

Oroeco Privacy Policy

Date Last Revised: June 3, 2015

This privacy policy describes our policies on the collection, use, and disclosure of your information in connection with your use of our website, emails, and mobile applications (“Site”) and how we use that information in connection with our service offered through the Site (the “Service”). The terms “we”, “us”, “Oroeco”, “Oroeco.com” refer to Oroeco Inc., a Delaware corporation. When you use the Site, you consent to our collection, use, and disclosure of your information as described in this Privacy Policy.

Oroeco is committed to maintaining the confidentiality, integrity and security of any personal identity information about our users. The information addressed in this Privacy Policy includes “Personal Information,” which is information about you that is personally identifiable such as your full name, physical address or email address, telephone and fax number as well as “Non-Identifiable Information,” which is non-public information that may be associated with or linked to a specific Oroeco account but does not by itself permit the identification of individual persons (e.g., demographic, interest, or site usage information). This Privacy Policy does not pertain to any information that is publicly available on or through Oroeco.

Oroeco stresses its privacy and security standards to guard against identity theft and provide security for your Personal Information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges.

Your Privacy is not for sale

Oroeco uses and discloses your Personal Information as follows:

- to analyze site usage and improve the Service and Site;
- to deliver to you any administrative notices and communications relevant to your use of the Service;
- to fulfill your requests for certain products and services;
- for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
- to third parties that provide services to Oroeco;
- to enforce Oroeco’s Terms of Use; and
- as otherwise set forth in this Privacy Policy.

We limit the collection and use of your information

In general, we collect both Personal Information and Non-Identifiable Information that you submit voluntarily to Oroeco. We collect information that you submit during the process of creating or editing your account and user profile on the Site. For example, the registration and login process requires you to provide us with your name, email address, and password (collectively “Registration Information”). Using the Site through our

mobile application, we will collect your phone number as part of the registration information. Certain areas and features of the Site may require authentication information for Third Party Sites (such as Mint.com). In order to benefit from the full functionality of the Service, you also must provide your Third Party Site account credentials (“Account Credentials”) to allow Oroeco to access your account data at those other institutions (“Account Information”) for your use.

We may also request Non-Identifiable Information including year of birth, gender, and other demographic information. We also collect information from content that you submit during your use of the Site, such as comments or feedback, and other information you chose to submit, including information from other social networks that you choose to link to your account.

From time to time we may request other Personal Information to provide you with other benefits of the Service. In all such instances, you will be given the opportunity to provide or to decline to provide that information, and it will be used only for the stated purpose.

Oroeco may make anonymous or aggregate Personal Information and disclose such data in a non-personally identifiable in combination with Non-Identifiable Information to:

- Advertisers and other third parties for their marketing and promotional purposes;
- Organizations approved by Oroeco that conduct research into consumer spending, investment, and/or decision making behavior; and
- Users of the Service for purposes of comparison of their personal spending and/or investment situation relative to the broader community.

Such information does not identify you individually.

Access to your Registration Information, Account Credentials, Account Information and any other Personal Information you provide is restricted and used in accordance with internal procedures and safeguard governing access, in order to operate, develop or improve the Service. Employees may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. We may also use third party vendors or service providers to help us provide the Service to you, such as sending email messages on our behalf or hosting and operating a particular feature or functionality of the Service. Our contracts with these third parties outline the appropriate use and handling of your information and prohibit them from using any of your Personal Information for purposes unrelated to the product or service they're providing. We require such third parties to maintain the confidentiality of the information we provide to them.

In general, both the Personal Information and Non-Identifiable Information you submit to us is used to provide you access to Oroeco, to improve Oroeco, to better tailor the features, performance, and support of Oroeco and to offer you additional information, opportunities, promotions and functionality from us, our partners or our advertisers. For example, we may use and display your full name and email address when you send an email notification to a friend through Oroeco or the social network from which you have connected to Oroeco (such as in an invitation, or when sharing your content).

This Privacy Policy does not limit our use or disclosure of Non-Identifiable Information in any way, and we reserve the right to use and disclose Non-Identifiable Information to our partners, advertisers and other third parties at our discretion. Specifically, we may use any of the Non-Identifiable Information you provide or that we collect from you or third parties to assist us in recommending content or connections, and we may disclose Non-Identifiable Information to third parties who assist us in delivering you more relevant advertising and content.

Changes to your Registration Information

If your Registration Information changes during your subscription to Oroeco, you may update it any time via the Service.

Online session information collection and use improves your experience

When you visit Oroeco.com, we may collect technical and navigational information, such as computer browser type, Internet protocol address, operating system, the source that directed you to our site, pages visited, and average time spent on our Site. This information is gathered to make Oroeco more useful to you and may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality.

“Cookies” are alphanumeric identifiers in the form of text files that are inserted and stored by your Web browser on your computer’s hard drive. Oroeco may set and access cookies on your computer to track and store preferential information about you. Oroeco may gather information about you through cookie technology. For example, Oroeco may assign a cookie to you, to limit the amount of times you see a particular feature or to help better determine how to serve to you. Please note that most Internet browsers will allow you to stop cookies from being stored on your computer and to delete cookies stored on your computer. If you choose to eliminate cookies, the full functionality of the Service may be impaired for you.

Web beacons are images embedded in a Web page or email for the purpose of measuring and analyzing site usage and activity. Oroeco, or third party service providers acting on our behalf, may use Web beacons to help us analyze Site usage and improve the Service.

An “Internet protocol address” or “IP address” is a number automatically assigned to your computer when you use the Internet. In some cases your IP address stays the same from browser session to session; however if you use a consumer Internet access provider, your IP address probably varies from session to session. We, or our service providers, may track your IP address when you access Oroeco.

We may use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online campaigns, analyze visitor activity on Oroeco.com, or track conversions. We may permit these service providers to use cookies and other technologies to perform these services for Oroeco. We do not share any Personal Information about our customers with these third party service providers, and these service providers do not collect such information on our behalf.

Blogs and other Forums on Oroeco.com

If you use a forum, blog or otherwise post public content on our Site, you should be aware that any information you submit there can be read, collected or used by other users and could be used to send you unsolicited messages. We are not responsible for the Personal Information you choose to submit in these forums. These forums may be hosted by Oroeco or by one of our third party service providers on Oroeco's behalf.

Contests, Giveaways and Surveys

From time to time, Oroeco may offer you the opportunity to participate in contests, giveaways, and other promotions. Any information submitted in connection with such activities will be treated in accordance with this Policy, except as specifically set forth in the rules for those contests, giveaways or promotions. From time to time, Oroeco may also ask you to participate in surveys designed to help Oroeco improve the Site. Any Personal Information provided to Oroeco in connection with any survey will be used only in relation to that survey and as elsewhere set forth in this Policy.

Disclosure of your information to protect our rights or if required by law

Notwithstanding the foregoing, Oroeco reserves the right (and you authorize Oroeco) to share or disclose your Personal Information when Oroeco determines, in its sole discretion, that the disclosure of such information is necessary or appropriate:

- To enforce our rights against you or in connection with a breach by you of this Privacy Policy or the Oroeco.com Terms of Use;
- To prevent prohibited or illegal activities; or
- When required by any applicable law, rule regulation, subpoena or other legal process.

Your data may be transferred upon change of control but only

in accordance with this Policy

Personal Information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change of control. If we sell, merge or transfer any part of our business, part of the sale may include your Personal Information. If so, you will be asked if you'd like to stop receiving promotional information following any change of control.

You can delete your data

Your data is yours. You can delete it anytime you want. When you request us to delete your account for the Service, your data will be permanently expunged from our primary production servers and further access to your account will not be possible. We will also promptly disconnect any connection we had established to your Account Information and delete all Account Credentials. However, portions of your data, consisting of aggregate data derived from your Account Information, may remain on our servers indefinitely. Your data may also remain on a backup server or media. Oroeco keeps these backups to ensure our continued ability to provide the Service to you in the event of malfunction or damage to our primary production servers. We reserve the right to use any aggregated or anonymous data derived from or incorporating your Personal Information.

Communications from us

We may provide our registered customers with summaries of their Account Information and account alerts or messages by email, phone, or other method of communication provided to Oroeco. We may also allow users to subscribe to email newsletters and from time to time may transmit emails promoting Oroeco or third party goods or services. Oroeco.com subscribers have the ability to opt-out of receiving our promotional emails and to terminate their newsletter subscriptions by following the instructions in the emails. Opting out in this manner will not end transmission of service-related communications.

Additionally, we may use your email address to contact you on behalf of your friends (such as when someone sends you a personal message or notifications from a social network or other website with whom you have registered to receive such notifications).

Security

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet or via mobile device, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

Third Parties

We do not rent, share, trade, or sell Personal Information with third parties for their direct marketing purposes. That said, please note the following:

- **Service Providers.** Some of the services provided through the Site are provide by third party providers, such as the blog and forum. We may also outsource some of our functions to third parties such as technical support, tracking or reporting functions, payment processing, and other services. We may share information from or about you with these third party providers so that they can perform their services and complete your requests.
- **Aggregate Information.** We may share information from and about you with third parties. For example, we may disclose the number of users that have been exposed to or clicked on specific content.
- **Investigations.** We may investigate and disclose information from or about you if we have a good faith belief that such investigation or disclosure is (a) reasonably necessary to comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us; (b) helpful to prevent, investigate, or identify possible wrongdoing in connection with the Site; or (c) protect our rights, reputation, property, or that of our users affiliates, or the public.
- **Advertising and third party Cookies.** We may allow third parties who provide services relating to advertising to use Cookies in connection with your use of the Site. Through this, they may collect and store the same type of information and use it for the same type of purposes as described for Oroeco above, and they may be able to associate the information they collect with other information they have about you from other sources. We do not necessarily have access to or control over the Cookies they use.
- **Links.** The Site may contain links to unaffiliated third party websites. Except as set forth herein, we do not share your personal information with them, and are not responsible for their privacy practices. We exercise no control over how your information is stored, maintained or displayed by third parties or on third party sites. Please read the privacy policies of all third party websites.

You are responsible for maintaining the confidentiality of your Registration Information

Please act responsibly to maintain the security and confidentiality of your Oroeco Registration Information, including your Login ID and Password, as well as Account Credentials for Third Party Sites. You should not provide your Oroeco Registration Information to any third party. If you believe that your Registration Information has been stolen or been made known to others, you must contact us immediately at help@oroeco.com, but in any event you should change your password immediately via the Service. We are not responsible if someone else accesses your account through Registration Information they have obtained from you or through a violation by you of

this Privacy Policy or the Oroeco.com Terms of Use.

If you have a security-related concern, please contact us at help@oroeco.com. We will work closely with you to ensure a rapid and personal response to your concerns.

Facebook

If you are logged into Facebook, and you access but are not logged into the Site, we may receive information from Facebook to make it easier for you to create an account on the Site and show you relevant content from your Facebook friends. This information personalizes your experience and helps you create an Oroeco account. To learn more about this feature and how to block aspects of it, please click [here](#). You can also connect your Oroeco account to your accounts on third party services like Facebook, in which case we may collect and store information identifying your account with the third party service. We use the information to help you connect and share public content with your friends and followers.

Children

This Site is intended for general audiences and is not directed to Children under 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information without parental consent, please contact us (help@oroeco.com). If we become aware that a child under 13 has provided us with personal information without parental consent, we take steps to remove such information and terminate the child's account.

We post updates on our website whenever there is a change to our Privacy Policy

We update this Privacy Policy periodically. The date last revised appears on the Policy. Changes take effect immediately upon posting.

Contact us if you have any questions or concerns

If you have questions, comments, concerns or feedback regarding this Privacy Policy or any other privacy or security concern, send an email to help@oroeco.com.