

PRIVACY POLICY

1. SCOPE OF THIS PRIVACY POLICY

In this Privacy Policy, we explain what personal data we collect from visitors to the Passky website and/or properties that link to this Privacy Policy and how we use such personal data.

It is important to note that this Privacy Policy does not apply to any other data, such as any personal data that may be included in the files, documents, recordings, chat logs, transcripts, and similar data that we maintain on our customers' behalf, as well as any other information our customers may upload to their Passky account(s) in connection with their use of our Services (which we refer to as "Content" in our Terms of Service or information gathered from other channels, such as publicly available sources. For the avoidance of doubt, we process customer Content, including any personal data which may be included therein, solely for the purpose of providing and operating our Services to our customers and only in accordance with their written instructions, which typically take the form of our Terms of Service.

2. DATA CATEGORIES AND COLLECTION PURPOSES

When you visit our website and/or use our Services, you provide the following categories of personal data to us:

- **Customer Account and Registration Data** is data you provide when you create your account with us, request support or technical assistance and a valid email address. We need this data to provide the Services to you, to maintain and support your account.
- **Service Data (including Session, Location and Usage data):** When you visit our website and use our Services, we receive data that you or others voluntarily enter, as well as data that is automatically logged by the website or Service - for example, duration of session, connections made, hardware, equipment and devices used, IP addresses, location, language settings, operating system used, unique device identifiers and other diagnostic data. We need this information to provide, operate, and improve our Services. We collect location-based data for the purpose of providing, operating, and supporting the Service and for fraud prevention and security monitoring; you can disable location data transmission on mobile devices at any time by disabling location services from the settings menu on your device.

We strive to limit the types and categories of personal data that is collected from, and processed on behalf of, our users to include only information which is necessary to achieve the purpose(s) for which it was collected and we do not use personal data for additional purpose(s) which are incompatible with their initial collection. In other words, we have measures and policies in place designed to ensure that we only collect and process information from our users that we believe is necessary to operate and provide them with a world-class Service.

3. HOW WE USE YOUR DATA

We use the data we collect from visitors to our website to: (a) provide and operate our Services; (b) address and respond to service, security, and customer support needs; (c) detect, prevent, or otherwise address fraud, security, unlawful, or technical issues; (d) comply with applicable laws and administrative requests, protect our rights, assert and defend against claims; (e) fulfill contracts; (f) maintain and improve our Services; (g) provide analysis or valuable data back to our customers and users; (h) assess the needs of your business to determine and promote other Passky products which we believe may be helpful to you; (i) provide product updates, marketing communications, and service data; (j) conduct research and analysis for business planning and product development; (k) display content based upon your interests; and (l) to the extent permitted by law, we may combine, correct, and enrich personal data that we receive from you with data about you from other sources, including publicly available databases or from third parties to update, expand, and analyze our records, identify new prospects for marketing, and provide products and Services that may be of interest to you.

4. ANALYTICS, COOKIES AND OTHER WEB SITE TECHNOLOGIES

We continuously improve our website through the use of first- and third-party cookies and other web analytics tools, which help us understand how our visitors use our websites, desktop tools, and mobile applications, what web pages, features and functions they like and dislike, and where they may have run into problems which need to be addressed.

5. DATA SHARING

We share your personal data: (a) with our affiliated companies and subsidiaries; (b) at your direction, with separate, specific notice to you, or with your consent; (c) with third-party service providers under appropriate confidentiality and data privacy obligations; (d) in connection with a merger, divestiture, acquisition, reorganization, restructuring, financing transaction or sale of assets pertaining to a business line; and (e) as required by law or administrative order, to assert claims or rights, or to defend against legal claims.

To the extent Passky uses its affiliates or third-party providers in the provision and operation of its Services and processing of any Content, including any personal data therein, it discloses those parties.

6. CHANGES

We update this Privacy Policy from time-to-time to reflect changes to our personal data handling practices or respond to new legal requirements and will post updates here. However, if we make any material changes that have a substantive and adverse impact on your privacy, we will provide notice on this website and additionally notify you by email for your approval prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

7. CHILDREN'S PRIVACY

Passky's web-pages are intended for general audiences, we do not seek through our sites to gather personal data from or about persons that are sixteen (16) years of age or younger. If you inform us or we otherwise become aware that we have unintentionally received personal data from an individual under the age of sixteen (16), we will delete this information from our records.

8. ACCESS REQUESTS

Passky respects your control over your information and, upon request, we will confirm whether we hold or are processing information that we have collected from you. You also have the right to amend or update inaccurate or incomplete personal data, request deletion of your personal data, or request that we no longer use it. Under certain circumstances we will not be able to fulfill your request, such as if it interferes with our regulatory obligations, affects legal matters, we cannot verify your identity, or it involves disproportionate cost or

effort, but in any event we will respond to your request within thirty (30) days and provide you an explanation.

Please note that for personal data about you that we have obtained or received for processing on behalf of a separate, unaffiliated entity – which determined the means and purposes of processing, all such requests should be made to that entity directly. We will honor and support any instructions they provide us with respect to your personal data.