

LAST UPDATED: July 13th, 2022

PRIVACY POLICY

Authenticiti, Inc., doing business as Cultos (“**Cultos**,” “**we**”) wants you to be familiar with how we collect, use and disclose personal information. This Privacy Policy describes our practices in connection with personal information that we collect through or use in connection with:

- The website operated by us from which you are accessing this Privacy Policy (the “**Website**”);
- Mobile applications that link to this Privacy Policy (each an “**Application**”); and
- Email messages that we send to you that link to this Privacy Policy.

The Applications linking this Privacy Policy include, without limitation, the Cultos App distributed through the Shopify app store (the “**Merchant Application**”). The Merchant Application is directed at merchants and other business customers (each a “**Merchant**”) and enables them to set up and manage a token-based loyalty program for end customers using the Merchants’ e-commerce websites. Our related admin dashboard provides functionality to set up, monitor and update campaigns and end customer rewards. The Merchant Application also offers the ability for Merchants to embed a Cultos widget into their e-commerce websites. The embedded Cultos widget allows end customers to view and participate in campaigns in order to earn tokens from Merchants, use the earned tokens to receive rewards offered by Merchants and track their token balance and all activities related to the loyalty program.

Collectively, we refer to our services provided in connection with the Website, Applications and email messages as the “**Services**.”

PERSONAL INFORMATION

“**Personal Information**” is information that directly identifies you or relates to you as an identifiable individual. Depending on the circumstances of the individual case and the purposes you use our Services for, the Services may particularly collect the following Personal Information:

- Your first and last name;
- Your business or residential address;
- Your employer, the brand you represent and your job title (where applicable);
- Contact information such as your telephone number or email address;
- User account information such as your username and password;
- For owners of business accounts, the way you configure and manage the Services we provide to you or your employer (e.g., brand tokens to be awarded to your customers, campaigns launched and managed through an Application, etc.);
- For owners of consumer accounts, the balance of brand tokens received from third-party e-commerce websites and retailers as rewards for your purchases with them and related transactional information (e.g., brand tokens redeemed, exchanges of brand tokens for cryptocurrency or other brand tokens, the crypto wallet storing the public and/or private keys for cryptocurrency transactions, etc.);
- Your IP address (we may also derive your approximate location from your IP address);
- Browser and device information, such as such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version,

device manufacturer and model, language, Internet browser type and version and the name and version of the Services you are using;

- Usage information about your interaction with our Services (e.g., what features of the Website or an Application you use, what pages of the Website you visit and how long you stay on such pages, when you open an email message, session information, etc.).

In addition, we may collect and otherwise process Personal Information on behalf and as per the instructions of our business customers. This includes, for example, the following Personal Information pertaining to end customers of Merchants collected and processed in connection with the Merchant Application (“**Merchant Customer Information**”):

- First and last name;
- Contact information such as email addresses;
- Date of birth;
- Social media information (where end customers choose to link their social media accounts to participate in Merchant campaigns);
- Transaction information with respect to purchases by end customers of Merchant products and related information required to process token rewards and spending.

Collection of Personal Information

We and our service providers may collect Personal Information in a variety of ways, including:

- **Information You Provide to Us**

You may choose to provide certain information to us in order to use our Services. This includes, for example, your name, address, contact information, username and password you make available when creating a user account on the Website or the email address you use to sign up for newsletters or similar communications.

- **Information Provided Through Your Browser or Device**

Certain information is collected by most browsers or automatically through your device, such as your IP address, Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services you are using.

- **Information Automatically Collected by Us**

When you use our Services, we and our service providers may collect usage information through automated means such as cookies, pixel tags or similar technologies. Cookies are pieces of information stored directly on the device that you are using. Pixel tags are small strings of HTML or JavaScript code that allow us, for example, to determine when a certain page of the Website is being viewed.

- **Information Collected From Third Parties**

Certain information about you may be collected by us or our service providers from third parties. This includes, for example, information about brand tokens received by owners of consumer accounts from third-party e-commerce websites and retailers as rewards for their purchases. Such information is provided to us directly by the operators of the respective e-commerce websites or the involved retailers.

If you do not provide the information requested by us in connection with the Services, we may not be able to provide the Services to you. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Use of Personal Information

We and our service providers use Personal Information for the following purposes:

- **Providing the functionality of the Services and fulfilling your requests.**
 - To provide the Services' functionality to you, such as operating the Website;
 - To respond to your inquiries and fulfill your requests, for example, when you send us questions, suggestions, compliments or complaints, or when you request other information about our Services.
- **Providing you with information and materials about our offerings.**
 - To send you newsletters or promotional emails with information about our services, products and other news about our company.
- **Accomplishing our business purposes.**
 - For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;
 - For fraud prevention and fraud security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
 - To understand your preferences and interests, personalize our Services and show you behavioral or targeted advertising. Such behavioral or targeted advertising may be based on the collection by third parties of personal information about your online activities over time and across different websites when you are using our Services.
 - For enhancing, improving, repairing, maintaining, or modifying our current products and services, developing new services, as well as implementing quality and safety assurance measures;
 - To protect our rights, privacy, safety or property, and/or that of you or others;
 - For compliance with applicable law and regulations. This may include laws outside your country of residence.

Merchant Customer Information is used

- To provide the functionality of the Merchant Application and the Cultos widget and to respond to related inquiries and fulfill the requests of Merchants;

- To enhance, improve, repair, maintain, or modify our current products and services, develop new services, and to implement quality and safety assurance measures;
- To protect our rights, privacy, safety or property, and/or that of end customers or others;
- For compliance with applicable law and regulations. This may include laws outside of the country of residence of end customers.

Disclosure of Personal Information

We disclose Personal Information:

- **To our third-party service providers, to facilitate services they provide to us.**
 - These can include providers of services such as website hosting, data analysis, fraud prevention, information technology and related infrastructure provision, email delivery, auditing, and other services.
- **To our third-party advisors.**
 - We may disclose your Personal Information to our advisors (e.g. auditors, legal counsel, tax advisers and consultants) relating to or in connection with the operation of our business or compliance with our legal, regulatory or contractual obligations.
- **To law enforcement agencies and other government authorities.**
 - In order to comply with our legal or regulatory obligations or to cooperate with them at their request in furtherance of their objectives, we may disclose your Personal Information to law enforcement agencies, regulatory or tax authorities and other governmental or public agencies or authorities.
- **To third parties in the event of reorganization.**
 - Your Personal Information may be disclosed to potential buyers, successors, trustees, administrators and other third parties in the event of any reorganization, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Merchant Customer Information is disclosed

- To our third-party service providers, to facilitate services they provide to us in connection with the Merchant Application or the Cultos widget;
- To our third-party advisors.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. If you have any questions or concerns regarding the security of your personal information or your interaction with us, please notify us in accordance with the “Contacting Us” section below.

CHOICES AND ACCESS

Receiving marketing-related emails from us.

If you no longer want to receive promotional emails from us on a going-forward basis, you may opt out by clicking on the unsubscribe link contained in every such email you receive from us. Alternatively, you may notify us of your decision to opt out in accordance with the “*Contacting Us*” section below.

Accessing, changing, or deleting your Personal Information.

If you would like to request to access, correct, update, or delete your Personal Information, you may contact us in accordance with the “Contacting Us” section below. We will respond to your request consistent with applicable law. When contacting us, please make clear what Personal Information is subject to your request. We may need to verify your identity before implementing your request. We will respond to your request in compliance with applicable law.

RETENTION PERIOD

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

THIRD-PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the processing of your personal information by, or other practices of, any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of thirteen (13), and we do not knowingly collect Personal Information from individuals under the age of thirteen (13).

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information may be transferred to countries outside of your country of residence, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

SENSITIVE INFORMATION

We ask that you not send or otherwise disclose to us any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Services.

DO NOT TRACK SIGNALS

We do not currently respond to browser “do not track” signals or other mechanisms that provide users the ability to exercise choice regarding the collection of personal information about an individual user’s online activities over time and across third-party websites or online services.

UPDATES TO THIS PRIVACY POLICY

The “*LAST UPDATED*” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services.

CONTACTING US

Authenticiti, Inc., doing business as Cultos, located at 18 Bartol St, # 181, San Francisco, CA 94133, is the company responsible for the collection, use, and disclosure of your Personal Information under this Privacy Policy.

If you have any questions about this Privacy Policy, please contact us at legal@cultos.io, or:

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San Francisco, CA 94133