



Data Ownership and Customer Privacy Policy

Data Ownership and Authentication

It is a primary objective of iPaladin to offer our customers the highest level of data ownership possible. This means that the Customer designated under the Subscription Services Agreement is, as between Customer and iPaladin, the sole legal owner of any and all information stored within their iPaladin Family Database. It is our business policy to verify the identity of the Customer before fulfilling any and all requests in order to protect against fraudulent or unauthorized attempts to gain access to information. During the subscription initiation process, we will confirm the required controls for verification of identity.

To further protect a Customer's digital assets, iPaladin provides tools to allow Customer to manage the issuance and deactivation of Customer's Family Administrator accounts. In the event a Family Administrator account needs to be disabled, the Customer will need to submit the request to iPaladin directly. By default, Family Administrators have full access to all information in the Family Database, and full permissions to view, edit, add & delete any information in the system. They also are responsible for adding, managing, and controlling the access and permissions of all Regular Users.

Privacy Policy

Another primary objective of iPaladin is to respect the privacy of our customers. We provide this data privacy policy to explain how customer information is collected, used, and shared by iPaladin and the available choices you have with respect to your personal information.

COLLECTION OF INFORMATION

We provide a cloud-based application that allows you to host and store documents and other information as part of your Family Database. The iPaladin application is a hosted service, which means that we and our service providers host the content you store in your Family Database. However, the application has been designed to limit our Company's exposure to the content of your Family Database. As your Subscription Administrator, we do not provide individual Company employees with readable access to records or content stored within your Family Database.

To operate and manage the services and our informational website, we do have access to and use the following categories of personal information:

- Information you provide directly to us, such as when you open an account or contact us through our website. This includes:
 - o Subscription information, such as the name and contact information for the Customer and the Customer's Family Administrators; Administrator and User authentication credentials; payment information; geographic information, such as your country and postal code; and other information provided during the subscription initiation and renewal process;

- o Correspondence you send to us; and
 - o Other information that you provide us.
- Information we collect automatically. We collect certain internet, electronic activity, and other information automatically when you access or use our informational website or the iPaladin application, such as for troubleshooting and fraud prevention purposes. This includes:
 - o Your device type; Internet protocol (IP) address; device and other unique personal or online identifiers; browser type and version; operating system and platform; and Internet service provider;
 - o Time zone setting, country, and language settings; and
 - o Date and time of your visit; website browsing history, such as information about the links you click and other information about how you use the website, and pages you visit before and after the website; and information about your usage of our other online services.

On our iPaladin website, we may aggregate or de-identify the information described above so that it does not identify you. Aggregated or de-identified data is not subject to this privacy policy. We may also collect information from other publicly and commercially available sources and combine it with data collected through the website.

USE OF INFORMATION

We use and otherwise process each of the categories of information identified above for the following business purposes:

- Provide users with services. This includes providing you with the information, products and services that you request from us and the features that you choose to use; and managing accounts and our relationship with you, including providing you with the information, products and services that you request from us, and notifying you about changes to our terms or privacy policy.
- Communicate with you. We send marketing and promotional communications by email — such as event invitations, newsletters, and updates about our services — where permitted, and we may use analytics to detect whether you open these emails and click the links in them so that we can improve them. You can opt out of marketing emails at any time by using the unsubscribe link included in every such email or by contacting us.
- Analyze use of our services. We analyze use of our services for purposes such as improving the website and our services and ensuring that content is presented in the most relevant and effective manner for you and for your device; administering the services, including troubleshooting, data analytics, testing, research, statistical and survey purposes; and keeping the services, website, business and users safe and secure.

- Comply with legal obligations. This includes using personal information to comply with applicable laws and regulations and to protect or exercise our legal rights or defend against legal claims.
- With your consent. We may use your information for any other purposes disclosed to you at the time we collect your information or with your consent.

DISCLOSURE OF INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the personal information we collect.

- Authorized third-party vendors and service providers. We share your information with third-party vendors and service providers that provide services to us for a variety of business purposes, such as data hosting, security and performance monitoring, and maintaining or servicing accounts. We require these vendors and service providers, including the artificial intelligence service provider described below, to protect your information with safeguards that provide at least the same level of protection as this privacy policy, and to use it only to provide services to us.
- Artificial intelligence service provider. The iPaladin application includes AARK™, an agentic AI assistant. When you use AARK™, your AARK™ conversation, including your questions and any information that appears in that conversation, is sent to Anthropic, PBC, which provides the AI model that powers AARK™. Anthropic processes this information to generate AARK™'s responses and does not use it to train its AI models. AARK™ acts only within the permissions of the logged-in user.
- Corporate affiliates. We may share your information with our corporate affiliates.
- Business transfers. We may share your information in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, or initial public offering, or in the unlikely event of bankruptcy.
- Legal purposes. We may disclose information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, safety, and security of the Company, our affiliates, users, or the public.
- With your consent. We may share your information for any other purposes disclosed to you at the time we collect your information or with your consent.

When you are no longer our customer, we continue to share your personal information as described in this notice.

COOKIES, WEB BEACONS, AND OTHER INTERNET TECHNOLOGIES

We, as well as certain third parties that provide content and other functionality on our website, may use cookies, web beacons, and other similar technologies. For example, we may use cookies on our website to store your preferred country, language selection, and other website preferences. We also may use cookies to collect information about how you use our website, such as which pages you visit regularly. These cookies do things such as tracking page load, site response times, and error messages. Our website uses HubSpot analytics cookies and

Google Analytics to understand how visitors use the site, and Google Ads and LinkedIn advertising tags to measure and improve our advertising. These and other third parties may collect certain information about your use of the website through cookies and similar technologies, and this information may be collected over time and combined with information collected across different websites and online services.

Please consult your browser settings and mobile settings for choices that may be available to you to limit cookies. Depending on your settings, you may not be able to take advantage of all of the features of the website.

In addition, some of the third-party companies participate in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising. To learn more, please click [here](#) or [here](#).

We do not use third-party cookies or tracking technologies within the iPaladin application, although we may use first-party cookies to help us track your preferences and analyze performance, as described above.

Do-Not-Track Signals and Similar Mechanisms. Some mobile and web browsers transmit “do-not-track” signals. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

SECURITY

We maintain reasonable administrative, technical, and physical safeguards designed to protect the personal information we collect, including transmitting information submitted through our website over encrypted connections. No method of transmission or storage over the Internet is completely secure, however, and we cannot guarantee absolute security.

DATA RETENTION AND DELETION

We keep information for as long as it is needed for the purposes described in this privacy policy. Content in a Family Database is kept for as long as the Customer’s subscription is active. When a subscription ends, we make the Family Database content available to the Customer and then delete it from our systems, except where the law requires us to keep it. Subscription, account, and correspondence information is kept while the account is active and afterward for as long as needed for billing, legal, tax, and record-keeping purposes. Information we collect automatically through our website is kept for as long as needed for the analytics and security purposes described above. Deleted information may remain in backup copies until those backups are overwritten in the ordinary course.

To request deletion, contact us at info@ipaladin.com or 813-616-5950. You may make this request at any time, wherever you live. We will verify your identity before acting on the request, as described under “Data Ownership and Authentication.” Because the Customer owns the Family Database, a request to delete Family Database content must come from or be confirmed by the Customer. A Regular User may ask to have their own account and personal information deleted, and we will coordinate that request with the Customer’s Family Administrators. We will confirm to you when the deletion is complete. We may keep information that the law requires us

to keep or that we need to establish, exercise, or defend legal claims, and we will tell you if that applies.

YOUR RIGHTS AND CHOICES

You or your authorized agent may be entitled to access, correct, or delete information that we have collected about you in accordance with applicable law. We may not be required to fulfil your requests in certain circumstances. To exercise these rights, please contact us using the information below under “Contact Us.” Anyone may ask us to delete their information at any time, as described under “Data Retention and Deletion” above.

CHANGES TO THIS POLICY

We may update this privacy policy from time to time. When we do, we will post the updated policy on this page and change the Last Updated date below.

CONTACT US

We are confident that you will not find a safer, more secure place to house your Digital Family Office than with iPaladin. If you have any further questions on security, privacy, or access into iPaladin, please contact us at: 813-616-5950 or by email at info@ipaladin.com.

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