



## Privacy and Confidentiality Policy

Opt-out Notice: By email ([ahenderson@teraverde.com](mailto:ahenderson@teraverde.com)) or telephone (717-344-5553) to Alex Henderson, Teraverde’s general counsel, you may require Teraverde not to share any of your nonpublic information with any person and/or destroy any information in Teraverde’s possession. You may exercise this opt out at any time. Teraverde will not share any of your nonpublic information within thirty days of receipt.

## Privacy Policy

TVMA, Inc. (“Teraverde”) respects the financial privacy of our clients, and the financial privacy of the customers of our clients. Teraverde complies with all applicable laws and regulations designed to secure privacy. Our clients’ relationship with us is important, and we want you to understand our policies and practices about handling information.

Our goal is to serve you as conveniently and effectively as possible, and to make sure you feel confident that the information about your relationship with us is treated with the utmost privacy.

Teraverde may collect information related to work performed on behalf of our clients (“Clients”) which may include Confidential Information of our Clients and our Client’s customers.

The following policies outline how we use and safeguard the information we collect. For this reason, we ask that you please read it carefully.

## Categories of Information We Collect

We may collect Confidential Information; “Confidential Information” means:

- any information received by Teraverde about the business or finances of our Clients or any subsidiary or affiliate, including without limitation all financial statements and other financial data, all personnel data, and all information about products or services, including without limitation, trade secrets but excluding information that our Clients deliberately and voluntarily makes publicly available;
- any information that may be obtained from our Clients that may be considered “personally-identifiable information” (“PII”) of our Client’s customers, which may include, information we receive from standard industry related forms, such as names, addresses, social security numbers, assets, and incomes.

## Categories of Information We Disclose



We do not disclose any nonpublic PII about our Client's customers or Client Confidential Information to anyone, except as permitted by law.

Teraverde may work with a variety of third parties to bring you services. We disclose information as necessary to fulfill these third-party service agreements. We may also disclose information about you to governmental entities as required by law, or in response to subpoenas.

We may disclose information we collect, as described above, to third parties with whom we have agreements in order to make a variety of services available to you. These third parties must agree to strict confidentiality provisions to assure the protection of your information.

#### Confidentiality and Security

Our Clients agree that they will use best efforts not to provide or allow Teraverde access to PII as defined in the Gramm Leach Bliley Act and regulations issued thereunder except to extent necessary to perform work requested of Teraverde by our Clients.

Our agreements with our Clients provide that Teraverde shall protect the Confidential Information from unauthorized use or disclosure by using the same degree of care, but no less than a reasonable degree of care, as Teraverde uses to protect its own confidential information of like nature. Teraverde will restrict access to: (i) Confidential Information to those employees, affiliates, agents, advisors, consultants and other representatives ("Representatives") who have a need to know for the purposes of this Agreement; and (ii) only the Confidential Information Representatives need for such purposes.

All employees are reminded of their confidentiality obligations at least quarterly during all employee meetings and certify and reaffirm in writing at least annually the confidentiality obligations of their employment agreements and the employee handbook and appendices.

All sensitive physical papers are discarded in a locked bin and an independent contractor shall shred the contents of the bin on a regular basis.

Teraverde will not be liable for use or disclosure of Confidential Information if the Confidential Information is or comes into the public domain through no fault of Teraverde or its Representatives, is known to Teraverde without restriction at the time of disclosure, is used or disclosed with the prior written approval of our Client; or is independently developed by personnel of Teraverde without reference to Confidential Information.

We restrict access to nonpublic personal information about you to our employees and agents on a "need to know" basis so they can do their jobs in providing products or services to our Clients. We prohibit our employees and agents from giving information about you to anyone in a manner that would violate any applicable law or privacy policy.

We do not provide information about our Clients to anyone without first verifying who they are and whether they may have legal access to the information. We train our employees to protect information about our Clients.



We also have a disaster preparedness program to secure Confidential Information in case of a natural disaster, hazards or threats. We maintain physical, electronic, and procedural safeguards that comply with standard industry best practices to guard nonpublic personal information.

Should TeraVerde become aware of any violation of this policy, it will: a) take appropriate actions to address incidents of unauthorized access to Client Confidential Information and PII and any other confidential and proprietary information of our Clients; b) notify our Clients as soon as possible of any violation; and c) appropriately assist our Clients to expeditiously implement a response program for such violations.

#### Maintenance of Accurate Information

We strive to maintain accurate, current and complete information about our Client's relationship with us. We also respond to requests to correct inaccurate information in a timely manner.

#### Ending Relationship

If a Client ends a relationship with us, or if we end our relationship with a Client, we will adhere to the privacy policies and practices as described in this notice.