

## PRIVACY POLICY

TransCrypt Solutions, Inc. (“we,” “us,” or “our”) wants you to be familiar with how we collect, use, and disclose information. This Privacy Policy describes our practices in connection with information that we collect through:

- Websites operated by us from which you are accessing this Privacy Policy;
- Social media pages and apps that we control from which you are accessing this Privacy Policy; and
- HTML-formatted email messages that we send to you that link to this Privacy Policy.

Collectively, we refer to the websites, social media pages, and emails, as the “**Services.**”

## PERSONAL INFORMATION

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual. The Services collect Personal Information, including:

- Name
- Telephone number
- Email address
- Business contact information
- Username and password when you set up an account with us
- Queries, feedback, or other information you choose to provide when using our online AI tool (Castello.ai)
- IP address (we may also derive your approximate location from your IP address)

## Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services.**
  - We collect Personal Information through the Services, for example, when you use our online AI tool or contact us with inquiries. We may also collect Personal Information automatically as described in the “Information Collected Automatically” section below.
- **From Other Sources.**
  - We receive your Personal Information from other sources, for example: social media platforms, payment processors, and professional networking platforms.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

## Use of Personal Information

We and our service providers use Personal Information for the following purposes:

- **Administering the Services and fulfilling your requests.**
  - To administer and provide the Services, respond to your inquiries, fulfill your requests, and provide you with customer service.
  - To fulfill our contract with your business and verify your information.
  - To send administrative information to you, such as changes to our terms, conditions, and policies.
- **Providing you with our marketing materials and facilitating social sharing.**
  - To send you marketing related emails, with information about our services, new products, and other news about our company.
  - To facilitate social sharing functionality that you choose to use.
- **Analyzing Personal Information for business reporting and providing personalized services.**
  - To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our Services.
  - To better understand your interests and preferences, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
  - To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.
- **Aggregating and/or anonymizing Personal Information.**
  - We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual.
- **Accomplishing our business purposes.**
  - For data analysis, for example, to improve the efficiency of our Services;
  - For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;
  - For fraud prevention and fraud security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
  - For developing new products and services;
  - For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures;
  - For identifying usage trends, for example, understanding which parts of our Services are of most interest to users;
  - For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users; and
  - For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.

## Disclosure of Personal Information

We disclose Personal Information:

- **To our third-party service providers, to facilitate services they provide to us.**
  - These can include providers of services such as website hosting, data analysis, AI tool support, fraud prevention, background checks, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services.
- **By using the Services, you may elect to disclose Personal Information.**
  - Through your social sharing activity. When you connect your Services account to your social media or other third-party platform account, you will share information with your friends associated with your third-party platform account, with other users, and with your third-party platform account provider. By doing so, you authorize us to facilitate this sharing, and you understand that the use of shared information will be governed by the third-party platform provider's privacy policy.
  - On message boards, chat, blogs, and other services to which you are able to post information and content (including, without limitation, our social media pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.

## Other Uses and Disclosures

We may also use and disclose Personal Information as we believe to be necessary or appropriate: (a) to comply with applicable law, to respond to requests from public and government authorities, to cooperate with law enforcement, and for other legal reasons; (b) to enforce our terms and conditions; and (c) to protect our rights, privacy, safety, or property, and/or that of you or others. We may use, disclose, or transfer Personal Information to a third party in connection with any proposed or actual reorganization, bankruptcy, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our assets or stock.

## INFORMATION COLLECTED AUTOMATICALLY

We and our service providers may collect information automatically in a variety of ways, including:

- **Your browser or device.**
  - Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services you are using. We use this information to ensure that the Services function properly.
- **Cookies.**
  - Cookies are pieces of information stored directly on your computer. Cookies allow us to collect such information as browser type, time spent on the Services, pages visited, language preferences, and traffic data. We use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also

gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used, and assist us with resolving questions regarding them.

- Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services or reach out to you directly with personalized marketing communications. We may also use cookies or other technologies in online advertising to track responses to our ads.
  - We do not currently respond to browser do-not-track signals.
  - If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting particular cookies from a particular website. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.
- **Pixel tags and other similar technologies.**
    - **Pixel tags.** Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.
    - **Analytics.** We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online resources. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
  - **Invisible reCAPTCHA**
    - We may use Google's invisible reCAPTCHA application on our Services in order to protect against spam and other automated abuse. The reCAPTCHA tool may make use of cookies, as well as other information like IP address, date, time, language, screen size and resolution, and mouse movements, while on the page. The use of the reCAPTCHA service and the treatment of any information collected through the service are subject to Google's applicable privacy policy, available at <https://policies.google.com/privacy>, and Google's terms of service, available at <https://policies.google.com/terms?hl=en>.
  - **IP Address**
    - Your IP Address is a number that is automatically assigned to your computer by your Internet Service Provider. An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the pages visited. We use IP Addresses for purposes such as calculating usage levels, diagnosing server problems, and administering the Services. We may also derive your approximate location from your IP Address.
  - **Physical Location**

- We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we may not be able to provide you with the applicable personalized services and content.

## **Uses and Disclosures of Information Collected Automatically**

We may use and disclose information collected automatically for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat the information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose Personal Information, as detailed in this Privacy Policy. In some instances, we may combine information collected automatically with Personal Information. If we do, we will treat the combined information as Personal Information so long as it is combined.

## **SECURITY**

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

## **CHOICES AND ACCESS**

You may opt out from receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by clicking on the opt-out or unsubscribe link in each such email.

We will try to comply with your request as soon as reasonably practicable. Please note that if you opt out of receiving marketing related emails from us, we may still send you important administrative messages, from which you cannot opt out.

## **THIRD PARTY SERVICES**

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Twitter, Instagram, YouTube, Pinterest, LinkedIn, Apple, Google, Microsoft, RIM, or any app developer, app provider, social media platform, operating system provider, wireless service provider, or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with our social media pages.

## **THIRD-PARTY ADVERTISING**

We use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services.

You may receive advertisements based on information relating to your access to and use of the Services and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>.

## **USE OF SERVICES BY MINORS**

The Services are not directed to individuals under the age of thirteen (13), and we do not knowingly collect Personal Information from individuals under 13.

## **JURISDICTION AND CROSS-BORDER TRANSFER**

We are located in the United States. We may store and process your Personal Information in any country where we have facilities or in which we engage service providers. By using the Services, you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

## **SENSITIVE INFORMATION**

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Services or otherwise to us.

## **UPDATES TO THIS PRIVACY POLICY**

The “LAST UPDATED” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services.

## **CONTACTING US**

If you have any questions about this Privacy Policy, please contact us at [admin@transcripts.com](mailto:admin@transcripts.com). Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.