

## PRIVACY POLICY

*Last updated: January 15, 2022*

This is the privacy policy (the "**Policy**") of Xverum LLC, of 2801 Greene Street, Suite #5, 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 by way of accessing Our API to extract publically available data from webpages (the "**Platform**" 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 Your Personal Data:

It is our primary goal to provide You with the relevant information concerning Your Personal Data, so you can make 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 writing to Our Data Protection Officer by email at the following address: [privacy@xverum.us](mailto:privacy@xverum.us).

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

The purposes for which We may process Your Personal Data, 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 Your Personal Data 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 Your Personal Data:

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 against You for exercising Your privacy rights.

- To secure Your Personal Data:

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

## Our Complete Privacy Policy

### **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.

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.

We do not knowingly collect Personal Data about any person under the age of 18 . If we learn that we have collected or have been sent Personal Data from a child under the age of 18, we will delete that Personal Data as soon as reasonably practicable without any liability to the company. If You believe We have obtained Personal Data about a person under the age of 18, please contact Us at: [privacy@xverum.us](mailto: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 Platform 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 Platform apply to such data.

## **3. When Do We Collect Your Personal Data?**

### 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.

#### **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.

#### **4. 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:** We collect Your usage patterns on the Platform (including usage times and types of use You are making). In addition, during Your use of the Platform We also collect Your IP address, in order to verify that You are the one using the Platform.

**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](mailto:privacy@xverum.us)

## **5. 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](mailto: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.

- d. **Processing which is necessary for compliance with a legal obligation to which the Company is subject.** This includes compliance and audit purposes, such as meeting Our reporting obligations in Our various jurisdictions, anti money laundering, and for crime prevention and prosecution in so far as it relates to Our staff, Users etc.

If necessary, We will use Personal Data to enforce Our terms, policies and legal agreements, to comply with court orders and warrants and assist law enforcement agencies as required by law, to collect debts, to prevent fraud, infringements, identity thefts and any other service misuse, and to take any action in any legal dispute and proceeding.

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:

<b>Purpose</b>	<b>Legal Basis</b>
(1) <b>In order to register you with Our Services</b>  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) <b>In order to contact you for the purpose of operational requirements</b>  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.	● 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.
(3) <b>In order to respond to Your queries, requests, and/or complaints</b>	● Processing is necessary for the purpose of the legitimate

Processing of Personal Data about You is required in order to respond to queries You have concerning the Services.

interests pursued by the Company or by a third party.

(4) **In order for You to pay Us the consideration in connection with Your 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.

(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.

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

(6) **In order to prevent fraud and/or abusive use of the Services**

- 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

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

assets, or those of third parties, according to any law, regulation, or agreement, including any of Our terms and conditions and policies.

*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](mailto: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.

**6. Your Right To Object To The Processing Of Your Personal Data 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](mailto: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.

## **7. Sharing Personal Data With 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.
- i. Other industry standard business software and partners.

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.

## **8. Your Rights In Respect Of Your Personal Data**

You are entitled to the rights listed below in respect of Your Personal Data.

To exercise such rights, You may send a request to exercise Your rights to the following email address: [privacy@xverum.us](mailto:privacy@xverum.us); or to the following physical address: 2801 Greene Street, Suite #5, Florida 33020, U.S.A

### **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, obtain disclosure regarding certain aspects of the processing and a copy of the Personal Data undergoing processing. The Company may charge a reasonable fee for any further copies requested by You.

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.

### **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.

### **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.

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. If the supervisory authority fails to deal with a complaint, You may have the right to an effective judicial remedy.

### **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.

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. We may keep details of such rights exercised for Our own compliance and audit requirements.

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. Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data, depending on technical commercial capability. Such information may continue to be used by Us.

## **9. 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	<p>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.</p> <p>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.</p>	<p>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.</p> <p>These cookies are deleted when You close Your web browser (session cookies).</p>
Functionality Cookies	<p>These cookies are used to recognize You when You return to the Platform and allow Us to remember Your choices and preferences.</p>	<p>These cookies survive the closing of Your web browser and last until their applicable expiry time.</p>

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 Platform 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](#)
- [Microsoft Edge](#)
- [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.

#### **10. Retention Of Your Personal Data**

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.

#### **11. 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.

The company transfers data to other jurisdictions, including Israel, a jurisdiction deemed adequate by the EU Commission. If you are an EEA resident, please note that where Your Personal Data is transferred outside of the EEA, We will take all steps reasonably necessary to ensure that Your Personal Data is subject to appropriate safeguards, including entering into contracts that require the recipients of Personal Data to adhere to data protection standards that are considered satisfactory under EU privacy laws and other applicable legislation, and that it is treated securely and in accordance with this Privacy Policy. Transfers to Israel and other jurisdictions outside the EEA are made based on an adequacy ruling by the EU Commission and where necessary, on the Standard Contractual Clauses published by the EU Commission. For more information about these safeguards, please contact us as set forth below.

#### **12. Protection Of Your Personal Data**

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.

Within the company, We endeavor to limit access to Personal Data to those of Our personnel who: (i) require access in order for us to fulfill our obligations, including also under our agreements, and as described in this Privacy Policy, and (ii) have been appropriately and periodically trained with respect to the requirements applicable to the processing, care and handling of the Personal Data, and (iii) are under confidentiality obligations as may be required under applicable law.

We shall act in accordance with our policies and with applicable law to promptly notify the relevant authorities and data subjects in the event that any personal data processed by Us is lost, stolen, or where there has been any unauthorized access to it, all in accordance with applicable law and on the instructions of qualified authority. The company shall promptly take reasonable remedial measures.

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).

### **13. 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.

### **14. 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.

## **15. General**

We invite any suggestions for improvements, questions, complaints or comments concerning this Privacy Policy. You are welcome to contact Us (details below) and We will make an effort to reply within a reasonable timeframe.

For this purpose, You may contact Us by writing to Our Data Protection Officer by email to the following address: [privacy@xverum.us](mailto:privacy@xverum.us).

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