

Privacy Policy

Definitions

TOO BEEQB., No.: **OC425323**, seated at **35 Firs Avenue, London, United Kingdom, N11 3NE** ("Company", "we", "us" or "our") is aware of the importance of the protection of personal data and, therefore, it has adopted this general data protection policy ("Privacy Policy").

We are the exclusive owner and operator of the **MARKET-PLACE** application ("App") and of the website located at www.market-place.io ("Website").

This Privacy Policy describes how we, as the data controller, collect, use, store, disclose and otherwise process your personal data provided to us (whether via the Website, the App or by any other means) or otherwise held by us. Any capitalized term used but not defined in this Privacy Policy will have the meaning defined in the Terms and Conditions.

Collection and processing of your personal data are conducted in accordance with the applicable data protection legislation, in particular, the General Data Protection Regulation (GDPR).

Personal Data Collected and Purposes of its Processing

We process your personal data only to the extent determined by the particular services we provide to you via App or Website or other purposes of processing as specified below.

1. When you register to our App or Website. During the registration with our services, we ask for your name, surname, email address, nickname, and password. In common with most websites, we also log the IP address of all requests to our servers. Once you've registered, we will send you a confirmation email acknowledging your new account to the address that you supplied. We need to process the abovementioned personal data to enable you the use of the services offered through the App and/or the Website. The legal basis for such processing is a performance of a contract to which you are a party (i.e. provision of our services you have registered for), and the collected personal data will be processed for the period of the duration of our contractual relationship.
2. When you register to our App or Website via third parties service providers. You may also register via your existing account registered with third-party service providers, such as Google, Facebook, Microsoft, LinkedIn or PayPal. If you do so, we will access for purposes of the registration your profile data, including your name, e-mail address, username, profile picture, profile URL, time zone, country, address, phone number, language, gender, birthday and age range, and your profile description, including education and work history and information you provide about yourself (the extent of this data may differ depending on the platform you use for the registration). Please note that processing of your personal data and their disclosure to third parties by the party service providers are subject to privacy policies adopted by those entities and this Privacy Policy does not apply. If you connect your existing account(s) registered with your account registered with us, we may also process your personal data stored with the connected third-party account(s) to provide you with a detailed statistical analysis of such account(s). The legal basis for such processing is a performance of a contract to which you are a party (i.e. provision of the requested service), and the collected personal data will be processed for the period of the duration of our contractual relationship.
3. When you decide to use our additional services or participate in customers' events. We may also ask for additional personal data when providing you with other optional additional services such as mobile applications and other services. If you don't want to provide us with the personal data requested, you don't have to, but you may not then be able to use some of the additional services. On occasion, we may also ask you, on a voluntary basis, for other personal data in connection with competitions, surveys, or other promotional offers running on the Website. Whether you give us that data or not is entirely your choice. The legal basis for such processing is a performance of a contract to which you are a party (i.e. provision of our additional services or of the promotional offers), and the collected personal data will be processed for the period of the duration of the contractual relationship.

4. When we need your data to ensure our Website and/or App works properly. While on the Website, we automatically log certain information about how you're using this Website that may be regarded as personal data. This information includes the URL that you just came from, your IP address, the pages you visit while using the Website, the number of pages viewed, browser identification and operating system, the device from which you come, traffic data and recording of some visits to the Website and/or App. We collect the said personal data to ensure that our Website and App work properly and we can thus provide you with the best web experience possible. This processing is based on our legitimate interest and the personal data will be processed for the period necessary to fulfill this purpose.

5. When we need to make sure our Website and/or App are secured. We may process your personal data in the extent of including your name, e-mail address, username, profile picture, profile URL, time zone, country, address, phone number, language, gender, birthday and age range and your profile description and information you provide about yourself to enhance the security of our services. This processing is based on our legitimate interest and the personal data will be processed for the period necessary to fulfill this purpose.

6. If we need to provide you our services properly and handle all your requests. If you contact us, we may keep a record of that correspondence in order to provide services upon a mutual agreement. We will keep details of transactions you carry out through the App and/or the Website and of the fulfillment of your orders and your historic trading track-record, and information about any trades from the point you start reporting them to us. The legal basis for such processing is a performance of a contract to which you are a party (i.e. provision of the requested service), and the collected personal data will be processed for the period of the duration of the contractual relationship.

7. If we want to enhance and improve our App and/or Website for you. From time to time, we may contact you (via e-mail, notification on the Website, pop-up or other plug-ins on the Website) in order for us to improve the quality of our App and/or Website and, as the case may be, to develop new services related to them. If you agree to participate in our survey to enhance our App and/or Website, you will be further contacted via the preferred means of communication. For this purpose, we may process the collected personal data (please see above for the scope of your personal data) as well as additional data you will provide within the survey. Such processing is based on your consent and the personal data will be processed for the duration of the consent, but no longer than is necessary for the survey evaluation.

8. If we need to keep data for potential claims in the future. In addition, we need to process and store all the collected personal data (please see above for the scope of your personal data) for the purpose of potential legal claims in the future. This processing is based on our legitimate interest as we might need to keep evidence for potential disputes that may arise. The personal data will be processed for the period necessary to fulfill this purpose, however, no longer than for the period of 10 years from the commencement of the statutory limitation period in each particular case.

9. If we need to deliver your marketing communications. If you register with us or sign up for any of our products or services, we may process your electronic contact details, such as your e-mail address or phone number, for purposes of promotion of our products and services. You can unsubscribe from such commercial communications at any time by contacting us at the contacts specified below. You will also have the option to unsubscribe from receiving this kind of communication in each message you receive from us. Details of your electronic contact will be processed for the period of the duration of the contractual relationship or until you unsubscribe, whichever comes first.

Types of Information We Collect

1. **Personal Information:** We collect the personal information you provide to us when you create an account. Such personal information consists of your full name, username, email address, your address, country of residence, age, credit card and bank information (without the CVV code), details of any requests or transactions you make through the eService, and communications you send to us or submit to the Site ("Personal Information");
2. **Aggregate and Anonymous Data:** Aggregate and anonymous data is information that does not identify you specifically, including data collected automatically when you enter our Site ("Non-Personal Data"). This may include cookies, pixel tags, web beacons, browser analysis tools, and web server logs. This also includes

information from the devices you use to access our Site or mobile platform, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device. Our server logs may also record the IP addresses of the devices you use to interact with the Site. We may also collect information about a website you were visiting before you came to our Website and any website you visit after you leave our Website if this information is supplied to us by your browser. We may also use software tools, such as Javascript, to measure and collect session information, including page response times, download errors, and methods used to browse away from the page. Non-Personal Data also includes some data collected by location services.

How We Use Personal Information and Non-Personal Data

We use Personal Information and Non-Personal Data to:

1. Build, operate and improve our Website and/or App;
2. Perform user analytics;
3. Provide customer support;
4. Communicate with you and provide additional information that may be of interest to you such as, for example, projects that we believe may be of interest to you based on your geographic location and previous use of the Service;
5. Send you reminders, technical notices, updates, security alerts and support, and administrative messages;
6. Manage our everyday business needs such as Site administration, analytics, fraud prevention, or to comply with the law.

When and Why We Disclose Personal Information and Non-Personal Data

Except as provided herein, we will not display on the Website and/or App, or otherwise disclose your Personal Information to any third parties unless it is necessary to provide the Services, when required by law, or if we have good faith belief that such action is reasonably necessary to

- a. comply with current judicial proceedings, a court order or legal process served on us;
- b. protect and defend our rights, property and interests, including by enforcing our agreements, policies and Terms and Conditions;
- c. respond to claims that any submitted content violates the rights of third parties;
- d. respond to your requests for customer service;
- e. protect the rights, property or personal safety of us, its members and the public;
- f. in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company, or (g) with your consent to share the information.

If you have created an account at Website and/or App, some information about you will be publicly available, such as:

- a. your account name;
- b. any information you choose to add to your profile (such as a picture, bio, your location);
- c. projects you've backed;
- d. projects you've launched;
- e. any comments you've posted on the Site.

If you are a Backer, we will share your account name and the amount of your donation with the Project Creators and your payment information with our third-party payment processor. If you are a Project Creator, you will be asked to verify your

identity before the project beginning. Every Project Creator's verified name will be publicly displayed on their profile and on any projects they launch.

We may share Non-Personal Data with analytics companies to learn information about how our users interact with the Site. This enables us to optimize the Service and improve our efforts. See also "Third Party Analytics" below. We will never sell your Personal Information or Non-Personal Data.

Security

We are committed to protecting your personal data. All information that you provide to us is stored on secure servers managed by us or otherwise as referred to in our Terms and Conditions. Access to personalized areas of the Website is password-protected for your privacy and security. You are responsible for maintaining the secrecy of your passwords and/or any account information. If you need to change your password, please follow the steps set out on the Website.

To ensure maximal protection of your personal data when you register with or log in to our services, we use a third-party service provider, Auth0, which securely stores passwords and performs user authentication when logging in. To ensure maximum protection of the API keys you enter when connecting to services provided by third parties, we use a third-party service provider, Amazon Web Services (AWS), which ensures security according to the most available technological procedures.

Personal Data Sharing and Disclosure

Your personal data will be, to the scope we process them, transferred to other controllers within our group to be processed if it is necessary for administrative purposes. In addition, your personal data will be disclosed to reliable third parties that provide us with administrative or technical support, ensuring accounting, analysis of the traffic on the Website, processing payment transactions and providing marketing research.

We may also share your personal data with government authorities or law enforcement bodies if required by law, with external advisors and with other personnel who is subject to a confidentiality obligation. Only a limited number of our employees will have access to your personal data. The employees are obliged to keep your personal data and measures taken for their protection strictly confidential. They are entitled to handle personal data only upon our explicit instructions.

On any forum, we may operate (and anywhere else on the Website), you are publicly identified by your user or screen name. If you choose your full name as your username, you have voluntarily disclosed that information to anyone reading the Website. Similarly, any information you provide in your public profile is for public consumption. The same is true for any personal data you include in any forum or related posts.

Cookies

The website uses cookies, or tiny pieces of information stored on your computer, to verify who you are. There are cookies for logged in users and for commenters.

The actual cookies contain hashed data, so you don't have to worry about someone gleaming your username and password by reading the cookie data. A hash is the result of a specific mathematical formula applied to some input data. It's quite hard to reverse a hash (bordering on practical infeasibility with today's computers). This means it is very difficult to take a hash and "unhash" it to find the original input data.

Google Analytics

Website and App use Google Analytics Solutions as our web analytics vendor which uses first-party cookies to collect standard internet log information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. This information is then used to evaluate visitors use of the website and to compile statistical reports on website activity.

We will never (and will not allow any third party) use the statistical analytics tool to track or to collect any personally identifiable information of visitors to our site. Google Analytics does not associate your IP address with any other data held by them. Neither we nor the web analytics vendor will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any personally identifying information from any source unless you explicitly submit that information via a fill-in form on our website.

Additionally Website uses IP anonymization feature in Analytics, which masks the actual IP and according to Google, the full IP address is never written to disk in this case. For more information, please visit:

<https://support.google.com/analytics/answer/2763052?hl=en>

Facebook Pixel

Facebook helps us to retarget website visitors. The website has a Facebook pixel installed, this tracks the movements of any visitors on the website who are simultaneously logged into Facebook. This will record which pages on Website they visit, and when they visit. Using this data, we can advertise to very targeted groups of people through Facebook Ads.

To be clear, when advertising on Facebook, we can't choose a specific website visitor and advertise to them. Instead, we can advertise to groups of users (custom audiences from the Website) based on shared behavior. A few examples include:

People who have visited the website in the past 24 hours.

People who have visited the website in the past 180 days but have not been back in 30 days.

People who have visited a specific page on the website.

People who have visited a specific page on the website but not another specific page.

To know more about it, please go to <https://www.facebook.com/business/help/952192354843755>

Subscription to our newsletter

The website informs its users when there is a critical update or security patch or launch of a new product or there is an offer from the house via newsletter. The website adds your email to one or more subscription lists (customer, blog subscriber, beta user) only if you provide us your consent. We manage our newsletter through MailChimp.

It is also possible to unsubscribe from the subscription lists at any time directly from the newsletter by clicking on "Unsubscribe".

Other usages of the collected data

We send multiple emails to the customers after they complete purchasing our add-ons, with their purchase details, invoice, getting started material like step by step guidance and helpful knowledgebase links, and inquire about his/her experience using our product.

Apart from that, we, also send abandoned cart emails to the visitor, who has added the product to the cart and provided his/her email address on the checkout page but did not make the purchase; 15 Minutes after abandonment, 1 Day after abandonment and 2 Days after abandonment respectively.

We delete the user cart-data after three days if they do not complete their purchase within that time whereas the email addresses collected at checkout are not deleted with the cart-data, we keep this data for as long as 2 months and can send promotional offers during that span.

All the emails are sent directly from our server and not from any third party server.

Other Data Controllers

Many of our partners, such as brokerages and merchants, link from the Website to areas on their own websites where they sell their own goods and services. If you follow these links from the Website to their websites, you should be aware that these other websites have their own privacy and data processing practices.

The Website may also include social media features, such as Facebook, Twitter, Instagram, WhatsApp, Telegram or LinkedIn plug-ins. These plug-ins may collect certain information about visitors of the Website, such as IP address or

browsing history and may implement cookies to the browser of the visitors. You should note that the processing of the collected data is governed by policies adopted by operators of the social media networks.

We are not responsible or liable for the independent policies of other data controllers. For more information regarding a third-party website and its privacy policies, check that website.

Transfer of Your Personal Data to Third Countries

Your personal data may from time to time be transferred to someone who provides a service to us in other countries and it may be processed, stored or otherwise used by us outside of the European Economic Area ("EEA").

Such transfers will only happen for the specific purposes mentioned above, and we will always ensure that appropriate safeguards are in place for such transfers as set out below:

- we will provide appropriate safeguards for the transfer through the use of "Model Contracts for the Transfer of Personal Data to Third Countries", as published by the Commission of the European Union, or any other contractual agreement approved by the competent authorities. You may obtain a copy of the contract/agreement by contacting us at EMAIL.
- we will disclose your personal data to the EU-US Privacy Shield certified companies.

Children

COMPANY not directed at children under the age of 13, and does not consciously collect any Personal Information from children under the age of 13. We request that all COMPANY users be at least 18 years old (or the legal age in your jurisdiction) or have received parental consent and supervision when using the Service.

Period of Processing of Personal Data

We retain your personal data for no longer than is necessary to fulfill the purpose of the processing in question, i.e. typically for the duration of our contractual relationship. Where we process your personal data based on your consent, such personal data will only be processed for the duration of the consent which you may revoke or restrict at any time. If you do so, we will stop processing the personal data concerned for the purpose for which the consent has been revoked or restricted. Where we process your data based on legitimate interest, you can object this processing anytime (please see below). Specific information about the retention of your personal data is stated above.

Your Right to Object and Other Rights

If you grant us your consent to the processing of your personal data, you do so entirely voluntarily and, therefore, you have the right to revoke or restrict the consent at any time. In certain circumstances, you have the right to object to the processing of your data by us, in particular where your personal data is processed on the basis of a legitimate interest; in such case, we will assess your objection and inform you about the result.

You also have the right to access your personal data and to request a copy thereof. You also have the right to ask us to rectify, complete and delete your personal data, to restrict its processing, and to 'port' your personal data (that is, to ask us to provide it to you in a structured, commonly used and machine-readable format and to transmit it directly to another organization).

However, there are exceptions to these rights. For example, it will not be possible for us to delete your data if we are required by law to keep it. Similarly, access to your data may be refused if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information.

In addition, you have the right to make a complaint to the relevant data protection authority or to seek a remedy through courts if you believe that your rights have been breached.

Changes to this Privacy Policy

Any changes to this Privacy Policy will be posted on the Website so you are always aware of what personal data we collect and how we use it. In case of important changes, we will inform you by sending an e-mail or through pop-up notifications.

Contact Details

In case of any personal data protection request or withdrawal of consent to further processing of your personal data, you can contact us at EMAL privacy-policy@market-place.io

In this regard, we would like to inform you that we may require you to prove your identity to us in an appropriate way so that we can verify your identity. This is a precautionary security measure to prevent unauthorized persons from accessing your personal data.