

ClearFP Privacy Policy

ClearFP IP, LLC and its affiliates (“ClearFP”) respect your privacy. “Affiliate” as opposed to “third party” means a company that controls, is controlled by, or is under common control with ClearFP IP, LLC. This Privacy Policy (“Policy”) is effective as of May 30, 2018. It explains how we collect and use the personal information you may provide to us, and it will help you make informed decisions when using our sites and services. It applies to all the sites and services offered by ClearFP, including the ClearFP App, ClearFP.com and Clear-FP.com Sites (“Services” and “Sites” as applicable). Some of our Services have additional privacy terms made available to you in connection with your use of those Services. If a Service has additional privacy terms, they supercede any conflicting terms in this Policy.

This Privacy Policy covers the following areas:

- * what information we collect through the Services;
- * how we use the information;
- * with whom we may share the information;
- * what choices you have about our collection, use and disclosure of the information;
- * what security procedures are in place to protect the loss, misuse or alteration of information under our control; and
- * how you can correct any inaccuracies in the information.

US Users

The ClearFP Sites and Services are offered for use by persons in the United States or its territories. ClearFP will comply with applicable US federal, state and local law in the collection and handling of your personal information. The Services are not certified compliant with the Privacy Shield framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union.

Information Collection

ClearFP collects information in two ways: passively, when you use our Sites and Services, and actively when you submit information.

Passive Information Collection. Our Sites use server logs to collect information (such as browser type, ISP, IP address, referring/exit pages, platform type, date/time stamp, and number of clicks) from all visitors to the Sites. Our Sites also use a standard technology called “cookies” to collect information about how the Site is used. Information gathered through cookies may include the pages viewed and the amount of time spent at the Site. Our Sites use both session ID cookies and persistent cookies. The session ID cookie terminates once you close the browser. For the persistent cookie, a text file is stored on your computer. Persistent cookies can be removed by following Internet browser help file directions. If you allow the persistent cookie, our Sites can recognize your computer and your browser can

remember your login information for our Sites. If you reject the cookie, your user experience may be limited. Our Sites do not recognize browser do-not-track settings.

ClearFP may connect information collected through its cookies or server logs with other personally identifiable information it collects. The types of personal information collected by ClearFP are described in detail in the next paragraph. The possible uses ClearFP may make of your personal information are also described below. The combined aggregate and personal information may be used for any of these same purposes as described below.

Active Information Collection. We collect information when you register to use the ClearFP App. During registration, you are required to provide full name, date of birth, ZIP code, valid email address, screen name and password. The date of birth allows us to ensure you are old enough to use the Services. The ZIP code allows us to determine your eligibility for products and services offered through the ClearFP App. The email address is necessary for us to communicate with you. After registration, the ClearFP App prompts you to enter information about your personal assets and income. The asset and income information is necessary to the functionality of the ClearFP App. If you elect to follow one of the marked links in the App relating to insurance products, the App will customize the offering based on your profile by disclosing the information to our trusted supplier. If you engage one of ClearFP's affiliated or licensed financial Advisors, you may separately provide the Advisor with additional information such as expenses, account balances, and social security number. We will collect and retain the information you provide to us. We may connect non-sensitive information you provide to us with information provided by third parties, in order to give you a better user experience.

Third Party Sites and Cookies

Links to sites other than the ClearFP Sites may be displayed within our Sites and Services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you. ClearFP does not control and is not responsible for the privacy practices of sites other than the ClearFP Sites, meaning that this Privacy Policy does not apply to the privacy practices any third parties, including our suppliers. You should carefully review the privacy policy of any site that solicits personal information from you.

Personal Information of Children under 13

Our Sites and Services are not directed to children, and we do not knowingly collect personally identifiable information from children under 13 years of age. We require registered users to be at least 18 years of age.

Service Communications from ClearFP

We may communicate with you to provide requested services and resolve issues relating to your use of the ClearFP Services. You may not opt out of these service-

related communications while you use the Services, but you may terminate your use of the Service at any time and opt out of further communications from us.

Marketing Communications from ClearFP

Within the ClearFP family of companies, we may share your information with our affiliates for purposes such as improving the user experience of the Sites, protecting the security of the Sites, defending claims against ClearFP or its affiliates, or alerting you to the existence of products or services that may be of interest to you. From time to time we may send notices about products, services, special deals, or newsletters. You may withdraw permission to receive marketing communications from us at any time. You can opt out by following the instructions at the bottom of any ClearFP marketing email, or contact us at support@Clear-FP.com.

Disclosure of Information to Unaffiliated Third Parties

ClearFP may share your non-sensitive information with unaffiliated third parties, including as part of a business transition, such as a merger, being acquired by another company, co-branding a product, or selling a portion of its assets. Please see the disclosure below regarding business transitions. An “affiliate” of ClearFP is a company that either (1) owns ClearFP, (2) is owned by ClearFP, or (3) is under common ownership with ClearFP. ClearFP may disclose personal information to service providers who assist us in such areas as data storage, hosting, web analytics and marketing, and in connection with legal proceedings as described below. If applicable state law gives you a right to opt out of having your information shared with third parties for marketing purposes, we will honor any such request.

Disclosure Required by Law. We will disclose personal information when required by law, or if we have a good-faith belief that such action is necessary to (a) comply with a current judicial proceeding, a court order or legal process served on us, (b) protect and defend our rights, or (c) protect the rights, property, and other interests of our users or others.

Business Transitions

In the event ClearFP goes through a business transition, such as a merger, being acquired by another company, co-branding a product, or selling a portion of its assets, users’ personal information will, in most instances, be part of the assets transferred.

Data Security

ClearFP takes reasonable precautions in accordance with industry standards to protect our users’ information from unauthorized access. However, such measures are by nature not a perfect or complete defense against malicious actors. Accordingly, ClearFP can not guarantee that your personal information will be completely secured against unauthorized access. ClearFP maintains procedures for notifying you in the event of a data security breach. If ClearFP experiences a data security breach and is required to notify you under applicable law, ClearFP will notify you by electronic mail using the e-mail address you have provided. You are

responsible for ensuring that your contact information is current and correct. To review or change your information and correct any inaccuracies, log in to the ClearFP App and update the information under the Account tab, or send an email request to support@Clear-FP.com (changes may require up to 10 business days to take effect).

Deactivating Your Account

You may deactivate your ClearFP account at any time by selecting Profile from the sidebar menu and selecting the Delete Account button at the bottom of the screen. Your profile and information may remain in our backup systems.

Notification of Changes

If we decide to change this Policy, we will post those changes here and in other places we deem appropriate, so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If, however, we are going to use users' personally identifiable information in a manner materially different from that stated at the time of collection we will notify users via email and by posting a notice on the applicable Site or Service for 30 days.

Questions

If you have questions or concerns regarding our privacy practices, please contact us at support@Clear-FP.com or ClearFP IP, LLC, att'n Customer Support, Three Centerpointe Dr., Ste. 160, Lake Oswego OR 97035.