### **Privacy Policy**

#### 1. General

This Privacy Policy describes Authic Labs B.V.'s policies regarding the collection, use, storage, sharing and protection of your personal information ("Privacy Policy"). This Privacy Policy applies to the Authic.io website ("Website") and all related websites, applications, services and tools referenced in this policy (hereinafter referred to as "Services"), regardless of how you accessed them, including access or use using mobile devices. Authic Labs B.V. is the data controller within the meaning of the <u>Personal Data Protection Act</u>.

**Scope and Consent:** By using Authic.io and related Services, you expressly consent to the collection, use, disclosure and retention by us of your personal data as described in this Privacy Policy and our Terms and Conditions.

Authic may change this Privacy Policy from time to time. We therefore recommend that you read it regularly. We will post substantial changes to our Privacy Policy on our Website. The amended Privacy Policy will be effective immediately after it is first posted on our Website. This Privacy Policy is effective as of December 1, 2021.

#### 2. What personal data do we collect?

When you decide to provide us with your personal data, you consent to that data being transmitted to and stored on our servers. "Personal data" is data that can be linked to a specific person and is usable to identify a specific person. If user data is anonymized, or aggregated then this data cannot be used to identify a person and is therefore not classifiable as personal data. We collect the following types of personal data:

**Data We Collect Automatically:** When you visit our websites, use our applications, Services and tools, or respond to advertisements or other content, we automatically collect the data sent to us by your computer, mobile device, or other device that you access. This data includes but is *not* limited to:

- the unique identification of the device or mobile device, type of device or device, information about your geographical location, computer and connection information, statistics regarding pages viewed, traffic to and from Authic.io, referring URL, advertising data, and IP address; and
- Information we collect using cookies

**Information you provide to us:** We collect and store any data that you enter on our websites or that you provide to us when you use our Services. This data includes, but is not limited to:

- information you provide to us when you sign up for an account or for the Services you purchase;
- additional data you may provide to us through social media websites or Third Party Services;
- other data that you generate, or that is associated with your account and your use of the website, applications, services and tools (such as use of functionality to place an ad, searches, ads viewed and saved, or your use of the contact options with an ad), including pseudonymized information related to calling a phone number shown to you in an ad;

- data provided in the context of dispute resolution, correspondence through our websites or correspondence sent to us; and
- Data about your location and the location of your device, including unique identifiers of your device if you have enabled this service on your mobile device.

**Data from other sources:** We may receive or collect additional data about you from third parties and add it to our account information. This data includes, but is not limited to: demographic data, navigation data, additional contact information, and additional data about you from other sources, such as government agencies, to the extent permitted by law.

In response to reports, whether or not through the Police's Internet Scams Hotline, we may process information (including personal data) about certain disputes between users and advertisers, including by storing such data in Authic's Transaction Disputes Database ("TDD"). The data that Authic processes in this context are not recorded on the basis of Authic's own research, but originate from users of Authic who provide information to Authic or to the Internet Fraud Disclosure Office by means of a report and/or concern information already present on the Website.

#### 3. How we use your personal data

You agree that we may use your collected personal data (see above) for the following purposes:

- To allow you to access our Services and provide customer support by email or by phone;
- to prevent, detect and respond to potentially prohibited or illegal activities, fraud and security breaches detect and investigate, and enforce our Terms and Conditions (e.g., stop suspicious conversations through our website);
- To tailor, measure and improve our Services, content and advertising to you;
- to contact you, via email, push notification, text message (SMS) or telephone, to inform you about our Services for purposes of targeted marketing activities, updates and promotional offers based on your messaging preferences, or for any other purposes to the extent described in this Privacy Policy; and
- To provide you with other services you have requested, as described when we collected the data.

**Data sharing with and registration on social media sites:** We may offer sign-on Services that allow you to access the Authic.io website or related websites using your login credentials on other websites. We may also offer Services that allow you to share data with third party social media sites, such as Facebook, Google Plus and Twitter.

If you give us access to certain personal data stored on third party websites, the scope of this access to personal data will vary from website to website and will be determined by your own browser settings as well as your consent. If you wish to connect your account with a third party to your Authic account and give us permission to access that data, you agree that we may collect, use and store data from those third party websites in accordance with this Privacy Policy.

**Transfer of your personal data to third parties:** We may disclose your personal data to third parties in accordance with this Privacy Policy and applicable laws and regulations. As further described in Section 4, we do not disclose your personal data to third parties for their marketing purposes without your express consent. We may share your personal data with:

- <u>service providers</u> with whom we have contracted to help us provide our Services on the website (for example, financial services, marketing agencies and technical support). In such cases, the personal data remains under the control of Authic.io
- <u>certain third parties</u> (such as intellectual property rights holders, regulators, tax authorities, police and other legal authorities), if we are required to do so by law or regulation or see cause under this Privacy Policy. We may share your personal information:
  - to comply with legal obligations or a court order; or
  - If this is necessary to prevent, detect or prosecute criminal offences (such as fraud, deception or prosecution); or
  - If it is necessary to enforce our policies or to protect the rights and freedoms of others.
- <u>Advertisers</u> If you have expressed an interest through the Website in purchasing a product and/or service offered in the Advertisement or respond to an Advertisement through the Website, to enable further communication and/or the possible transaction (purchase/sale) in respect of the product and/or service offered in the Advertisement between you and the Advertiser.
- <u>Other third parties</u> to whom you have given permission to share your information with authic.io (e.g. in the context of a collaboration).
- <u>companies</u> with which we plan to merge or through which we are acquired as part of a reorganization.

Without limiting the foregoing, we - in our effort to respect your privacy and keep the Website free from malicious persons or parties - will not otherwise disclose your personal information to law enforcement, other government officials or other third parties without a court order or formal request from the government in accordance with applicable law, unless we believe in good faith that the disclosure of information is necessary to prevent imminent injury or imminent financial loss or to report alleged illegal activity.

We strongly recommend that if you are visiting our website from a shared computer or a computer in an internet café, you log out after each session. If you do not want the shared computer to remember you and/or your data, you will need to delete the cookies and/or the history of your website visit.

#### 4. Marketing Purposes

You agree that we may use the information we collect to send you offers, personalized or otherwise, or to contact you by phone about Authic products or Services that may be of interest to you.

We do not sell or rent your personal data to third parties for their marketing purposes without your express consent. We may combine your information with information we collect from other companies and use it to improve and personalize our Services and functionality.

If you do not wish to receive marketing messages from us, you may indicate your message preferences by emailing us at info@authic.io, either in your "My Authic account" or in the message you received.

#### 5. Cookies

When you use our Services, we or our service providers may place cookies (data files on the disk of your device or mobile device). We use these cookies, to help us identify you as a user, to provide you with a better user experience on our website(s), to measure promotional effectiveness and to promote and ensure trust and security on our website.

#### 6. Accessing, viewing and modifying your personal data

We cannot change your personal and account information. You can change your data yourself by logging into your My Authic account. When you post something publicly, you may not be able to change or remove your message (advertisement).

If you wish to close your account with us, please send us a request. We will process your request within a reasonable time and process your personal data in accordance with applicable law. On the other hand, you may also contact Customer Support to access your personal data that we store and that is not directly viewable on Authic, unless Authic is not required to provide such access under the Data Protection Act. In order to fulfill your request, we will need the following from you:

- A signed version of your request that includes your contact information and your email address
- A copy of your valid ID (after verification, Authic will destroy it)

You can send your request by e-mail to <u>info@authic.nl</u> with the documentation attached, or by post to: Authic Labs B.V., Attn. Customer Support: [fill in Authic customer support mail address].

#### 7. Protection and storage of your personal data

We protect your data using technical and administrative security measures to minimize the risk of loss, misuse, unauthorized access, disclosure and alteration. These include firewalls, data encryption and physical or administrative access controls to the data and servers. If you still believe that your account has been misused, please contact us via the contact form on the website.

We do not retain personal data longer than permitted by law and delete personal data when it is no longer necessary for the purposes described above.

#### 8. Protection and storage of your personal data

Abuse and unsolicited commercial communications ("spam"): We do not tolerate abuse of our Website. You do not have permission to add other users of Authic.io to your mailing list (email or postal mail), even if a user has purchased something from you, unless that user has expressly agreed. Should you notice that someone is abusing our Website (spam or spoof emails), please send an email to info@authic.nl.

You are not allowed to use our communication tools to send spam or otherwise send content that violates our Terms and Conditions. For your safety, we automatically scan messages and may check them for spam, viruses, phishing and other harmful activities or illegal or prohibited content. However, we do not permanently store messages sent through these means.

**Third Parties:** Except as otherwise expressly provided in this Privacy Policy, this Privacy Policy applies solely to the use and transfer of information we collect from you. Authic.io has no control over the privacy policies of third parties that may apply to you. When we partner with third parties or use third party tools to provide certain services, we will explicitly indicate which privacy policy applies to you.