

EFIZZA PRIVACY POLICY

1. OVERVIEW OF THIS POLICY

This Privacy Policy (this “Policy”) relates to the personal information that you submit when you access and use our Website and App (the “Platform”) and other information we automatically collect when you access the Platform. This Policy explains all activities regarding your information, including but not limited to how we collect, use, disclose, and secure it and the rights available to you.

You are required to read, understand, and agree to how we process (collection, use, disclosure, security, etc.) your information in this Policy. By your use of the Platform and your submission of the requested personal information, you hereby agree to how we process your information as described in this Policy. If you do not agree, you should not submit information.

2. WHAT INFORMATION DOES EFIZZA COLLECT FROM YOU?

2.1 We collect information from and about users of our Platform:

- Directly from you when you provide it to us.
- Automatically when you use the Platform.

2.2 Information that you provide to us (“personal information”) when you register to use our app may include:

- First Name, Last Name;
- Email Address;
- Location;
- Phone number; and
- Tax map ID

2.3 This information may also include:

- Information that you provide by registering on the Platform such as first name, last name, email address, telephone number and address (“Contact Information”). This includes information provided at the time of registering to use the Platform and requesting further services.
- Information you provide to us when you complete user surveys or surveys for research purposes such as your Contact Information.
- Information you provide to us when you report a problem with the Platform such as your first name, last name and email address.

- Records and copies of your correspondence (including e-mail addresses and phone numbers), if you contact us.
- Details of transactions you carry out through the Platform when you make payment to Efizza.
- Your correspondence within the Platform with other users (your username and location).

2. WHAT DOES EFIZZA USE INFORMATION COLLECTED FOR?

Any information collected by us is for a purpose in relation to your use of our Platform, including for providing the services, processing, and delivering your orders.

- **Provide Services to you:** We collect information to send you email about your registration, perform tasks required to complete a transaction, provide customer support, or provide other types of customer relationship management and fulfillment. We may also use your information to optimize or improve our Services and operations, for example, training and quality assurance.
- **Fulfilling legal and compliance obligations:** We collect information to fulfill our legal obligations. Examples of this may include satisfying regulatory screening requirements in connection with entity formations, responding to subpoenas and other legal requests for information, and maintaining records as required in our role as Registered Agent. We may also collect information to detect fraud or other suspicious activity.
- **Analytics:** We collect information for use in performing various types of analytics. For example, we use the information to analyze how visitors interact with our Platform, where visitors to our Platform arrive from and exit to, pages visited, links clicked, text entered and mouse movements to understand site usage, to detect fraud and potential threats and improve our services.
- **To communicate with you:** We collect your email address and phone number to (i) contact you regarding your use of our Platform, (ii) respond to your questions, complaints, and queries, and (iii) send you updates regarding our services or this Policy and other agreements;
- **For other purposes through your consent:** We may also process your information for some other reasons which your consent will be sought before we process such information. You may also withdraw your consent at any time.

Third-party Information Collection

1. When you use the Platform, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:
 - Advertisers, ad networks and ad servers.
 - Analytics companies.
 - Your mobile device manufacturer.
 - Your mobile service Provider.
2. These third parties may use tracking technologies to collect information about you when you use the Platform. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different Platforms, Platforms and other online services or Platforms. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.
3. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible Provider directly.
4. For information about how you can opt out of receiving targeted advertising from many Providers.

3. HOW PERSONAL DATA IS COLLECTED.

4.1 Automatic Information Collection and Tracking.

When you access and use the Platform, it may use technology to automatically collect:

- **Usage Details.** When you access and use the Platform, we may automatically collect certain details of your access to and use of the Platform, including traffic data, location data, logs and other communication data and the resources that you access and use on or through the Platform.

4.2 If you do not want us to collect this information, please do not create an account with us.

4.3 We may also use these technologies to collect information about your activities over time and across third-party Platforms, Platforms or other online services (behavioral tracking).

4.4 Information Collection and Tracking Technologies.

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies)**. A cookie is a small file placed on your smartphone or device. It may be possible to refuse to accept mobile cookies by activating the setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Platform.

The cookies we use include “analytical” cookies. They allow us to recognize and count the number of visitors and to see how visitors move around the Platform when they are using it. This helps us to improve the way our Platform works, for example, by ensuring that users are finding what they are looking for easily.

These cookies are used to collect information about how visitors use our Platform. We use the information to compile reports on general user traffic, conversion statistics and to help us improve the site. The cookies collect information anonymously.

Please note that our advertisers may also use cookies, over which we have no control.

- **Web Beacons**. Pages of the Platform and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related Platform statistics (for example, recording the popularity of certain Platform content and verifying system and server integrity).
- **Third Party Cookies**. The Platform may link to other Platforms owned and operated by certain trusted third parties (for example Facebook) who, for example, collect data that helps us to track conversions from Facebook ads. These other third-party Platforms may also use cookies or similar technologies in accordance with their own separate policies. Please note that our advertisers may also use cookies, over which we have no control. For privacy information relating to these other third-party Platforms, please consult their policies as Appropriate.

4. RECIPENTS AND TRANSFERS TO THIRD PARTIES

The Efizza may appoint third parties – data processors to perform some of the personal data processing operations, however only for the purposes specified in this Policy, on a basis of written agreement and under statutory conditions.

Otherwise, the Efizza does not transfer or disclose your Personal Data to any third parties unless you have consented otherwise under this Policy or initiated the disclosure or except as required by the applicable laws.

Sharing your Personal Data with other users of Efizza is completely under your control.

For the transfer of personal data to the USA, there is no Commission decision on adequate protection and therefore the transfer is carried out on the basis of appropriate safeguards in the form of standard data protection contractual clauses as approved by the European Commission. A copy of your Personal data can be obtained from the data processors through the Efizza.

5. HOW WE USE PERSONAL DATA AND LAWFUL BASES FOR PROCESSING

5.1 Lawful Bases for Processing under the GDPR

What are the lawful bases for processing personal data? The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever we process personal data. We mainly use consent, contract, legal obligations and legitimate interests as the bases to process your personal data in accordance with this privacy policy.

- **Consent:** the individual has given clear consent for us to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

5.2 We use information that we collect about you or that you provide to us, including any personal information, to:

- To set up and operate your Efizza account (such processing is necessary for the performance of our contract with you).
- To verify your identity and carry out security checks in order to set up your account (such processing is necessary for the performance of our contract with you and necessary for us to comply with a legal obligation).
- Provide you with the Platform and its contents, and any other information, products or services that you request from us (such processing is necessary for the performance of our contract with you).

- Give you notices about your account, the account you create (such processing is necessary for the performance of our contract with you and necessary for us to comply with a legal obligation).
- Ensure that content from our Platform is presented in the most effective manner for you and for your computer or device for accessing the Platform (such processing is necessary for the performance of our contract with you).
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection (such processing is necessary for our legitimate interests).
- To manage your account, including processing payments and providing notifications, should this service be introduced within the Platform (such processing is necessary for the performance of our contract with you and is necessary for our legitimate interests (to process payments)).

5.3 The usage information we collect helps us to improve our Platform and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns (such processing is necessary for our legitimate interests (for running our services and to study how users use our Platform)).
- Store information about your preferences, allowing us to customize our Platform according to your individual interests (such processing is necessary for our legitimate interests (for running our services)).
- Speed up your searches (such processing is necessary for our legitimate interests (for running our services)).
- Recognize you when you use the Platform (such processing is necessary for the performance of our contract).
- To provide us with information about how the Platform is running or whether there are any faults or issues with our products and services (such processing is necessary for our legitimate interests (for us to deliver a better service to you)).

5.4 We may also use your information to contact you about news, offers, notifications, surveys, information, goods and services that we think may be of interest to you (such processing is done with your consent and is necessary for our legitimate interests (to develop our products/ services and grow our business)). We give you the option to consent to such emails when you sign up for the Platform. If you do not want us to use your information in this way, please do not consent. You may adjust your user preferences in your account profile.

5.5 We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure.

5.6 The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Platform like message boards. The information you share in public areas may be viewed by any user of the Platform.

5.7 Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Platform. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

5.8 If you suspect that there has been a breach of the security of your data you should contact us at: <admin e-mail> and include details of:

- the nature of the breach;
- the date of the breach; and
- the full circumstances of the breach.

9. On notification of such a breach we will investigate the matter and, where appropriate and required by law, notify the relevant Data Protection Regulator.

6. INTERNATIONAL USE OF THE PLATFORM

This Privacy Policy is intended to cover collection of information on our Platform from residents of the United States. If you are using the Platform from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy.

7. LOCATION

Some of the Efizza features may access and collect your current location data, including GPS coordinates or other similar information regarding the location of your device. Some features of Efizza may not function properly if use of location data is blocked or disabled. Efizza will not access your location without your approval, you can select the “use my location” option when using the platform.

8. TECHNICAL DATA

You acknowledge that Efizza may collect and use technical data, including but not limited to information about your mobile device and system, Internet connection or your use of Efizza Platform. The purpose of the collection of technical data is to ensure quality, increase your comfort and further analyze and develop Efizza and related services.

Technical data is anonymous and stored separately from the Personal Data, therefore it cannot be linked back to you in any way in order to identify you.

9. HOW PERSONAL DATA IS SHARED AND WITH WHOM

Efizza does not sell or share your personal information to third parties but may share your information if need arises such as the following:

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by the Company about our Platform users is among the assets transferred.
- For any other purpose disclosed by us when you provide the information.
- For the purposes of academic research.
- For any other purpose with your consent.
- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us.

If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

10. WHAT ARE YOUR PRIVACY RIGHTS?

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you have questions or comments about your privacy rights, you may email us at <admin e-mail>

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log into your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account

11. YOUR RIGHTS WITH RESPECT TO PERSONAL DATA.

- You can review and change your personal information by logging into the Platform and visiting your account settings page.
- You may also send us an e-mail at <admin e-mail> to request access to, correct or delete any personal information free of charge that you have provided to us. We cannot delete your personal information except by also deleting your user account.
- We will respond to a request to access, correct or delete any data within 30 days of the date we receive the request.
- We may not accommodate a request to change information if we believe the change would violate or breach any law or legal requirement or cause the information to be incorrect.
- If, on your request, we refuse to amend, correct or delete your personal information, we will set out our reasons for not doing so and provide you with details of how you may complain about our refusal.
- If you delete your User Contributions from the Platform, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Platform users. Proper access and use of information provided on the Platform, including User Contributions, is governed by our Terms and Conditions.

12. INTERNATIONAL TRANSFER OF INFORMATION

The information we hold about you may, from time-to-time, be transferred or shared with Contractors and subsidiaries located outside the EEA and EU for the purposes described in this

Policy. When we transfer information in this manner, your personal information will also be subject to the policies set out in this Policy and other safeguards provided by law. For example, we will only share information with any Contractor in the US if such a Contractor signs an agreement with us or is a part of the US Privacy Shield.

13. CHILDREN'S PRIVACY

The Children's Online Privacy Protection Act was created to protect children under the age of 13 from unsuspecting acts or practices in conjunction with collecting, using, and disclosing any information about them. Our Services are not intended for anyone under the age of 13. If you are under 13, do not use or provide any information on or through our Services. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you are a parent or guardian or otherwise believe we might have any information from or about a child under the age of 13, please contact us so that we can delete the child's information. The Services will never knowingly accept, collect, maintain or use any information from a child under the age of 13. If a child whom we know to be under the age of 13 sends personal information to us online, we will only use that information to respond directly to that child or notify parents

14. HOW LONG PERSONAL DATA IS KEPT?

We will only retain personal data for as long as is reasonably necessary. Upon deletion of an account, all personal data will be removed as soon as possible, and always within 90 days of the deletion.

15. LEGAL BASIS FOR THE PROCESSING OF PERSONAL INFORMATION

1. We rely upon both consent and legitimate business interests for processing personal information. For example, we may process personal information with a user's consent when they agree that we may place cookies on their devices, or that we can process information that they enter into a form on one of our sites.

2. It is in our interest as a business to enhance the services that we provide which may include processing your information to enable us to:
 - Respond to User enquiries and to fulfil User requests
 - Send Customers or Potential Customers relevant marketing information and offers
 - Complete transactions
 - Provide customer service

- Send administrative information
 - Personalize Users' experiences with our sites
 - Do so where we are required to by law
3. We may also process personal information when it is in our or a Users' legitimate interests to do so and when these interests are not overridden by an individual's data protection rights.

16. CALIFORNIA RESIDENTS –CALIFORNIA PRIVACY RIGHTS

Pursuant to California Civil Code Section 1798.83, residents of the State of California have the right to request from companies conducting business in California certain information regarding Site's disclosure within the immediately preceding calendar year of that California resident's personal information to third parties (and in some cases, affiliates) for their direct marketing purposes.

If you are a California resident and you have questions about our practices with respect to sharing information with third parties and affiliates for their direct marketing purposes, please send your request to the following email address: <admin email>. You must put the statement "Your California Privacy Rights" in the subject field of your e-mail. You must include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labelled or sent properly, or do not have complete information.

19 DATA SECURITY

We have implemented multiple security measures designed to secure your personal information from accidental loss and unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Platform. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platform.

17. DO NOT TRACK DISCLOSURE

Third parties such as advertising networks, analytics Efizza, and widget Efizza may collect information about your online activities over time and across different Platforms when you access or use our Service.

18. CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Platform home page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the primary e-mail address specified in your account and/or through a notice on the Platform home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Platform and this privacy policy to check for any changes.