



Privacy Policy

The information we collect and how we keep it safe.

Last updated on October 28, 2019

Oranj is the trademark and trade name of Investment Grade Technologies, LLC, a Delaware limited liability, d/b/a Oranj (hereafter “Oranj,” “we,” “us,” or “our”). This privacy policy (the “Privacy Policy”) discloses the privacy practices of Oranj, the Oranj website located at <http://www.runoranj.com/> (the “Site”), and the Oranj software application and all related programs, mobile applications and services (collectively, the “Application”). This Privacy Policy was developed to help you understand what information we collect, as well as how we use and safeguard the information you provide to us on our Site. **By visiting this Site and/or using the Application, you agree to be bound by both this Privacy Policy and Oranj’s Terms of Use, located at www.runoranj.com/terms (“Terms of Use”), which are incorporated herein by reference.**

Information We Collect

We may collect personal information from you only when you choose to voluntarily provide to us such information, including without limitation: registering on our Site, utilizing the Application, opening an account, placing and paying for an order, participating in a survey and/or contest, reporting any problems with our Site and filling out a form or providing online banking or investing credentials. For example, when registering on our Site to use the Application, as appropriate, you may be asked to enter, among other information, your: name, email address, mailing address, phone number, password(s) and/or credentials for your investment, finance or bank accounts.

In addition to personal information you provide to us, we may receive personal information about you that you authorize third parties to provide to us, such as banks, credit bureaus, affiliates, or other companies. For example, if you register your bank account with us, we will aggregate your bank account information via our Site and/or Application in order to present it to you. We also may obtain personal information from third parties in order to verify your identity, to prevent fraud, or to help us identify products and services that may benefit you.

Personal information we collect may include, among other things, your name and address, Social Security number or taxpayer identification number, location information, date of birth, assets, income, account balances, investment activity and accounts at other institutions. Personal information does not include information that is anonymous, aggregated or is no longer identifiable to a specific person.

We do not knowingly collect, use or disclose personal information from children under the age of 13 without prior parental consent, except as permitted by the Children’s Online Privacy Protection Act. By using our Site, you represent that you are at least 13 years of age.

Generally, you can access and browse some areas of our Site without disclosing any personally identifiable information. However, we may collect and track information provided to us by your device, including the website you came from, browser type,



unique device identifiers, IP address, domain name, geo-location information, time and date of access and other information that does not personally identify you. We may use this information to individually customize its offerings and presentations if you submit your personal information.

Cookie Usage

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser. A cookie enables the site's or service provider's systems to recognize your browser and capture and remember certain information. We use cookies, pixel tags and other similar technologies to help us remember and process your login information, understand and save your preferences for future visits, keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our Site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

Most web browsers automatically accept cookies, but it is possible to change your browser setup to allow you to control whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to you. If your browser is set to reject cookies, the advertiser may not recognize you when you return to their site. Please review your browser manufacturer's help pages for assistance with changing your settings. If you would like more information about advertisers' use of cookies and about your option not to accept these cookies, please visit <http://www.networkadvertising.org/choices/>.

How We Use Your Information

Any of the information we collect from you may be used by us in any one or more of the following ways:

- To personalize your experience — Your information permits us to personalize our Site with your unique financial information to offer you targeted products, programs and services.
- To improve our Site — We continually strive to improve our Site offerings based on the information and feedback we receive from you by performing market research and product development, troubleshooting problems, and analyzing user behavior for marketing and promotions purposes.
- To improve customer service — Your information helps us to more effectively respond to your customer service requests and support needs.
- To process transactions — Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.
- To improve the quality of our business — Your information helps us perform business analysis for internal purposes to improve the Site, Application, and the services we offer.
- To send periodic emails — The email address you provide in your profile may be used to send you information and updates pertaining to your Oranj services, or to send you information at the request of other Oranj users or licensees to whom you disclose your email address, in addition to receiving occasional company



news, updates, and related product or service information. You may opt of receiving such emails as provided in the “Opting Out” Section provided herein.

When We May Share Your Information

As is common in the industry, we may use non-affiliated third parties from time to time to provide certain services, such as accessing and aggregating financial accounts. We do not disclose any non-public personal information provided by you or gathered by us to non-affiliated third parties, except as required or permitted by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities or violations of our Terms and Conditions, or for our everyday business purposes, such as to process transactions or service your account. We do not, without your permission, sell, publish or share your personal information to non-affiliated third parties for their marketing purposes. However, aggregate or anonymous non-personally identifiable visitor information may be provided to non-affiliated third parties for our product marketing, advertising, or other uses.

We reserve the right to disclose or report personal or account information to non-affiliated third parties in limited circumstances where we believe, in good faith, that disclosure is required under law, to cooperate with regulators or law enforcement authorities, and to protect our rights, safety, or property of us or of third parties. In addition, we may disclose information about you or your accounts to a non-affiliated third party at your request or if you consent in writing to the disclosure.

We may share personal information about you with our affiliates, including internal service providers, which perform services such as data aggregation and data normalization. Our affiliates, in turn, are not permitted to share your information with non-affiliated entities, except as required or permitted by law. **We may also share personal information about you with our attorneys, accountants, auditors, or persons assessing our compliance with industry standards, all of whom are not permitted to share your information with non-affiliated entities, except as required or permitted by law.**

If our company or our assets are acquired by another company, or in the event of a merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties, information concerning your relationship with us, including, without limitation, personal information that you provide. Such third parties will assume the rights and obligations regarding such information as described in this Privacy Policy.

How We Protect Your Information

Oranj takes your security seriously. To prevent unauthorized access, maintain data accuracy and ensure the appropriate use of information, we use reasonable industry-accepted technology and controls to protect your data from disclosure to unauthorized third parties.

We use secure Web standards (HTTPS, SSL) to keep your confidential information secure between your web browser and our servers. We never store your usernames and passwords for third party sites on our servers, even in encrypted form. We encrypt all



other personally identifiable information stored on our servers, including any Oranj credentials, connection information identifying where your information is stored with our third parties, and any transaction information.

To ensure your data remain secure, we and our vendors follow the ISO 27002 standard, a code of practice for information security. Your data is stored on servers located in secure facilities that have successfully passed a SAS 70 Type II audit and follow the ISO 27002 information security framework. We and our vendors are obligated to periodically submit to routine audits, including the physical security of our servers, network monitoring and security, and the security of our applications.

Please note, however, that use of the Internet and related computer systems is inherently vulnerable to unauthorized access or “hacking.” No guarantee can be given that all information you provide to us will not be accessed by unauthorized persons.

Links to Third Parties

Our Site may offer links to other websites, including links embedded in advertisements and links to various sources that are not under our control. Such links to other websites may have information policies and practices different from ours. In addition, certain companies associated with the Site may have their own privacy policies. We do not own or control such companies and websites and are not responsible for the privacy policies or practices or the content of websites that we do not own or control. We recommend that you carefully read the privacy policy of any third party website you visit.

Terms and Conditions

By using our Site and Application, you consent to the Terms of Use establishing the use, disclaimers and limitations of liability governing the use of our Site and Application.

Your California Privacy Rights

Under California law, website operators are required to disclose how they respond to web browser “do not track” signals or other similar mechanisms that provide consumers with the ability to exercise choice regarding the collection of personally identifiable information of a consumer over time and across third party websites and apps, to the extent the operator engages in that collection. At this time, we do not track our customers’ personally identifiable information over time and across third-party websites and apps; and therefore, we do not respond to Do Not Track (DNT) signals. This law also requires website and app operators to disclose whether third parties may collect personally identifiable information about their users’ online activities over time and across different websites and apps when the users use the operator’s website or app. We do not knowingly permit third parties to collect personally identifiable information about an individual consumer’s online activities over time and across different websites and apps when a consumer uses our Site. To learn more about how Do Not Track signals work, please visit <http://allaboutdnt.com/>.

California residents may request to review changes to his or her personally identifiable information as collected by Oranj by contacting Us at info@runoranj.com.



Opting-Out

If you no longer desire to use the services of our Application or Site, you may delete your profile within the Application or by submitting a request to info@runoranj.com. We will retain your personal information for as long as (i) your account is active or as needed to provide you services; and (ii) is necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the “unsubscribe” instructions included at the bottom of such emails.

If you would like information on how to opt-out of information collection practices in general, please visit <http://www.networkadvertising.org/choices/>.

Changes to Our Privacy Policy

We reserve the right to modify this Privacy Policy at any time and at our sole and absolute discretion. If we do decide to change our Privacy Policy, we will post those changes on this page. If we make a significant or material change in the way we use your personal information, the change will be posted on this page thirty (30) days prior to taking effect and subscribers will be notified via email. We encourage you to periodically review this page for the latest information on our privacy practices.

This Privacy Policy was last modified on 10/28/2019 and supersedes and replaces any prior Oranj Privacy Policy.

Contacting Us

If you have any questions regarding this Privacy Policy, you may contact us at info@runoranj.com or send a written request to 351 W. Hubbard St., Suite 501, Chicago, IL 60654.