

PRIVACY POLICY

1. INTRODUCTION

Klaros Group and its affiliates are committed to protecting the privacy of visitors to klaros.com (the "Site") and other parties whose personal information we hold. This Privacy Policy (this "Policy") explains the standards we have set with respect to the personal information we may gather about you, the purposes for which we use that information, and the persons to whom we may give that information. It also covers your rights in relation to your information and how to contact us if you have any questions or concerns.

By using our Site, you consent to the collection and use of your personal information in accordance with this Policy.

2. PERSONAL INFORMATION

"Personal information," as used in this Policy, is information that specifically identifies an individual, such as an individual's name, social security number, telephone number, or e-mail address. Personal information also includes information about an individual's activities, such as information about his or her activity on the Site or credit history, and demographic information, such as date of birth, gender, address, geographic area, and preferences, but only where any of this information is linked to personal information identifying that individual.

Personal information does not include aggregate or other non-personally identifiable information. Aggregate information is information that we collect about a group or category of products, services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes.

3. COLLECTION OF INFORMATION

3.1. Passive Information Collection

When you visit the Site, we and our service providers may automatically collect certain information about you. Examples of this could include:

- Your IP address;
- Your browser type;
- Your system type;
- The content and pages that you access on the Site;
- The "referring URL" (i.e., the page from which you navigated to the Site);
- The pages to which you navigate on the Site and from which you leave the Site; and
- The time you spend on the Site.

We collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as Web beacons). We use passively-collected information to administer, operate, and improve the Site, and may in the future use it to provide content that is tailored to you. If we link or otherwise associate any information gathered through passive means with personal information, we treat the combined information as Personal Information under this Policy. Otherwise, we only use information collected by passive means in a non-personally identifiable form.

3.2. Collection of Voluntarily Provided Information

We may collect personal information that our users provide to us in a variety of ways through our Site and during the course of our business more generally. For instance, when you request information about our services or otherwise communicate with us, we collect the personal information that is provided to us. Examples of personal information we may collect include, but are not limited to,

your name, e-mail address, city, state, country, other similar demographic information, as well as your interests and preferences.

3.3. Information from Other Sources

We may receive information about you, including personal information, from third parties, and may combine this information with other personal information we maintain about you. If we do so, this Policy governs any combined information that we keep in a personally-identifiable format.

4. USE OF PERSONAL INFORMATION

We use personal information to provide to you services and information that you request; to operate, maintain, enhance, and improve, as applicable, the Site and our programs, services, and other systems; to prevent fraudulent use of our Site and services; to tailor your user experience; to maintain a record of our dealings with you; and for other administrative purposes.

We may also use the personal information you provide to contact you regarding our services. We allow you to opt-out from receiving marketing communications from us as described in the "Choice" section below.

5. DISCLOSURE OF PERSONAL INFORMATION

We will never sell your personal information to third parties. We may disclose personal information to third-party service providers (e.g., data storage and processing facilities) that assist us in our work. We limit the personal information provided to these service providers to that which is reasonably necessary for them to perform their functions.

We may also disclose personal information if we believe that doing so is legally required or is necessary to protect our property or other legal rights (including, but not limited to, enforcement of our agreements) or the rights or property of others.

In addition, information about our users, including personal information, may be disclosed as part of any merger, acquisition, debt financing, sale of Company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information could be transferred to third parties as one of our business assets.

6. CHOICE

Upon your written request to the email address given at the end of this Policy, we will use commercially reasonable efforts to confirm whether we hold any of your personal information and, if we do hold any such information, provide you with copies of it. If we do hold your personal information, you may request that we make any necessary updates or corrections to it. You may also request that we delete any personal information that we hold about you, which we will do provided we do not need the information to comply with or enforce any of our rights or obligations.

If you receive a commercial email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt-out from receiving commercial emails from us by sending us an email or by writing to us at the email address given at the end of this Policy.

7. LINKS

For your convenience, the Site may contain links to other websites or services that we do not own or operate. This Policy does not apply to any personal information you submit to any website operated by a third party. If you choose to visit any third-party websites or use third-party products or services, your information will be governed by the applicable third party's privacy policy. We recommend you consult the privacy statements on each of these other websites you visit before disclosing any personal information.

8. CHILDREN

The safety of children is important to us, and we encourage parents and guardians to take an active interest in the online activities of their children. We do not knowingly collect personal information from children under the age of 13.

9. INTERNATIONAL VISITORS

Our Site is hosted in the United States and is generally intended for U.S. visitors. If you visit from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please be aware that you are transferring personal information to the United States. The United States does not have the same data protection laws as the European Union and some other regions. By providing personal

information to us, you consent to the transfer of it to the United States and the use of it in accordance with this Policy.

10. SECURITY

Klaros Group protects the personal Information it collects with reasonable and appropriate physical, electronic, and procedural safeguards that are designed to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, or inadvertent destruction. Please note, however, that no data security measures can be guaranteed to be completely effective. Consequently, we cannot ensure or warrant the security of any personal information or other information. You transmit information to us at your own risk.

11. UPDATES TO THIS POLICY

We may occasionally update this Policy. When we do, we will also revise the "Last Updated" date at the beginning of the Policy. Your continued use of the Site and our services after such changes will be subject to the then-current Policy. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose personal information.

12. CONTACTING US

If you have any questions, comments, or concerns about this Policy or your personal information, please contact us at compliance@klarosgroup.com. If you have a complaint that we have breached this Policy or otherwise compromised your privacy, please contact us at the same email address. We take all complaints extremely seriously and will provide you with a substantive response, or an explanation of why we need more time to do so, within 30 days of receiving the complaint. If we do not resolve the complaint to your satisfaction, you have the right to complain to a country or state data protection authority with appropriate jurisdiction.