

## begratz Inc. (“begratz” “we” and/or “us”) Privacy Policy

We are grateful you are here to use the begratz app, website, newsletter, and associated goods and services. We want you to understand the information collected about you and how it’s used and disclosed (shared) when using any or all of them.

By using any one or more of the begratz app, website, and newsletter (app, website, and newsletter, individually and collectively, “app”), you consent to the following privacy policy terms and the collection, use, and disclosure (sharing) of your information as described in these terms. Your consent and use of the app is our legal basis to collect, use, and disclose your information according to these terms. The information collected, used, and disclosed depends on how you use the app. Our app contains links to other apps and websites. Our privacy policy applies only to our app, so if you click on a link to another app or website, you should read its privacy policy.

### 1. Information Collected

We collect data (“data” and/or “information”) about you, including information you provide to us, information we obtain by your use of begratz and products and services purchased or used in connection with begratz, information provided by others who interact with you, information we infer from activities you take and others take with respect to you, and information provided about you from third parties.

- a. When you create an account, you provide your first name, last name, email address, phone number, birth date, displayed user name, and username, password, password and account recovery information, such as answers to challenge questions or other means of contact to recover or reset passwords, and language for content. You may also provide a location.
- b. When you engage with us, whether by sending us emails, chats, or otherwise, we obtain the information you send.
- c. When you purchase products or services or transfer money to others, you provide your credit card or other means of payment information, as well as the goods and services purchased, and all related information, such as account name, account number, expiration date, CW code, billing address, and credit card provider to PayPal or other third-party payment processor. We do not retain such information, but we will also if credit has been accepted or rejected and whether the transaction or money transfer was completed.
- d. If you purchase goods or services using one of the links provided to vendors, we are provided information about the goods and services you purchased, including but not limited to, the date, time, amount, good or service purchased, returns, cancellations, rejected credit, and additional information about the transaction, and, in some cases the same information for additional purchases made after the initial purchase using the link, depending upon the vendor’s terms. We may earn a commission or referral fee for such purchases.

- e. Information can also be inferred from your activities and activities from others engaging with you, from using the app, posting and interacting with content, and making purchases. For example, if someone sends you a note of congratulations about a new job, we may infer you have a new job. Another example may be that you send someone a note of gratitude for receiving baby gifts, in which case we may infer you just welcomed a new baby. We can make inferences from your social network and from characteristics of others with similar attributes. For example, based on your social network and attributes, we may infer you have a child graduating from school and may infer what are popular graduation gifts within your network. We understand inferences are not necessarily reality, they are guesses which may or may not be correct.
- f. Information is obtained based on your usage of the app itself and interaction with other users and content you and others post, such as messages you like or repost and those you do not like or repost, messages you reply to, messages you share, messages you pin and favorite, the amount of time you spend viewing messages, advertisements, and other content, who you do and do not associate with, any contacts and their information that you provide to us, and where and when you use the app. We also receive information about search terms, advertisements shown to you and how you interact with those advertisements, and how you interact with links provided to you.
- g. We also collect information about the device and internet or other communications services you use to access the app, post content, and purchase goods and services, such as your device make, model, and other information, such as device identification and app identification; IP address; internet service provider; browser type; languages; referring in and referring out webpages, apps, advertisements, social media posts, and other media, such as emails and texts; when accessed; time spent viewing; mobile service provider; device settings; advertising and other promotion and sales activities identification information; battery status; memory; operating system; installed apps; and information you allow to be shared with us about other apps and services usage.
- h. Information is obtained about your username with other social media platforms, as well as your interactions with other social media platforms to which you post content or you share with by other means, such as text messaging, email, and other apps. We may also obtain sign-in information about you and the service providers you choose to use to sign-in to the app, and related information, such as the service provider you use.
- i. Information is obtained about you and your interests through your indication of interests directly in the app, surveys, questionnaires, and other requests for information.
- j. Information is obtained about your interests in goods and services and what you may desire saving for as a purchase by you or as a gift from others, or by

removing that information, it may be inferred that you have already received those goods or services.

- k. We obtain information about your preferences for using the app when you choose settings options.
- l. We also obtain metadata, which can be described as data about data, related to all of the collected data.
- m. We use cookies and similar technologies to collect data about your use of the app and related products and services, as well as activity before, during, and after use of the app and related products and services, such as visited web pages, emails, and other applications.
- n. Other companies that provide advertising and other promotion and sales activities, products, and services to you provide information to us about your use of their advertising and other promotion and sales activities, links you click, cookies installed with your devices and cookie gathered information, the devices you use to interact with the other companies, date, time, and location of your interactions with the other companies, customer identifiers, internet service and mobile service providers you use, goods and services you buy, and other information obtained about your interaction with them.
- o. When you post information publicly, others can view and record it, on a global basis, including to people who are not users of the app or signed-in to the app, including your posts, your likes, what you choose not to like, whether you send or receive gifts, and your usernames for other social media platforms to which you post content as people may capture and redisplay publicly such information. All public information you post, and others post about you, is available to us and the public generally. Information you send to others using the app may be recorded and redisplayed publicly. Be sure you are always comfortable with the information you are sharing, including sharing privately, knowing that someday people may choose to redisplay it publicly.
- p. You also provide facial, vocal, and other biometric elements when you make an avatar based on real life compositions of those things, or post video or audio content, including background elements, such as people and things within the scope of video or audio content. When you post it, and others repost it, it is available to the general public on a global basis. We also receive any biometric information you provide, such as facial recognition or fingerprints, for sign-in purposes.
- q. Information is collected when you use the app and associated social media platforms related to the app or its content, as well as any additional apps for which you give permission to collect information, whether or not you are signed-in to the app.

- r. Third-parties may provide us that same type of information about you and your usage of their products and services that we obtain directly from you. The information obtained from third parties may be combined with information we obtain directly to make inferences about additional information about you. For example, if you do not post or otherwise provide your current location while away from your residence, but you stay at a hospitality provider that is authorized by you to provide your location to us, the hospitality provider may provide your location and duration in that location to us.

## 2. Use of Information

We use your information to provide the intended app experience, as well as in connection with advertisements, products, and services provided to you.

- a. We may associate your account with certain devices or browsers and additional devices or browsers associated with those devices or browsers.
- b. We send your information to our affiliated companies that have common ownership, either as a parent, subsidiary, or other related company, as well as any companies that may acquire equity interests in us or some or all of our assets, as well as lenders and other creditors that may extend short or long term debt to us, and if it occurs, those involved in any bankruptcy or receivership.
- c. We provide your information to other companies to provide advertising and other promotion and sales activities, products, and services to you. We also provide anonymized data from you and consulting services about that data to other companies for their business decisions and operations.
- d. We use information you provide to us to:
  - i. operate the app, including providing content, and maintaining and recovering your account,
  - ii. send to third-parties that help us provide our goods and services and operate the app, including app and internet hosting, data transmission and storage, email, text, and other communications, and advertising and other promotion and sales activities,
  - iii. send to third-parties that help us collect debts you or third-parties owe to us,
  - iv. provide advertising and other promotion and sales activities to you,
  - v. provide our and third-parties' goods and services to you,
  - vi. contact you with special offers on other products and services we think you might like,

- vii. suggest to you and others gifts and services you are or may be interested in or that you may desire saving up for a purchase by you or as a gift from others,
- viii. make inferences about you and those you associate with, including your demographics, and interests, and goods and services and advertising and other promotion and sales activities you may be interested in,
- ix. sort, prioritize, and personalize posts and advertising and other promotion and sales activities provided to you,
- x. suggest other users to connect with and follow and help others find you within the app and outside the app if you permit us to,
- xi. display your posts and posts about you on other social media platforms and in emails and texts sent to those you direct either as recipients or contributors to posts,
- xii. enforce our policies and terms and conditions of use of the app,
- xiii. communicate with you about the app, our goods and services, and third-parties' goods and services,
- xiv. to gather information for research and analysis to learn more about the app, our users, our goods and services, and third-parties goods and services,
- xv. maintain and enhance privacy and security of the app, the app users, our goods and services, third-parties, and the goods and services of third-parties,
- xvi. minimize and try to eliminate fraud, unauthorized use, including use that violates our or third-parties terms of use, and illegal activities,
- xvii. cooperate with law enforcement activities,
- xviii. comply with rules, regulations, laws, and court and administrative proceedings,
- xix. troubleshoot, debug, and enhance the app, your experience with the app, our goods and services, and third-parties' goods and services,
- xx. train artificial intelligence and machine learning programs used in providing or assisting in the providing of the activities listed as uses of your information, and
- xxi. measure the effectiveness of advertising and other promotion and sales activities and other promotion and sales activities, goods, services, and the other activities listed as uses of your information.

- e. When you send messages, or posts, including reposting, liking, and other ways of interacting with the app and content, we share that information publicly, including through the app, other social media platforms, and potentially through internet searches. Others who receive that information and people you send that information to, may further share that information publicly, including through the app, other social media platforms, text messaging, emails, and other apps, and potentially through internet searches. Keep in mind, people can take pictures, video recordings, audio recordings, or otherwise record content you provide to them and share that information within the app or outside of the app, and you may have no way of deleting that information or effectively controlling the distribution of it.
- f. Keep in mind, you can control much of your information by being mindful about what information you provide and post, to whom and where you provide the information, and selecting your settings in the app and with third-parties.

### 3. Sharing of Information

- a. As noted elsewhere in this privacy policy, we share your information with various third-parties and the public depending upon the use, including:
  - i. third-parties that help us provide our goods and services and operate the app, including app and internet hosting, data transmission and storage, email, text, and other communications, and advertising and other promotion and sales activities,
  - ii. third-parties that help us collect debts you or third-parties owe to us,
  - iii. third-parties to provide you with advertising and other promotion and sales activity,
  - iv. third-parties to process your payments,
  - v. third-parties to help identify redundant contact information and bots and sham accounts, and to correct, supplement, or complete contact or profile information,
  - vi. third-parties to learn of and infer your preferences to provide you with goods and services and for the third-parties business decisions and operations,
  - vii. other social media platforms, websites, text messaging providers, email providers, and other apps to share your posts and other content you provide, for the users of those platforms and the public generally, on a global basis to repost, comment, like, critique, and otherwise engage with your posts and other content you provide,

- viii. third-parties, including blog posters and news, opinion, and commentary providers for use of your publicly available information (information that would otherwise be available to the public whether we provide it directly or not) in their post, stories, analysis, critique, and other content,
  - ix. third-parties, on an anonymized basis, for sale of anonymized data and consulting services,
  - x. affiliated companies that have common ownership, either as a parent, subsidiary, or other related company, as well as any companies that may acquire equity interests in us or some or all of our assets, as well as lenders and other creditors that may extend short or long term debt to us, and if it occurs, those involved in any bankruptcy or receivership,
  - xi. other users and non-users of the app, including other social media apps and the public generally, on a global basis, for sharing your content and content others post about you, as well as interest in goods and services you may have for saving to purchase or as gifts to receive, or by removing that information, it may be inferred that you have already received those goods or services,
  - xii. troubleshoot, debug, and enhance the app, your experience with the app, our goods and services, and third-parties' goods and services, and
  - xiii. third-parties for privacy, security, enforcement of policies and terms of use, fraud prevention, compliance with rules, regulations, laws, and court and administrative proceedings, and investigation and prosecution of illegal activities.
- b. Please review the rest of this privacy policy for additional indications of specific ways your information is shared.

#### 4. Transfer of Information Outside Your Country

- a. Information is transferred between countries according to Standard Contractual Clauses, a copy of which may be obtained by sending an email request to: [privacy@begratz.com](mailto:privacy@begratz.com).

#### 5. Use of Cookies

- a. Cookies are text files placed on your device to collect standard log information and visitor behavior information. When you use our app, we may collect information from you automatically through cookies or similar technology. For further information, visit [allaboutcookies.org](http://allaboutcookies.org).
- b. We use cookies in a range of ways to improve your experience on our app, including: keeping you signed in, understanding how you use our app, and understanding your preferences for content, goods, and services.

- c. There are a number of different types of cookies, however, our app uses:
  - i. **Functionality** - We use these cookies so that we recognize you on our app and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
  - ii. **Advertising** - We use these cookies to collect information about your visit to our app, the content you viewed, the links you followed and information about your browser, device, and your IP address. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our app.
  - iii. **Performance** - We use these cookies to allow us to analyze app usage so we can measure and improve performance. They collect information in a way that does not directly identify individuals.
  - iv. **Social Sharing Cookies** - We use these cookies in connection with some social media sharing plugins that allow you to post certain content of our app on social media.
  - v. You can configure your device settings not to accept cookies, and the above website tells you how to remove cookies from your device. However, in a few cases, some of our app features may not function as a result.

## 6. How Your Information is Stored

- a. We store your data with our data storage providers. These storage providers follow typical data storage industry security practices.

## 7. How Long Your Information is Kept

- a. We keep your information as long as required by law, accounting and information security rules, standards, and principles, contracts, and document and data retention standards and principles.
- b. Except as otherwise required by law, accounting and information security rules, standards, and principles, contracts, and document and data retention standards and principles, we keep your information as follows:
  - i. as long as required during pending litigation or other court or administrative proceedings, and criminal or other government investigations, and



- ii. as long as required for investigating and preventing future violations of our privacy policy, terms of use, and other policies and agreements, fraud, and security matters.
- c. Except as otherwise stated in this section, we keep your profile information and content, including posts, likes, and reposts, for as long as your account remains valid and open, and we keep other personally identifiable data for up to 24 months.
- d. Information that you make publicly available will be kept as long as the companies holding your information determine according to their own retention policies.

## 8. Your Data Rights

- a. Every user is entitled to the following:
  - i. The right to access - You have the right to request copies of your personal data. We may charge you a fee for this service.
  - ii. The right to rectification - You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete information you believe is incomplete.
  - iii. The right to erasure - You have the right to request that we erase your personal data, under certain conditions.
  - iv. The right to restrict processing - You have the right to request that we restrict the processing of your personal data, under certain conditions.
  - v. The right to object to processing - You have the right to object to our processing of your personal data, under certain conditions.
  - vi. The right to data portability - You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- b. If you make a request to exercise your rights, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email at [privacy@begratz.com](mailto:privacy@begratz.com).

## 9. Corrections to Information

- a. You can change your profile information in the settings area of the app.

## 10. Use of Authorized Agents

- a. When you are permitted to use an authorized agent to submit requests to us on your behalf, we verify the authorized agent's authority to act on your behalf.

b. Specifically,

- i. For requests to know, delete, or correct personal information, we require the following for verification purposes:
  1. a power of attorney valid under the applicable law from you or your authorized agent demonstrating your authorized agent has been authorized by you to act on your behalf for such purpose; or
  2. sufficient evidence to show that you have:
    - a. provided the authorized agent signed permission to act on your behalf for such purpose; and
    - b. Either:
      - i. verified your own identity directly with us according to the instructions we provide; or
      - ii. directly confirmed with us that you provided the authorized agent permission to submit the request on your behalf.
- ii. For requests to opt-out of personal information “sales” or “sharing”, we require a signed permission demonstrating your authorized agent has been authorized by you to act on your behalf for such purpose.

11. Stopping Contact and Information Sharing

- a. You have the right at any time to stop us from contacting you for marketing purposes or giving your data to our affiliated companies or third-parties. You may do so by making that request by sending us an email at [privacy@begratz.com](mailto:privacy@begratz.com).

12. Copies of Information

- a. You can obtain a copy of your information by sending us an email at [privacy@begratz.com](mailto:privacy@begratz.com) and requesting that we provide you with a copy of your information. We may charge you a fee for this service.

13. Removal of Information and Account

- a. You can delete your information and close your account by contacting us and requesting that we delete your information and close your account.

14. Compensation

We earn fees or are otherwise compensated for advertisements, sale of anonymized collected information, consulting services related to anonymized collected information, and commissions on sales of products and services you purchase. Our revenue may be based on the

prioritization or sort order of advertising and other promotion and sales activities, products, and services provided to you.

#### 15. Revisions

We may revise the terms of this privacy policy at any time upon giving you notice that the privacy policy is revised. Your continued use of the app constitutes acceptance of the revised privacy policy.

#### 16. Governing law and forum

This privacy policy is governed by the laws of the State of Minnesota, United States of America, without giving effect to its conflicts of laws principles. All disputes arising out of or related to this privacy policy shall be resolved by the courts of the State of Minnesota, or the United States District Court for the District of Minnesota, and venued in Hennepin County, Minnesota.

The governing language of this privacy policy is English. This privacy policy may be translated into other languages, but in any enforcement activities of or related to this privacy policy, the English language version shall apply and supersede any other language version of this privacy policy.

#### 17. Interpretation.

Use of the phrase “such as”, the word “including”, or the giving of any example is intended to be an illustration of an item, and not the full set of items, more generally described.

#### 18. Contact Information.

If you have any questions about our privacy policy, the information we hold about you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: [privacy@begratz.com](mailto:privacy@begratz.com)

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the appropriate authority as follows:

If you are located in Canada, contact the Office of the Privacy Commissioner. Follow this link for details:

<https://www.priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/file-a-complaint-about-a-federal-institution/>

If you are located in the UK, contact the Information Commissioner’s Office. Follow this link for details:

<https://ico.org.uk/make-a-complaint/#:~:text=Start%20a%20live%20chat%20or.their%20office%20by%20the%20public>

If you are located in the EU, contact the European Data Protection Supervisor. Follow this link for details:

[https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en#:~:text=Please%20contact%20the%20data%20protection,your%20complaint%20at%20this%20stage](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en#:~:text=Please%20contact%20the%20data%20protection,your%20complaint%20at%20this%20stage)