

PRIVACY POLICY

Last updated: December 23rd, 2020

This is the privacy policy (the “**Policy**”) of Xverum LLC,, of 2801 Greene St., Suite #2, Hollywood, Florida 33020, U.S.A. (the “**Company**,” “**We**,” **Us**,” or “**Our**”).

The Company's services are offered in two manners. Users can receive a dataset in a machine-readable format (the "**Dataset Services**"). Alternatively, they can use Our Platform (the "**Platform**") by way of accessing Our API to extract publically available data from webpages (the "**API Services**" and together with the Dataset Services, the "**Services**").

This Policy describes how We handle Personal Data of the users of Our Services (the “**Users**”) and of the persons whose Personal Data is posted on publically available pages on the web, including their public social media profiles, and which are the subject of the Dataset Services (the “**Dataset Subjects**”). Each of the Users and the Dataset Subjects shall also be referred to in this Policy as “**You** or “**Your**”.

WE DO NOT COLLECT ANY PERSONAL DATA ABOUT DATASET SUBJECTS THAT WAS NOT PREVIOUSLY MADE PUBLIC BY THEM OR ON THEIR BEHALF ON ANY THIRD PARTY ON-LINE SERVICE.

The Company is committed to securing Your Personal Data and Your privacy. According to this commitment, We will uphold the following principles:

- To be transparent in respect to the collection and processing of Personal Data about You:

It is our primary goal to provide You with the relevant information concerning Your Personal Data, so you can take your own decisions about the use of it.

Our complete Policy is intended to provide You with the widest understanding of the types of Personal Data collected by Us and how We process them. It is therefore important that You review the Policy at the first possible opportunity and from time to time.

Also, if We find that You are required to be provided with specific information, We will provide it to You in the appropriate time and place, in accordance with the applicable law.

We are also happy to answer any questions You may have and provide You with clarifications regarding any concerns You may have, subject to the law. For that purpose, You can contact Us by sending email to the following address: privacy@xverum.us.

- To process Personal Data about You solely for the purposes outlined in the Policy:

The purposes for which We may process Personal Data about You, as a User, include, among other things providing the Services requested/asked by You, enhancing the user experience in the Services, improving the Services, protecting Our rights and interests,

performing business and administrative activity that supports the provision of the Services to Our Users, and/or upholding any legal and/or regulatory requirements.

As a Dataset Subject, We primarily process Personal Data about You to preserve a record of data published by You or on Your behalf publically on the web, including Your public social media profiles, thereby creating a repository of data about the Dataset Subjects and make such repository available to Our Users on a fee basis.

The entire list of purposes for which We use Personal Data about natural persons is listed in section 6 of the Policy.

- To invest significant resources in order to respect Your rights in connection with Personal Data about You:

We apply significant resources to allow You to exercise Your rights as a data subject. Your rights as data subjects are outlined in detail in section 9 of the Policy, and You may approach Us any time if You wish to exercise them. We will fulfill Your instructions in accordance with the law, and We will not discriminate You for exercising Your privacy rights.

- To secure Personal Data about You:

We will do Our best efforts to use a wide array of means and measures aimed at ensuring that the Personal Data about You is secured.

Our Complete Privacy Policy

In order to view the entire document, please press [here](#).

1. To What Does This Privacy Policy Apply?

This Policy describes what kind of Personal Data the Company collects about natural persons, and how it collects it, uses it, shares it with third parties, secures it, processes it, etc.

In this Policy, “Personal Data” refers to any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or in combination with additional information that We have or that We have access to.

In this Policy, the “processing” of Personal Data refers to any operation or set of operations performed on Personal Data, including the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of Personal Data.

You must be at least 18 years old (or such other age permissible by applicable law if higher than 18) to access and/or use Our services and/or register with Us. We do not knowingly collect Personal Data about any person under the age of 18 (or such other age permissible by applicable law if higher than 18). If You believe We have obtained Personal Data about a person under the age of 18, please contact Us at: privacy@xverum.us.

2. Data Controller

The Company:

The Company is the data controller in respect of the Personal Data it collects about its Users and in respect of the Personal Data that it collects about the Dataset Subjects for the purpose of providing to its Users the Dataset Services. This means that We are primarily responsible for the processing of Personal Data about Our Users and Dataset Subjects.

PLEASE NOTE: the Personal Data collected by the Users of the API Services is controlled by such Users, and not by the Company, which is considered a data processor in respect of the processing of such data. Therefore, this Policy does not apply to such Personal Data, but rather the privacy policies of the Users of the API Services apply to such data.

3. When Do We Collect Personal Data About You?

Users:

We collect Personal Data about Users whenever they use Our services (including, but not limited to, the Platform and/or Services), and/or contact Us. In some instances, as a User, You will actively provide Us with the Personal Data, and in other instances, We will collect the Personal Data about You by examining and analyzing Your use of the Services, including the Platform.

Dataset Subjects:

We crawl publically available web pages, which contain publically available social media profiles, and scrape data that matches the requirements of the Dataset Services that We offer to Our Users. Therefore, when Dataset Subjects publish Personal Data on publically available web pages, We may collect such Personal Data. When You post Personal Data on a third-party website or social media, Our collection of such Personal Data depends upon Your privacy settings with that third-party website or social media. Therefore, You should always review, and if necessary, adjust Your privacy settings in any third-party website or social media before publishing any Personal Data on their pages.

4. No Obligation To Provide Personal Data To The Company And Its Implications

You are not obligated to provide Us with any Personal Data about You. However, in some instances, not providing such Personal Data will prevent Us from providing You with the

services You requested Us to provide You, and/or may cause malfunctioning of the Services, including the Platform. Please see below a detailed description of such instances.

Providing Personal Data in order to contract with You: In some instances, providing Personal Data about You is a precondition to executing a contract between Yourself and the Company. In these instances, while You are not obligated to provide Personal Data about You, if You do not provide the Company with such Personal Data, We will not be able to contract with You and therefore will not be able to allow You to use some of the Services.

For example, in order for Us to provide You with certain operational messages relating to the Company and/or the Platform and/or the Services, You are required to Provide Your email address.

5. What Personal Data We Collect About You?

Users:

If You are a User, We may collect from You the following types of Personal Data:

Personal Data We collect upon registration to Our Services: full name, email address, business name, country location, and any additional information that You choose to share in the message box prior to clicking on “Submit”.

Personal Data We collect while You use the Platform and/or API Services: We collect Your usage patterns on the Platform and/or API Services (including usage times and types of use You are making). In addition, during Your use of the Platform and/or API Services, We also collect Your IP address, in order to verify that You are the one using the Platform and/or API Services.

Personal Data We receive from You: We collect any Personal Data You provide to Us of Your own free will when contacting Us. We may record and/or document in writing Your calls.

Dataset Subjects:

The Personal Data about Dataset Subjects that We collect includes, but not limited to, the following types of Personal Data:

Name, number of contacts, general description, country location, position, workplace, education data, professional experience, membership in social groups, language proficiency, recommendations, professional certificates, social activities, participation in projects and participation in volunteer activities.

The webpages from which We gather Personal Data are not those that typically contain special categories of Personal Data (data regarding race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation). Therefore, unless the User chooses to publish sensitive data about himself, We have no business reason to collect or retain special categories of Personal Data. If You are concerned that special categories of

Personal Data sensitive information about You may be stored by Us, please contact Us at: privacy@xverum.us.

6. The Purposes Of The Processing Of Personal Data And Their Legal Basis

The Company processes Your Personal Data for one or more of the purposes outlined in this section 6 and according to the appropriate legal basis.

The Company will not process Personal Data about You unless there is a legal basis for such processing. The legal basis according to which the Company may process Personal Data about You are as follows:

- a. **Processing is necessary for the performance of a contract to which You are a party or in order to take steps at Your own request prior to entering into a contract.** For example, in order to provide You with access to the Platform and/or Services, Your registration as a User is required as a precondition.
- b. **Processing is based on Your specific consent (if requested and provided).** We may contact and update You about various developments in our Services and make additional offers.
- c. **Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party.** By way of example, for the exercise or defense of legal claims.

Whenever the processing of Personal Data about You is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, the processing is conditional upon such interests not overriding your interests or fundamental rights and freedoms that require protection of Personal Data about You. At any time, You may approach Us by sending a notice to the email address privacy@xverum.us, in order to receive information concerning the review performed by Us. In this way, You can have confidence that We considered Your rights before determining that We may process the Personal Data about You for the purposes of the legitimate interests pursued by the Company or by a third party.

Users:

If You are a User, the following list outlines the purposes for which We may process Personal Data about You and the legal basis for any such processing:

Purpose	Legal Basis
(1) In order to register you with Our Services Upon Your request to access the Company's API or, upon Our engagement with You for the provision of the Dataset Services, We will process Personal Data about you in order to allow Us to provide You with the Services.	● Processing is necessary for the performance of a contract to which You are a party or in order to take steps at Your request prior to entering into a contract.

- (2) **In order to contact you for the purpose of operational requirements**
- In some circumstances, We will contact you in order to update you in respect of certain operational matters—for instance, if We are required to cease operation of the Services in certain jurisdictions, or if a certain aspect of the Services is changing. In these circumstances, We will need to use Personal Data about you accordingly.
- (3) **In order to respond to Your queries, requests, and/or complaints**
- Processing of Personal Data about You is required in order to respond to queries You have concerning the Services.
- (4) **In order for You to pay Us the consideration in connection with Your use of the Services**
- (5) **In order to improve Our services**
- We may use Personal Data about You in order to improve the Services. Such processing will include, among other things, any comments and complaints received in respect of the Services, as well as any errors and malfunctions.
- (6) **In order to prevent fraud and/or abusive use of the Services**
- Processing is necessary for the performance of a contract to which You are a party or in order to take steps at Your request prior to entering into a contract.
 - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
 - Processing is necessary for the performance of a contract to which You are a party or in order to take steps at Your request prior to entering into a contract.
 - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
 - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
 - Processing is necessary for compliance with a legal

obligation to which the Company is subject.

(7) **In order to perform analysis, including statistical analysis**

We use various analytical measures (including statistical ones) to make decisions on various issues.

- Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.

(8) **In order to protect Our and third parties' interests, rights, and assets, including initiation, exercise, or defense of legal claims**

We may process Personal Data about You in order to protect Our interests, rights, and assets, or those of third parties, according to any law, regulation, or agreement, including any of Our terms and conditions and policies.

- Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.

Dataset Subjects:

The Company's primary goal in collecting Personal Data regarding Dataset Subjects is to create a repository of publically available Personal Data regarding persons from webpages that matches the requirements of the Dataset Services offered to Our Users, and make it available to them on a fee basis.

WE DO NOT COLLECT ANY PERSONAL DATA ABOUT DATASET SUBJECTS THAT WAS NOT PREVIOUSLY MADE PUBLIC BY THEM OR ON THEIR BEHALF ON ANY THIRD PARTY ON-LINE SERVICE.

In addition, there are other uses of Personal Data about Dataset Subjects that are incidental to the main use, and they include the following: improving Our Services, developing new Services, protecting Our and third parties' interests, rights, and assets, including initiation, exercise, or defense of legal actions.

The legal basis for Our processing of Personal Data regarding Dataset Subjects is that the processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.

These processing activities are conditional upon such interests, do not override Dataset Subjects' interests or fundamental rights and freedoms that require protection of Personal Data about them. At any time, You may approach Us by sending a notice to the email address privacy@xverum.us, in order to receive information concerning the review performed by Us to make sure We can rely on this legal basis. In this way, You can have confidence that We

considered Your rights before determining that We may process the Personal Data about You for the purposes of the legitimate interests pursued by the Company or by a third party.

We do not control Our Users' use of the Dataset Services and assume no responsibility thereto. However, as part of Our engagement with the Users We require them not to use the Personal Data for purposes that override the interests of the Dataset Subjects and to refrain from using the Personal Data in an unlawful manner.

7. Your Right To Object To The Processing Of Personal Data About You Where Such Processing Is Necessary For The Purpose Of The Legitimate Interests Pursued By The Company Or By A Third Party

If the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, You have the right to object to such processing for this purpose by sending a notice to the following email address: privacy@xverum.us. The above applies unless We demonstrate compelling legitimate grounds for the processing that override Your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

8. Transfer Of Personal Data To Third Parties

The Company shares Personal Data with other companies within the group of companies of which the Company is a part, for the purpose of supporting the activities of the Company and the offering of the Services.

The Company may also share Personal Data about You with third parties that provide Us with the following services:

- a. Storage and hosting providers;
- b. Cloud computing services;
- c. Security services;
- d. Support services;
- e. Payment processing;
- f. Google Analytics;
- g. Research, analytical, technical, and diagnostic services;
- h. Digital signing.

The Company may also share Personal Data about You with its business partners, which provide it with resources that enable the Company to enrich and improve the level of services it provides to its Users.

The Company may share Personal Data about You with governmental, local, official, and regulatory authorities, as well as if such disclosure is required by any applicable law and/or to protect Our and third parties' interests, rights, and assets, including initiation, exercise, or defense of legal claims.

In addition, We may disclose Personal Data about You to potential purchasers or investors of, or lenders to, the Company and/or any company within the group of companies of which the Company is a part, or in the event of any similar transaction (including the sale of assets of the Company and/or of any company within the group of companies of which the Company is a part), and/or in connection with any merger, reorganization, consolidation, or bankruptcy of the Company and/or any company within the group of companies of which the Company is a part.

Applicable to Dataset Subjects:

As part of providing Our Dataset Services, We share Personal Data about Dataset Subjects with the Users of Our Dataset Services, which are persons or entities that come from various sectors, in consideration for a fee.

9. Your Rights In Respect Of The Personal Data About You

You are entitled to the following rights in respect of the Personal Data about You. To exercise such rights, You may send a request to exercise Your rights to the following email address: privacy@xverum.us. In addition, You may exercise Your rights by contacting Us at the following toll-free telephone number: +1 (888) 301-2526.

Right of access and right to know

You have the right to receive from the Company confirmation as to whether or not Personal Data about You is being processed, and, if that is the case, access to the Personal Data and the following information: (1) the purposes of the processing; (2) the categories of Personal Data concerned; (3) the specific pieces of Personal Data that We have collected about You; (4) the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, in particular recipients in third countries outside the European Economic Area (EEA) or international organizations; (5) if possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; (6) the existence of the right to request from the Company rectification or erasure of Personal Data or restriction of processing of Personal Data about You or to object to such processing; (7) the right to lodge a complaint with a supervisory authority; (8) if the Personal Data is not collected from You, any available information as to its source; (9) the existence of profiling; and (10) if Personal Data is transferred to a third country outside the EEA or to an international organization, the appropriate safeguards relating to the transfer.

The Company shall provide a copy of the Personal Data undergoing processing and may charge a reasonable fee for any further copies requested by You. If You make the request by electronic means, and unless otherwise requested by You, the information shall be provided in a commonly used electronic form.

The right to obtain a copy of the Personal Data shall not adversely affect the rights and freedoms of others. Therefore, if the request harms the rights and freedoms of others, the Company may not fulfill Your request or do so in a limited manner.

Right to rectification

You have the right to obtain from the Company the rectification of inaccurate Personal Data about you. Taking into account the purposes of the processing, you have the right for incomplete Personal Data about you to be completed, including by means of providing a supplementary statement.

If the Dataset Subject informs the Company that Personal Data about him/her is inaccurate or incomplete, the Company shall delete such Personal Data.

Right to erasure

In some circumstances, You have the right to obtain from the Company the erasure of Personal Data about You if one of the following grounds applies: (a) the Personal Data is no longer necessary in relation to the purpose for which it was collected or otherwise processed; (b) You withdraw your consent on which the processing is based and there is no other legal ground for the processing; (c) You object at any time, on grounds relating to Your particular situation, to the processing of Personal Data about You that is based on the legitimate interests pursued by Us or by a third party, and there are no overriding legitimate grounds for the processing; (d) You object to the processing of Personal Data about You for direct marketing purposes; (e) the Personal Data has been unlawfully processed; or (f) the Personal Data about You has to be erased for compliance with a legal obligation in European Union or Member State law to which the Company is subject.

Right of restriction of processing

You have the right to obtain from the Company the restriction of processing of Personal Data about You if one of the following applies: (a) the accuracy of the Personal Data is contested by You, for a period enabling the Company to verify the accuracy of the Personal Data about You; (b) the processing is unlawful and You oppose the erasure of the Personal Data about You and request the restriction of its use instead; (c) the Company no longer needs the Personal Data about You for the purposes of processing, but the Personal Data is required by You for the establishment, exercise, or defense of legal claims; (d) if the processing of Personal Data about You is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, unless We demonstrate compelling legitimate grounds for the processing that override Your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims; or (e) if the Personal Data about You is processed for direct marketing purposes, including profiling, to the extent it is related to such direct marketing.

If the processing of Personal Data about You has been restricted following Your request, such Personal Data shall, with the exception of storage, only be processed with Your consent or for the establishment, exercise, or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

Right to data portability

You have the right to receive the Personal Data about You, in a structured, commonly used, and machine-readable format.

The exercise of Your right to data portability is without prejudice to Your and the Company's rights under Your right to erasure. In addition, the right to data portability shall not adversely affect the rights and freedoms of others.

Right to object

You have the right to object at any time, on grounds relating to Your particular situation, to the processing of Personal Data about You that is based on the legitimate interests pursued by the Company or by a third party, including profiling based on such legitimate interests. In such case, We shall no longer process the Personal Data about You, unless We demonstrate compelling legitimate grounds for the processing that override Your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.

You have the right to object at any time to the processing of Personal Data about You for direct marketing purposes, including profiling, to the extent it is related to such direct marketing.

Right to withdraw consent

You may withdraw Your consent provided to Us for the purpose of processing Personal Data about You at any time, without affecting the lawfulness of processing based on Your consent before its withdrawal.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority established by a Member State in the EEA, if You believe that the processing of Your Personal Data by the Company infringes the applicable privacy laws.

Right to non-discrimination for the exercise of Your privacy rights

You have the right to not be discriminated against by Us because You exercised any of Your privacy rights in this section 9.

Right to opt-out of the sale of Your Personal Data

We may share Personal Data about You with third parties in ways that may constitute a "sale" under the California Consumer Privacy Act (CCPA). You may request that We not "sell" Your Personal Data on a going-forward basis. To do so, please complete the form available here and include Your name, email address and/or Company name.

Your rights in respect of Personal Data about you as outlined in this section 9 may be restricted by the European Union or Member State law to which the Company is subject.

We shall provide You with the information requested according to Your rights outlined in this section 9 without undue delay and in any event within one month of receipt of the request. That period may be extended by additional 45 days where necessary, taking into account the complexity and number of the requests. We shall inform You of any such extension within one month of receipt of your request, together with the reasons for the delay.

The information requested according to Your rights outlined in this section 9 shall be provided free of charge unless stated otherwise in this section 9. Where requests are manifestly unfounded or excessive, in particular, because of their repetitive character, We may either (a) charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

The Company may require you to provide additional information necessary to confirm Your identity in order to fulfill Your request according to Your rights outlined in this section 9, if We have reasonable doubts concerning the identity of the natural person making the request.

You may designate an authorized agent to make a request under section 9. To do so, You need to provide the authorized agent written permission to do so and the agent will need to submit to Us proof that such agent has been authorized by You. We will also require that You verify Your own identity, as explained above.

10. Tracking And Cookies

Cookies are commonly used by many web-platforms and Websites. When you visit or access the Platform, a cookie file (which is a small text file) is installed on the device via which You visit or access the Platform. The cookies allow Us to collect information about You and Your behavior, in order to improve Your user experience, to remember Your preferences and settings, and to customize and offer You services that may interest You. Cookies are also used to collect statistics and perform analytics.

Some of the cookies We use are session cookies, which are downloaded temporarily to Your device and last until You close Your web browser, while others are persistent cookies, which last on Your device after You cease browsing the Platform and are used to help the Platform remember You as a returning visitor when You return to the Platform.

Types of cookies:

The cookies We use have been classified according to their functionality, as follows:

Type of Cookie	Purpose	Additional Information
Strictly Necessary Cookies	These cookies are strictly necessary to enable You to navigate the Platform and use features You have requested. They are used to provide you with Our content and services that You have requested. Such cookies are essential to help Your device download or stream information so that You can navigate around the Platform, use its features, and return to pages You have previously visited.	These cookies collect Personal Data about You, such as user name and last login date, and identify You as being logged in to the Platform. These cookies are deleted when You close Your web browser (session cookies).

Functionality Cookies	These cookies are used to recognize You when You return to the Platform and allow Us to remember Your choices and preferences.	These cookies survive the closing of Your web browser and last until their applicable expiry time.
Google Analytics	These cookies are set by Google Analytics for collecting IP addresses and usage habits.	These cookies collect interests, user behavior, device info, operating system info, browser info, screen resolution, flash version, current, and previous webpages browsed entry and exit page, IP address, and device ID.
Performance Cookies	These cookies are used to provide aggregated statistics in respect of the performance of the API Services and to test and improve such performance, in order to provide a better user experience. In addition, they allow Us to carry out analytical functions on the Platform.	These cookies collect anonymized data that is not related to an identified or identifiable natural person. These cookies are valid for varying periods; some are deleted once You close Your browser, while others have an indefinite validity period.
Third-Party Marketing/Targeting Cookies	These cookies are used to deliver ads and marketing communications, and to display the Platform in a manner that is more relevant to You. They are also used to measure the effectiveness of an advertising campaign. These cookies record Your visit to the Platform and the pages You have visited.	Some of these cookies are provided and used by third parties. These cookies are valid for varying periods; some are deleted once You close Your browser, while others have an indefinite validity period.

Blocking and removal of cookies

You can change Your browser settings to block and delete some or all cookies. Please see below links to instructions on how to do this in respect of some of the most popular web browsers:

- [Firefox](#)
- [Internet Explorer](#)
- [Google Chrome](#)

- [Safari](#)

Please note, however, that if You do so, some or all of the Platform and/or Services features and functionalities might not perform as intended.

11. Retention Of Personal Data About You

The Company shall retain Personal Data about You for as long as is required to fulfill the purposes of the processing of the Personal Data as outlined in this Policy, or for a longer period as required according to the legislation, regulation, policies, and orders that apply to Us.

In order to ensure that Personal Data about You is not retained for longer than is required, We periodically review Personal Data retained by Us to examine whether any Personal Data can be erased.

12. Transfers Of Personal Data To A Third Country Or An International Organization

Personal Data about You may be transferred to a third country (that is, in case that you are an EEA resident, a country outside the EEA; and in case that you are not an EEA resident jurisdictions other than the one you reside in) or to international organizations. In such circumstances, the Company shall take appropriate safeguards to ensure the protection of Personal Data about You and to provide that enforceable data subject rights and effective legal remedies for data subjects are available.

If you are an EEA resident, please note that these safeguards and protection will be available if any of the following are met:

- a. The transfer is to a third country or an international organization that the EU Commission has decided provides an adequate level of protection to the Personal Data that is transferred to it pursuant to Article 45(3) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("**GDPR**"), including any transfer in accordance with the EU-US Privacy Shield Framework;
- b. The transfer is according to a legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR; or
- c. The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR. The clauses adopted by the EU Commission can be viewed at: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

13. Protection Of Personal Data About You

We implement appropriate technical and organizational measures to ensure an appropriate level of security to Personal Data, taking into account the risks that are presented by processing, in particular from an accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored, or otherwise processed.

We may be required, due to legal or other obligations outside Our control, to transfer Personal Data about You to third parties, such as public authorities. In such circumstances, We have limited control over the level of protection provided to the Personal Data about You by such third parties.

Any transfer of Personal Data via the internet cannot be fully secured. Therefore, the Company cannot ensure the protection of Personal Data about You when transferred via the internet to Us (including, but not limited to, via the Platform and/or Services).

14. Links To Websites of Third Parties

The Platform may provide links to websites and/or applications of third parties. The Company does not control such websites and applications, nor the collection and/or processing of Personal Data about You by such websites and applications, and We are not responsible for such websites and applications, nor for their privacy and data protection policies and activities. This Policy does not apply to any actions taken via such websites and/or applications.

Whenever You access such third parties' websites and/or applications, We recommend that You carefully review their privacy policies prior to using such websites and/or applications and prior to disclosing any Personal Data about You.

15. Changes To This Policy

We may amend, from time to time, the terms of this Policy. Whenever We amend this Policy, We will notify You of such amendments by publishing the updated Policy on Our website . In addition, when We make significant amendments to this Policy, We will strive to inform You about such amendments via means of communication We believe are reasonably appropriate to inform You of such amendments and by publishing a notice about such amendments on the Website. Unless stated otherwise, all amendments will enter into force upon publication of the updated Policy on Our website.