

# PRIVACY NOTICE

## Website and application

### SUMMARY: 2-MINUTE-READ

We take our obligation to protect your privacy seriously!

That is why we provide you with this 2-minute summary, containing the necessary information on how we process your Personal Data.

What you should know:

First of all : you always remain in control of your data.

To whom does this Privacy Notice apply?

This notice applies to any individual whose Personal Data we may collect, use or otherwise process, and more specifically:

- Visitors and users of the BuddyRise Website (hereinafter "Visitors");
- (Representatives of) business partners working with BuddyRise in connection with BuddyRise's business activities (hereinafter "Business Partners");
- (Representatives of) suppliers of goods or services, IT-suppliers, consultants, lawyers, accountants and other third parties in contact with BuddyRise (hereinafter "Suppliers");
- Applicants applying for a position at BuddyRise (hereinafter "Applicants");
- People that have an autoimmune disease and use the Application (hereinafter "Autoimmune Buddies");
- People that are related to an Autoimmune Buddy and use the Application (hereinafter "Loved Ones");
- People that join the community of BuddyRise and do not fall under Autoimmune Buddy, nor under Loved Ones (hereinafter "Other Buddies");
- All Other Persons from whom BuddyRise may process Personal Data, with the exception of those defined above (hereinafter "Other Persons").

What information do we collect about you?

#### When visiting and/or using the Website:

- When you contact us or enter into a contract with us as a (prospective) business partner or supplier, we may collect and process your contact data (such as your (employer/company) name, e-mail address or telephone number); financial data (such as bank account numbers and transaction details) and contractual data (such as the date and type of our agreement).
- By applying for a position at BuddyRise, we collect the information you provide to us, such as identification details, CV and cover letter.

- If you contact us through any medium, we collect information about the communication you have had with BuddyRise, including content and technical data.
- When you fill in the contact form on our Website, we collect and process your data to follow-up on your communication.
- Information about how you make use of our Website.

When using the Application:

- Your general account data;
- Your additional account data;
- Tracking data;
- Information about how you make use of our Application.

Why do we collect this information?

- To respond to your communication and assure good follow-up.
- To establish and/or maintain our contractual relationship.
- To provide you with requested information and carry out our business activities.
- To evaluate your job application.
- To provide you access to our Application via a personal user profile;
- To offer you an optimal use of the Application;
- To provide you useful insights regarding your health condition;
- To improve our services, providing technical support and ensuring the functionality and security of our Website and Application.

Who has access to your data?

- Only the relevant part of our team has access to the information you provide us with.
- Furthermore, we use some suppliers and service providers, such as but not limited to computer security, digital solutions and web hosting services. These parties are legally obliged to ensure your privacy at all times, and will only process data in accordance with our purposes.
- Finally, we may commission a third party to process your data. However, they can only do this for aforementioned purposes and upon our instructions and signature of a data processing agreement.

What do you control?

At any moment, you can request to modify, erase or get a copy of your data. To do so, we kindly request you to follow the procedure as described in our full Privacy Notice under Article 5.

What do we do to protect your data?

- We adopted appropriate safety measures on a technical and an organizational level.

- If you reside in the European Economic Area, your data is stored on high-security servers within the European Union. If you are not residing in the European Economic Area, your data is stored on servers in the United States of America.
- In order to improve our Website and Application and ensure its safety, BuddyRise may need to use the data you have provided us. However, at all times, BuddyRise shall use this data in a GDPR-compliant manner, using state of the art software and solutions.
- We have implemented internal procedures to ensure the confidentiality of our IT-infrastructure and to make sure it is managed responsibly.

If you want to know more: we invite you to read our entire Privacy Notice below, which explains everything in further detail.

# PRIVACY NOTICE

## Website and application

Version Draft 1 (09.09.24)

BuddyRise makes it a matter of utmost importance to respect the privacy of the users of its Website and Application. We are committed to treat your Personal Data with the strictest confidentiality, in accordance with the applicable data protection legislation and the present Privacy Notice (hereinafter the "Privacy Notice").

This Privacy Notice is intended to inform you, in a transparent manner, about the Personal Data we collect, the legal grounds for the collection, the purposes for which it is used and the rights you have regarding the processing of such Personal Data.

You are not obliged to provide us your Personal Data, however understand that in some cases, if you refuse to provide us certain Personal Data, we will not be able to provide the requested services or provide you the requested information.

BuddyRise reserves the right to change, modify and update this Privacy Notice from time to time by posting a revised version on the Website and in the Application. Therefore, we advise you to regularly consult this Privacy Notice to stay informed about the latest changes.

If you have any other questions, please do not hesitate to contact us at the following e-mail address: [charline@buddyrise.com](mailto:charline@buddyrise.com).

### ARTICLE 1 - GENERAL

1.1 BuddyRise Inc., (hereinafter "we", "us", "our" or "BuddyRise"), with registered office at [813 E University Dr, Phoenix, AZ 85034, United States](#) XXX and registered with the Crossroads Bank for Enterprises under enterprise number 38 4329122 assumes responsibility for the processing of your Personal Data as "Controller", including the use of the BuddyRise Website, ([www.buddyrise.com](http://www.buddyrise.com)) (hereinafter "Website") and the BuddyRise Application, (<https://buddyrise.flutterflow.app>) (hereinafter "Application").

1.2 In our Privacy Notice, "Personal Data" shall mean any information relating to you as an identified or identifiable natural person and User of the Website and Application, including personal information, the term used in US law, being any information about you which can be used to identify you. This personal information includes information about you as a person (such as name, address, and date of birth and health data), your devices, payment details, and even information about how you use an app or online service (hereinafter "Personal Information"). BuddyRise can

collect, use or otherwise process Personal Data of people classified in the following categories:

The users of the Website and Application (hereinafter "you", "your" or "Users") being:

- Visitors and users of the BuddyRise Website (hereinafter "Visitors");
- (Representatives of) business partners working with BuddyRise in connection with BuddyRise's business activities (hereinafter "Business Partners");
- (Representatives of) Suppliers of goods or services, IT-suppliers, consultants, lawyers, accountants and other third parties in contact with BuddyRise (hereinafter "Suppliers");
- Applicants applying for a position at BuddyRise (hereinafter "Applicants");
- People that have an autoimmune disease and use the Application (hereinafter "Autoimmune Buddies");
- People that are related to an Autoimmune Buddy and use the Application (hereinafter "Loved Ones");
- People that join the community of BuddyRise and do not fall under Autoimmune Buddy, nor under Loved Ones (hereinafter "Other Buddies");
- All Other Persons from whom BuddyRise may process Personal Data, with the exception of those defined above (hereinafter "Other Persons").

1.3 BuddyRise processes Personal Data in accordance with the applicable legislation, and, in particular, in accordance with the Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of Personal Data and the free movement of such data, applicable from 25 May 2018 (hereinafter "GDPR"). If you do not reside in the European Economic Area, there are additional disclosures for the relevant applicable legislation in Article 8, 9, 10 and 11.

1.4 The access to or use of our Website and Application implies your full and unreserved understanding of this Privacy Notice. This means that you are fully informed about how BuddyRise collects, uses and processes your Personal Data, in accordance with the provisions of this Privacy Notice and for the purposes outlined therein.

## ARTICLE 2 – WHAT PERSONAL DATA DOES BUDDYRISE COLLECT

For the purposes outlined in Article 3, BuddyRise might process the following categories of your Personal Data as a User of our Website and/or Application:

Data Category	Relevant Data Subjects	Details	Context
<p><b>Category 1</b> (Professional) identification data</p>	<ul style="list-style-type: none"> <li>• Business partners</li> <li>• Suppliers</li> <li>• Applicants</li> <li>• Other Persons</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname, phone number, e-mail address, address and country;</li> <li>• Information about your employer or company, such as company name, business address, billing details and VAT number;</li> <li>• Where applicable: social media information, such as your (company) username/names on your social media;</li> <li>• Information about our/your communications, including content, IP address and technical details.</li> </ul>	<ul style="list-style-type: none"> <li>• By contacting us, via phone, e-mail or any other communication channel;</li> <li>• By (considering) entering into a business relationship with us (e.g. when you enter into a contract with us as a business partner, supplier, etc.);</li> <li>• By giving out your business card;</li> <li>• Through social media (for example, when you follow us or contact us on LinkedIn).</li> </ul>
<p><b>Category 2</b> Contractual data (to the extent that it constitutes Personal Data)</p>	<ul style="list-style-type: none"> <li>• Business partners</li> <li>• Suppliers</li> </ul>	<p>Data relating to agreements you have entered into with BuddyRise (e.g. date and type of agreement, financial data and other Personal Data relating to the agreement ).</p>	<ul style="list-style-type: none"> <li>• By entering into an agreement with us.</li> </ul>
<p><b>Category 3</b> Your data as an applicant</p>	<ul style="list-style-type: none"> <li>• Applicants</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname, phone number, e-mail address, address, photo and country, as well as other identification you provide to us;</li> </ul>	<ul style="list-style-type: none"> <li>• By applying for a position or internship at BuddyRise.</li> </ul>

		<ul style="list-style-type: none"> <li>• CV and cover letter.</li> </ul>	
<p><b>Category 4</b></p> <p>Your communication via our business relationship or Website</p>	<ul style="list-style-type: none"> <li>• Visitors</li> <li>• Business partners</li> <li>• Suppliers</li> </ul>	<p>Information about your communications with BuddyRise, through our Website or as a result of our business relationship, including technical details and content.</p>	<ul style="list-style-type: none"> <li>▪ By contacting us, by phone, e-mail or any other communication service;</li> <li>▪ By (considering) entering into a business relationship with us and communicating with us in that context.</li> </ul>
<p><b>Category 5</b></p> <p>Data from the Contact Form on our Website</p>	<ul style="list-style-type: none"> <li>• Visitors</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• Email address</li> <li>• Message</li> </ul>	<p>By completing the Contact Form on our Website.</p>
<p><b>Category 6</b></p> <p>Information about your visit and use of our Website</p>	<ul style="list-style-type: none"> <li>• Visitors</li> </ul>	<p>By visiting our Website, the accessed servers automatically record certain data, by setting cookies.</p>	<p>By setting cookies (see Article 8 - Cookies).</p>
<p><b>Category 7</b></p> <p>General account data</p>	<ul style="list-style-type: none"> <li>• Autoimmune Buddies</li> <li>• <u>    </u>Loved Ones</li> <li>• <u>    </u>Other Buddies</li> </ul>	<p><u>Required:</u></p> <ul style="list-style-type: none"> <li>• Email address</li> <li>• Password hash</li> <li>• Username</li> <li>• Profile picture</li> <li>• Gender</li> <li>• Country of residence</li> <li>• Date of birth</li> <li>• Reason for joining (Autoimmune Buddy, Loved One or Other Buddy)</li> </ul> <p><u>Optional:</u></p> <ul style="list-style-type: none"> <li>• Google account</li> </ul>	<p>Your identification data will be processed when you log into our Application for the first time to create your personal user profile.</p>
<p><b>Category 8</b></p>	<ul style="list-style-type: none"> <li>• Autoimmune Buddies</li> </ul>	<ul style="list-style-type: none"> <li>• Autoimmune condition</li> </ul>	<p>Your additional account data will be</p>

Additional account data		<ul style="list-style-type: none"> <li>• Diagnosis story or related story</li> <li>• Hobbies and passions</li> </ul>	processed when you log into our Application for the first time and choose to share this data with us within the Application.
	<ul style="list-style-type: none"> <li>• Loved Ones</li> </ul>	<ul style="list-style-type: none"> <li>• Autoimmune condition of your loved one</li> <li>• Diagnosis story or related story</li> <li>• How you support your Autoimmune Buddy</li> </ul>	
	<ul style="list-style-type: none"> <li>• Other Buddies</li> </ul>	<ul style="list-style-type: none"> <li>• Reason for joining</li> <li>• Motivation to involve in communities like BuddyRise</li> </ul>	
Category 9 Tracking data	<ul style="list-style-type: none"> <li>• Autoimmune Buddies</li> </ul>	<ul style="list-style-type: none"> <li>• Symptoms experienced</li> <li>• Food pictures</li> <li>• Medication or supplement intake</li> <li>• Mood and feelings tracking</li> <li>• Chats</li> <li>• ...</li> </ul>	Your tracking data will be processed during your use of the Application to provide you useful insights regarding your health.
Category 10 Information about your usage of the Application	<ul style="list-style-type: none"> <li>• Autoimmune Buddies</li> <li>• Loved Ones</li> <li>• Other Buddies</li> </ul>	Information related to your use of the Application, such as: <ul style="list-style-type: none"> <li>• Features and functionalities used</li> <li>• Technical (device-related) information</li> <li>• Feedback</li> <li>• ...</li> </ul>	Information about your usage of the Application will be processed when you make use of the Application.

In certain cases, we collect personal data that has not been directly provided by you, but by other Users of the App or Website. This may occur, for example, when a Loved One provides information about an Autoimmune Buddy in the App or Website or vice versa.

### ARTICLE 3 – THE LEGAL BASES AND PURPOSES OF DATA PROCESSING

We only process your Personal Data when we have a specific purpose and lawful basis to do so. Furthermore, we only process what is relevant for the pursuit of each specific purpose, in particular:



### 3.1 General purposes

Data Category	Legal basis	Purpose
<p><b>Category 1</b> (Professional) identification data</p>	<p>Necessary for the performance of the contract we have entered into or are considering entering into with you (Art. 6.1, b) GDPR)</p> <p><i>or</i></p> <p>Our legitimate interests (Art. 6.1, f) GDPR)</p> <p><i>or</i></p> <p>Your consent (Art. 6.1, a) GDPR)</p>	<p>Personal Data is processed by BuddyRise to provide our services, conduct our business activities, manage the contractual relationship we may have with you, answer your queries, provide information, advise you on our services, etc.</p> <p>Depending on the specific circumstances, some of these processing activities will be necessary for the performance of a contract we have entered into or will enter into with you. In the absence of such a contract, the processing will be necessary to pursue our legitimate interests. Finally, if required by law, we will seek your prior consent before processing certain of your Personal Data.</p>
<p><b>Category 2</b> Contractual data (to the extent that it constitutes Personal Data)</p>	<p>Necessary for the performance of the contract we have entered into or are considering entering into with you (Art. 6.1, b) GDPR)</p>	<p>Contractual data will be processed by BuddyRise to manage the commercial and contractual relationship we have with you (e.g. for payment and billing purposes).</p>
<p><b>Category 3</b> Your data as an applicant</p>	<p>Necessary for the performance of the contract we have entered into or are considering entering into with you (Art. 6.1, b) GDPR)</p> <p><i>or</i></p> <p>Our legitimate interests (Art. 6.1, f) GDPR)</p> <p><i>or</i></p> <p>Your consent</p>	<p>Applicant data is processed by BuddyRise to evaluate your application and pursue a recruitment policy.</p> <p>Depending on the specific circumstances, some of these processing activities will be necessary for the performance of the contract we are considering entering into with you. In the absence of such a contract, the processing will be necessary to pursue our legitimate interests related to the improvement of our recruitment policy and process. Finally, if required by law, we will seek your prior consent before processing certain of your Personal Data.</p>

	(Art. 6.1, a) GDPR)	
<b>Category 4</b> Your communication via our business relationship or Website	Necessary for the performance of the contract we have entered into or are considering entering into with you (Art. 6.1, b) GDPR <i>or</i> Your consent (Art. 6.1, a) GDPR)	Your communication may be processed by BuddyRise if necessary, in connection with the performance of the agreement we have entered into or are considering entering into with you.  BuddyRise may also process your communication based on the consent you have given by actively contacting us through our Website.
<b>Category 5</b> Data from the Contact Form on our Website	Our legitimate interests (Art. 6.1, f) GDPR)	The data you insert into the contact form will be processed in order to make it possible to respond to your communication.
<b>Category 6</b> Information about your visit and use of our Website	Your consent (Art. 6.1, a) GDPR) <i>or</i> Our legitimate interests (Art. 6.1, f) GDPR)	Information about your visit and use of our Website is processed by BuddyRise in order to: <ul style="list-style-type: none"> <li>● analyze, adapt and improve the content of the Website;</li> <li>● personalize your experience on the Website;</li> <li>● maintain and improve the security of our Website;</li> <li>● generate statistics;</li> <li>● facilitate the availability and use of the Website.</li> </ul> For more information, please refer to Article 8 – Cookies.
<b>Category 7</b> General account data	Necessary for the performance of a contract (Art. 6.1, b) GDPR) <i>And</i> Your explicit consent (Art. 9.2, a) GDPR)	We may process your account data set out to create your personal user profile, in accordance with the Terms of Use of the Application.  Insofar your account data includes health-related information, its processing will be based on your explicit consent.
<b>Category 8</b> Additional account data	Your consent (Art. 6.1, a) GDPR) <i>And</i>	We may process your additional account data to complete your profile with additional information to offer you an optimal use of the Application. We do this based on your consent

### 3.2 Improvement of our algorithms

As part of our efforts to improve our Application and services and provide you with the best possible user experience, we may process your Personal Data, relating to the Application, for the purpose of training our algorithms (being the core components of our Application). This may include but is not limited to the use of your Personal Data to refine and enhance the functionality of the Application and our services, tailor our analyses, and optimize user experience.

We will exclusively process your Personal Data for this purpose in a strictly minimized manner, either in aggregated form or, whenever feasible, in pseudonymized form.

The processing of your Personal Data for the improvement of our algorithms is based on our legitimate interest.

### 3.3 Direct Marketing

If we have obtained your electronic contact details in the context of providing our services, we may use your electronic contact details to send you, via e-mail, promotional material regarding similar services we may offer. This is based on our legitimate interest.

Other promotional material, concerning non-similar services we may offer, will only be sent to you if you have given us your prior consent to do so.

We may also transfer some of your Personal Data to our data processors, for direct marketing purposes relating to our services.

We will at all times offer you a GDPR-compliant way to opt out of receiving such emails at any time, free of charge and without motivation, for example by clicking the unsubscribe button at the end of every promotional email or by sending an email to [charline@buddyrise.com](mailto:charline@buddyrise.com).

### 3.4 Transfer to third parties

We treat your Personal Data as confidential information and will not disclose or communicate them to third parties under any condition or for any purpose other than those specified in this Privacy Notice, or under the conditions in which the law requires us to do so.

We may disclose your Personal Data to third parties to the extent that this is necessary to be able to carry out our business activities, including but not limited to suppliers and service providers that offer services related to IT-support, hosting, computer security or other specific services. In any case, these third parties will not disclose your Personal Data to other third parties, except in the following situations:

- the communication of your Personal Data by such third parties to their suppliers or subcontractors is necessary to be able to carry out our business activities;
- such third parties are obliged by applicable law or regulations to communicate certain information or documents to the competent authorities.

In case of non-payment or intentional misuse, BuddyRise may disclose your Personal Data to authorized persons or agencies determined by law.

We will not sell or hire out your Personal Data to third parties, except in the situations described in this Privacy Notice or unless you explicitly provide your prior consent.

In the event of total or partial reorganization of BuddyRise, transfer of BuddyRise's activities or in the event of BuddyRise being declared bankrupt, your Personal Data may be transferred to new entities or third parties. If reasonably possible, we will inform you in advance of the fact that BuddyRise transfers your Personal Data to such third parties.

### 3.5 Legal requirements

In extraordinary circumstances it may occur that we are obliged to transfer your Personal Data following a court order, or in order to comply with imperative laws and/or regulations. We will, if reasonably possible, try to inform you beforehand, unless revealing this information is subject to legal constraints.

## Article 4 – THE DURATION OF THE PROCESSING

We will store your Personal Data for the duration necessary to achieve the purposes listed in Article 3 of this Privacy Notice, including for as long as this is necessary for the contractual relationship between you and BuddyRise.

We may also store your Personal Data in order to comply with applicable laws or as part of legal requirements, including storage obligations after the termination of the contractual relationship between you and BuddyRise. Therefore, the retention periods mentioned below shall not apply where we are legally obliged to store your Personal Data for shorter or longer periods of time, including by applicable statutes of limitation for invoicing, payment, accounting, tax and regulatory compliance.

## Retention periods

Data	Retention period
<b>Category 1</b> (Professional) identification data	We keep your (professional) identification data contained in Category 1 for as long as necessary to communicate with you, i.e. never longer than <b>two (2)</b> years after the first request or contact. In case of a contractual relationship, we will not retain your identification data for longer than necessary for the purposes set out in this Privacy Notice, which may be up to <b>ten (10)</b> years after the end of the contractual relationship.
<b>Category 2</b> Contractual data (to the extent that it constitutes Personal Data)	We keep your contractual data contained in Category 2 for as long as necessary for the purposes set out in this Privacy Notice, i.e. for <b>ten (10)</b> years after the end of the contractual relationship.
<b>Category 3</b> Your data as an applicant	We do not retain your data as an Applicant contained in Category 3 for longer than <b>two (2)</b> years after the last qualitative contact with you as an Applicant.
<b>Category 4</b> Your communication via our business relationship or Website	We keep your communications data through our business relationship contained in Category 4 for as long as necessary to communicate with you, i.e. never longer than <b>two (2)</b> years after the first request or contact. In case of a contractual relationship, we do not retain your communications through our services for longer than <b>ten (10)</b> years after the end of the contractual relationship.
<b>Category 5</b> Data from the Contact Form on our Website	We keep your data from the contact form contained in Category 5 no longer than necessary to deal with the support you requested, i.e. never longer than <b>two (2) years</b> after the request.
<b>Category 6</b> Information about your visit and use of our Website	With regard to data relating to cookies contained in Category 6, please refer to our Cookie Notice .
<b>Category 7</b> General account data	Your Personal Data contained in Category 7, 8, 9 and 10 will be retained for <b>two (2) years</b> after the deletion of your user profile (which indicates the end of our contractual relationship).
<b>Category 8</b>	

Additional account data	
Category 9 Tracking data	
Category 10 Information about your usage of the Application	

## ARTICLE 5 – YOUR RIGHTS

### 5.1 Right of access and right to obtain a copy

You have the right to access your Personal Data at any time and to obtain information about how we use your Personal Data. This includes the right to request a copy of your Personal Data, for example in the form of screenshots, as well as to receive a summary of your Personal Data in machine-readable form.

### 5.2 Right to rectification

You always have the right to ask us to modify or complete your Personal Data if it is inaccurate or incomplete.

### 5.3 Right to restriction of processing

You have the right to obtain restriction of processing of your Personal Data in the following cases:

- You contest the accuracy of the Personal Data, whereby processing of your Personal Data will be restricted for the period necessary for us to verify the accuracy of your Personal Data.
- The processing is unlawful and you oppose the erasure of your Personal Data and request instead the restriction of its use.
- BuddyRise no longer needs your Personal Data for the purposes described in article 3, but you require them for the establishment, exercise, or defense of legal claims.
- You have objected to the processing of your Personal Data, in accordance with article 5.5 of this privacy statement.

When the processing of your Personal Data is restricted, these data, except for storage, will only be processed:

- i. With your consent;
- ii. For the establishment, exercise, or defense of legal claims;
- iii. To protect the rights of another natural person or legal entity; or

- iv. For important reasons of public interest.

#### 5.4 Right to erasure

You have the right to request BuddyRise to delete your Personal Data to the extent we are not in a position to anonymize it, except where we are required by law to retain it.

Please note that if you request deletion of your Personal Data, we may no longer be able to provide you with the optimal BuddyRise services.

In addition, we will retain your request for deletion of your Personal Data for a period of one year after your request. This is in order to substantiate our fulfillment of your request.

#### 5.5 Right of objection

You have the right to object to the processing of your Personal Data that we process based on our legitimate interests, if you have serious and legitimate reasons for doing so. Upon receiving your objection, we will cease processing your Personal Data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or that are related to the establishment, exercise, or defense of legal claims.

You also have the right to object to the use of your Personal Data for direct marketing purposes. In this case, no specific justification will be required. Please refer to article 3.2 above for further details.

#### 5.6 Right to data portability

You have the right to obtain your Personal Data processed by us in a structured, common and machine-readable form and/or to transfer it to other controllers.

#### 5.7 Right to withdraw consent

You have the right to withdraw your prior consent for the processing of your Personal Data when such processing is based on your consent.

#### 5.8 Automated decisions and profiling

You have the right to ask us not to be the subject of a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.

#### 5.9 Exercising your rights

You may exercise your rights, as set forth under articles 5.1 to 5.8 above, by contacting us through any of the channels listed below:

Either through e-mail to: [celeste@buddyrise.com](mailto:celeste@buddyrise.com) [charline@buddyrise.com](mailto:charline@buddyrise.com)

Or via ordinary mail to: XX

#### 5.10 Right to file a complaint:

If you are a resident in the European Economic Area, you have the right to file a complaint with BuddyRise's supervising Data Protection Authority/the Data Protection Authority of the country you reside in:

Autorité de la protection des données - Gegevensbeschermingsautoriteit  
(APD - GBA)

Address: Drukpersstraat 35, 1000 Brussels, Belgium

Tel: +32 (0)2 274 48 00

Fax: +32 (0)2 274 48 35

E-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be)

This is without prejudice to a remedy before a civil court. If you are from or work in an EU member state other than Belgium, you may also file a complaint with your national data protection authority. You can find a list of national supervisory authorities within the EU on the following webpage: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en).

If you would suffer damages as a result of the processing of your Personal Data, you may bring a claim for compensation.

#### ARTICLE 6 – SECURITY AND CONFIDENTIALITY

We have adopted safety measures which are suited on a technical, organizational and physical level to avoid the destruction, the loss, the forgery, the adjustment, the non-authorized access or the accidental disclosure of your Personal Data to a third party, as well as the non-authorized processing of these data.

Nevertheless, should these events still occur and affect your Personal Data, we will inform you of the breach without undue delay, including a summary description of the potential impact and a recommendation on measures to mitigate the possible adverse effects of the breach.

We shall not be liable in any way for direct or indirect damages caused by a wrongfully or improper use of the Personal Data by a third party.

At the same time, you also share the responsibility for maintaining the privacy and security of the Application, for example: by not allowing any third party to have insight in your confidential information.

#### ARTICLE 7 – APPLICABLE LAW AND JURISDICTION



This Privacy Notice is managed, interpreted and executed in accordance with Belgian law which exclusively applies to every potential dispute.

The courts of Brussels, Belgium have exclusive jurisdiction to settle any dispute arising out of or in connection to the interpretation or execution of the present Privacy Notice.

## ARTICLE 8 – COOKIES

### 8.1 What are cookies and why do we use them?

A "cookie" is a small file sent by BuddyRise's server and placed on your computer's hard drive. The information stored on these cookies can only be read by BuddyRise and only for the duration of the visit to the Website.

Our Website uses cookies and similar technologies to distinguish your preferences for use from those of other users of our Website. The cookies we use are safe and help us to provide you with a better user experience when you visit our Website.

### 8.2 Types of cookies

There are many different cookies that can be distinguished according to functionality, origin or storage period. Below we provide a general description of the types of cookies relevant in the context of a website. In article 8.3, a detailed overview is given of the specific cookies that are used on our Website.

Type	Function
Essential/Strictly necessary cookies	These cookies are necessary for a website to function and cannot be disabled. They are usually set only in response to actions you have taken, such as setting your privacy preferences, logging in or filling out forms. They are necessary for good communication and facilitate navigation (e.g. returning to a previous page, etc.).
Functional cookies	These cookies increase the user-friendliness of a website by remembering your choices (e.g. language preferences) and offer improved functionality and personalisation to the visitor. These cookies ensure that certain settings are personalised at your request. If you do not accept these cookies, this may affect the performance and functionality of a website and may restrict access to content on said website. These cookies can be set by the website provider or by external providers whose services the website provider has added to the website.
Performance/Analytic cookies	These cookies collect information about the use of a website such as the number of visitors, the time visitors spend on a web page and any error messages. They help a website provider to improve the performance of a website. These cookies do not identify you as an individual.

<p>Targeting/Advertising cookies</p>	<p>These cookies are used to deliver content that is more relevant to you. They can be used to deliver targeted ads or to reduce the number of times you see an ad. They also help measure the effectiveness of advertising campaigns on a website. These cookies may be used to remember websites you have visited and may share this information with other parties, including advertisers. These cookies can also be set by advertising partners through the particular website. They may be used by those companies to create a profile of your interests and show you relevant advertisements on other sites.</p>
<p>First &amp; Third party cookies</p>	<p>First party cookies are cookies that are sent from servers or domains of the website provider, from where the requested service is offered. Third party cookies are cookies that are sent to your browser from a server or domain that is not managed by the website provider, but by a cooperating organisation. Only these third parties have access to these cookies and the information collected by the cookie. If you would like to know more about these cookies, we refer you to the cookie notice these parties offer on their respective websites. Please note that we have no influence on the content of this notice or on the content of these third party cookies.</p>

### 8.3 Overview of cookies

#### First Party Cookies

Domain: www.buddyrise.com

Name Cookie	Type Cookie	Description	Retention Period

#### Third Party Cookies

Name Cookie	Type Cookie	Domain	Description	Retention Period

### 8.4 Your consent

On your first visit to our Website, you will be asked to accept non-essential cookies used by us. You can change the cookie settings for our Website at any time via the hyperlink at the bottom of our Website and thus withdraw your consent.

You can refuse or block cookies by changing the configuration parameters of your navigation system. Disabling cookies may mean that you will not be able to use certain functionalities of the Website.

For more information on how to set your browser, please refer to the following links:

Google Chrome

<https://support.google.com/chrome/answer/95647?hl=en&sjid=12181039658259662986-EU>

Safari

[https://support.apple.com/kb/PH19214?locale=en\\_US](https://support.apple.com/kb/PH19214?locale=en_US)

Internet Explorer

<https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

Mozilla Firefox

<https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

Currently, some browsers offer a "do not track" or "DNT" option that sends a signal to the Websites visited to indicate a visitor's tracking preference. BuddyRise is not currently responding to these signals, as no common industry standard for DNT has been adopted by industry groups, technology companies or regulators. The third parties that place cookies on our Website may or may not respond to any such signals however.

Please note that changing the settings may cause a Website to not work as expected.

More information about cookies can also be found via the following link:

<http://www.allaboutcookies.org/>

More information about online behavioural advertising and online privacy can be found via the following link:

<http://www.youronlinechoices.eu/>

## ARTICLE 9 – ADDITIONAL DISCLOSURES FOR U.S. STATES PRIVACY LAW COMPLIANCE

The following section includes provisions that comply with the privacy laws of these states (California, Colorado, Delaware, Florida, Virginia, and Utah) and is applicable only if you are a resident of one of those states. Specific references to a particular state (in a heading or in

the text) are only a reference to that state's law and applies only to that state's residents. Non-state specific language applies to all the states listed above.

## 9.1 Cookies and Pixels

At all times, you may decline cookies from our Website if your browser permits. Most browsers allow you to activate settings on your browser to refuse the setting of all or some cookies. Accordingly, your ability to limit cookies is based only on your browser's capabilities. Please refer to Article 8 - Cookies of this Privacy Notice for more information.

## 9.2 California Privacy Laws - CCPA

Under California Civil Code Section 1798.83, if you live in California and your business relationship with us is mainly for personal, family, or household purposes, you may ask us about the information we release to other organizations for their marketing purposes. In accordance with your right to non-discrimination, we may offer you certain financial incentives permitted by the California Consumer Privacy Act, and the California Privacy Rights Act (collectively, CCPA) that can result in different prices, rates, or quality levels for the goods or services we provide. Any CCPA-permitted financial incentive we offer will reasonably relate to the value of your Personal Information, and we will provide written terms that describe clearly the nature of such an offer. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Under California Civil Code Section 1798.83, if you live in California and your business relationship with us is mainly for personal, family, or household purposes, you may ask us about the information we release to other organizations for their marketing purposes. To make such a request, please contact us by sending an email at [charline@buddywise.com](mailto:charline@buddywise.com) with "Request for California privacy information" in the subject line. You may make this type of request once every calendar year. We will email you a list of categories of Personal Information we revealed to other organizations for their marketing purposes in the last calendar year, along with their names and addresses. Not all Personal Information shared in this way is covered by Section 1798.83 of the California Civil Code.

### California Notice of Collection

In the past 12 months, we have collected the following categories of Personal Information enumerated in the CCPA:

- Identifiers, such as name, email address, phone number, account name, IP address, and an ID or number assigned to your account.
- Demographics, such as your age or gender. This category includes data that may qualify as protected classifications under other California or federal laws.
- Commercial information, such as products or services history and purchases.
- Audio or visual data, such as photos or videos you share with us or post on the service.
- Geolocation data.

For more information on information we collect, including the sources we receive information from, review Article 2 of this Privacy Notice. We collect and use these categories of Personal Data, including Personal Information, for the purposes described in Article 3, including to provide and manage our Application.

### Right to Know and Delete

You have rights to delete your Personal Information we collected and know certain information about our data practices in the preceding 12 months. In particular, you have the right to request the following from us:

- The categories of Personal Information we have collected about you;
- The categories of sources from which the Personal Information was collected;
- The categories of Personal Information about you we disclosed for a business purpose or sold;
- The categories of third parties to whom the Personal Information was disclosed for a business purpose or sold;
- The business or commercial purpose for collecting or selling the Personal Information; and
- The specific pieces of Personal Information we have collected about you.

To exercise any of these rights, please contact us by sending an email to [charline@buddyrise.com](mailto:charline@buddyrise.com).

### Shine the Light

In addition to the rights discussed above, you have the right to request information from us regarding the manner in which we share certain Personal Information as defined by applicable statute with third parties and affiliates for their own direct marketing purposes.

To receive this information, send us a request, to [charline@buddyrise.com](mailto:charline@buddyrise.com). Requests must include "Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code.

## ARTICLE 10 – ADDITIONAL DISCLOSURES FOR AUSTRALIAN PRIVACY ACT COMPLIANCE (AU)

This Article is applicable if you are a resident of Australia.

Under the Australian Privacy laws, personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances (hereinafter "Personal Information AU").

### 10.1 International Transfers of Personal Information

Where the disclosure of your Personal Information AU is solely subject to Australian privacy laws, you acknowledge that some third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act. You acknowledge that if any such third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

## ARTICLE 11 – ADDITIONAL DISCLOSURES FOR UK GENERAL DATA PROTECTION REGULATION (UK GDPR) COMPLIANCE (UK)

This Article is applicable if you are a resident of the United Kingdom.

### 11.1 Third-Party Provided Content

We may indirectly collect Personal Data about you from third parties who have your permission to share it. For example, if you purchase a product or service from a business working with us and give your permission for us to use your details in order to complete the transaction.

We may also collect publicly available information about you, such as from any social media and messaging platforms you may use. The availability of this information will depend on both the privacy policies and your own privacy settings on such platforms.

### 11.2 Additional Disclosure for Collection and Use of Personal Data

In addition to the aforementioned purposes warranting the collection and use of Personal Data, we may also conduct marketing and market research activities, including how Visitors use our Website, website improvement opportunities and user experience.

### 11.3 Legal Bases for Processing Your Personal Data

Data protection and privacy laws permit us to collect and use your Personal Data on a limited number of grounds as stated in Article 3 of this Privacy Notice. In which case, we will collect and use your Personal Data lawfully, fairly and in a transparent manner. We never directly market to any person(s) under 18 years of age.

### 11.4 International Transfers of Personal Information

The Personal Data we collect is stored and/or processed in the United Kingdom by us. Following an adequacy decision by the EU Commission, the UK has been granted an essentially equivalent level of protection to that guaranteed under UK GDPR.

On some occasions, where we share your data with third parties, they may be based outside of the UK, or the European Economic Area ("EEA"). These countries to which we store, process, or transfer your Personal Data may not have the same data protection laws as the country in which you initially provided the information.

If we transfer your Personal Data to third parties in other countries:

- We will perform those transfers in accordance with the requirements of the UK GDPR (Article 45) and Data Protection Act 2018;
- We will adopt appropriate safeguards for protecting the transferred data, including in transit, such as standard contractual clauses (“SCCs”) or binding corporate rules.

### 11.5 Your Data Subject Rights

The same data subject rights as described in Articles 5.1 to 5.8 apply to you as a UK resident.

#### Notification of data breaches

Upon discovery of a data breach, we will investigate the incident and report it to the UK’s data protection regulator and yourself, if we deem it appropriate to do so.

#### Complaints

You have the right, at any time, to lodge a complaint with the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. Please provide us with as much information as you can about the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

### ARTICLE 12 - ADDITIONAL DISCLOSURES FOR PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT (PIPEDA) COMPLIANCE (CANADA)

This article is applicable if you are a resident of Canada.

#### 12.1 Additional scope of Personal Information CA

In accordance with PIPEDA, we broaden the definition of Personal Information to include any information about an individual, such as financial information, information about your appearance, your views and opinion (such as those expressed online or through a survey), opinions held about you by others, and any personal correspondences you may have with us (hereinafter “Personal Information CA”). While this information may not directly identify you, be aware that it may be combined with other information to do so.

#### 12.2 Legal ground for processing Personal Information CA

We will only collect, use or disclosure your Personal Information CA based on your consent, except where required or permitted by PIPEDA or other law. In addition, when you access a product or service offered by us, consent is deemed to be granted. Express consent may be obtained verbally, in writing or through electronic means. Alternatively, consent may be

implied through your actions or continued use of a product or service following BuddyRise's notification of changes.

Your consent is only valid if it is reasonable to expect that you would understand the nature, purpose, and consequences of the collection, use, or disclosure of the Personal Information CA to which you are consenting.

### 12.3 International Transfers of Information

While BuddyRise endeavors to keep, store and handle customer data within locations in Canada, it may use agents or service providers located in the United States (U.S.), European Economic Area (EEA) or United Kingdom (UK) to collect, use, retain and process Personal Information CA as part of providing services to you. While we use all reasonable efforts to ensure that Personal Information CA receives the same level of security in any other jurisdiction as it would in Canada, please be aware that privacy protections under U.S. laws may not be the same adequacy.

### 12.4 Data Subject Rights

The following rights are granted to you by the Canadian legislation PIPEDA.

#### Right to Withdraw Consent

You have the right to withdraw the consent you gave us to collect and use your Personal Information CA for a specific purpose. Subject to some restrictions, you can, at any time, refuse to consent, or continue to consent to the collection, use or disclosure of your Personal Information CA by notifying us by sending an email to [charline@buddyrise.com](mailto:charline@buddyrise.com). Withdrawal of consent may impact our ability to provide or continue to provide services.

We do not need your consent for the collection, use and disclosure of your Personal Information CA in the following circumstances:

- The collection is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- It is reasonable to expect that the collection with the knowledge or consent of the individual would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province;
- It is contained in a witness statement and the collection is necessary to assess, process or settle an insurance claim;
- It was produced by the individual in the course of their employment, business or profession and the collection is consistent with the purposes for which the information was produced;
- The collection is solely for journalistic, artistic or literary purposes;
- The information is publicly available and is specified by the regulations; or
- The collection is made for the purpose of making a disclosure



- o That is required by law or
- o For law enforcement.

While you may request that we delete your contact details at any time, we cannot recall any email we have already sent. If you have any further enquiries about how to withdraw your consent, please feel free to enquire us by sending an email to [charline@buddyrise.com](mailto:charline@buddyrise.com).

### Right of Access

You have a general right to access your Personal Information CA. To exercise this right, you must send your request to [charline@buddyrise.com](mailto:charline@buddyrise.com).

We retain the right to decide how we disclose the copies of your Personal Information CA to you. We will take all necessary measures to fulfill your request in 30 days from receipt, otherwise we must inform you of our inability to do so before the 30-day timeframe if:

- meeting the time limit would unreasonably interfere with our business activities; or
- the time required to undertake consultations necessary to respond to the request would make it impractical to meet the time limit.

We can also extend the time limit for the length of time required to convert the Personal Information CA into an alternative format. In these circumstances, we will advise you of the delay within the first 30 days and explain the reason for it.

### Right of rectification

You may request a correction to any factual errors or omissions within your Personal Information CA. We would ask you to provide some evidence to back up your claim. We will amend the information, as required, if you successfully demonstrate that it's incomplete or inaccurate.

You may contact us at any time by sending us an email on [charline@buddyrise.com](mailto:charline@buddyrise.com) if you believe your Personal Information CA on our systems is incorrect or incomplete.

If we cannot agree on changing the information, you have the right to have your concerns recorded with the Office of the Privacy Commission of Canada.

## 12.5 Openness

We will make our policies and practices relating to the collection and management of Personal Information CA readily available upon request, including our brochures or other information that explain our policies, standards, or codes.

## 12.6 Cookie Compliance

Our email interactions with you are compliant with Canadian Anti-Spam Legislation. We do not send unsolicited email to persons with whom we have no relationship. We will not sell

your Personal Information CA, such as email addresses, to unrelated third-parties. On occasion, your Personal Information CA may be provided to our third-party partners to administer the products and services you request from us.

Please refer to Article 8 - Cookies for more information.