

EMBURSE, LLC PRIVACY POLICY

Last Update: September 18, 2020

This Emburse Privacy Policy (“**Privacy Policy**”) describes the how Emburse, LLC (“**Emburse**” or “**we**” or “**us**” or “**our**”) collects, processes, discloses, and shares the personal information you provided when you visit the Emburse websites <https://cards.emburse.com> and <https://app.emburse.com/login> (the “Site”) or use our services provided in connection with the Site, including any software or related tools (the “Emburse Service”). If you use business applications offered through an Emburse affiliated company, like Chrome River, Certify, SpringAhead, Nexonia, or Tallie, for which your company, institution, or other providing entity (“**Providing Entity**”) has subscribed either directly with an Emburse affiliated company or indirectly via an authorized reseller, please see the privacy policy on the applicable website for such entity for information on how we access, use, store, collect or disclose data about you on behalf of your Providing Entity. This Privacy Policy is incorporated into, and considered a part of, the [Emburse Terms of Service](#).

By submitting or making available Personal Data (as defined below) through our Site or the Emburse Service, you confirm that you have read and acknowledged the terms of this Privacy Policy and you understand our practices around the collection, storage, use, and disclosure of your Personal Data in accordance with this Privacy Policy.

As used herein, “you” and “yours” refers to individual users of the Emburse Service, as well as any Providing Entity.

Links to other websites. This website may contain links to foreign (meaning non-Emburse companies) websites. Emburse is not responsible for the privacy practices or the content of such foreign websites. Therefore, we recommend that you carefully read the privacy statements of such foreign sites.

Use of Emburse websites by children. The Site and the Emburse Service are not directed to users under the age of 13. If you are younger than 13, you may not use our Site or the Emburse Service. If you are a parent or guardian and believe we may have collected information about a child, please contact us at: privacy@emburse.com

WHAT INFORMATION WE AND OTHERS COLLECT FROM YOU AND HOW IT IS COLLECTED

“Personal Data” means any data collected through the various Site and related technologies that can be used to directly or indirectly identify an individual. We collect such Personal Data about you directly, indirectly and/or automatically as described below. Emburse will not use your Personal Data except as set forth in this Privacy Policy and in the Terms of Service. To the extent permitted by applicable law, we may combine the information collected about you, as described below, including information about the organization for which you work, with other information in our possession or information that you provide to us, and we treat all this information about you as Personal Data.

Where you are a candidate

You may be a past candidate or a candidate in process or you may have participated in our recruitment or other similar events.

How we collect your data:

- You may provide personal data to us by email, post, telephone, face to face during meetings or at our events or through our website; or
- We may collect your data indirectly or from third parties: through recruitment agencies, social media searches (such as LinkedIn), research companies, client or supplier conversations, or referrals from other third parties.

What data we collect:

- The Personal Data we collect about candidates includes: first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, right to work, social security/national insurance number, nationality, employment and education history, skills proficiency, references, or qualifications information contained in your resume/CV, or written records of our conversations or meetings.
- We do not mandate the collection of any Special Categories of personal data about you through this website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data).
- We will ask for your explicit consent before we collect Special Category personal data, including where required to carry out criminal or other background checks. We will not disclose such Special Category personal data without your express consent.

When you are a User of the Site

When you access, use and/or interact with our Site, we directly collect information you voluntarily provide us, such as when you download content or contact us, which includes:

- Personal Data that you provide by completing online registration forms, complete questionnaires or surveys, or when you create or update any of your marketing preferences.
- Personal Data collected via cookies, in line with cookie consent, server logs and other similar technologies preferences and settings in your browser, as further described below; or
- Personal Data you provide when requesting asset downloads about our businesses and partners.

We also obtain business information and personal data (such as your name, title, company name and email) about you from third party sources, as permitted by applicable law, such as the following:

- information collected by our marketing service providers on our behalf, which are a variety of marketing lead generation service providers, marketing opt-in lists or data aggregators or professional event organizers
- information shared with us by Emburse business partners as part of their referral activities
- public databases or other data you may have made publicly available, such as social media posts on professional networks and social media platforms;
- information shared with us by a third party who recommended you, once you have confirmed your agreement for us to keep and process such data (for the purpose of providing you with updates about Emburse's services).

When you are a User of our Services through a Corporate Account

When you register for the Emburse Service through a corporate account, Emburse acts as the data processor. Our business customer is the data controller. If you are a user with one of our business customers and would no longer like to be contacted regarding the use of Emburse Service, please contact the business customer directly regarding the issue.

In this case, Personal Data collected will include data you provide when you apply for the Emburse Service. This information might include username, password, email address, date of birth, government identifier, and banking information for ensuring the functioning of the Emburse Service and fulfilling compliance requirements.

Automatic collection of business information and Personal Data

While using the Site or the Emburse Service, Emburse may automatically record information that your browser sends. These logs may include the following information:

- your computer's operating system, Internet Protocol (IP) address (including information derived from your IP address such as your geographic location), access times, browser type, browser language, device type, domain name, duration of visit, new and repeat information, time stamp and language, referring website addresses, the date and time of your request and one or more cookies that may uniquely identify you;

- behavioral data about your usage and activity on the electronic channels, such as webpages clicked, websites and content areas visited, content downloaded, date and time of activities; and
- information obtained from third parties on your interests.

Google API Services

- Emburse automates the collection of receipts for filing business expenses through the Emburse Service. Users can choose to connect their Google Account with the Emburse Service and grant access to the content of their emails and attachments to create receipts using the contents of emails or attachments matching purchases made or recorded through the Emburse Service. Each User must affirmatively grant permission for Emburse to use this information.
- Authentication tokens used to access Google Accounts are encrypted before storage to a database server with no public IP or public access. Only email content and email attachments used for creating receipts are retained by Emburse. Personal Data available through use of the Google API Services is not collected and will not be shared unless necessary for compliance purposes, including legal process, protection of Emburse property (including enforcement of our agreements), or in urgent situations to protect the personal safety of users of the Emburse Service.
- Use of information received from the Google APIs will adhere to [Google's Limited Use Requirements](#).

The information collected through various tracking technologies described above may be considered Personal Data under applicable data protection laws. For additional information, please see below in *How We Follow Visits and Usage (Cookies and Analytics)*.

HOW YOUR INFORMATION IS USED AND PROCESSED

Legal Basis for Processing. We collect and process your Personal Data with your consent or as permitted under applicable data protection laws to provide the Emburse Service, fulfill your inquiry, operate our business, meet our contractual and legal obligations, ensure compliance, protect the security of our systems and our customers, or fulfill other legitimate interests.

Freely Given Personal Data or Consent. As a general principle, granting your consent and providing business information and Personal Data about you is entirely voluntarily and there are no adverse consequences to you if you do not grant a consent when required under applicable law or do not provide the required information. However, there are circumstances where Emburse cannot take action without certain Personal Data because such information is required, such as to provide you with access to a web offering or the Emburse Service. In these cases, without the relevant Personal Data, Emburse will not be able to provide you with what you requested.

Purposes of Processing. We use and process Personal Data about you for purposes described below:

- **To Provide the information requested by you.** If you request information on the Emburse Service, we will use the Personal Data which you enter into our online or other forms (typically your name, email address, name of company, phone number, job title and role) to process your request. This may include conversation data that you may trigger on various channels (e.g., chat-functionalities or other web appearances, contact forms, e-mails or telephone). Generally, you cannot opt out of these communications, which are not marketing related but merely required to fulfill your request in the context of the relevant business relationship you initiated. Please note also that we will also use your Personal Data to prevent, detect, mitigate, and investigate fraudulent or illegal activity. When the data protection laws applicable in the EEA apply to you, the legal basis for processing your Personal Data is based on the law (as opposed to being based on your consent).
- **To Ensure compliance with your choices.** We use your Personal Data to ensure compliance with your choices. The information that is indeed required to track your choices regarding the processing or use of your Personal Data or receiving marketing materials is stored and exchanged between members of the Emburse group as necessary to ensure compliance.

- **Legitimate Interest: To Operate and Improve the Emburse Service, to keep you up to date, to follow-up on a referral, to append data or request your feedback.** Emburse processes and uses your Personal Data based on its legitimate interest for the use cases below. Your right to object to processing based on legitimate interest is explained below in “Your European Privacy Rights”:
 - We may anonymize Personal Data provided under this Privacy Policy to create anonymized data sets which will then be used to improve Emburse products and services or for insights into our customer behavior for public relations purposes.
 - In case of telephone calls or chat sessions, we may record such calls, after informing you accordingly during that call and before the recording starts, or chat sessions to improve the quality of our services.
 - We may engage into communications with you for marketing purposes through social media channels until you request us to not be contacted any longer.
 - As described above, we also obtain business and Personal Data about you from third party sources, as permitted by applicable law, such as third-party data aggregators, public databases, or posts on social or professional networking platforms. We may combine this information with information you have provided to us to ensure that our records about you are accurate and provide you with more relevant content.
 - Where you are a user of the Emburse Service, we may inform you about the service, including confirmations, invoices, technical notices, updates, security alerts, support, and administrative messages.
 - Within an existing business relationship between you and Emburse, we may inform you, where permitted in accordance with local laws, about webinars, seminars, conferences or events, that are similar or relate to goods and services you have already ordered or used from Emburse. In addition, when you have attended a webinar, seminar or event of Emburse, we may contact you for feedback regarding the improvement of the relevant webinar, seminar, event, good or service.

HOW WE FOLLOW VISITS AND USAGE (COOKIES AND ANALYTICS)

We may use tracking technologies such as cookies, beacons, tags and scripts which are used in analyzing trends, administering the website, tracking users’ movements around the website and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

Cookies

We use cookies to remember users’ settings and for authentication into our online application site. Cookies are small text files placed on your computer while visiting certain sites on the Internet used to identify your computer. Cookies set by us are called “first party cookies”, while cookies set by parties other than Emburse are called “third party cookies”. The parties that set third party cookies can recognize your device, when you use the Emburse Service and when you use other websites or mobile apps. You should check the third party’s website for information about how they use cookies and other tracking technologies.

We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide a more personal and interactive experience on the Site, and to tailor our marketing programs to better suit your needs by displaying ads that are relevant to you. Users can control the use of cookies at the individual browser level (see

Local Storage Objects (HTML 5)

We use Local Storage Objects (LSOs) such as HTML5 to store content information and preferences. Various browsers may offer their own management tools for removing HTML5 LSOs.

Managing Cookie Preferences. You have the right to accept or reject cookies and can access and/or change your cookie preference or opt-out of third party analytics or opt-out of receiving interest-based advertising from Emburse at any time by accessing our preference center [here](#) (or if located in the European Union click [here](#)). For additional information on managing cookies, please see below in “WHAT PRIVACY CHOICES AND CHANGES ARE AVAILABLE TO YOU.”

In addition to what is specified in this Privacy Policy, you can manage preferences for Cookies directly from within your own browser. It is also possible to delete Cookies installed in the past through browser preferences, including the Cookies that may have saved the initial consent for the installation of Cookies by this website. Information about how to manage Cookies in the most commonly used browsers can be found at the following addresses: [Google Chrome](#), [Mozilla Firefox](#), [Apple Safari](#), and [Microsoft Internet Explorer](#).

With regard to Cookies installed by third parties, you can customize and control the privacy practices of third-party advertisers and analytics service providers through your the cookie preferences, by clicking the related opt-out link (if provided), by using the means provided in the third party's privacy policy, or by contacting the third party.

In addition, the Network Advertising Initiative and other similar providers offer information about some of the Internet advertising companies we may use, including how to opt-out of interest based advertising they deliver. Please follow the instructions provided by [YourOnlineChoices \(EU\)](#), the [Network Advertising Initiative \(US\)](#) and the [Digital Advertising Alliance \(US\)](#), [DAAC \(Canada\)](#), [DDAI \(Japan\)](#) or other similar services. To opt-out of Google Analytics web tracking you can download Google Analytics Opt-out Browser Add-on.

HOW YOUR INFORMATION IS SHARED

We work with affiliated and third party vendors, consultants and other service providers that help us run our sales and marketing activities. These companies provide work and services such as email delivery, postal delivery, collecting business information and Personal Data about you on our behalf, event/campaign registration and management, information technology and related infrastructure services, data analysis and insight, auditing and other similar services. In some cases, these companies need access to some of your Personal Data to carry out their work for us. They are not permitted to use your Personal Data for their own promotional or business purposes.

We may also share your information in the following circumstances:

- in an aggregated form that does not directly or indirectly identify you, such as statistical information about visitors to our Site.
- when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Emburse, our users, or others; and in connection with the enforcement of our terms and contracts.
- in connection with a corporate transaction, such as a divestiture, merger, acquisition, consolidation, or asset sale (or the negotiation thereof), or in the unlikely event of bankruptcy.
- as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, data protection authority request or legal process served to us

HOW YOUR INFORMATION IS KEPT SAFE

Emburse maintains data handling and storage practices and procedures that are designed to promote the integrity and confidentiality of Personal Data. We update and test our security technology on an ongoing basis. We use commercially acceptable means to protect your Personal Data in an effort to prevent loss, misuse and unauthorized access, disclosure, alteration and destruction, but we cannot guarantee its absolute security. If you have questions about the security of your Personal Data, or if you have reason to believe that the Personal Data that we hold about you is no longer secure, please contact us as described in this Privacy Policy.

HOW YOUR INFORMATION IS TRANSFERRED INTERNATIONALLY

As part of a global group of companies, Emburse has affiliated companies and third-party service providers within, as well as outside of, the EEA. Therefore, your Personal Data may be transferred, used, processed or stored in the United States or any other country where Emburse operates, including jurisdictions that may not have data privacy laws that provide protections equivalent to those provided in your home country. We take steps designed to ensure that the Personal Data we collect under this Privacy Statement is processed according to the provisions of this Privacy Statement and applicable law wherever the data is located. By providing your information to us, you agree to that transfer, storage, and processing in the United States and other countries outside of the European Union. Also, we may transfer your data from the United States to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our digital channels. When we transfer Personal Data from the European Economic Area and Switzerland to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection, such transfer is based on the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement) or other acceptable mechanism in order to contractually ensure that your Personal Data is subject to a level of data protection which applies within the EEA or other permitted mechanism. You may gain information regarding such transfer by sending a request to privacy@emburse.com.

HOW YOUR INFORMATION IS STORED AND RETAINED

We store and retain your Personal Data for as long as necessary to fulfill the purposes described in this Privacy Policy. For clarity, in circumstances where we are required by law to retain your Personal Data longer, such as for tax, legal, accounting or other purposes, or where we need your Personal Data to assert or defend against legal claims, we will retain such information until the end of the relevant retention period or the resolution of such claim.

WHAT PRIVACY CHOICES AND CHANGES ARE AVAILABLE TO YOU

You can unsubscribe from promotional emails by: (1) following the unsubscribe instructions in our emails; or (2) emailing us at privacy@emburse.com. If you have any problems using any of these opt-out mechanisms, please contact us at privacy@emburse.com. Please note that even if you unsubscribe from promotional email messages, we may still need to contact you with transactional information related to the Emburse Service as you have subscribed.

Where required by applicable laws, you can opt out of cookies that are not required to enable core site functionality and can manage your cookie preferences via the links set forth under *Managing Preferences* above. If you are a US resident, please be aware that we may not recognize or respond to every type of “do not track” signal or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party websites or online services, but we give you certain choices about how we collect Personal Data as described in this Privacy Policy. **Remember, if you delete your cookies, or use a different browser or computer, you will need to set your cookies preferences again.** If you have any problems regarding cookies, please contact us at privacy@emburse.com.

YOUR EUROPEAN PRIVACY RIGHTS

If required by applicable law, we adhere to the following rights described below. If Emburse holds your information as a controller (for instance, if you have provided your information on our website other than registration for the Service), upon request Emburse will provide you with information about whether or not Emburse holds any of your personal information.

If you wish to exercise any data protection and privacy right that is available to you, we will process your request in accordance with applicable data protection laws. We may need to retain certain information for record-keeping purposes and/or to complete transactions that you began prior to requesting any deletion.

- **Right to object to Processing based on Consent and Legitimate Interest.** Where we seek to rely on your consent or where we rely on our legitimate interest in order to process certain parts of your Personal Data (for instance as explained above when we provide you updates about

Emburse's goods and services or when we try to keep you up-to-date and request feedback), you have the right not to provide your consent or to withdraw your consent at any time. In case of withdrawal, Emburse will not process the Personal Data subject to this consent any longer unless legally required or unless such Personal Data is permitted to be used by Emburse for another purpose set out in this Privacy Statement or we determine and demonstrate a compelling legitimate interest to continue in processing your Personal Data. In case we are required to retain your Personal Data for legal reasons, such data will be restricted from further processing and only retained for the term required by law. Withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, if your use of a good or service requires your prior consent, we will no longer be able to provide the relevant good or service to you after withdrawal of your consent.

- **Right of Information and Access.** You can require Emburse to confirm at any time that Emburse is processing your Personal Data, or to have access to the Personal Data Emburse may have about you. You may also request information about the purpose of the processing as well as the legal basis for the processing, including the legitimate interest, if applicable, the categories of Personal Data concerned, third parties that might have received the data from Emburse, the source of the Personal Data, if you did not provide it directly to Emburse, and how long it will be stored. Reasonable access to your Personal Data will be provided at no cost to you upon request. If access cannot be provided within a reasonable time frame, Emburse will provide you with a date when the information will be provided. If for some reason access is denied, Emburse will provide an explanation as to why access has been denied.
- **Right to Rectification.** You have a right to correct the record of your Personal Data maintained by Emburse if it is inaccurate.
- **Right of Erasure.** Where applicable, you may have the right to the erasure of Personal Data that we hold about you, such as it is no longer necessary for the purposes for which it was originally collected but only if there is no statutory obligation or prevailing right of Emburse to retain it. Or, if applicable, you withdraw your consent provided, or where your Personal Data was processed by Emburse based on legitimate interest, including profiling.
- **Right to Data Portability.** If Emburse uses your Personal Data on the legal basis of either your consent or performance of a contract with you, you may also request from Emburse a copy of the Personal Data you provided to us, clearly stating which Personal Data you require from Emburse, to which processing operations the request relates and in which format and whether the Personal Data shall be provided to you or another recipient. We will carefully review your request and discuss with you how it can be best implemented.
- **Right to Restriction of Processing.** You can request that Emburse restricts your Personal Data from any further processing in any of the following events: (i) you state that the Personal Data Emburse has about you is incorrect, (but only for as long as we are required to check the accuracy of the relevant Personal Data), (ii) there is no legal basis for us processing your Personal Data and you demand that we restrict your Personal Data from further processing, (iii) we no longer require your Personal Data but you claim that you require us to retain such data in order to claim or exercise legal rights or to defend against third party claims or (iv) in case you object to the processing of your Personal Data by us, where based on our legitimate interest, for as long as it is required to review as to whether we have a prevailing interest or legal obligation in processing your Personal Data.
- **Right to lodge a complaint.** If you take the view that Emburse is not processing your Personal Data in accordance with the requirements set out in the Privacy Policy or applicable EEA data protection laws if such laws apply to you, you can at any time lodge a complaint with the data protection authority of the EEA country where you are. A list of the national data protection authorities can be found at ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.
- **Other rights.** As applicable under French law, you can also send us specific instructions regarding the use of your Personal Data after your death.

If you would like to exercise any of the above rights, please contact privacy@emburse.com so that we may consider your request under applicable law, verify any relevant legal requirements and exemptions, including steps to verify your identity before complying with the request.

YOUR CALIFORNIA PRIVACY RIGHTS

This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act or “CCPA.”

Definitions Specific to this Section

The CCPA includes definitions for terms specific to this California Privacy Policy that do not apply to the rest of this Privacy Policy, including the following terms:

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include publicly available information obtained from government records; deidentified or aggregated consumer information that cannot be reconstructed to identify you; any information covered under the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act, activities covered by the Fair Credit Reporting Act, or protected health information as defined under the Health Insurance Portability and Accountability Act.

“Sale” or “sell” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information by the business to another business or a third party for monetary or other valuable consideration.

“Service Provider” means a sole proprietorship, partnership, limited liability company, corporation, association, or other legal entity that is organized or operated for the profit or financial benefit of its shareholders or other owners, that processes information on behalf of a business and to which the business discloses a consumer’s Personal Information for a business purpose pursuant to a written contract.

Minors

The Emburse Service is not intended for children or minors under the age of 18 years old. Accordingly, we do not knowingly collect or store information about minors under the age of 18 and we do not sell the Personal Data of minors.

Access to Specific Information and Data Portability Rights

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use and disclose this information), to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights. This section describes those rights

California consumers may make a request pursuant to their rights under the CCPA by contacting us at privacy@emburse.com. We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months or delete certain information. Please note that there are circumstances in which we may not be able to comply with your request pursuant to the CCPA, including when we cannot verify your request and/or when there is a conflict with our own obligations to comply with other legal or regulatory requirements, or other reasons provided by law. We will notify you following submission of your request if this is the case.

The disclosure rights include:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.

- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (and access thereto, also called a data portability request).
- Whether we have disclosed your personal information for a business purpose and if so, the categories of personal information that each category of recipient received.

Right to Request Deletion

You have the right to request that we delete your personal information. Under certain circumstances Emburse may be unable or otherwise not required to delete your personal information, for example, to comply with legal obligations, or to complete a business transaction that you have requested.

Right to Non-Discrimination

You have a right not to receive discriminatory treatment for exercising your privacy rights as identified in this section of the Privacy Policy as conferred by the CCPA.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a consumer request to us via email at: privacy@emburse.com with the subject line "California Rights Request". We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account.

Response Information

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Authorized Agents

You may designate an authorized agent to exercise your rights under the CCPA on your behalf, however we may deny a request as permitted by the CCPA.

Sale of Personal Information

We have not sold the personal information of California residents in the preceding twelve months. We do not sell the personal information of our users or minors under the age of 18 years of age. This fact notwithstanding, you can opt out of data sale by emailing a request to that effect to privacy@emburse.com.

Collection, Use and Disclosure of Personal Information

For more details about the personal information collect, including the categories of sources, please see the What Information We Collect section above. We collect this information for the business and commercial purposes described in the How Your Information is Used section above. We share this information with the categories of third parties described in the How Your Information is Shared section above. Emburse does not sell (as such term is defined in the CCPA) the personal information we collect (and will not sell it without providing a right to opt out). Please note that we do use third-party cookies for

our advertising purposes as further described in the How We Follow Your Visits and Usage section above.

ADDITIONAL DISCLOSURES FOR NEVADA RESIDENTS

Pursuant to Nevada law, you may direct a business that operates an internet website not to sell certain Personal Information a business has collected or will collect about you. Emburse does not sell your Personal Information pursuant to Nevada law. For more information about how we handle and share your Personal Information or your rights under Nevada law, contact us at privacy@emburse.com.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Statement from time to time without notice to you other than posting the revised Privacy Statement on the Channels or by providing such notice about or obtaining consent to changes as may be required by applicable law. If we change our Privacy Statement, we will post those changes to this Privacy Statement and change the "last updated" date above. We encourage you to periodically review this Privacy Statement for the latest information on our privacy practices.

QUESTIONS

Notwithstanding the right you may have to lodge a complaint as stated about "Your European Privacy Rights", if you have any questions about this Privacy Statement or to file any complaint regarding this Privacy Statement, please contact us at privacy@emburse.com.

Emburse will investigate and attempt to resolve complaints and disputes regarding the collection, use, and disclosure of Personal Data by referencing the privacy principles stated in this Privacy Statement. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at feedback-form.truste.com/watchdog/request.