

Privacy and Cookie Policy

Last Updated: April 20, 2020

This Privacy and Cookie Policy (this “Privacy Policy”) describes the ways in which Digital SPV LLC (“DigitalSPV”, “we” or “us”) collects, uses, and discloses information about you, including personally identifiable information, in connection with your use of the website www.digitalspv.com (the “Website”). Throughout this Policy, “you” refers to the individual or entity that is visiting the Website. By using the Website, you consent to the use of your information as set forth in this Policy.

This Privacy Policy is incorporated into our Terms of Use, and therefore governs your use of DigitalSPV’s services. By using DigitalSPV’s services, you accept the terms of this Privacy Policy and our Terms of Use. If you have questions or concerns about the Privacy Policy, please contact us at info@digitalspv.com.

Information We Collect About Consumers.

In this section of the Privacy Policy, we explain what types of Personal Information we may collect about consumers.

As used in this Privacy Policy, Personal Information means information that relates, and is capable of being linked, to a particular person. It does not include de-identified or aggregate information.

DigitalSPV potentially collects the following categories of information about consumers, some of which may be collected or maintained in a manner such that it can be considered Personal Information:

Identifiers: Examples of the types of identifiers that DigitalSPV may collect include names, postal addresses, online identifiers, Internet Protocol addresses (“IP addresses”), email addresses, account numbers, Social Security numbers, driver’s license numbers, passport numbers, and other government identification numbers, and any other information a user provides during the process to form a limited liability company through our Website, including without limitation, information about the company’s members, ownership of the company, terms of the company’s limited liability company agreement and the nature of such company’s business.

Other types of information: Examples of other types of information include telephone number, and financial information, including bank account, credit card, and debit card numbers. It also includes additional information provided to DigitalSPV directly by you, such as when you complete our questionnaire.

Commercial information: Examples of the types of commercial information that DigitalSPV may collect includes records of business and other property owned, products or services

purchased, obtained, or considered from DigitalSPV or our partners, and other purchasing or consuming histories or tendencies.

Internet information: Examples of the types of internet or other electronic network activity information that DigitalSPV may collect includes browsing history, search history, information about the device the consumer is using to access our website or applications, and information regarding a consumer's interaction with DigitalSPV's or our partners' websites, applications, or advertisements.

Geolocation information: DigitalSPV may collect information about where a consumer resides or is otherwise located.

Where We Collect Information About Consumers.

In this section of the Privacy Policy, we explain where and how we collect data about consumers. We receive information about consumers from several categories of sources.

Consumers: The vast majority of the information that DigitalSPV collects comes directly or indirectly from the consumer that it relates to. Information that is collected directly from you is information that you provide when you complete a form online (specifically, the new SPV questionnaire on our Website and information included on our user dashboard), use a chat feature, or speak to us on the phone. We may also collect information indirectly about you when you interact with our website, through the use of cookies and other tracking technologies. Indirect collection is described in more detail in the section below called "How DigitalSPV Uses Cookies and Similar Technologies."

Related Consumers: We may collect information about you from someone you know. For instance, if you are a member or manager in a business that is formed through DigitalSPV, we may be given information about you in order to complete the formation.

Service Providers: We may collect information about you from our Service Providers. As used in this Privacy Policy, Service Providers means entities that DigitalSPV has contracted with to provide us with services to help fulfill our business needs, which will include our providers of Registered Agent services and entity formation services. Service Providers may also assist us in collecting information both directly and indirectly from you.

Professionals: We may collect information about you from the independent professionals with whom you may work with through our Website (e.g., to bankers, accountants and lawyers) or other product offerings.

Business Partners and Affiliates: We may collect information about you from our business partners and affiliates. An example of the type of information that we may receive from business partners and affiliates is information about the product you purchased from them after you indicated an interest in an offer that DigitalSPV presented to you.

Publicly/Commercially Available Information: We may collect information related to you from publicly available sources of information, including government records and commercially available sources of consumer information. Examples of the type of information we may collect from publicly available sources are whether your entity is in good standing with a Secretary of State or whether you have recently expressed interest in purchasing a product that DigitalSPV sells.

Unrelated Parties: We may receive information related to you from people and entities with whom DigitalSPV does not have a direct relationship. An example of the type of information that we may receive from unrelated third parties is documents that we receive on your behalf in our role as your Registered Agent.

How We Use the Information We Collect About Consumers.

In this section of the Privacy Policy, we explain our commercial and business purposes for collecting information about consumers. DigitalSPV uses the information that it has collected about consumers, for the purposes listed below. In some instances, we may combine information that we have collected from multiple sources in order to fulfill these purposes. DigitalSPV potentially uses each category of information that we collect for each of these purposes.

If, in the future, DigitalSPV wishes to use information about you in a manner that is not consistent with the purposes outlined below, we will seek your consent prior to the expanded use if and where we are legally required to do so.

Providing Products and Services: DigitalSPV collects information for the purpose of providing products and services. We may also use information to respond to inquiries from potential customers who are interested in learning more about our products and services. Examples of the types of uses of consumer information for these purposes include producing and delivering documents purchased by consumers, administering the DigitalSPV website, and displaying content based on consumer preferences. Specifically, when providing our entity formation services, DigitalSPV will provide Personal Information required by governmental authorities to form your entity with the applicable state, obtain an employer identification from the IRS and hire a Registered Agent for the entity.

Security: DigitalSPV collects information for the purpose of ensuring that we maintain appropriate security over computer networks and our physical facilities. We may also collect information for the purposes of detecting fraud or other suspicious activities.

Meeting Legal Requirements: DigitalSPV collects information in order to meet our legal obligations.

Marketing: DigitalSPV collects information for use in marketing to current and prospective customers. More information about how you can control the marketing you receive from DigitalSPV is located in the sections “How DigitalSPV Uses Cookies and Similar Technologies” and “How You Can Control The Information DigitalSPV May Have About You.”

Product Development: DigitalSPV collects information for use in improving our existing products and developing new products.

Analytics: DigitalSPV collects information for use in performing various types of analytics. For example, DigitalSPV uses information to analyze how visitors interact with our website, where visitors to our website arrive from and exit to, and gaining insights into the types of consumers that may be interested in our products and services. We may also use information to develop inferences from the information we collect regarding consumer preferences, characteristics, predispositions, behaviors, and attitudes.

Operational Purposes: DigitalSPV collects information for use for our operational purposes, and the operational purposes of our service providers and business partners. For instance, DigitalSPV may use information for maintaining our website and other infrastructure, training and quality assurance, for conducting surveys or sweepstakes, to promote our brand, and to use in connection with our relationships with service providers and business partners.

Sharing with Business Partners: DigitalSPV collects information in order to provide business partners' information in connection with consumers who have either expressed interest in hearing from the business partner or who have purchased a bundled product through DigitalSPV.

Financial Reporting: DigitalSPV collects information for use in various types of financial reporting and other similar internal uses. Examples of the types of financial reporting that DigitalSPV may use consumer information in connection with are internal budgets and projections, calculation of compensation, and reporting to investors.

Business Transfers: If DigitalSPV undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including information related to consumers in connection with the transaction or in contemplation of the transaction (such as conducting due diligence). If such an event occurs, your information may be treated like any other DigitalSPV asset and sold, transferred, or shared with third parties, or used in ways not contemplated or permitted under this Privacy Policy. In this case, you will be notified via email and/or a prominent notice on our site of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

In addition to the purposes listed above, DigitalSPV may also use de-identified or aggregate data that is not capable of being linked to any individual consumer for additional purposes not listed above.

How We Share Consumer Information and Who We Share It With.

In this section of the Privacy Policy, we explain who we share consumer information with and under which circumstances we may do so.

Service Providers: DigitalSPV may share information about consumers with Service Providers who assist us with completing the business purposes outlined in the “How We Use the Information We Collect About Consumers” section. These companies are not authorized to use the information we share with them for any other purpose other than providing services to DigitalSPV or to you.

Registered Agent: DigitalSPV may provide certain information with the Registered Agent whom we hire to provide registered agent service for the business entity.

Professionals: DigitalSPV may share consumer information with the independent professionals that can be accessed through products such as attorneys, accountants and bankers.

Government Entities: DigitalSPV may share information about consumers with government entities in order to fulfill the products purchased by our customers. Certain Personal Information becomes public record when documents are filed with the federal or state government, or with a court. For example, a corporation's name, business address, and registered agent name become public information when its articles of incorporation are filed. A Secretary of State may publish this information to its website or provide this information to third parties for a fee. This Privacy Policy does not cover these or similar third-party actions.

Required by Law: DigitalSPV may disclose consumer information as required by law, such as in response to a subpoena, a lawful request by a public authority, including to meet national security or law enforcement requirements, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a legal request.

Related Parties: DigitalSPV may disclose consumer information with businesses controlling, controlled by, or under common control with DigitalSPV. If DigitalSPV is merged, acquired, or sold, or if some or all of our assets or equity are transferred, we may disclose or transfer consumer data in connection with the associated transactions.

In addition to the circumstances listed above, DigitalSPV may also share de-identified or aggregate data that is not capable of being linked to any individual consumer with additional entities not listed above.

How DigitalSPV Uses Cookies and Similar Technologies.

This section expands on how DigitalSPV uses internet technologies, such as cookies, to collect information about consumers.

Cookies. DigitalSPV and its partners may use the standard cookie feature of major browser applications and third-party service providers, including Google Analytics features, or employ internally developed cookies and tracking codes, that allow DigitalSPV to store a small piece of data on a visitor's computer, or any other device a visitor uses to access our website, about his or her visit to the website or use of other plug-ins exchanging information with DigitalSPV. We

also may use similar technologies, such as JavaScripts or ETags, to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can remove persistent cookies by following directions provided in your Internet browser's "help" directory. If you reject cookies, you may still use our site, but your ability to use some areas of our site, such order forms, will be limited.

Web Beacons. We may employ a software technology called clear gifs (a.k.a. web beacons), that help us track referrals from our partners and affiliates and better manage content on our website. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence.

3rd Party Tracking. The use of tracking technologies by our service providers, technology partners or other 3rd party assets (such as social media links) on the site is not covered by our Privacy Policy. These 3rd parties may use cookies, clear gifs, images, and scripts to help them better manage their content on our site. We do not have access or control over these technologies.

Partner and Affiliate Tracking. Our partners and affiliates may use cookies and web beacons to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests. This means that these partners and affiliates may show our ads on sites across the Internet based upon your previous visits to our website. Together with our partners and affiliates, we may use these cookies and web beacons to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to your visits to our site.

Third Party Links

Third-Party Websites. DigitalSPV may maintain links to other websites and other websites may maintain links to DigitalSPV's websites. This Privacy Policy applies only to DigitalSPV.com and not to other websites accessible from DigitalSPV or that you use to access DigitalSPV, each of which may have privacy policies materially different from this Privacy Policy. If you visit other websites, DigitalSPV is not responsible for the privacy practices or content of those sites. It is your responsibility to review the privacy policies of non-DigitalSPV websites to confirm that you understand and agree with them.

Social Media Widgets. Our website may include social media features, such as the Facebook "like" button and widgets, such as the "Share this" button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

How You Can Control The Information DigitalSPV May Have About You.

This section describes how you can access and control the information that DigitalSPV may have about you. It applies to all consumers worldwide, including individuals who have purchased from DigitalSPV or who believe that information about them may have been provided to us by a third party. Depending on where you reside, you may have additional rights beyond what is described in this section.

Confirmation of Possession of Information Related to You. Upon a verified request, and subject to the privacy interests of others and technical limitations, DigitalSPV will provide you with information about whether we hold any information related to you. At DigitalSPV's sole discretion, unless otherwise required by law, we may in some instances correct or delete information upon a verified request. Please note, however, that in certain circumstances we may be required by law to retain your Personal Information, or may need to retain your Personal Information in order to continue providing a product or service to you or another customer.

If you would like to submit a request about your data, you may do so by emailing us at info@digitalspv.com. After you submit the request, you will be asked to verify your email address and may also be asked to provide additional information in order to verify your identity.

User and Authorized Contact Access to Order Information. DigitalSPV will give you, or anyone listed as an authorized contact for your account, information about your order. This may include information about the nature and status of your order, information you provided to process your order, payment information, and contact information. If you want someone to have access to your order, you must list him or her as an authorized contact or they may not obtain information. For product-specific information about who may request information about your order, please contact us at info@digitalspv.com.

User Access to and Ability to Update Personal Information through MyAccount. You may visit your personal account profile at any time through our user dashboard. Through My Account, you may: (i) review and update basic information about you; (ii) complete pending orders; and (iii) begin new orders.

Opting Out of Email. We send promotional emails and newsletters from time to time to consumers who have provided us with their email address or whose email addresses we have obtained through other sources. You can opt-out of promotional communications by using the "Unsubscribe" link and following the unsubscribe instructions in an email you receive from us or by emailing us at info@digitalspv.com. We may also send service-related or transactional communications, which are not promotional. Generally, you may not opt-out of these communications. If you do not wish to receive service-related communications, you may terminate your account by contacting us at info@digitalspv.com.

Data Retention. At minimum, we will retain your information for as long as needed to provide you services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. DigitalSPV may maintain some or all of this data in its archives even after it has been removed from the Site.

How Secure Is the Personal Information We Collect?

Our Commitment to Data Security. The security of your personal information important to us. We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it. Unfortunately, no data transmission is completely secure and we therefore cannot guarantee the security of information you transmit to or from our website or through the use of our services, and you provide this information at your own risk. ACCORDINGLY, WE DISCLAIM LIABILITY FOR THE THEFT, LOSS, OR INTERCEPTION OF, OR UNAUTHORIZED ACCESS OR DAMAGE TO, YOUR DATA OR COMMUNICATIONS BY USING OUR WEBSITE AND OUR SERVICES. YOU ACKNOWLEDGE THAT YOU UNDERSTAND AND ASSUME THESE RISKS.

IF YOU BELIEVE YOUR PRIVACY HAS BEEN BREACHED PLEASE CONTACT US IMMEDIATELY AT info@digitalspv.com.

Enforcement. We periodically review this Privacy Policy and our compliance with it to verify that both are accurate. We encourage you to contact us with any concerns, and we will investigate and attempt to resolve any complaints and disputes about our privacy practices.

Changes To This Policy.

We may update this privacy policy to reflect changes to our information practices. If we make any material changes, a notice will be posted on this page along with the updated Privacy Policy prior to the change becoming effective. We encourage you to review this page periodically for the latest information on our privacy practices.

If you have any questions regarding our Privacy Policy, please contact us at info@digitalspv.com.