

# Privacy Policy

Celerative, Inc. ("Alto", "us", "we", or "our") operates the [www.goalto.io](http://www.goalto.io) website (the "Site") and provides staffing and payment services (the "Service"), which are available through the Site.

This Privacy Policy informs you of how information about you is collected, used, and disclosed by us when you access our Site and our Service. By using the Service, you agree to the collection and use of your information in accordance with this policy.

Unless otherwise defined in this Privacy Policy, capitalized terms used in this Privacy Policy have the same meanings as in our Terms of Service.

## Information Collection

While accessing our Site and/or using our Service, we collect and store certain information about you. Some of this information can be used on its own or in combination with other information to identify you ("Personal Information"). Below is a list of types of Personal Information that we may collect and use when you apply for, or use any of our products or services.

**Contact:** Your name, addresses, e-mail addresses, phone numbers, and other ways in which to contact you.

**Payment:** Payment card number, expiration date, security code, and billing address.

**Transactional:** Details about the transactions you carry out and the payments to and from your accounts with us.

**Contractual:** Details about the products or services we provide to you.

**Locational:** Data we get about where you are. This may come from your mobile phone or the place where you connect a computer to the internet. It may also include locations where you used your card.

**Behavioral:** Details about how you use our Services and Site.

**Technical:** Details on the devices and technology you use.

**Communications:** What we learn about you from communications between us.

**Public and third-party records:** Details about you that are in public records and information about you that is publicly available on the internet. We also collect information about you that we receive from other companies, such as (without limitation) credit references or fraud protection agencies (see below for more information).

**Usage Data:** Other data about how you use our products and services.

**Documentary data:** Details about you that are stored in documents in different formats, or copies of them. This could include things like (without limitation) your passport, driver's license, photographs, or birth certificate.

**Consents:** Any permissions, consents, or preferences that you give us.

## Where we collect personal information

We may collect personal information about you or your businesses from any of these sources:

- Data we collect when you use our products or services
  - Payment and transaction data
  - Profile and usage data (including, without limitation, your security details, app or your website browser settings, marketing choices, and data from the devices you use to connect to our Platform so we can provide you with our products or services).
  - We also use cookies and other internet tracking software to collect data while you are using our website or mobile apps (or any other device as described in more detail below).
- Data from third parties
  - Companies and business partners that introduce you to us.
  - Our service partners, such as PSP partners as defined in Alto's [terms](#).
  - Our third-party vendors, including (without limitation) those that help us authenticate your identity.
  - Social networks and other technology providers (for instance, when you click on one of our Facebook or Google adverts).
  - Fraud prevention agencies.
  - Other financial services companies (to fulfill a payment or other service as part of a contract [which they have] with you, or to help prevent, detect and prosecute unlawful acts, money laundering, and fraudulent behavior)
  - Public information sources such as (without limitation) Companies House
  - Third-party agents, suppliers, sub-contractors, and advisers.
  - Market researchers.
  - Firms providing data services.
  - Government, law enforcement agencies, authorities, and regulatory bodies to help Alto comply with its legal obligations.

## Cookie Use

We use cookies to improve your user experience, optimize our websites and render them more user-friendly.

By using the website, you agree to our use of cookies in accordance with this policy.

Cookies are small text files that are placed on your computer by the websites you visit. They are widely used in order to allow websites to work properly, remember your preferences, improve user experience and provide information to the owners of the site.

We mainly use cookies that are necessary for the proper functioning of the website, as well as for providing you with an enhanced user experience. These types of cookies may include, but are not limited to:

**Necessary cookies:** These cookies are essential in order to enable you to navigate around the web pages and the various features. Without these cookies, the services you may have requested cannot be provided.

**Preferences cookies:** These cookies allow our website to remember information that changes how the website behaves or looks, like your preferred language or the region you are in.

**Statistic cookies:** These cookies collect information about how you use the website, for example, which pages are visited the most often as well as if any error messages may have occurred. The information collected remains anonymous and does not include any

identifiable information about the website visitor.

Marketing cookies: These cookies are used to deliver advertisements more relevant to you and your interests. These are generally placed by advertising networks, such as Google. We do not have third-party advertising on our website, so we do not use targeting cookies for advertising purposes. We may use them, however, for gathering analytics and intelligence about the site. These cookies only use anonymous identifiers and have no way of associating identifiable users.

Third-party cookies: Some cookies we use are from third-party companies, which provide us with web analytics and intelligence about our websites. The type of information collected by these cookies mostly includes how a visitor has interacted on our website.

This site uses Google Analytics, which is an analysis tool provided by Google Inc. ("Google"). They use their own cookies to help us better analyze how users use this site, such as the pages you visit, the links you click on, and how long you are on our site. For more information on how Google collects and uses information on our behalf, please refer to their privacy policy. Other third-party cookies: We may use various social media and other third-party features on our website including Facebook, Twitter, Pinterest, LinkedIn, embed buttons from YouTube, Intercom, Logrocket, Sentry, Calendly, Paypal, Braintree, Stripe, and Heap. These features may involve the relevant companies using cookies or linking your visit with cookies previously placed by them on your computer in order for them to collect information relating to your visit to our website or your interaction with their services or otherwise. Click the links shown above for further information about the specific features and those companies' cookie/privacy practices generally as well as to opt out where this is possible.

The site contains electronic images known as web beacons (sometimes called trackers). They allow us to count the number of users who clicked on an advertisement for our products or services from a third-party site. Web beacons collect only specific information, such as the cookie number, time and date of visit, and a description of the page on which the web beacon is installed.

It is not possible to opt out of web beacons used on web pages, you will not be able to accept or decline them. However, because we use web beacons together with cookies, you can limit their use by deleting cookies or changing their settings in your browser.

You can manage your cookies settings to clear or block specific cookies, such as third-party cookies, or all cookies. However, if you block all of the cookies that we use, it may affect your user experience and result in the website becoming unusable. You can access these settings via our cookie banner, or in your browser by going to the browser settings; this option should be available for most browsers. Please keep in mind that by clearing all cookies, your website preferences may be lost, including your ability to opt-out of enabling cookies as this function itself requires the placement of a cookie on your device.

## Information Use

Below is a list of the ways that we may use your personal information and our reasons for doing so:

What we use your personal information for	Our reasons
Serving you	
<ul style="list-style-type: none"><li>Managing our relationship with you or your business</li><li>Developing and carrying out marketing activities</li><li>Studying how our customers use products and services from Alto</li><li>Communicating with you about our products and services</li></ul>	<ul style="list-style-type: none"><li>Fulfilling Alto's contract with Users</li><li>When it is Alto's legal duty</li><li>When Users consent to it</li><li>When it is in Alto's legitimate interest:<ul style="list-style-type: none"><li>Keeping our records up to date</li><li>Working out which of our products and services may</li></ul></li></ul>

	<p>interest you and telling you about them</p> <ul style="list-style-type: none"> <li>○ Developing products and services, our pricing for them, and types of customers that may want to use them</li> <li>○ Asking for your consent when we need it to contact you</li> </ul>
<p>Improving our business</p>	
<ul style="list-style-type: none"> <li>● Testing new products</li> <li>● Improving our products and services</li> <li>● Managing how we work with other companies that provide services to us and our customers</li> <li>● Developing new ways to meet our customers' needs and grow our business</li> </ul>	<ul style="list-style-type: none"> <li>● Fulfilling Alto's contract with Users</li> <li>● When it is Alto's legal duty</li> <li>● When Users consent to it</li> <li>● When it is in Alto's legitimate interest: <ul style="list-style-type: none"> <li>○ Being efficient about how we fulfill our legal and contractual duties</li> <li>○ Asking for your consent when we need it to contact you</li> <li>○ Developing products and services, our pricing for them, and types of customers that may want to use them. This may include sending questionnaires and surveys as well as requesting feedback from existing customers</li> </ul> </li> </ul>
<p>Marketing and events-related communications</p>	
<ul style="list-style-type: none"> <li>● Communicating Alto's products, and services, inviting you to participate in events or surveys or otherwise communicating with you for marketing purposes with the consent requirements of applicable law</li> </ul>	<ul style="list-style-type: none"> <li>● When Users consent to it</li> <li>● When it is in Alto's legitimate interest: <ul style="list-style-type: none"> <li>○ Being efficient about how we fulfill our legal and contractual duties</li> </ul> </li> </ul>
<p>Managing our operations</p>	
<ul style="list-style-type: none"> <li>● Delivering Alto's products and services</li> <li>● Making and managing payments</li> <li>● Managing fees and charges due on user accounts</li> <li>● Collecting and recovering money that is owed to Alto</li> </ul>	<ul style="list-style-type: none"> <li>● Fulfilling Alto's contract with Users</li> <li>● When it is Alto's legal duty</li> <li>● When Users consent to it</li> <li>● When it is in Alto's legitimate interest: <ul style="list-style-type: none"> <li>○ Being efficient about how we fulfill our legal and contractual duties</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>Complying with rules and guidance from regulators</li> </ul>
Crime prevention and managing risks	
<ul style="list-style-type: none"> <li>Identifying, investigating, reporting, and preventing fraud, money laundering, and other crime</li> <li>Managing risk for us and our Users</li> <li>Complying with laws and regulations</li> <li>Investigating and responding to complaints and feedback</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling Alto's contract with Users</li> <li>When it is Alto's legal duty</li> <li>When Users consent to it</li> <li>When it is in Alto's legitimate interest: <ul style="list-style-type: none"> <li>Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect</li> <li>Being efficient about how we fulfill our legal and contractual duties</li> <li>Complying with rules and guidance from regulators</li> </ul> </li> </ul>
Business management	
<ul style="list-style-type: none"> <li>Operating our business in an efficient and proper way, including managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit</li> <li>Carrying out our obligations arising from and exercising our rights set out in our contracts</li> </ul>	<ul style="list-style-type: none"> <li>When it is Alto's legal duty</li> <li>When it is in Alto's legitimate interest: <ul style="list-style-type: none"> <li>Being efficient about how we fulfill our legal and contractual duties</li> <li>Complying with rules and guidance from regulators</li> </ul> </li> <li>Fulfilling Alto's contract with Users</li> </ul>

## Communications

We may contact you with newsletters and other marketing information that may be of interest to you. You may opt out of receiving any, or all, of these marketing communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us. Please note that we may still send you transactional or administrative messages related to the Service even after you have opted out of receiving marketing communications.

## Information Sharing with Third Parties

We will only share your information with the third parties listed below for the purposes described above in the "Use of Your Information"

section unless otherwise noted at the point of collection:

- Third-party agents, partners, and service providers who are only permitted to use your information as we allow which may include contacting you on your behalf, and are required under law or contract to keep your personal information confidential. Information is shared to help us provide the Service.
- Government agencies and taxing authorities, as required to provide the Service, including but not limited to the Internal Revenue Service, state and local tax agencies, and state and federal regulatory agencies.
- Insurance carriers and other third parties, as needed to carry out the Benefits Service
- Banking and financial institutions.
- Certain parties as necessary to respond in good faith to the legal process where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.
- Legal and financial advisors and auditors
- The following third parties under the circumstances described below:
  - we may share business or personal information with credit bureaus, and we may share information with certain companies, banks, and organizations for purposes such as fraud prevention or determining eligibility for the Service;
  - if you participate in a referral program, the referral email and referral link sent to any Referred Leads may include your first name;
  - if there is a sale of Alto (including, without limitation, a merger, stock acquisition, sale of assets, or reorganization), or in the event that Alto liquidates or dissolves, we may sell, transfer, or otherwise share some or all of our assets, which could include your information, to the acquirer;
  - we may share de-identified personal information with academic institutions to perform research, under controls that are designed to protect your privacy—including requiring such institutions to operate under confidentiality agreements and mandating that published findings contain only de-identified and aggregated data;
  - from time to time, we may share reports with the public that contain anonymized, aggregate, de-identified information and statistics; and
  - we may share your information with certain other third parties with whom you, your Client, or your Client's accountant partner expressly authorize us to share your information.

## How long do we keep your personal information?

We will keep your personal information as long as you are a User of Alto.

We may keep your personal information for up to 10 years after you stop being a customer. The reasons we may do this are:

- To respond to a question or complaint, or to show whether we gave you fair treatment
- To study customer data as part of our own research
- To comply with legal rules that apply to us about keeping records. For example, the Money Laundering Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 require us to retain certain data for a minimum of 5 and a maximum of 10 years.
- We may also keep your data for longer than 10 years if certain laws mean that we cannot delete it for legal, regulatory, or

technical reasons.

## Security

The security of your Personal Information is important to us. However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you. You are also a key stakeholder in making sure that your Personal Information is protected. If you become aware of any breach of security or privacy, please contact us immediately.

## International Transfer

Information collected while you use the Site and/or Service, including your Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside the United States and choose to provide information to us, please note that we transfer the information, including your Personal Information, to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such Personal Information represents your agreement to that transfer.

## Link To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## Children's Privacy

We do not knowingly collect Personal Information from children under 13. If you are a parent or guardian and you learn that your Children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a child under the age of 13 without verifiable parental consent, we will take steps to remove that information from our servers.

## California Privacy Rights

This section provides additional details about the personal information we collect about California consumers as well as the rights of California consumers under the California Consumer Privacy Act (CCPA).

California residents that have an established business relationship with us can request a notice disclosing the categories of Personal Information we have shared with third parties during the preceding calendar year for the third parties direct marketing purposes. To make such a request from us, if entitled, please use the contact information listed below.

Your CCPA Rights and Choices. As a California consumer and subject to certain limitations under the CCPA, you have choices regarding our use and disclosure of your personal information:

- Exercising the right to know. You may request, up to twice in a 12-month period, the following information about the personal information we have collected about you during the past 12 months:
  - the categories and specific pieces of personal information we have collected about you;
  - the categories of sources from which we collected the personal information;
  - the business or commercial purpose for which we collected the personal information;
  - the categories of third parties with whom we shared the personal information; and
  - the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.
- Exercising the right to delete. You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.
- Exercising the right to opt-out from a sale. You may request to opt out of any “sale” of your personal information that may take place. As described in Advertising, we do not use, share, rent or sell the Personal Data of our Users’ Customers for interest-based advertising. We do not sell or rent the Personal Data of our Users, their Customers, or our Site visitors.

Non-discrimination. The CCPA provides that you may not be discriminated against for exercising these rights.

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and/or across different websites. We do not support Do Not Track requests at this time.

To submit a request to exercise any of the rights described above, you may contact Alto. We may need to verify your identity before responding to your request, such as verifying the email address from which you send the request matches your email address that we have on file. Authentication based on a government-issued and valid identification document may be required.

## Changes To This Privacy Policy

This Privacy Policy is effective as of the “LAST REVISED” date specified at the top of this Privacy Policy and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us and/or by placing a prominent notice on the Site and/or Service.

## Questions or Concerns Regarding the Privacy Policy

If you have questions or concerns regarding privacy using our Service, please contact us.