PRIVACY POLICY

#### THE OASIS GROUP PRIVACY POLICY

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The Oasis Group is committed to safeguarding the confidential information of our clients. We hold all information provided to us in the strictest confidence. These records include all information we collect from you in connection with any of the services provided by The Oasis Group (collectively, our "Services"). We do not provide your information to mailing lists vendors or solicitors for any purpose. We do not disclose information to non-affiliated third parties, except as required by law. We only use information that you provide to complete a service or transaction which you have requested. We maintain a secure office and computer environment to ensure that your information is not placed at risk.

This Privacy Policy explains how we collect, share, use, and protect information when you visit or use this online service and any other online services offered by The Oasis Group that link to or reference this policy (collectively, our "Services"), including our website, newsletter, as well as any interactions you may have while viewing content provided through one of The Oasis Group's digital advertising campaigns.

For purposes of this Agreement, "Site" refers to the Company's website, which can be accessed at <u>www.theoasisgrp.com</u>

"Service" refers to the Company's services.

The terms "we," "us," and "our" refer to the Company.

"You" refers to you, as a user of our Site or our Service.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

#### I. INFORMATION WE COLLECT

We only collect and process what is necessary for the purposes set out in this Privacy Policy or in any local supplement or notice. We collect information when you give it to us (such as when you utilize our services or hire us to provide you with consulting services), when you give us permission to obtain it, or when we obtain it from other sources such as from the business partners or third parties that makes our service available to you.

We collect "Non-Personal Information" and "Personal Information." Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. Personal Information includes your name, email, phone number and company name which you submit to us through the registration process at the Site.

# Information collected via Technology:

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To activate the Service, you do not need to submit any Personal Information other than your email address. To use the Service thereafter, you do not need to submit further Personal Information. However, in an effort to improve the quality of the Service, we track information provided to us by your browser or by our software application when you view or use the Service, such as the website you came from (known as the "referring URL"), the type of browser you use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user's browser from our servers and are stored on the user's computer hard drive. Sending a cookie to a user's preferences when utilizing our services, both on an individual and aggregate basis. For example, the Company may use cookies to collect the following information:

- Identifying if you are signed in to the Website;
- Testing content on the Website;
- Storing information about your preferences;
- Recognizing when you return to the Website
- Analyzing our web traffic using an analytics package;

The Company may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser. For example, we store a persistent cookie to track settings or preferences that you saved on the Site. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent.

## Children's Privacy:

The Site and the Service are not directed to anyone under the age of 13. The Site does not knowingly collect or solicit information from anyone under the age of 13 or allow anyone under the age of 13 to sign up for the Service. If we learn that we have gathered personal information from anyone under the age of 13 without the consent of a parent or guardian, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at Hello@TheOasisGrp.com.

## II. HOW WE USE AND SHARE INFORMATION

## Personal Information:

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company, such as the vendors for our email communications who are provided access to a user's email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy.

In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers.

We may share Personal Information with outside parties if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to comply with any court order, law, or legal process, including to respond to any regulatory or governmental request; to enforce applicable Terms of Service, including investigation of potential violations; address fraud, security or technical concerns; or to protect against harm to the rights, property, or safety of our users or the public as required or permitted by law.

#### Newsletters:

The Company currently offers its users the chance to sign up for e-mail newsletters that provide additional information about wealth management technologies, sales skills, and coaching. After users subscribe to one or more newsletters, they will begin to receive said newsletters on a regular basis as well as other infrequent, unscheduled announcements from the company. Users' email addresses are collected and used by the Company for the purpose of distributing these newsletters and unscheduled announcements about the Company. Users can unsubscribe to our newsletters at any time by following the unsubscribe instructions at the bottom of every newsletter.

## Non-Personal Information:

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information to track trends and analyze use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers, and other third parties at our discretion.

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets; your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes to the Site so that you may opt out of the new information practices. We suggest that you check the Site periodically if you are concerned about how your information is used.

## **III. HOW WE PROTECT INFORMATION**

We implement security measures designed to protect your information from unauthorized access. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls, and secure socket layer (SSL) technology. However, these measures do not guarantee that your information will not be accessed, disclosed, altered, or destroyed by breach of such firewalls and secure server software. We limit employee and agent access to information only to those who have a business or professional reason for access. By using our Service, you acknowledge that you understand and agree to assume these risks.

# The Oasis Group

# IV. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional e-mail. You can also indicate that you do not wish to receive marketing communications from us here.

Please note that notwithstanding the promotional preferences you indicate by either unsubscribing or opting out in the unsubscribe footer of our email communications, we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy. You may also send us an email at Hello.TheOasisGrp.com to request access to, correct, or delete any personal information that you have provided to us.

## V. LINKS TO OTHER WEBSITES

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

## VI. CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our Site. Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.

## VII. YOUR CALIFORNIA PRIVACY RIGHTS

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of "Personal Information," as well as rights to know, access, delete, and limit sharing of Personal Information. For purposes of this section, "Personal Information" has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. Due to the nature of our Services, much of the information we collect is exempt from the CCPA because it is covered by federal or state financial and/or data privacy laws. To the extent that we collect Personal Information that is subject to the CCPA, your rights as a California resident to request access and deletion of that information are as described below.

As a California resident, you have the following rights listed below. However, these rights are not absolute, and in certain cases we may decline your request or comply with it in a more limited way than you anticipated, as permitted by law.



- You may request the following information about how we have collected and used your Personal Information during the past 12 months:
  - Categories of Personal Information we have collected.
  - Categories of sources from which we collected Personal Information.
  - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third-party recipient.
  - Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third-party recipient.
- You may request a copy of the Personal Information that we have collected about you during the past 12 months.
- You may request in certain circumstances that we delete Personal Information that we have collected directly from you.
- If we sell your Personal Information, you may opt out.
- You are entitled to exercise the rights described above free from discrimination.

In order to process a request to know about or delete Personal Information we collect, disclose, or sell, we must verify your request.

#### VIII. CONTACT US

If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to Hello@TheOasisGrp.com

Last Updated: This Privacy Policy was last updated on June 28, 2023.