

Tribute Book Privacy Policy

Last updated: March 17, 2022

Tribute is committed to protecting your personal information. This Privacy Notice describes the personal information that we collect about you, how we use and disclose this information, and the steps we take to protect this information. For purposes of this Privacy Notice, (a) “personal information” means any information that relates to you as an individual and could reasonably be used to identify you and (b) “Tribute,” “we,” “us,” and “our” each refer to the applicable legal entity referred to in Section IX of this Privacy Notice. This Privacy Notice applies to our collection and use of personal information through this website and any related websites, applications, tools, or platforms (the “Services”), as well as through any other means, in each case, where a link or reference to this Privacy Notice is provided at the time of collection.

I. Our Services

Tribute’s primary business is as a software-as-a-service provider of funeral technology services, including memorial product creation, payment processing, search engine optimization, marketing and ecommerce services, to funeral homes and other funeral professionals (our “Clients”). In connection with this facet of Tribute’s business, Tribute collects and stores personal information regarding individuals who visit and utilize certain functions or features of our and our Clients’ websites (“End Users”). This Privacy Notice applies to Tribute’s collection and use of Client and End User personal information but not to our Clients’ use of such personal information.

Tribute also maintains an online presence, including an ecommerce store, offering sales of Tribute Books and related products, and a web repository, the Tribute Archive, containing obituaries with a link to Tribute Books, and other funeral-related content in connection with which personal information may be collected from individuals (“Tribute Users”). This Privacy Notice also applies to Tribute’s collection and use of personal information from Tribute Users and other individuals who interact directly with Tribute.

II. Personal Information We Collect

When you access or use the Services or otherwise interact with us, whether as a Client, End User, Tribute User or other individual, we may collect certain categories of personal information about you from a variety of sources.

Categories of personal information that we may collect from you directly include:

- Contact information (for example, name, phone number, mailing address, email address)
- Payment-related details (for example, billing address and other credit card details)

- Account information (for example, username and password and transaction history)
- Communications (for example, submitted questions or other posts, marketing preferences and user generated content like photos and videos)

Categories of personal information that we may collect automatically when you use the Services include:

- Technical information (for example, browser type, IP address, cookies, and operating system)
- Usage information (for example, pages visited, search terms entered, frequency of visits and transaction information, such as what products you purchase)

Categories of personal information that we may collect from other sources, including from our Clients in connection with their use of the Services, include:

- End User contact information (for example, name, phone number, mailing address, email address)
- End User payment-related details (for example, billing address and other credit card details)
- End User funeral contributions, including tribute video data, data entered in funeral register books, obituaries and posts and comments
- End User funeral administration data, including life insurance claim forms and affidavits to ensure dispersal of funds to cover funeral costs and data required to file death certificates

We use Google Analytics to collect and analyze information about use of the Services and to help us understand activities and trends. This includes use of Google Analytics performance reports relating to demographics and interests. As part of this service, we share a unique identifier with Google Analytics. You may opt-out of Google Analytics by installing a Google Analytics opt-out browser add-on available for download here: <https://tools.google.com/dlpage/gaoptout>.

Finally, we may collect personal information pursuant to a legal or contractual requirement, and failure to provide such information may impact our ability to fulfill our obligations.

III. How We Use Your Personal Information

We may use the personal information we collect for the following purposes:

- **Provide and improve the Services.** We may use your personal information to provide and improve the Services, including to fulfill your orders and requests, to create

your Tribute Books, and to post your photos, videos, comments, and other funeral contributions. We may also use your personal information for the administration of our business, for business development purposes, and to fulfill our contractual obligations.

- **Risk mitigation and security.** We may use your personal information for risk mitigation and security purposes, including to maintain the privacy and security of our data, to conduct internal audits or investigations, for data security testing and business continuity planning purposes, and to ensure the safety and security of our and our affiliates' Clients, staff and assets.
- **Communication and marketing.** We may use your personal information to communicate with you about the Services, respond to your questions, or offer you additional products or services.
- **Comply with the law and exercise our rights.** We may use your personal information as reasonably necessary to assess and ensure compliance with applicable laws, legal requirements, and company policies; to protect our and our affiliates' assets or to investigate or defend against any claims of illegality or wrongdoing (including to obtain legal advice or to establish, exercise or defend legal rights); and in response to a court order or judicial or other government subpoena or warrant.
- **Corporate transaction.** We may use your personal information in the event we undertake or are involved in or contemplating any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event.

We may also aggregate, anonymize, or otherwise de-identify your personal information and use it for any purpose permitted by applicable law.

Some jurisdictions require that we determine a "lawful basis" for processing personal information. Where such requirements exist, we rely on the following lawful bases for our processing activities: that you have consented to the processing; that the processing is necessary for the performance of our contract with you; that we have a legal obligation; or that we have a legitimate interest in providing and improving the Services and managing our business operations. Our Clients determine the lawful basis for processing End User personal information.

IV. Use of Cookies

When you use the Services, we may send one or more cookies (which are small text files containing a string of alphanumeric characters) to your computer or mobile device, to help analyze our web page flow, customize our content, measure promotional effectiveness, and promote trust and safety. You are always free to decline our cookies if your browser permits, although doing so may interfere with your ability to use the Services or certain features of the Services. We may also use Google Analytics or a similar service that uses cookies to help us analyze how users use the Services.

We may also allow certain third parties such as advertising, analytics providers, and widget providers to place cookies in order to collect information about your online activities over time and across different websites when you access or use the Services. Currently, various browsers offer a “Do Not Track” option, but there is no standard for how “Do Not Track” should work on commercial websites. Due to the lack of such standards, the Services, including this website, do not respond to “Do Not Track” consumer browser settings.

V. How and When We Disclose Your Personal Information

We may disclose your personal information to the following categories of recipients, to be used only for legitimate purposes in keeping with this Privacy Notice:

- **Group companies and affiliates.** We may disclose, share, or transfer your information to any business entity that is part of our corporate family.
- **Clients.** We may share your information with our Clients in connection with our Clients’ provision of services to you and/or their customers.
- **Service providers and professional advisors.** We may disclose your information to third party vendors who provide services in support of our business operations, such as website development and hosting, payment processing, recruitment and hiring, marketing management, service optimization, vendors that fulfill orders for funeral-related items such as flowers, and data analytics. We may also disclose your personal information to professional advisors such as our attorneys, accountants, and ours or End Users’ insurance providers.
- **Parties involved in a corporate transaction.** We may disclose your information to relevant third parties in the event of a divestiture, merger, consolidation, or asset sale, or in the unlikely event of a bankruptcy.
- **Law enforcement or other governmental entities.** We may disclose your information if required to do so by law or if we believe in good faith that such action is necessary to comply with the law, prevent unlawful activity, defend our rights, or maintain security.
- **Other third parties with your consent.** We may disclose your information to any other third party where you have provided consent to such disclosure.

VI. Security, Retention & Transfer of Personal Information

We have implemented and maintain commercially reasonable and appropriate technical and organizational measures designed to protect the confidentiality, integrity, and security of your personal information. Please note, however, that no security measures are perfect or impenetrable. We therefore cannot guaranty and do not warrant the absolute security of your personal information. We retain your personal information for no longer than reasonably

necessary to fulfill the purposes for which we collected it or to comply with the law, prevent fraud, facilitate an investigation, defend against legal claims, or exercise our legal rights.

Depending on your location, the personal information we collect about you may be transferred to a jurisdiction that does not provide the same level of protection of personal information as the jurisdiction in which you reside. Among other places, personal information may be transferred to, and stored in, Canada, Australia and the United States. Transfers from the European Union to Canada are made pursuant to European Commission Decision 2002/2/EC, which determined that Canada is considered as providing an adequate level of protection of personal information.

VII. Your Choices & Rights

You may decline to share certain information with us, in which case we may not be able to provide to you some of the features and functionality of the Services. Once you have registered for an account with us, you may update or correct your profile information and preferences at any time by accessing your account preferences page through the Services. If you do not wish to receive marketing communications from us, you can opt-out by using the unsubscribe process provided or described in any such communication, but you may still receive transactional or administrative communications from us. Although your changes are reflected promptly in active user databases, we may retain all information you submit for a variety of purposes, including backups and archiving, prevention of fraud and abuse, and analytics.

Depending on your location and subject to local law, you may have certain rights with respect to your personal information. These may include: the right to access, correct, and delete your personal information; the right to restrict or object to our use of your personal information; and the right to receive a portable copy of your personal information in a usable format. If you provide us with consent to use your personal information, you may withdraw that consent at any time, however, such withdrawal will not impact the lawfulness of our use of your personal information based on your consent up to that point.

To make a request related to your personal information or otherwise exercise your rights, you may contact us using the contact information provided below. In order to fulfill your request, we may require additional information from you. We will respond to requests within the relevant time periods established by applicable law. We are committed to finding a fair and reasonable resolution to any request, concern, or complaint you bring to our attention. However, if you are unsatisfied with our response to your request, you may have the right to lodge a complaint with applicable governmental authorities, subject to local law.

VIII. Children's Privacy

We do not knowingly collect or maintain information from persons under 16 years of age ("children"), and no part of the Services is directed to children. If you are under 16 years of age, then please do not use or access the Services at any time or in any manner. If we learn that

information has been collected through the Services from children and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child has provided us with personal information without your consent, please contact us using the contact information below to request that we delete the information from our systems.

IX. Applicable Entity

All references to “Tribute,” “we,” “us” or “our” in this Privacy Notice refer to the applicable entity specified in the table below, which is based on the location of your primary residence (or if you are a business entity, your domicile).

Your Primary Residence or Domicile	Applicable Entity
Canada	Tribute Technology Canada, ULC, a British Columbia unlimited liability company
United States and the rest of the world	Tribute Technology US, LLC, a Delaware limited liability company

X. California Residents

Supplemental to the above, the following additional information pertains to California residents only:

- Collection and Use of Personal Information
- Categories of personal information collected about California residents in the past twelve months include identifiers, other identifying information, characteristics of protected class, commercial information, Internet or other electronic network activity information, professional or employment-related information, education information, and inferences drawn from such information. For examples of specific pieces of personal information collected, please see the “Personal Information We Collect” section above.
- Categories of personal information disclosed for a business purpose about California residents in the past twelve months include identifiers, other identifying information, characteristics of protected class, commercial information, Internet or other electronic network activity information, professional or employment-related information, and education information.

We do not sell personal information, nor do we share personal information with third parties for those third parties’ direct marketing purposes.

XI. Your California Privacy Rights

As a California resident, you have the following rights with respect to your personal information:

- You have the right to request to know about personal information collected, disclosed, or sold.
- You have the right to request the deletion of personal information.
- You have the right to opt-out of the sale of your personal information at any time. Note that we do not currently sell personal information.

Finally, you have the right to not be discriminated against as a result of exercising your privacy rights. Accordingly, unless permitted by law, we will not deny you goods or services, charge you different prices or rates for goods or services, provide you a different level or quality of goods or services, or suggest you will receive a different price or rate for goods or services or a different level or quality of goods or services.

To exercise your rights, you may contact us using the contact information provided below or call 1-866-834-4420. In order to fulfill your request, we may require additional personal information for purposes of verifying your identity. If you make a request through an authorized agent, we may require additional information to verify your authorization of the agent.

XII. Changes to Privacy Notice

We reserve the right to make changes to this Privacy Notice at any time, without notice. We will notify you about changes that significantly impact our use of your personal information by placing a prominent notice on this website or by sending you an email. Please revisit this page periodically to stay aware of any changes to this Privacy Notice. For the avoidance of doubt, disputes arising hereunder will be resolved in accordance with the Privacy Notice in effect at the time the dispute arose.

XIII. Contact Us

Please contact us with any questions, comments or concerns about this Privacy Notice or our use of your personal information by email at support@tributebook.com or by mail at:

Tribute Technology
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