

GRETEL PRIVACY POLICY

(Last Updated: May 2018)

Gretel's Privacy Promise to You.

Gretel, LLC (“Gretel,” “we” or “us”) respects your privacy. We place a high priority on protecting your personal information that you provide to us and we will only share your personal information in accordance with this Privacy Policy. We will not sell, rent, or lease your personal information, unless in connection with a transfer of our business. You always own your personal information. You control your personal information and we will protect your personal information.

Gretel Believes in Communicating Clearly with You.

This Privacy Policy, together with our Terms of Use, applies to our applications, various websites (including www.gretelme.com), widgets, email notifications, and other mediums, or portions of such mediums (collectively, our “Services”), through which you have accessed this Privacy Policy. This Privacy Policy and our Terms of Use describe the types of personally identifiable data and information (“Personal Information”) that you provide to us or that we collect from you in connection with the provision of our Services. This Privacy Policy and our Terms of Use also describe how your Personal Information may be used and disclosed by us and the choices available to you regarding our use of your Personal Information.

Please read this Privacy Policy and our Terms of Use carefully. If you have questions or concerns regarding this Privacy Policy or our Terms of Use, please contact us at contact@gretelme.com or in writing at:

Gretel, LLC
4440 PGA Boulevard, Suite 600
Palm Beach Gardens, Florida 33410
Attention: Privacy Manager

You Control Your Personal Information.

You control your Personal Information. If you do not want your Personal Information used or disclosed in the manner described in this Privacy Policy, then you should not use our Services or provide us with your Personal Information.

How We Collect Your Personal Information.

You Provide Your Personal Information to Us.

Our Services allow you to build and communicate with your network of personal, commercial, and professional relationships, as well as compile and organize your network's up-to-date contact information.

To use and access our Services, you must provide us with the following Personal Information when you register:

- Your email address (so that we can deliver messages to you relating to your use of the Services)
- Your mobile number (so that you can deliver and receive invitations from your contacts)
- One initial (so that we can identify you)

Any other Personal Information that you choose to share with Gretel through your communications with

us is optional and not specifically required to enable you to use the Services.

When using the Gretel Services, you may choose to share certain Personal Information with your contacts, such as your address, your employment information, including your employer, work telephone number, and work email, as well as other information, such as your age, gender, birth date, marital status, location data and names of your family members. Gretel uses a decentralized data storage model whereby this information is stored in an encrypted form and only visible to your contacts with whom you choose to share the information. Gretel does not have access to this information.

We May Receive and Collect Certain Information Automatically.

We may receive, collect, and store information that is automatically collected as a result of your use of our Services, such as information about your preferences and usage of our Services, including, without limitation, your IP address, browser type, ISP, referral and exit pages, and clickstream data. We receive and collect such information through a variety of technical methods, including sending cookies, pixel tags, and other anonymous identifiers to your device.

“Cookies” are pieces of data stored on our computer, mobile phone, or other device. Please note that, in most cases, you can remove or block cookies (such as by using the settings in your browser), but doing so may affect your ability to use our Services. A “pixel tag” is a type of technology placed within a website or email for the purpose of tracking activity, which is often used in combination with cookies. Other “identifiers” are random strings of characters used for the same purposes as cookies, such as with mobile devices where cookie technology is not available. These technologies help us know that you are logged in to your Gretel account, provide you with features based on your preferences, understand when you are interacting with our Services, and compile other information regarding your use of our Services.

How We Use Your Personal Information.

We may use your Personal Information for the following lawful business purposes:

- *To provide our requested Services to you or carry out a contract with you.* For example, we will privately populate our contact database with your up-to-date contact information in order to provide our Services to you and your network. We might contact you on the contact details you have provided us (such as your email address, address, or telephone number), to provide you with updates about the Service and any other information that we (or our business partners) need to share with you in order to provide our Service to you, such as quotes or personalized information.
- *Where we have your consent.* For example, if you have consented to us doing so, we may contact you with promotional materials or offers.
- *Where we have a legitimate interest.* For example, in order to analyze, improve and manage our Services and operations, we might obtain feedback regarding our Services, understand and anticipate your needs and preferences, better understand your use of our Services, customize and tailor Service content and advertising, improve our marketing and promotional efforts, engage in statistical analysis, and provide feedback or information to our business partners, vendors, advertisers, and other third parties. In order to resolve any problems, disputes or security issues, we may use your Personal Information to comply with, monitor compliance with, and enforce our Terms of Use and any other applicable agreements and policies, and to protect the security and integrity of our Services.
- *Where we have a legal obligation.* For example, we may have to use your Personal Information to meet certain legal or regulatory requirements under applicable laws.

We may delete your Gretel account if you do not use our Services for a significant period of time. Prior to

doing so, we will send you at least one notice to provide you with the opportunity to keep your Gretel account active.

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use the Services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligations under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law;
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase or anonymise your information once this is no longer needed.

How We Disclose Your Personal Information.

The Personal Information that you choose to place on the Gretel Services will be visible to your contacts who also use the Gretel Services with whom you have agreed to share such Personal Information.

In addition, we may disclose your Personal Information:

- To any person who, in our reasonable judgment, is authorized to receive your Personal Information as your agent, including as a result of your business dealings with that person (for example, your attorney);
- To our third-party vendors so that they may provide support for our internal and business operations (“Our Vendors”). A list of Our Vendors is included in Appendix 1 to this Privacy Policy along with a link to their website and the service that they provide to us;
- With your consent, to third parties that are interested in contacting you or providing offers to you that may be related to our Services or to products or services you may find of interest;
- To any third parties whose websites or applications we may link to through the Gretel Services, if you choose to click on the third party links;
- As required by law or ordered by a court, regulatory, or administrative agency;
- As we deem necessary, in our sole discretion, if we believe that you are violating any applicable law, rule, or regulation, or are otherwise interfering with another’s rights or property, including, without limitation, our rights or property;
- If requested by authorities in the event of any act or instance of local, regional, or national emergency;
- To enforce our Terms of Use and any other applicable agreements and policies;
- To enforce or protect our rights;
- In connection with a business transfer (as described in the section titled *Business Transfers* below); and
- To our affiliated companies (i.e., companies under common control or management with us).

Disclosures to Our Vendors.

We will take commercially reasonable efforts to ensure that all of Our Vendors agree to protect your Personal Information in accordance with applicable data privacy law and/or privacy guidelines that are at

least as strict as the privacy guidelines set forth in this Privacy Policy. A list of Our Vendors is included in Appendix 1 to this Privacy Policy and we would recommend that you review their privacy policies on the links provided.

Circumvention of Security Measures.

Protecting your privacy is critically important to us. As a result, we have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. However, please be aware that methods of transmission and electronic storage are not completely secure. We cannot guarantee the security of your Personal Information, as third parties may unlawfully intercept or access transmissions or electronic storage. Therefore, you use our Services at your own risk and we do not guarantee the performance or adequacy of our security measures. In the event that an unauthorized third party compromises our security measures, we will not be responsible for any damages, directly or indirectly, caused by an unauthorized third party's ability to view, use, or disseminate your Personal Information.

User Contributions.

You may provide information to be published or displayed ("posted") on public areas of our Services, or transmitted to other users of our Services or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to other users of our Services at your own risk. We cannot control the actions of other users of our Services with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Business Transfers.

We specifically and expressly reserve the right to disclose, lease, sell, assign or transfer your Personal Information to a buyer or other successor in the event of a sale, acquisition, merger, consolidation, reorganization, bankruptcy, dissolution, or other corporate change involving our business, even if such event is only being contemplated and regardless of whether such event relates to a part or the whole of our business. Nothing in this Privacy Policy is intended to interfere with our ability to transfer all or part of our business, equity, or assets to an affiliate or independent third party at any time, for any lawful purpose, without notice or compensation to you.

Personal Information that You Disclose to Third Parties.

Any information that you disclose to third parties will be subject to the privacy policies and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review the privacy policies and practices of such third parties prior to disclosing information to them.

Linking

This Privacy Policy applies only to the Gretel Services, and not to websites or applications owned by third parties. We may provide links to other websites or applications, which we believe may be of interest to you, such as ride-hailing applications whereby you may choose to share your address or location data and the address of another Gretel user with such service providers. We aim to ensure that such websites or applications are of the highest standard. However, due to the nature of the internet, we cannot guarantee the privacy standards of websites or applications to which we link. Please note that these other sites or applications will have their own privacy policies and accordingly we cannot accept any responsibility or

liability for such policies.

Children’s Information.

We do not direct our Services to children under 17, and do not knowingly collect Personal Information from children under 17. If we learn we have collected or received Personal Information from a child under 17 without verification of parental consent, we will delete that information. By using our Services, you represent that you are 17 years of age or older.

Changes to this Privacy Policy.

We do not expect any changes to this Privacy Policy. However, we reserve the right to update, amend, or change this Privacy Policy at any time in our sole discretion; provided, however, that if we make any material changes we will notify you by means of a notice on our Services or by email. This Privacy Policy replaces all previous notices or statements with respect to this subject, and cannot be modified orally by any of our representatives, employees, or agents.

Your California Rights Policy.

Individuals who are residents of California and have provided Personal Information to us may request certain information regarding our disclosure of such Personal Information to third parties for direct marketing purposes. Such requests must be submitted to us at contact@gretelme.com or in writing at:

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Attention: Privacy Manager

Your Rights Under EU Law if Applicable.

The General Data Protection Regulation (“GDPR”) is an EU regulation that provides individuals with certain rights in relation to their personal data which is either processed by an organization established in the EU, or, for individuals located in the EU, processed by an organization outside of the EU that offers goods/services to or monitors such individuals in the EU.

If this applies to you, you will have the following rights (subject to certain conditions) when it comes to your Personal Information:

- The right to object to processing – you have the right to object to certain types of processing, including processing based on our legitimate interests (including profiling) and processing for direct marketing.
- The right to obtain further information on the legitimate interests balancing exercise carried out to determine whether we can rely on our legitimate interests as a lawful basis for the types of processing outlined in the ‘Where we have a legitimate interest’ section above.
- The right to be informed - you have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Information and your rights, which is why we are providing you with this information in this Privacy Policy.
- The right of access - you have the right to obtain access to your Personal Information (if we’re processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you’re aware and can check that we’re using your information in accordance with data protection law. You can do this by contacting us on the details provided above.

- The right to rectification - you are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in Personal Information that we hold by contacting us on the details provided above.
- The right to erasure – this essentially enables you in some circumstances to request and obtain the deletion of your Personal Information where there is no compelling reason for us to keep using it.
- The right to restrict processing – you have rights to suspend further use of your Personal Information, whereby we can still store your Personal Information but cannot use it further.
- The right to data portability – you have rights in some circumstances to obtain and reuse your Personal Information for your own purposes across different services.
- The right to withdraw consent - if you have given your consent to anything we do with your Personal Information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).
- The right to lodge a complaint. You have the right to lodge a complaint about the way we process your Personal Information with your national data protection regulator.

If you have questions on the processing of your personal data, would like to exercise any of your applicable rights, or are unhappy with how we've handled your information, please contact us at contact@gretelme.com or in writing at:

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Appendix 1

Company	Website	Provided Service
Amazon	https://www.amazon.com/	Cloud Storage and Compute: app and services
Apple	https://www.apple.com/	App: Distribution, Subscription, and User Payments: : App Store
Dropbox	https://www.dropbox.com	Document Storage
Google	https://www.google.com	App: Distribution, Subscription, and User Payments: Google Play
Heroku	https://www.heroku.com	App Platform as a Service
Ionic	https://ionicframework.com/	App Development Platform
MailChimp	https://login.mailchimp.com	Email User Communications and Marketing
Mandrill	https://www.mandrill.com/	Email User Communications and Marketing
MixPanel	https://mixpanel.com/	Web Analytics
Salesforce	https://login.salesforce.com	Customer Relationship Management
SendGrid	https://www.sendgrid.com	Email: User Communication
Virgil Security	https://virgilsecurity.com/	User Data Encryption
ZenDesk	https://www.zendesk.com	User Support