

NOVI AMS Privacy Policy

Last Updated: September 4, 2024

This Privacy Policy describes how NOVI AMS (“NOVI”, “we”, “our”, or “us”) collects, uses, stores, and shares your personal information when you access our website located at www.noviams.com or any other digital location where this Privacy Policy is posted; (2) communicate with us, including via telephone, e-mail, and text; and (3) when we engage with third party service providers (collectively, the “Services”).

What Personal Information Do We Collect About You, and How Do We Collect It?

Depending on how you engage with our Services, we collect your personal information in three ways: (1) directly from you; (2) automatically when you access our Services; and (3) from third parties.

Personal Information We Collect Directly From You

When you use our Services, create an account with us, or otherwise engage with us, we may collect various pieces of your personal information, including first and last name, e-mail address, account password, and telephone number.

Personal Information We Collect Automatically When You Use Our Services

When you use our Services, we may collect the following information automatically from your device or browsers:

- Device information.
- Browser information.
- Internet service provider or mobile carrier.
- Referring and exit pages.
- Date and time stamps.
- Clickstream data (including page clicks and scrolls).
- Location (for access and use verification).
- Bandwidth speed.
- IP address and device ID.
- Information from cookies and similar technologies (see below for more information).

We may also make this information available to third parties, as outlined below.

How Do We Use Your Information?

We may use your information to:

- Provide our Services to you.
- Notify you about changes to our Services.
- Enforce our terms, conditions, and policies.
- Personalize content you receive and provide you with tailored content.
- Perform data analytics (including market research, trend analysis, financial analysis).

- Operate, evaluate, develop, manage and improve our Services (including operating, administering, analyzing, and improving our Services, developing new Services, managing and evaluating the effectiveness of our Services, performing accounting, auditing, and billing reconciliation and collection activities and other internal functions).
- Protect against, identify and prevent abuse, fraud and/or other criminal activity, claims and other liabilities.
- Comply with and enforce relevant industry standards and policies.
- Prevent and respond to other harmful content distributed through our Services.
- Prevent the unlawful use and/or selling of our Services.
- Perform other business functions, such as a merger, sale, acquisition, proceed with bankruptcy, engage in due diligence relating to the acquisition or sale of part or some of NOVI, and related functions.

How Do We Disclose Your Information?

- **With Your Consent.** We may, from time to time, disclose or share your information with your consent. We may obtain your consent in writing, online through “click-through” or related agreements, when you accept our terms, orally, in person, on the telephone, or by other means. We may share your information in these circumstances to complete a transaction, perform a service, or offer you our Services.
- **With Our Subsidiaries and Affiliates.** We may, from time to time, disclose your information to our subsidiaries and affiliates for organizational and internal purposes.
- **With Other Third Parties.** We may share your information with certain third parties, such as business partners, advertising networks, associations, auditors, legal service providers, insurers, marketing partners, data analytics providers, online and offline data collectors, operating systems and platforms, and service providers who provide us a service (e.g., credit / debit card processing, billing, customer service, auditing, marketing, debugging to identify and repair error and/or protecting against malicious, deceptive, fraudulent, or illegal activity).
- **Business Transfers / Bankruptcy.** We may transfer your information as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the unlikely event of insolvency, bankruptcy, or receivership, in which to any successor or to any person or entity that acquires ownership or control of the Sites and/or Products. This may occur in the event of a merger, acquisition, bankruptcy or other sale of all or a portion of our assets. Other than to the extent ordered by a bankruptcy or other court proceeding, the use and disclosure of all transferred information will be subject to this Privacy Policy, unless otherwise provided.
- **By Law Or To Protect Rights.** We may share your information to satisfy any law, regulation, legal process, governmental request, or where we have a good belief that access, use, preservation or disclosure of such information is reasonably necessary to: (1) enforce or apply agreements; (2) protect our rights or interests, property or safety or that of others; (3) in connection with claims, disputes, or litigation (in court or elsewhere); or (4) protect users of our Services.

How Do We Store & Protect Your Information?

Although no system can guarantee the complete security of your information, we take commercially reasonable steps, appropriate to the nature of information at issue, to ensure your information is subject to appropriate organizational, technical, and physical safeguards in alignment with applicable laws and regulations.

How Long Do We Keep Your Information?

We keep your information for as long as necessary in accordance with the purposes for which it was collected, our business needs, and applicable legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to the nature of the information subject to disposal, consistent with applicable laws and regulations.

Links To Other Sites

We may, from time to time, offer links to other websites from our Services. These third parties may have terms of use and privacy policies that are different than ours. We recommend you review such site’s terms of use and privacy policies prior to use or submitting any information to them. We cannot verify, warrant, endorse or take responsibility for the availability, accuracy, completeness, quality, practices, or policies of such sites or content available from such sites. We do not make any representations

or warranties as to the security of any information (including, without limitation, credit card and other personal information) you might be requested to give any third party.

Cookies, Advertising, & Tracking

From time to time, our Services may collect and share your information through the use of cookies, pixels, and related technologies for the purpose of identifying and authenticating users, preventing fraud, enhancing our Services, performing analytics and other measurement services, advertising, and to tailor content to you.

Cookies are small information files that our Services place on your computer or other devices. Some cookies are temporary. Others are permanent. And there are different types of cookies that serve different purposes, such as functionality and targeting (marketing / advertising).

Our Services may also use embedded scripts and/or web beacons. An embedded script is programming code used to collect information about how you interact with our Services. The embedded script is temporarily downloaded onto your device from our, or a third party web server and is active only while you are connected to the Services. A web beacon is a small graphic image or programming code that may be included in our Services and email messages.

Our Services may also use data analytics vendors to monitor the performance of our Services, enhance and provide a more relevant browsing experience for our users, personalize the content on our Services, and better understand our users' needs and optimize our Services. To help us accomplish these goals, our data analytics vendors may use cookies, identifiers for mobile devices and other technologies to collect and store data about our users' behavior and their devices, such as how much time users spend on which pages, which links they choose to click, what users do and do not like, etc. This data may include a device's IP address, device screen size, device type (unique device identifiers), and browser information. For further details about our data analytics vendor, Google Analytics, please see **How Google uses data when you use our partners' sites or apps**, www.google.com/policies/privacy/partners/ and visit Google's Privacy Policy at <https://policies.google.com/privacy>.

Your Choices

We provide you the ability to exercise certain controls and choices regarding your information. To exercise any of the rights described below, send your request via our contact us form. We will respond to your request as soon as possible and in accordance with applicable laws and regulations.

- **Control Cookies Through Your Browsers.** You may be able to disable and manage some cookies through your browser settings. If you use multiple browsers on the same device, you will need to manage your settings for each browser.
- **Email Opt-Out.** If at any time you wish to opt out or "unsubscribe" from receiving commercial emails related to our Services, you may use the unsubscribe link at the bottom of each commercial email you receive or respond to the e-mail with "unsubscribe" written into the body of the reply email. Please note that even if you opt-out of receiving commercial emails from us, we reserve the right to send transactional or relationship communications to you (e.g., if we need to contact you regarding your account status, technical support, changes to our Sites or Services, etc.).

Do Not Track

Our Services may, from time to time, collect information about your online activities, over time and across different sites and applications. When you use our Services, certain third parties may also collect information about your online activities, over time and across different websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a "Do Not Track" feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Our Services currently do not change the way they operate based upon a "Do Not Track" or similar signal. You may, however, disable certain tracking as discussed in Your Choices section.

Children

Our Services are not intended for children under the age of 18. We do not knowingly collect or use any information from individuals under the age of 18.

Changes

We may change this Privacy Policy from time to time. Any and all changes will be reflected on this page, and where appropriate and consistent with applicable law and regulation, provided to you in person or by another electronic method. The last updated date will be stated at the top of this Privacy Policy. You should regularly check this page for any changes to this Privacy Policy.

Accessibility

To request a copy of this Privacy Policy in an alternative format, please contact us at the information provided below.

Contact Us

If you have any questions about this Privacy Policy, please contact us.