

PRIVACY POLICY

Last Modified: February 2nd

CONTENTS

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| | | |
|----------------------------------------------|----|-----|
| 1. Important information and who we are..... | 1 | 2. |
| The data we collect about you..... | 2 | 3. |
| How is your personal data collected?..... | 4 | 4. |
| How we use your personal data..... | 4 | 5. |
| Disclosures of your personal data..... | 7 | 6. |
| International transfers..... | 8 | 7. |
| Data security..... | 9 | 8. |
| Data retention..... | 9 | 9. |
| Your legal rights..... | 9 | 10. |
| Glossary..... | 11 | |

Introduction

Welcome to EarnDeck Ltd's Privacy Policy.

Your privacy is very important to us.

We have created this Privacy Policy to demonstrate our firm commitment to privacy and security.

Please use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE INFORMATION WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL INFORMATION COLLECTED

4. HOW WE USE YOUR PERSONAL INFORMATION

5. DISCLOSURES OF YOUR PERSONAL INFORMATION

6. INTERNATIONAL TRANSFERS

7. INFORMATION SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

1. 10. GLOSSARY]Important information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how EarnDeck Ltd collects and processes your personal information through your use of the EarnDeck Ltd corporate website, its Support, and their respective subdomains (collectively the "Website"), including any information you may provide through the Website when you access some of our services without creating an account with us, when you register to open a vendor or affiliate account to sell/promote products and/or pay a monthly fee to subscribe to our services, when you search our Website, when you register to open a Support account with us, when you submit a Support ticket.

Please note that this website is not intended for persons under 18 years of age. No one under age 18 may provide any information to or on this Website. We do not knowingly collect personal information from individuals under 18. If you are under 18, do not use or provide any information on this Website or on or through any of its features, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a person under 18 without verification

1

of parental consent, we will delete that information. If you believe we might have any information from or about an individual under 18, please contact us.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This Privacy Policy supplements the other notices and is not intended to override them.

Controller

[EarnDeck Ltd Group is made up of different legal entities. This Privacy Policy is issued on behalf of the EarnDeck Ltd Group so when we mention "EarnDeck Ltd", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the EarnDeck Ltd Group responsible for processing your information.] EarnDeck Ltd, is the controller and responsible for your personal information.

If you have any questions about this Privacy Policy, including any requests to exercise *your legal rights*, please contact us

If you are based in the European Union, you also have the right to make a complaint at any time to your local supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the regulator so please contact us in the first instance.

Changes to the Privacy Policy and your duty to inform us of changes

This version was last updated on February 2nd

We reserve the right to change the terms of this Privacy Policy at any time. When we do, we will post the revised Privacy Policy to our Website and the last revision date of revision will be updated so that you will always be able to understand what information we collect, how we use your information, and under what circumstances we may share your information with others. We will notify you of any material changes by way of a pop-up notice on the Website announcing that the Privacy Policy has changed pointing the changes to your attention AND/OR by the way of email AND/OR web app notification.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Third-party links

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

Please note that we also do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. If you are based in the United States you can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website at <http://optout.networkadvertising.org>. If you are based in the European Union you may visit the website of the European Interactive Digital Advertising Alliance ("EIDAA") at <https://www.edaa.eu> as well as of the European Advertising Standards Alliance ("EASA") at <http://www.easa-alliance.org>.

Public Forums

Our Website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information, if you are EU from our blog or community forum, contact us.

Social Media Features

2. **Our Website may include Social Media Features, such as the Facebook Like button. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policies of the companies providing them. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, [marital status], title, date of birth, and gender.

- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your mobile device's unique ID number, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- **Profile Data** includes your username and password, [photo], purchases or orders made by you, your [location,] interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website and services, such as the buttons, controls, products and ads you click on, pages of our application or Website that you visit, the time spent on those pages, your search queries, the dates and times of your visits, but also about the webpage you were visiting before you came to our Website [app(s)?] and the webpage[,app(s)?] you go to next.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal information in law as this information does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal information

3. **Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time. How is your personal information collected?**

We use different methods to collect data from and about you including through:

• **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you :

- create an account with us;
- access some of our services;

4

- register to open a Support account with us;
 - submit a Support ticket;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - give us some feedback.
 - Purchase product from vendor/seller on EarnDeck Ltd platform
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. [We may also receive Technical Data and Usage Data about you if you visit other websites employing our cookies.] Please see our Cookie Policy for further details].

• **Third parties or publicly available sources.** We may receive personal information about you from various third parties and public sources as set out below :

- Technical Data from the following parties:

(α) analytics providers such as Google based outside the EU;

(β) advertising networks such as perfectaudience.com based outside] the EU; and (χ) search

information providers such as Google and Bing based outside the EU. • Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as PayPal and Stripe based outside the EU.

- Identity and Contact Data from our partners, data brokers or aggregators BBC Systems inc based outside the EU]=.
- Identity and Contact Data from publicly available sources such as Facebook, Twitter, any public websites based outside and inside of the EU.

4. Facebook Pixel. How we use your personal information

We will only use your personal information when the law allows us to. Most commonly, we will use

your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

5

Generally we do not rely on consent as a legal basis for processing your personal information other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|-----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| To register you as a new vendor or affiliate | (a) Identity (b) Contact | Performance of a contract with you |
| To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |

| | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or Privacy Policy</p> <p>(b) Asking you to leave a review or take a survey</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> | <p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p> |
| <p>To enable you to partake in a prize draw, competition or complete a survey</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> | <p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)</p> |
| <p>To administer and protect our business and this Website (including troubleshooting, data</p> | <p>(a) Identity</p> <p>(b) Contact</p> | <p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network</p> |

| | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>analysis, testing, system maintenance, support, reporting and hosting of data)</p> | <p>(c) Technical</p> | <p>security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p> |
| <p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p> | <p>Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)</p> |
| <p>To use data analytics to improve our website, services, marketing, customer relationships and experiences</p> | <p>(a) Technical</p> <p>(b) Usage</p> | <p>Necessary for our legitimate interests (to define types of customers for our services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)</p> |
| <p>To make suggestions and recommendations to you about services that may be of interest to you</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p> | <p>Necessary for our legitimate interests (to develop our services and grow our business)</p> |

Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising. [We have established [a privacy center where you can view and make certain decisions about your personal data use **OR** the following personal information control mechanisms]:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal information with any company outside our company for marketing purposes, including service providers who perform

7

marketing services on our behalf, such as conducting surveys, sending communications to you on our behalf, or serving advertisements to you.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the Website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you o] by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal information provided to us as a result of a service purchase, service experience or other transactions.

California residents: Under California Law SB27, California residents have the right to receive, once a year, information about third parties with whom we have shared information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of personal information shared. To make such a request, please contact us and please include the phrase "California Privacy Request" in the subject line of request, and the domain name of the Website you are inquiring about, along with your name, postal address, and email address. We will respond to you within 30 days of receiving such a request.

Do Not Track "DNT" Signals

While we take all reasonable steps to protect the privacy of our Website visitors, we cannot promise that the current limitations of our online applications programming will address every browser setting or honor every personal browser preference. In particular, we have not implemented the necessary program changes to honor "Do Not Track" or "DNT" browser signals. As our online applications programming is refined, we will take all reasonable steps to honor such requests in the future. Please return to this Privacy Policy for further updates on this topic.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may

become inaccessible or not function properly. For more information about the cookies we use, please see our cookies info doc.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Disclosures of your personal information

We may have to share your personal information with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [*Glossary*].
- External Third Parties as set out in the [*Glossary*].
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.

6. We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions. International transfers

We share your personal information within our company. This will involve, if you are based in the European Union, transferring your data outside the European Economic Area (EEA).

Many of our external third parties are also based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of data outside the EEA.

If you are based in the European Union, whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguard is implemented :

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.

7. Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. However, you should note that no transfer of data over the Internet is completely secure. While we use reasonable efforts to protect your personal information on our systems, when the information is transferred over the Internet, it may be accessed and used by unauthorized third parties. EarnDeck Ltd has no control over the performance, reliability, availability or security of the Internet and does not warrant that any information transfer via the Internet or any communication through the Internet is secure. EarnDeck Ltd shall not be liable for any disclosure, unauthorized use, loss, damage, expense, harm or inconvenience resulting from the loss, delay, interception, corruption, intervention, misuse or alteration of any personal information due to any reason beyond EarnDeck Ltd's reasonable control.

Data retention

How long will you use my personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your information: see [*Request erasure*] below for further information.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. EU residents: Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. Please click on the links below to find out more about these rights:

- *Request access to your personal information.*
- *Request correction of your personal information.*
- *Request erasure of your personal information].*
- *Object to processing of your personal information.*
- *Request restriction of processing your personal information.*
- *Request transfer of your personal information].*
- *Right to withdraw consent.*
- If you wish to exercise any of the rights set out above, please contact us.

10

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

10. **We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Glossary**

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your information where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the EarnDeck Ltd Group acting as joint controllers or processors and who are based US and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers [acting as processors] based Ukraine, India, Romania, Sri Lanka, Belarus, Venezuela, Kosovo, Mexic, Argentina, Philippines who provide IT and system administration services.
- Social networking sites [acting as processors] based in the United States to which you have linked your account.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based US an France who provide consultancy, banking, legal, insurance and accounting services.

EU RESIDENTS: YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.