

## PRIVACY POLICY

Last Updated on August 15, 2025

### BACKGROUND

This Privacy Policy describes how Across Technology, Inc. ("Company", "we", "us", "our") may collect, store, use, share, process and disclose your user's Personal Data and protect your privacy when you use the Site. By visiting, interacting with our Site, you agree that the Company can use such data in accordance with our Privacy Policy. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not use the Site.

While this Privacy Policy may reference aspects of our Master Service Agreement (MSA) and Terms of Use; referred to collectively as "Terms." Capitalized terms used but not defined in this Privacy Policy have their meaning set forth in the Terms.

This Privacy Policy applies to all information collected through our Site. With respect to your utilization of our products and services, terms and conditions pertaining to collection, storage, handling, security and disposal of Client Data shall be as set forth in the MSA.

If our practices and policies change, we will update this Privacy Policy and notify you via email.

### INFORMATION COLLECTED

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device.

**A. Information You Provide to Us.** We collect specific personal information that you voluntarily provide to us via forms on our Site or when you contact us. We collect the following data points solely for the purpose of marketing our products to you and establishing business relationships:

- Name
- Email Address
- Phone Number

You may provide information to Across when you send us an email to contact us for further discussion, however, such information should be limited to non-sensitive personal information such as your name, address, email address, phone number and purpose of enquiry.

**B. Information Collected Automatically.** We may allow selected third parties to use tracking technology on the Site, which will enable them to collect data on our behalf about how you interact with our Site over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity.

### INFORMATION USE

- a. To establish contact with you to understand your business requirements with an aim to establish business relationships.

- b. For marketing and promotional purposes, unless the user “opt-out” or withdraw consent to this purpose, as described in the section entitled “Offers, Promotions and Opting Out” below.
- c. In connection with certain business transactions relating to you, your business, or assets, as further described in the section entitled “Information Disclose” below.
- d. Otherwise with your consent or as permitted or required by law and our third-party service providers.
- e. Using user and transaction information as an input mechanism to strengthen our user verification and risk mitigation services to adapt to the dynamic nature of account takeover and fraud transaction attempts in the future.

## **INFORMATION WE DISCLOSE**

- a. We may disclose your personal information to unaffiliated third parties in connection with the purposes described in this Privacy Statement as follows:
  - i. Business Partners. Some of our services or programs that you participate in are provided jointly with other third party business partners, and certain personal information may be disclosed to these third party businesses for the purpose of administering the service or program.
  - ii. Marketing Purposes. We may disclose personal information to third parties for marketing and promotional purposes, unless you “opt out” or withdraw consent to this disclosure, as described in the section entitled “Offers, Promotions and Opting Out” below.
  - iii. Business Transactions. Your personal information may be used by this website and disclosed to parties connected with the contemplated or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets (including, for example, your service account with us), for purposes related to the evaluation and performance of these transactions, including:
    - permitting such parties to evaluate and determine whether to proceed or continue with the transaction, and
    - fulfilling reporting, inspection or audit requirements or obligations to such parties.
  - iv. Successors and assigns of this website and/or its business or assets may use and disclose your personal information for similar purposes as described in this Privacy Statement.
  - v. Legal, Regulatory, etc. Legal, Regulatory, etc. this website may disclose your personal information as necessary to meet legal, regulatory, insurance, audit, and security requirements, and as otherwise with your consent or as permitted or required by law (including as required by applicable United States and foreign laws).

More specifically, we may need to process your data or share your personal information in the following situations:

- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Site, which will enable them to collect data on our behalf about how you interact with our Site over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- Affiliates. We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- Business Partners. We may share your information with our business partners to offer you certain products, services or promotions.

## **OFFERS, PROMOTIONS AND COOKIES**

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we may provide for you to control certain uses and disclosures over your information.

**Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. You can choose whether or not to allow the Site to collect information through other tracking technologies by selecting to Opt-out. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Site may then be inaccessible or not function properly.

**Promotion by the Company.** If you do not want us to use your email address to promote our own or third parties' products or services, you can opt-out by selecting to Opt-out.

**Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by selecting to Opt-out.

**Disclosure of Your Information for Third-Party Advertising and Marketing.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for advertising and marketing purposes, you can opt-out by selecting to Opt-out.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way.

## **STATE SPECIFIC PRIVACY RIGHTS**

**A. California Residents (CCPA/CPRA).** If you are a resident of California, you have specific rights regarding your personal information:

- Right to Know: You may request details about the categories of personal information we collect and the specific pieces of personal information we have collected about you.
- Right to Delete: You may request the deletion of your personal information, subject to certain legal exceptions.
- Right to Correct: You have the right to request correction of inaccurate personal information.
- Non-Discrimination: We will not discriminate against you for exercising your privacy rights.

## **B. Delaware Residents (DOPPA).**

**Do Not Track:** We currently do not respond to browser "Do Not Track" (DNT) signals as no uniform standard for DNT has been adopted by the industry.

**Marketing to Children.** We do not knowingly market or advertise online services, products, or applications to minors under the age of 18.

## **OPT OUT**

For the purpose of this Policy, you may request to opt-out of any marketing or activities conducted by Across by emailing Across at [services@verifyacross.com](mailto:services@verifyacross.com). Any Opt-out request shall be completed within forty-eight (48) business hours of receipt of request.

## **CONFIDENTIALITY AND SECURITY**

The safety and security of your information also depends on you. We endeavor to maintain physical, electronic, and procedural safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Authorized employees, agents, representatives, and mandataries that require access to user's personal information in order to fulfill their job requirements will have access to your personal information. No data transmission over the Internet or the telephone can be guaranteed to be perfectly secure, and any personal information users submit or access electronically or over the telephone is done at your own risk, and our Site does not guarantee or warrant the security of information transmitted in these manners. You should be aware that third parties may unlawfully intercept your transmissions or may wrongly instruct you to disclose personal information to them while posing as this Site and you should exercise caution when providing user's personal information to any person. The Site record retention policies dictate that we maintain information about you, users, including user's opt-out choices, for a fixed time period. If users do not perform another transaction during the fixed time period, the user's information, as well as their opt-out choice will be removed. If users perform another transaction or otherwise provide us with personal information thereafter, users will be afforded another opportunity to opt-out.

If you suspect any security issues, incident or failure, you may report such issues to Across by emailing to [incidentreporting@verifyacross.com](mailto:incidentreporting@verifyacross.com).

## **CHANGES**

Our Site reserves the right to modify this Privacy Statement from time to time. You can get updated Privacy Statements by emailing us at [services@verifyacross.com](mailto:services@verifyacross.com). The updated Privacy statement shall also be posted on the Site. We urge you to review this Privacy Statement frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes.