

HARBOR

Privacy Principles

Last Updated: 30th of Sep 2017

Your privacy is important to us. This Privacy Policy explains how information about you is collected, used and disclosed by Harbor, Inc. and its subsidiaries and affiliated companies (Harbor). It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information. This Privacy Policy applies to information we collect when you use our services, use or access toharbor.com, Harbor applications, and other online services offered by Harbor that link to or reference this policy (collectively, our online services).The first part of this policy describes how we collect, use, and disclose personal information to provide the Harbor platform and Software distributed at Harbor. The second part of the policy describes how we collect, use, and disclose other information collected through our Services.

Our Pledge to You: We are committed to maintaining your trust and pledge the following:

Transparency.

We will keep you informed of our privacy practices. Keeping your information safe. While we cannot promise perfection, we have implemented security tools that are designed to safeguard your information in accordance with industry standards.

You are in the driver's seat. We will ask for your permission before we share your personal information with third parties, in accordance with this Privacy Policy.

Security

We take our responsibility to protect the privacy and confidentiality of your information, including personal information, very seriously. We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. If you have any questions about the security of your personal information, you can contact us at support@toharbor.com.

Collection of Information

Information You Provide to Us

We collect information you provide directly to us. For example, the types of personal information we may collect from you when you visit or use our online services include your name, email address, mailing address, social security number, telephone number(s), account numbers, user name and password.

Information We Collect Automatically When You Use the Online Services

In addition to the personal information described above, we may collect certain information about your use of our online services.

Log Information

We collect log information about your use of the online services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our online services.

Device Information

We collect information about the computer or mobile device you use to access our online services, including the hardware model, operating system and version, unique device identifiers and mobile network information.

Location Information

We may collect information about the location of your device each time you access or use one of our mobile applications or otherwise consent to the collection of this information.

Information Collected by Cookies and Other Tracking Technologies

Our third-party partners or we may use cookies (as well as web beacons or other technologies) to collect and store this and other information about your visit to, or use of, our online services. Cookies are small data files stored on your hard drive or in device

memory that help us improve our online services and your experience, and to see which areas and features of our online services are popular. Web beacons are electronic images that may be used in our online services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. We may later associate the usage and other information we collect online with personal information about you, as permitted or required by law. For more information about cookies, and how to disable them, please see "Your Choices" below.

Information We Collect From Other Sources

We may also collect information about you from additional online and offline sources including commercially available third-party sources, such as consumer reporting agencies, for the purposes of verifying eligibility and securely offering our services to you. We may combine this information with the personal and other information we have collected about you under this Privacy Policy.

Use of Information

We may use the information we collect from you for various purposes, including to:

help us deliver our Services; administer, evaluate and improve our business (including developing new products and services, improving existing products and services, performing data analytics, monitoring and analyzing trends, and performing accounting, auditing and other internal functions);

Communicate information to you at the request of our partners;

Manage our risks;

Market our Services and products;

Comply with and enforce applicable laws and regulations, relevant industry standards, contractual obligations and our policies; and carry out any other purpose for which the information was collected.

We may also use data that we collect on an aggregate or de-identified basis for various business purposes, where permissible under applicable laws and regulations.

Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy: with Harbor partners as part of the delivery of our Services to you;

With affiliates, consultants, and other service providers when we believe it will enhance the Services and products we can provide to you or for legal and routine business reasons. For example, we may share selected details when checking your identity for indicators of fraud during sign up or when providing alerts. These parties are authorized to use your personal information only as necessary to provide these services to us.

as required or permitted by law, such as to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, comply with a subpoena, bankruptcy proceedings, or similar legal process. For example, we may share information with regulatory authorities and law enforcement officials when we believe in good faith that such disclosure is necessary to comply with legal requirements. We may share information with third parties where appropriate to protect against fraud or verify or enforce our terms of use, our other rights, or other applicable policies.

In connection with a merger, acquisition, or sale of all or a portion of its assets; you may be notified via email and/or a prominent notice on our website of any change in ownership, uses of your personal information, and choices you may have regarding your personal information.

Between and among our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and with your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Your Choices

We provide you with relevant and appropriate choices regarding the sharing of personal information. We may give you choices regarding the sharing of personal information with affiliates and third parties. Choices you have about the sharing of your personal information will be described in the privacy policies or notices you receive in connection with the products or services you obtain from us.

We offer you the opportunity to access, update, and correct your information on file with us.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our online services.

We tell you when our privacy policies and practices change.

We may change this Privacy Policy from time to time. If we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new Last Updated date. All changes will become effective when posted unless indicated otherwise. If we make any material changes we may notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.