

## **Privacy Policy**

Please read this privacy policy carefully to understand how we use personal information. If you do not agree to this Policy, your option is not to use the Site, MyBlinker mobile applications and their related sites, applications, services and products or any other website operated by MyBlinker that links to this Policy. By accessing or using this Site, you agree to this Policy. This Policy may be amended from time to time; any changes we make to this Policy will be posted on this Site. We will also take other steps, as required by applicable law, such as notifying you and/or requesting your express consent to significant changes. Modifications to this Policy are effective as of the "last updated date" indicated. Except where we have sought your express consent, your continued use of the Site after we make modifications will constitute acceptance of such modifications and agreement that they are binding. Therefore, please check the Policy periodically to verify if any updates or modifications have been made.

MyBlinker respects your privacy and is committed to protecting the personal information of its users: experts, companies and other visitors browsing the Site ("Users"), as well as affiliates, and other partners who interact with MyBlinker. We believe you have a right to know our practices with respect to the information we collect when you visit and/or use the Site. This Policy explains our privacy practices for the Site and the services provided by MyBlinker. By accessing and/or using the Site and its related sites, applications, services and products and/or registering for a MyBlinker account and/or using it as a contributor, you agree to the terms and conditions of this Policy, including our collection, use, disclosure, processing and retention of personal information. You can also learn more about how to limit the sharing of information in this Policy.

## **Information We Collect**

When you register on the Site, use it, fill out forms or use it as a user, we ask you to provide certain personal information, including a valid email address and login details. We will also ask you to provide additional information in order to provide optimal performance of the Site, such as your profile data, physical address, telephone number or other contact information, financial information (such as payment method), information and forms, information about your services, level of education, profession and experience, and additional authentication information (such as your government-issued ID or passport, as permitted by applicable

laws. We also collect information about your communications with MyBlinker, as well as your communications with other MyBlinker users.

We also collect information when you access, browse, view or use the Site. In other words, when you access the Site, we have knowledge of your usage, browser information and web log information, and all communications recorded by Users through the Site. We use that information to improve the user experience and personalize your browsing experience, as well as to monitor the Site to prevent fraud and inappropriate content or behavior.

Once an expert registers, their username, country and additional information related to their activity are public knowledge and will be visible to all Users of the Site. This information includes the photos you upload, your published portfolio, Service information, ratings, and additional information you choose to add to your profile.

Companies when registering will not have a visible profile, the name will only be shown when you make contact with the experts and in the reviews you offer to them. The other information provided at the time of registration will be visible only to MyBlinker, this to validate that it is a real company.

### **How do we collect information?**

Users directly provide us with most of the information we collect. It does this when you complete registration data on the Site, fill out application forms, as well as when you voluntarily post and share additional information. This may include information about your Services, education and profession, portfolio sharing, company ratings and reviews, and anything you choose to add to your user profile.

**Information we collect when you use the Site:** We collect technical information indirectly and automatically through our systems such as the use of cookies that help us improve your navigation and the usability of our Site.

## **How do we use the information collected?**

Where relevant under applicable laws, all processing of your personal information will be justified by "legal grounds" for its processing. In most cases, processing will be justified based on the following:

- You have given us your consent for us to use your personal information for a specific purpose.
- Our use of your personal information is necessary to comply with the proper functioning of the platform.
- The processing is necessary to comply with a relevant legal or regulatory obligation we have (e.g. fraud prevention).
- The processing is necessary to support our legitimate interests as a business (e.g. to improve our services to you), subject to your interests and fundamental rights, and provided that it is carried out in a proportionate manner.

## **We will use your personal information for the following purposes:**

- To provide you with quality service and security, to operate the Site, to fulfill our obligations in relation to you, and to develop and improve our service. For example, we use the information we collect about you to verify your identity. We also use this information to establish and set up your account, verify or reissue a password, record your activity, allow you to communicate with other members, provide customer support, and communicate with you from time to time. The information helps us develop and improve the services we provide to you, understand and analyze your preferences and performance, and personalize and tailor your experience, such as suggesting a service, ranking search results, etc.
- To ensure the integrity of the platform, prevent fraud and maintain a secure and reliable platform. For example, we use your information to track and prevent fraudulent and other inappropriate activity, monitor content integrity, conduct security investigations and risk assessments, verify or authenticate the information you provide to us, enforce our Terms of Service, and comply with applicable laws. We perform certain behavioral analytics to fulfill the above purposes and, in limited cases, if we detect activity that we believe poses a risk to the MyBlinker platform,

other users, our community, or third parties, automated processes may restrict or limit your ability to use MyBlinker.

- To communicate with you, as requested or otherwise approved or permitted under this Policy.
- To promote and advertise the Site and the MyBlinker platform. For example, we use the information we collect about you for the purpose of sending direct marketing messages (as detailed below), to show you information that may be of interest to you, to organize and facilitate referral programs, contests or other promotional activities or events.
- To maintain appropriate business records, to comply with legal requests by authorities, and to comply with applicable laws and regulations or as required by law.

We will seek your consent before using the information for a purpose other than those set out in this Policy.

### **How long do we keep personal information?**

We apply a general rule of retaining personal information only for as long as necessary to fulfill the purpose for which such information was collected. However, in some circumstances we will retain your personal information for longer periods of time. We will retain personal information for the following purposes:

- Where necessary and relevant to our operations, for example so that we have an accurate record of the transactions you have entered into with us in the event of complaints or objections.
- In connection with personal information from closed accounts to comply with applicable laws, prevent fraud, collect fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce the terms of our Site, and take other action as permitted by law.

## **Personal Information We Share with Third Parties**

We do not sell or rent your personal information to third parties for such third parties' marketing purposes without your explicit consent.

We share your personal information with third parties as detailed below:

- We share personal information with service providers who provide services to us for the purpose of operating the Site, opening and operating your account, as well as providing ancillary services and solutions. These include, but are not limited to, hosting services, billing and payment providers, cybersecurity, web analytics tools, and performance.
- We share personal information with law enforcement agencies, public authorities or other parties in order to respond to a subpoena or court order, judicial process or regulatory authorities, if we believe that we are required to do so by law, or that doing so is reasonably necessary to comply with legal process; when we believe it is necessary or appropriate to disclose personal information to law enforcement authorities, to investigate actual or suspected fraudulent situations or violations of law, security breaches or violations of this Policy; to respond to claims against us; and to protect the rights, property, or personal safety of MyBlinker, our customers, or the public.
- We share personal information with payment processors, fraud detection agencies, and similar third-party vendors for the purpose of facilitating payments made through the Site and keeping the Site secure and protecting it against fraud, unauthorized transactions (such as money laundering), claims, or other liabilities.
- In addition, your personal information will be disclosed in the event of a business transition, such as a merger, sale, partial or total transfer of MyBlinker's assets, acquisition, bankruptcy or similar event. In the event that we sell businesses or assets, we will disclose your details to the prospective buyer. If a third party acquires the company or substantially all of our assets, the information we hold about our users will be one of the transferred assets.

Please note that your profile information and additional information about your activity (including Services, reviews, postings and so on) is made public and visible to all Users of

the Site. When you post your information and/or share your data with other MyBlinker Users, you do so at your own risk.

### **Where we store your personal information**

Some of the personal information you provide to us will be stored or processed by third-party data providers and processors on our behalf and may be located in other jurisdictions, such as the United States, whose laws may be different from existing laws in the jurisdiction in which you live. Whether to third parties or internally, any transfer of personal information from the European Economic Area ("EEA") to countries that are not deemed to provide an adequate level of data protection is governed by European Union (EU) standard contractual clauses and/or equivalent data transfer regulations to protect the security and confidentiality of personal information. We will take all steps reasonably necessary to ensure that your personal information is processed securely and in accordance with this Policy.

### **Cookies**

We use cookies and similar technologies (such as web beacons, pixels, tags and scripts) to improve and personalize your experience, provide our services, analyze Website performance, and for marketing purposes.

### **Safety**

We strive to maintain the security of the Site and your information and to prevent unauthorized access, loss, misuse, alteration, destruction or damage through industry-standard technologies and internal procedures. In addition, we contractually ensure that any third party processing your personal information ensures the confidentiality and integrity of your data in a secure manner. However, the transmission of data over the Internet is not completely secure, and although we will do our best to protect your personal information, we cannot guarantee the security of any data transmitted to the Site; Any transmission you make is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorised access.

Users who have registered on the Site agree to keep their password strictly confidential and not to disclose such password to any third party.

## **Rights of users**

Under the relevant regulations, you have the following rights with respect to your personal information:

- Obtain a copy of your personal information along with information about how and on what basis that personal information is processed.
- Rectify inaccurate personal information.
- Delete your personal information in limited circumstances when (a) you believe that it is no longer necessary for us to retain your personal information; (b) we process your personal information based on legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided us with your personal information with your consent and wish to withdraw your consent and there is no other ground on which we may process your personal information; and (d) where you believe we are processing your personal information unlawfully.
- Restrict the processing of your personal information when: (a) the accuracy of the personal information is disputed; (b) the processing is unlawful but you object to the deletion of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is necessary for the establishment, exercise or defense of a legal claim; or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection.
- Object to decisions that are based solely on profiling or automated processing.
- Where you have provided us with your personal information with your consent, you can ask us for a copy of this data in a structured, machine-readable format and also for us to share (transfer) this data with another data controller.

In addition to the above, you have the right to lodge a complaint with a data protection supervisory authority.

We will ask you for additional data to confirm your identity and for security reasons, before disclosing the data you request. We reserve the right to charge a fee where permitted by law. We will refuse to process requests that jeopardize the privacy of others, are extremely impractical, or require us to take any action that is not permitted under applicable laws. In addition, to the extent permitted by applicable law, we will retain, where necessary, certain personal information for a limited period of time for record-keeping, accounting and fraud prevention purposes.

We will verify your request using the information associated with your account, including email address.

### **Updating Personal Information**

We take steps to ensure that the personal information we collect is accurate and up-to-date, and we provide you with the opportunity to update your information through your account profile settings. In the event that you believe your information is incorrect or inaccurate, please inform us immediately. We will ensure that we investigate the matter and correct any inaccuracies as quickly as possible when necessary or provide you with tools to update or remove it quickly, unless we need to keep such information for legitimate business or legal purposes. When updating your personal information, we will ask you to verify your identity before we can proceed with your request. If for any reason you have a problem with the deletion of your personal information, please contact the MyBlinker Customer Support team and we will make every effort to delete such information in accordance with relevant privacy laws.

You may review and modify your personal information by logging into the Site and visiting your account profile page.