## **Your Privacy Rights**

Effective Date: April 30, 2023

This Privacy Policy delineates the types of information collected by Beamo Inc., BEAMO EUROPE LIMITED LIABILITY COMPANY, and their affiliate domains including, but not limited to, https://www.beamo.co/ and https://www.breeze.cash/ (collectively referred to as "Beamo," "us," or "we") during the provision of services. These services comprise our websites (the "Sites"), mobile device software applications (the "Apps"), along with the data, services, information, tools, functionality, updates, and similar materials (collectively, the "Services"). This policy further elaborates on how we use the information, the entities with whom the information may be shared, the choices available to you regarding the collection, use, and distribution of information, as well as our dedicated efforts to protect the information you provide to us through the Services.

By using the Service, you hereby consent to allow us to process information in accordance with this Privacy Policy. Please also refer to our Terms of Service, available at <a href="https://www.beamo.co/terms-of-service">https://www.beamo.co/terms-of-service</a> which are incorporated as if fully recited herein. Terms defined in the Terms of Service that are not defined herein shall have the same definition as in the Terms of Service.

This policy is subject to change. If our information retention or usage practices change, we will let you know by posting the Privacy Policy changes on the Service and/or otherwise making you aware of the changes. Your continued use of the Service following our notice of changes to this Privacy Policy (or other form of legal acceptance) means you accept such changes. Please refer to the "Effective Date" above to see when this Policy was last updated.

### **Territoriality**

Regardless of where our servers are located, your personal data may be processed by us in the United States, where data protection and privacy regulations may or may not be to the same level of protection as in other parts of the world. BY VISITING THE SITE AND USING THE SERVICE, YOU UNEQUIVOCALLY AND UNAMBIGUOUSLY CONSENT TO THE COLLECTION AND PROCESSING IN THE UNITED STATES OF ANY INFORMATION COLLECTED OR OBTAINED BY US THROUGH VOLUNTARY SUBMISSIONS, AND, TO THE EXTENT POSSIBLE, THAT U.S. LAW GOVERNS ANY SUCH COLLECTION AND PROCESSING.

This Privacy Policy may be subject to the provisions of the EU General Data Protection Regulation ("EU GDPR"), the UK General Data Protection Regulation ("UK-GDPR", and together with the EU GDPR, the "GDPR"), and other applicable privacy laws. Under the GDPR, Beamo is a data "Controller". If you are an individual who resides in the United Kingdom the European Union, or Switzerland (collectively, and for the purposes of this Privacy Policy, the "EEA"), you are a "Data Subject" with certain protected privacy rights concerning your "Personal Data." We will take commercially reasonable steps to maintain compliance with GDPR. Your Personal Data, combined with any other information that may identify you as a person, may be referred to in this Privacy Policy as Personally Identifiable Information (collectively, "PII").

#### 1. Who Collects Your Information On Our Service?

We do. Under the GDPR, Beamo is what is known as a "Controller" of the Personal Data that you provide us with. We collect information from you on the Service, and we are responsible for protection of your information.

### 2. What Information Does Beamo Collect?

A. Personal Information. We collect certain personal information about you, which may be supplied when you register for the Service, when you create or update an account, when you use the Service, when you request services, and otherwise when you submit such information. The types of personal information we collect and save include:

i. Contact and/or account information, such as your name, physical address, phone

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ii. Technical information collected in our logs, such as standard web log entries that contain your IP address, first- and third-party cookies, web beacons, page URL and timestamp.

You may also provide us with information when you interact with us through email, submit a review or a post, or through other use of the Service. We may retain such information in order to provide you with services, and you agree that we may share this information as needed with other users in order to resolve any issues that may arise between you and another user of the Service.

Although it may appear that we collect the following personal information, it is collected, processed, and stored by third parties:

- i. Financial information is collected and processed through our third-party payment processor ("Payment Processor"). Our Payment Processor may collect information such as banking information or credit card number, name, CVV code or date of expiration, from you through use of the Service. We do not collect, use, view, or hold your financial information.
- ii. Sensitive personal information such as social security number, driver's license number, and/or biometric information (collectively, your "Sensitive Information") is collected by third-party vendors (similar to your payment information and our Payment Processor). We do not collect, view, use, or store your Sensitive Information.
- B. Non-personal Information. Non-personal information is non-personally identifiable or anonymous information about you, including but not limited to browser information, the pages accessed most frequently, how pages and features are used, time spent on a page, when and how you use the App, applications downloaded, search terms entered, and similar non-personal data.

Automatically tracking Internet Protocol (IP) addresses is one method of automatically collecting information about your activities online and information volunteered by you. An IP address is a number that is automatically assigned to your device whenever you surf the internet. Further, the Service may utilize web beacons, pixel tags, third-party cookies, embedded links, and other commonly used information-gathering tools.

If non-personal information is paired with any of your PII, we will treat the non-personal information as if it were also PII.

C. Aggregate Information. We may also collect anonymous, non-identifying and aggregate information, the date and time of any request you make, your language preference, pages you visit, the referring website, the website you go to immediately after visiting our Site, and the domain name of your Internet service provider.

#### 3. Why Is My Information Being Collected?

We accept and gather information to provide the Service to you. We collect your personal information so that we can respond to your requests for information, to be added to our email lists, to enforce our Terms of Service, or to otherwise provide the Service. Our third-party vendors collect your Sensitive Information to comply with our obligations under applicable laws and regulations including, but not limited to, Know Your Business ("KYB") and Know Your Customer ("KYC") regulations. Our Payment Processor collects your payment information for sales of products. We collect aggregate information to help us better design the Service. We also collect log information for monitoring purposes to help us to diagnose problems with our servers, administer the Service, calculate usage levels, and otherwise

provide services to you.

#### 4. How Do We Use the Information We Collect?

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A. We use the personal information you provide for the purposes for which you have submitted it, including:

- Internal Uses. We may use your PII to respond to your inquiries, to fulfill your requests for information, track usage trends, conduct experiments, develop and improve the Service and other offerings, and perform research and analytics.
- Creating and Maintaining Your Account. We use your PII to create and maintain an account for you to allow you to purchase and use the Service.
- Paying For the Service. Our Payment Processor uses your PII to process your payment for the Service.
- Complying With Applicable Laws and Regulations. Our third-party vendors collect and verify your PII and Sensitive Information to comply with applicable laws and regulations and to reduce identity theft and fraud.
- Communicating With You About Our Services. We may use your PII to send you information about new services and other items that may be of interest to you.
- Sending Administrative and Promotional Emails. We may use your PII to send you emails to: (a) confirm your account information and your other PII; (b) process your transactions to purchase our Service; (c) provide you with information regarding the Service; (d) inform you of changes to this Privacy Policy, our Terms of Service, or our other terms, conditions, or policies; or (e) provide you with information on our other services and products, or promotions related to the Service or our other services and products.
- Serve You Targeted Advertisements. We may use your PII to serve you advertisements with the Service that are targeted to your interests.
- B. We may use anonymous information that we collect to improve the design and content of our Service, and to enable us to personalize your internet experience. We also may use this information in the aggregate to analyze how our Site is used, as well as to offer you programs or services. We may use any anonymous, aggregate information, which may include or be based on your information, without restriction.

#### 5. Do We Share Your Personal Information?

We will not share your personal information except: (a) for the purposes for which you provided it; (b) with your consent; (c) as may be required by law (including, but not limited to, our compliance with our obligations KYB, KYC, and other applicable laws) or as we think necessary to protect our organization or others from injury (e.g., in response to a court order or subpoena, in response to a law enforcement agency request, or when we believe that someone is causing, or is about to cause, injury to or interference with the rights or property of another); or (d) with persons or organizations with whom we contract to carry out internal operations or business activities. Upon notice to you, we may share your personal information with our business partners, such as our marketing partners and event co-hosts.

We may also share aggregate information with others, including affiliated and non-affiliated organizations.

Finally, we may transfer your PII to a third party, or an actual or potential purchaser, buyer, or successor-in-interest, in relation to, or in the event of, an actual or potential merger, acquisition, sale of all or substantially all of our assets, reorganization, bankruptcy, or other change of control. After such disclosure or transfer, the third party or successor in interest may use the information in accordance with applicable law.

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#### 6. How Can You Access And Control Your Information?

After becoming a user of the Service, you may revise or edit your information through your Account, or by sending us an email to privacy@beamo.co. For instructions on how you can further access your personal information that we have collected, or how to correct errors in such information, please send an e-mail to privacy@beamo.co. We will also promptly stop using your information and remove it from our servers and database at any time upon your e-mail request to do so. To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access, making corrections, or removing your information. You may further control your information by opting-out of our sharing it with certain third parties, using it other than for the primary purpose for which you provided it, including you in an online directory, and sending you promotional emails, simply by emailing us at privacy@beamo.co. You may also opt-out of promotional emails via the unsubscribe link in any such promotional email.

## 7. How Do We Store and Protect Your Information?

A. After receiving your personal information, we will store it on our servers for future use. We have physical, electronic, and managerial procedures in place to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect including, but not limited to, strong encryption, firewall protection, and industry best practice authentication. Unfortunately, no data transmission over the internet or data storage solution can ever be completely secure. As a result, although we take industry-standard steps to protect your information, we cannot ensure or warrant the security of any information you transmit to or receive from us or that we store on our or our service providers' systems.

- B. If you are visiting the Site from outside of the USA, you understand that your connection will be through and to servers located in the USA, and the information you provide will be securely stored in our servers and internal systems located within the USA.
- C. We retain and store your PII until you request us to remove it from our servers. We store our logs and other technical records indefinitely.

#### 8. How Do We Use Cookies And Other Network Technologies?

A. To enhance your online experience with us, our web pages may presently or in the future use "cookies." Cookies are text files that our web server may place on your computer or mobile device to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other PII unless you choose to provide this information to us. Once you choose to provide PII, however, this information may be linked to the data stored in the cookie. Although it may be possible to turn off the collection of cookies through your device or browser, certain features of the Services may not function properly without the aid of cookies.

B. Our Service uses Google Analytics, provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 ("Google"). Google Analytics uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may collect information regarding the use of other websites, apps and online resources. For more information

on how Google uses data when you use our Site, App, or the Service, please follow this link: https://policies.google.com/technologies/partner-sites. You may be able to opt-out of some or all of Google Analytics features by downloading the Google Analytics opt-out browser add-on, available at, https://tools.google.com/dlpage/gaoptout. For more information about interest-based ads, or to opt-out of having your web browsing information used for behavioral advertising purposes, please visit http://optout.aboutads.info.

C. Beamo or its service providers may also use "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "Pixel Tags") in connection with some of our Site pages and HTML-formatted email

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messages for purposes of, among other things, compiling aggregate statistics about website usage and response rates. A Pixel Tag is an electronic image, often a single pixel (1x1), that is ordinarily not visible to website visitors and may be associated with cookies on visitors' computers or mobile devices. Pixel Tags allow us and our service providers to count users who have visited certain pages of our Site, to deliver customized services, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, Pixel Tags can inform the sender of the email whether and when the email has been opened.

D. As you use the internet, you leave a trail of electronic information at each website you visit. This information, which is sometimes referred to as "clickstream data", can be collected and stored by a website's server. Clickstream data can reveal the type of computer and browsing software you use and the address of the website from which you linked to our Site. We may use clickstream data as a form of non-personally identifiable information to determine how much time visitors spend on each page of our Site, how visitors navigate through the Site, and how we may tailor our web pages to better meet the needs of visitors. We will only use this information to improve our Site, App and the Services.

E. Do Not Track. At present, the Site does not specifically respond to browser do-not-track signals.

## 9. Collection of Information by Others.

Our Terms of Service document identifies certain third-party websites to which we may provide links, and that you may click on our Site or in our Service. This Privacy Policy is only applicable to our Service. Please check the privacy policies of these other websites to learn how they collect, use, store and share information that you may submit to them or that they collect.

Your financial information and Sensitive Information are not collected, processed, or stored by us, but by third-party vendors. Since we do not control our third-party vendors, we encourage you to read the privacy policies of the third-party vendors with which you interact, such as the privacy policies of Persona and Stripe. We do not endorse and are not responsible for the privacy practices of the third-party vendors.

# 10. 'EEA' Privacy Rights.

If you currently reside in the EEA, the GDPR applies to your PII and you are a Data Subject. The GDPR requires that we, in our capacity as a Controller, have a legal basis to process your PII.

A. We process your PII under one or more of the following legal bases:

- Processing is necessary for our legitimate interests;
- To perform the contract that we are about to enter with you (e.g., our Terms of Service);
  To comply with a legal obligation; and/or
- With your consent to do so, which may be revoked at any time.
- B. Under the GDPR, as a Data Subject you have certain rights. They are:
  - The right to be informed. This is your right to be informed about what we are processing, why,

and who else the data may be passed to.

- The right of access. This is your right to see what data about you is held by us. The right to rectification. This is the right to have your data corrected or amended if what is held is incorrect in some way.
- The right to be forgotten. This is the right to have your personal data to be deleted in the event that such data is no longer required for the purposes it was collected for, your consent for the processing of the data is withdrawn, or the data is being unlawfully processed.
- The right to restrict processing. This is the right to ask for a temporary halt to processing of your personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.

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- The right to data portability. This is the right to ask for your personal data to be provided to you in a structured, commonly used, and machine-readable format.
- The right to object. This is the right to object to further processing your personal data if such processing is inconsistent with the primary purposes for which it was collected.
- Right in relation to automated decision making and profiling. This is the right to not be subject to a decision based solely on automated processing. The Service does not engage in automated decision making or profiling.

You can find instructions for enforcing some of these rights elsewhere in this Privacy Policy. Otherwise, if you wish to find out more about these rights, please contact us at privacy@beamo.co.

# 11. Children and Young People's Information.

We do not knowingly collect any information from any minors, and we comply with all applicable United States privacy laws including the GDPR, the USA's Children's Online Privacy Protection Act ("COPPA") and associated Federal Trade Commission ("FTC") rules for collecting personal information from minors. Please see the FTC's website (www.ftc.gov) for more information. If you have concerns about our Site, wish to find out if your child has accessed our services, or wish to remove your child's personal information from our servers, please contact us at privacy@beamo.co. Our Site will not knowingly accept personal information from anyone under 13 years old in violation of applicable laws, without consent of a parent or guardian. In the event that we discover that a child under the age of 13 has provided PII to us, we will make efforts to delete the child's information in accordance with COPPA. If you believe that your child under 13 has gained access to our Site without your permission, please contact us at privacy@beamo.co.

## 12. California Privacy Rights

California law allows California residents to request information regarding our disclosures to third parties in the prior calendar year, if any, of their personally identifiable information. To make such a request, please contact us at privacy@beamo.co with "Request for Privacy Information" in the subject line. Please include enough detail for us to locate your file; at a minimum, your name, email, and username, if any. We will attempt to provide you with the requested information within thirty (30) days of receipt. We reserve our right not to respond to requests sent more than once in a calendar year, or requests submitted to an address other than the one posted in this notice. Please note that this law does not cover all information sharing. Our disclosure only includes information covered by the law.

#### 13. Nevada Privacy Rights

If you are a Nevada resident, we do not "sell" personal information as defined in the Nevada Privacy of Information Collected on the Internet from Consumers Act as amended by Nevada Senate Bill 220. Nonetheless, you may submit a request to prohibit such sales by contacting us at privacy@beamo.co. Additional information on the categories of personal information collected and

categories of personal information shared with third parties can be found in this Privacy Policy. If you would like to tell us not to sell your information in the future, please email us at privacy@beamo.co with your name, postal address, telephone number, and email address with "Nevada Do Not Sell" in the subject line.

## 14. Contact Information

If you have any questions or suggestions regarding our Privacy Policy, please contact us via e-mail at privacy@beamo.co.

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appearance, and design of the Service, as well as the trademarks, product names, graphics, logos, service names, slogans, colors, and designs.