party sources include, but are not limited to: (i) credit history information from credit bureaus, which we use to help prevent and detect fraud and to enter Product transactions; (ii) demographic data from data brokers and other sources to help anticipate consumer trends and needs; (iii) data provided from sources that you have authorized to share such data with us, either on our Site or via the third-party applications, devices, websites, or other digital interfaces; and/or (iv) other similar types of data.

**Combined Data.** We may combine the data we collect from you and information from other sources (collectively “Combined Data”).

### **How Long Do We Retain Your Data?**

We will retain Combined Data so long as: (i) we are required to by applicable law, or (ii) there is a business need to use the data. You may request that we delete data you have provided to us by submitting a consumer request (if you have the right to do so) as described in our California Consumer Privacy Act Privacy Policy and Notice at Point of Collection (“CCPA Notice”) for California residents. In the event you have the right to submit a consumer request for deletion, to the extent required by applicable law, we will delete all data subject to the request, except that data which we have a legal right or obligation to retain.

### **What Rights Do I Have Regarding the Combined Data?**

Whether you are a customer of ours or not, with regard to the data about you we’ve collected, in addition to the disclosure provided by this Privacy Statement, you may have the right to submit a consumer request as described below.

### **HOW WE MAY USE THE DATA WE COLLECT**

We may use data we collect for a variety of purposes, including, but not limited to, the following:

- for our everyday business purposes, such as evaluating a life insurance policy and personal information for a Product transaction, providing information you request, and providing support in conjunction with a Product transaction;
- to evaluate a potential Product transaction, engage with you in Product related transactions, and/or provide Product related services;
- to provide you with up to date information regarding the Site, Products, including changes to terms and conditions and/or other administrative information (if applicable);
- for special events, programs, surveys, contests, sweepstakes, and other offers or promotions, some of which may have additional rules or provisions addressing how your data is used or shared (if applicable);
- to price, purchase, sell, and service new and existing Products;
- to develop technology and analyze the effectiveness of Product transactions, marketing trends, applications and websites to maintain Products or technology which we may own, control, or provide;
- to conduct internal research;
- to develop and demonstrate technology;
- to deliver content and marketing communications that we think may interest you, including, ads or offers tailored to you based upon your browsing and usage history, both within this Site and on other websites and applications;
- to provide retirement calculators, assessments, and other financial planning tools on the Sites;
- to comply with applicable laws, regulations and other legal obligations;
- to properly verify your identity, prevent fraud and/or enhance security;
- to audit and provide reporting relating to particular transactions and interactions, including online interactions, you may have with us or others on our behalf;
- to allow you to utilize features within our Sites when you grant us access to information from your device (e.g., contact lists, geolocation, etc.);
- to provide you with location-based services, advertising, search results, and other personalized content;
- to contact you via telephone, text, or chat at your request;
- for short-term, transient use including contextual customization of ads; and/or
- for other purposes permitted by or required by law or to which you consent.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any specific individual) for various business purposes, where permissible under applicable laws and regulations.

## **SOCIAL MEDIA**

We may now or in the future include applications or widgets from social media providers on our Sites that allow you to interact or share data and/or information or content with them. These widgets, such as a Facebook “Share” or “Like” button, are visible to you on the web page you visit. Integration between this Site and social media networks such as Facebook, X (formerly known as Twitter) and others may allow the social media networks to collect data and/or information about your browsing on the pages of our Sites where the widgets are visible, even when you do not click on or otherwise activate the widget. Please visit the applicable social media network’s privacy policy to better understand their data collection practices and the choices that they make available to you. The privacy policy of the social media network controls the collection, use and disclosure of all data and/or information transmitted to that network. For clarification purposes, the preceding sentence does not apply to social media icons. Social media icons, which are graphical interfaces that allow you to link directly to our social media pages, **do not collect** your browsing activities (or any activities).

We may now or in the future participate in several social media platforms such as Facebook, X (formerly known as Twitter) and LinkedIn, which allow their users to create, share, and exchange content and information. Any data and/or information that you post on a social media platform is also subject to the privacy policies of that social media network. These platforms may share your data and/or information with us in identifiable or aggregated form.

## **ADVERTISING NETWORKS**

We may now or in the future partner with advertising networks that deliver targeted advertisements to consumers, including advertisements with links to our websites, and generate related statistics and metrics. These ad networks may utilize data and/or information collected through a variety of Data Technologies to provide advertising placement, customization, auditing, research and reporting for us and other advertisers. This data and/or information collection takes place over time, both on this Site and on third-party websites and mobile applications and includes data and/or information such as number of page visits, pages viewed on our Sites, search engine referrals, browsing activities over time and across other sites following your visit to one of our Sites or apps, and responses to advertisements and promotions on the Sites and on sites and apps where we advertise. In some cases, we have access to the data and/or information gathered by the Data Technologies used by the ad networks on our Sites. This process allows us and third parties to deliver targeted advertising (online and offline), enhance marketing programs and help track the effectiveness of such efforts. Advertising networks, which may have their own privacy policies, determine how they use this data and/or information, including for purposes such as determining or predicting the characteristics and preferences of their advertising audiences and measuring the effectiveness of their advertising. As of the effective date set forth above, we do not respond to Do Not Track signals or other similar mechanisms.

## **DATA WE SHARE**

We may share your data with third parties and among affiliated entities as permitted or required by law, or when you authorize us to do so. For example, we may share your data:

- with our corporate entities, for example, for their everyday business purposes, to provide services or to perform marketing;
- to the extent you engage with us online about a Product, to all of the entities you have authorized us to share

- data with or request data from in the application or other transaction documentation;
- with third party service providers who we engage to provide services offered through this Site or on our behalf, including providers who help us operate our business;
- with marketing partners, including analytics companies and advertising networks who provide Data Technologies on our website; and/or
- with insurance regulators, law enforcement, governmental authorities, auditors, and other third parties in order to comply with our legal obligations, to comply with applicable laws and regulations, or to protect our interests, property, or legal rights, or those of our customers or members of the public.

## YOUR CHOICES

You are entitled to make certain choices about how we communicate with you.

- You may choose not to provide your data, even though that might impact your ability to receive information about or engage with us regarding a particular Product.
- If you do not want to receive marketing email from us, you can follow the unsubscribe link provided in those emails.
- You have a number of choices regarding certain Data Technologies. Most web browsers automatically accept cookies, but you can usually modify your browser's setting to notify you of cookie placement or decline cookies if you prefer. You may also render some web beacons unusable by rejecting their associated cookies and disabling or deleting similar data and/or information used by browser add-ons, such as Flash cookies, or by changing the add-on's settings or opting out at the website of the technology provider. If you choose to decline cookies or other Data Technologies, however, please note that certain features of our Sites may not function properly or at all as a result.
- You may be able to adjust the use of advertising identifiers on mobile devices through the settings on your device. In order for online behavioral advertising opt outs from our Sites and on other sites to work on your device, your browser must be set to accept cookies. If you delete cookies, buy a new device, access our Site or other sites from a different device, login under a different screen name, or change web browsers, you will need to opt-out again.
- If you do not want us to use data revealing your location, you may be able to configure your browser settings, or change the location services setting on your mobile device, to prevent the sharing of that data. Please note that certain features may not function properly or at all as a result if you opt out. Also note that in order for browser-based location services opt outs to work on your device, your browser must be set to accept cookies. If you delete cookies, buy a new device, access our Site or other sites from a different device, login under a different screen name, or change web browsers, you will need to opt-out again.
- If you have transacted with us for a Product, we will use and share any data that we collect from or about you in accordance with the consumer privacy notice applicable to that Product.

You may have additional rights under applicable laws.

## LINKING TO THIRD-PARTY WEBSITES

We may provide links to websites that are owned or operated by other companies. When you use a link to visit a third party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should review the privacy policy, terms of use and security practices of the linked third-party website to understand how that site may use your data and/or information. We are not responsible for the privacy or security of these third-party websites, or the accuracy, completeness, or reliability of the information they provide.



## CHILDREN'S PRIVACY RIGHTS

Our online services are not directed to children under the age of 13. We do not knowingly collect data from children under age 13 without parental consent.

## ACCESSING YOUR DATA

Access to data that we collect and maintain about you may be available to you. For example, if you create an online account, you can access that account to update the data you previously provided. Additionally, if you believe that data we maintain about you is inaccurate, subject to applicable law, you may request that we correct or amend the data by contacting us as indicated in the [How to Contact Us](#) section below.

## PROTECTING YOUR DATA

We use administrative, technical, and physical security measures designed to safeguard your data that is in our possession against loss, theft and unauthorized use, disclosure or modification. Of course, despite these measures, no network or system is ever entirely secure, and we cannot guarantee the security of networks and systems we operate or that are operated on our behalf.

## DISPUTES

Your Site use and any dispute regarding privacy is subject to this Privacy Statement and the dispute resolution provisions of our Terms of Use.

## UPDATES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement to provide clarification or notice of changes to our practices. If we make changes, we will revise the date at the bottom of this Privacy Statement. Material changes to this Privacy Statement will be effective once they are posted.

## HOW TO CONTACT US

If you have any questions or comments about this Privacy Statement, or if you would like us to update data we have about you or your preferences, please contact us by email at [privacy@spiritussettlements.com](mailto:privacy@spiritussettlements.com).

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