

# PRIVACY POLICY

## Preamble

This Privacy Policy explains how information about you is collected, used and disclosed by Petrichor Holdings LLC (d/b/a J.H. Harrington, J. Howard Harrington, or any other name). This Policy covers Petrichor Holdings LLC, a Kansas limited liability company, its affiliated companies, and any subsequent divisions (collectively, “we”, “us” or “our”) when you access or use our website (the “Site”) and our online resources, services, solutions, membership platform, and other services (the “Service”), which are provided through the Site. By using the Site and/or the Service, you consent to the collection, use, and disclosure of your information as outlined in this Privacy Policy.

## 1. Information We Collect and How We Collect It

In connection with your access to our Site and/or use of 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 individually. That information is defined as “personal information.” Personal information will be collected using lawful and fair means and will be collected only from you unless this is unreasonable and impracticable. Personal information may be collected in a variety of ways, including:

- *Information You Provide.* We collect your personal information when you or your Petrichor Holdings LLC register to use a Service, provide information when using the Site or Service, update your account information, add additional services, submit information to verify your identity, contact us with questions or feedback, or otherwise communicate with us. This personal information may include your name, your gender, mailing address, email address, phone number, date of birth, bank account information, occupation, references and previous employment history, qualifications and skills, relationship or marital status, information provided by you through our website, Facebook, LinkedIn, Instagram, Twitter or other social media accounts, your contractual and performance history with us, or your accredited investor status
- *When You Choose to Participate any Website or Membership Platform Activities.* We may collect information from you, including personal information, if you choose to provide your email address for update, engage with us on social media, participate in our membership platform events, networking events, or other Petrichor Holdings LLC activities.

- *Public Information.* We may collect information about you from public sources, such as public social media pages.
- *Public inquiries through our website or with our staff.* We may collect information about you through enquiries made by you through our websites and comments you make through our websites or social media accounts. We may also collect information about you through direct contact between you and our staff – for example: email, mail, by telephone and direct meeting
- *Information from Third Parties.* We may collect and receive information about you, including personal information and financial account information, from third parties, such as financial institutions and our service providers, for identity verification, fraud protection, risk assessment, providing the Service, and other purposes. We may collect your business or personal information from credit bureaus for the foregoing purposes as well. In addition, we may receive demographic and business industry information about you from third parties to help us better understand our users and to improve and market our Service.
- *Automatically Collected Information.* We automatically collect certain usage information when you access the Site or use the Service, such as your device identifier (if using a mobile device), Internet Protocol (IP) address (if using a browser), operating system, browser type and the address of a referring site. We also automatically collect certain usage information through cookies and related technologies, as described below.
- *Applications to Petrichor Holdings LLC Events and Subscription Services.* We may collect information about you when you apply to participate in a video lecture, training session or other event. We may also collect information you provide when subscribing to Medium updates and educational materials, Petrichor Holdings LLC materials, and additional services provided by the Petrichor Holdings LLC and its related group of partners.
- *Sensitive Information:* We may need to collect Sensitive Information such as health information, status, or your membership of a professional association. We will not collect this information without providing you with a purpose for collection and obtaining your consent. All sensitive information collected by us will be dealt with strictly in accordance with the requirements of the relevant and applicable international, state and federal privacy and security laws.

We will take reasonable steps to ensure that the Personal Information we collect is accurate, up to date and complete.

### Cookies and Other Related Technologies

We may use cookies, pixel tags, web beacons and other similar technologies to better understand how you interact with our Site, monitor aggregate usage by our users, and monitor web traffic routing on our Site to help us improve our Site or the Service.

Cookies are small text files that are stored on your computer as a result of visiting a website. This allows the site to know that you have visited before and in some cases can be used to record your preferences. Cookies can be used/stored for two reasons:

- To help track usage patterns in order to improve and manage a website; or
- To record preferences in order to personalize your visit to that website.

Petrichor Holdings LLC uses cookies on its website. Most Internet browsers let you change the browser's settings to stop accepting cookies or to prompt you before accepting a cookie from websites you visit.

## 2. Storage of Personal Information

We will store your Personal Information in electronic forms. We will take reasonable steps to ensure that all Personal Information collected from you is stored in a secure environment accessible only by our authorized personnel.

We will endeavor to protect any Personal Information transmitted by you or received from us over the Internet; however, we cannot ensure or warrant the security of this information. These activities are conducted at your own risk. Once we receive your transmission, we will take reasonable steps to ensure its security.

## 3. Sharing, Use and Disclosure of Your Personal Information

### Use of your Personal Information

We use information that we collect about you for the following purposes:

- to administer the Site and provide the Services;
- to monitor, analyze, improve and develop the Site and Service, and to create and test new Service features;
- to provide a more customized experience on the Site or Service;
- to understand our users better;
- to validate user information provided to us for fraud and risk detection purposes;
- to determine eligibility for the Service and our partners' programs;
- to prevent, identify and address fraudulent or other illegal activity and security issues;
- to (i) solicit feedback, (ii) respond to your or your Petrichor Holdings LLC's comments, requests or inquiries, (iii) provide customer service and support, or (iv) otherwise contact you in connection with the Site or Service;
- to generate anonymized, aggregated data containing only de-identified, non-personal information that we may use to publish reports;
- for our marketing purposes, such as (i) informing you of our or our partners' or affiliates' products, services, features or offerings that may be of interest to you, (ii) providing you with newsletters, articles, reports, updates and announcements, as well as information about upcoming events, (iii) improving and tailoring our advertising and communications, (iv) analyzing our marketing efforts, and (v) determining your eligibility for certain programs, events and offers;

- to operate our business, which includes, without limitation, using your information (i) to process payment transactions, (ii) to manage and enforce contracts with you or with third parties, (iii) to manage our corporate governance, compliance and auditing practices, and (iv) for recruitment purposes, if you submit an application for employment with Petrichor Holdings LLC;
- to (i) comply with laws, rules and regulations, including any disclosure or reporting obligations, (ii) resolve disputes with users or third parties, (iii) respond to claims and legal process (including but not limited to subpoenas and court orders) as we deem necessary or appropriate, (iv) protect our property rights or those of third parties, (v) protect the safety of the public or any person, and (vi) prevent or stop any activity which we may consider to be (or to pose a risk of being) illegal, unethical or legally actionable; and
- for any other purpose for which you or your Petrichor Holdings LLC expressly authorize us to use your information.

### Sharing and Disclosure of Personal Information

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:

- government departments and agencies;
- banking and financial institutions;
- certain parties as necessary to respond in good faith to legal process (including but not limited to subpoenas and court orders);
- legal and financial advisors and auditors;
- third-party agents, partners and service providers, who (i) are only permitted to use your information as we allow (which may include contacting you on our behalf), and (ii) are required under law or contract to keep your personal information confidential; and
- 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 the Petrichor Holdings LLC (including, without limitation, a merger, stock acquisition, sale of assets or reorganization), or in the event that the Petrichor Holdings LLC liquidates or dissolves, we may sell, transfer or otherwise share some or all of our assets, which could include your information, to the acquirer;
  - 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 Petrichor Holdings LLC expressly authorize us to share your information.

We will take reasonable steps to ensure that the Personal Information we use or disclose is accurate, up to date, complete and relevant to the purpose of the use or disclosure. We do not share information with third parties for their own direct marketing purposes.

### Retention

We do not keep Personal Information for longer than is reasonably required, which will depend on the nature of the Personal Information we hold and the purposes for which it was received.

We maintain a detailed retention schedule for Personal Information but is informed by the following principles:

- In the first instance, Personal Information will be retained as long as required by a relevant law (e.g. to ensure compliance with tax requirements);
- If a relevant law no longer requires us to maintain Personal Information (or that period has elapsed), the Personal Information may then still be retained if required by any relevant contractual agreement or arrangement; and
- For Personal Information to which a relevant law or contractual agreement or arrangement does not apply, we will retain the Personal Information for as long as is required to manage our engagement and/or relationship with you plus a reasonable period afterwards.

## 4. Your Options

### Objection or withdrawal of consent

Under the applicable international, state and federal privacy and security laws, where we rely solely on your consent to process your Personal Information, including for the use of marketing materials, you may object to such processing, or withdraw your consent to our ongoing Personal Information processing by notice to us using the details set out at the end of this page. If you withdraw your consent to our processing of your data, we may no longer be able to receive your services, provide you with services or otherwise contract with you.

### Erasure

Under the applicable international, state and federal privacy and security laws, you may have the right to have your personal Information erased by us in certain limited circumstances, including if we no longer need the Personal Information for the purpose for which it was collected, where we have relied your consent and it is subsequently withdrawn, where we have processed Personal Information unlawfully, or where you request erasure in order to comply with a legal obligation. We may object to such erasure in certain circumstances. You can make such a request using the contact details set out in at the end of this page. If your data is erased, we may no longer be able to receive your services, provide you with services or otherwise contract with you.

### Not to Provide Personal Information

You may not wish to provide us with your Personal Information. Please note that in this circumstance we may be unable to assist you through answering your query, providing you with our services or otherwise contracting with you.

### Access to and correction of your Personal Information

You may request access to your Personal Information that we hold and we will attempt to provide the Personal Information in the manner you request. We may refuse your request for access to your Personal Information where permitted to do so under the various laws governing privacy and access to Personal Information, and we will provide you with a written notice that outlines our reasons for refusal.

You may request us to correct the Personal Information we hold if you believe that the Personal information is inaccurate, out of date, incomplete, irrelevant or misleading. Under certain circumstances permitted by the various laws governing privacy and access to Personal Information, we may refuse your request to correct your Personal information and we will provide you with a written notice that outlines our reasons for refusal.

### Unsolicited Personal Information

If we receive unsolicited Personal Information, we will make a determination whether the information is reasonably necessary for, or directly related to our functions or activities. If it is, we will ensure that the Personal information is stored in the same manner as if we received the Personal information directly from you. If we find that it is not, we will destroy or de-identify the Personal information. We will comply with any requirement of a relevant law to disclose the collection of such Personal information.

### California Residents under California Consumer Privacy Act (CCPA)

This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act or “CCPA.”

For more details about the personal information we have collected over the last 12 months, including the categories of sources, please see the [Information We Collect and How We Collect It](#) above. We collect this information for the business and commercial purposes described in the [Sharing, Use and Disclosure of Your Personal Information](#) above. We share this information with the categories of third parties described in the [Sharing, Use and Disclosure of Your Personal Information](#) above. Petrichor Holdings LLC does not sell (as such term is defined in the CCPA) the personal information we collect (and will not sell it without providing a right to opt out). Please note that we do use third-party cookies for our advertising purposes as described above.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use and disclose this information), to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at [jhowardharrington@gmail.com](mailto:jhowardharrington@gmail.com). You can mail a written request to PO Box 581, Bonner Springs, KS 66012. We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf. To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

## Security

We employ administrative, physical and technical measures designed to protect your information from unauthorized access and to comply with all applicable international, state and federal privacy and security laws. However, despite these efforts, no security measures are perfect or impenetrable and no method of data transmission can be guaranteed to prevent any interception or other type of misuse. We also depend on you to protect your information. If you become aware of any breach of security or privacy, please notify us immediately.

## 5. Changes to this Privacy Policy

Any information that we collect is subject to the Privacy Policy in effect at the time such information is collected. We may, however, modify and revise our Privacy Policy from time to time. If we make any material changes to this policy, we will notify you of such changes by posting them on our Site, informing you through the Service, or sending you an email or other notification, and we will indicate when such changes will become effective. By continuing to access or use our Site or Service after those changes become effective, you are agreeing to be bound by the revised policy.

## 6. Contact Information

Please contact us at [jhowardharrington@gmail.com](mailto:jhowardharrington@gmail.com) if you have any questions about our Privacy Policy and/or our privacy practices.