

# CROWDFIRE INC.

## PRIVACY POLICY

Last modified: September 20, 2023

### 1. Introduction

In this policy, “we”, “us”, “our” and “**Crowdfire**” refer to Crowdfire Inc. and its subsidiary Codigami Labs PVT Ltd. For more information about us and how to contact us, see Section 13.

We respect your privacy and are committed to protecting it through our compliance with this Policy.

This privacy policy (“**Policy**”) applies when we are acting as a data controller with respect to the personal data of our users. This Policy describes how we collect, use and share personal data of consumer users across our websites, including [www.crowdfireapp.com](http://www.crowdfireapp.com) (the “**Website**”), Crowdfire’s mobile application (the “**App**”) and services offered to users (collectively with the Website and the App, the “**Services**”), and from our partners and other third parties. When using any of our Services you consent to the collection, transfer, storage, disclosure, and use of your personal data as described in this Policy.

Please read this Policy carefully to understand our policies and practices regarding your personal data and how we will treat it. By accessing or using the Services, you agree to this Policy. Our Services also incorporate privacy controls which affect how we will process your personal data. Please refer to Section 5 for a list of rights with regard to your personal data and how to exercise them.

This Policy may change from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

### 2. Information We Collect About You and How We Collect It

There are three general categories of information we collect.

#### 2.1 Information You Give to Us.

(a) We collect your account data, which may include your name, email address (“**Account Data**”). The Account Data may be processed for the purposes of providing to you our Services and of ensuring their security, maintaining back-ups of our databases and communicating with you. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested Services.

(b) We process information that you post for publication through our Services (“**Publication Data**”), including the content that you share to your social profiles. The

Publication Data is processed for the purposes of enabling such publication and administering our Services. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Without it, we may not be able to provide you with all the requested Services.

(c) We process financial information such as credit card or PayPal information when you order Services in order to facilitate the processing of payments (“**Payment Information**”). The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

(d) We may process information contained in or relating to any communication that you send to us (“**Correspondence Data**”). The Correspondence Data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

(e) We may process information included in your personal profile, which may include your location, time zone and website (“**Profile Data**”). The Profile Data may be processed for the purposes of providing you a better user experience when using the Services. The legal basis for this processing is your consent.

## 2.2 Information We Automatically Collect from Your Use of the Services.

(a) When you use the Services, we may automatically process information about your computer and internet connection (including your IP address, operating system and browser type), your mobile carrier, device information (including device and application IDs), search terms, cookie information, as well as information about the timing, frequency and pattern of your service use (“**Service Data**”). The Service Data is processed for the purpose of providing our Services. The legal basis for this processing is the adequate performance of the contract between you and us, to enable us to comply with legal obligations and our legitimate interest in being able to provide and improve the functionalities of the Services.

## 2.3 Information We Collect from Third Parties.

(a) You may choose to connect the Services to your accounts on third party services such as Twitter, Facebook, Instagram, TikTok, Pinterest, Shopify, Etsy, LinkedIn and Youtube (“**Social Networking Service**”), for the purpose of managing your social media presence through our Services. Crowdfire uses a third party vendor (Zapier) to facilitate your connection to the Social Networking Services. When you do this, we automatically process personal information about you on such Social Networking Services, including your account and profile data, RSS, lists of followers, social media content and your actions with respect to such content (the “**Social Media Information**”). The Social Media Information is processed for the purposes of optimizing your social media activity on the Social Networking Services and administering our Services. The legal basis for the processing of Social Media Information is the

performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

### 3. Disclosure of Personal Data

3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

3.2 Financial transactions relating to the Services are handled by our payment services providers, Paypal, Braintree and Stripe. We will share Payment Information with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.paypal.com/in/webapps/mpp/ua/privacy-full>, <https://www.braintreepayments.com/leg> and <https://stripe.com/us/privacy/>.

3.3 We may disclose personal data to Social Networking Services insofar as reasonably necessary to allow you to manage your social media presence through our Services.

3.4 We may disclose Service Data to a variety of third party service providers insofar as reasonably necessary to improve the functionalities of the Services. For example, we may disclose Service Data to obtain useful analytics, provide in-app support to mobile app users, determine location data and provide search engine functionality to our users.

3.5 We may share aggregated data (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

3.6 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; or in order to protect your vital interests or the vital interests of another natural person; to protect the safety or integrity of the Services, or to explain why we have removed content or accounts from the Services; or to address fraud, security, or technical issues; or to protect our rights or property or the rights or property of those who use the Services.

3.7 We offer individuals the opportunity to choose (opt out) whether their personal information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals. In order to opt out from disclosure of your personal information, please email us at [hello@crowdfireapp.com](mailto:hello@crowdfireapp.com).

### 4. International transfers of your personal data

In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA). We and our

other group companies have offices and facilities in the United States and India. To facilitate our operations we may transfer, store, and process your information within those countries or with service providers based in Europe, India, Asia Pacific and North America. Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Policy. Where we transfer store, and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection. Please refer to Section Section 10 below.

Transfers to our subsidiary in India, to our service providers and other third parties will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission or applicable certification schemes - for example, the Data Privacy Framework (DPF) program referred to in Section 10 below.

## 5. Your Rights with Regard to Personal Data

In this Section 5, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

5.1 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

5.2 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by following the instructions [here](#).

5.3 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal

data about you completed. You can request correction or modification of your personal data by following the instructions [here](#).

5.4 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims. You can request the deletion of your account by following the instructions [here](#).

5.5 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest. You can manage your privacy settings and other account features [here](#).

5.6 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

5.7 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

5.8 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5.9 To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others. You can download your account information, by following the instructions [here](#).

5.10 To the extent that the legal basis for our processing of your personal data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

5.11 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 5.

## 6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information to provide the Services to you, you can request that we erase your personal information and close your account.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 7. Children

Our Services are not intended for children. You must also be old enough to consent to the processing of your personal data in your country without parental consent. No one under age 13 may provide any personal data through the Services. We do not knowingly collect personal data from children under 13. If you are under 13, do not use or provide any information through the Services or on or through any of their features or register an account, make any purchases through the Services, use any of the interactive features of the Services or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal data from a child under 13, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [hello@crowdfireapp.com](mailto:hello@crowdfireapp.com).

## 8. Cookies

## 8.1 About cookies

(a) A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

(b) Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

(c) Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

(d) We also use other technologies with similar functionality to cookies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity, browser, and device.

## 8.2 We use these technologies for the following purposes:

- (a) to identify you and log you into the Services;
- (b) to store information about your preferences and to personalise the Services for you;
- (c) as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (d) to help us display content that will be relevant to you;
- (e) to help us analyse the use and performance of the Services ; and
- (f) to store your preferences in relation to the use of cookies more generally.

## 8.3 Cookies used by our service providers

(a) We use the following service providers to analyse the use of the Services. Each service provider gathers information about the Services by means of cookies and this information is used to create reports about with usage information. You can find information about the service providers’ privacy policies and practices at the URLs set forth below:

<u>Service Provider - Analytics</u>	<u>Privacy Policy</u>
Google Analytics / Fabric / Crashlytics	<a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a>
Branch	<a href="https://branch.io/policies/#privacy">https://branch.io/policies/#privacy</a>

Mixpanel	<a href="https://mixpanel.com/legal/privacy-policy/">https://mixpanel.com/legal/privacy-policy/</a>
AppsFlyer	<a href="https://www.appsflyer.com/privacy-policy/">https://www.appsflyer.com/privacy-policy/</a>
Freshdesk's Mobihelp SDK	<a href="https://www.freshworks.com/privacy/">https://www.freshworks.com/privacy/</a>
Foursquare Labs	<a href="https://foursquare.com/legal/privacy">https://foursquare.com/legal/privacy</a>
Algolia	<a href="https://www.algolia.com/policies/privacy">https://www.algolia.com/policies/privacy</a>
Honeybadger	<a href="https://www.honeybadger.io/privacy/">https://www.honeybadger.io/privacy/</a>

#### 8.4 Managing cookies

(a) Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

(b) Your mobile device may allow you to control cookies through its settings function. Refer to your device manufacturer's instructions for more information.

(c) If you choose to decline cookies, some parts of the Services may not work as intended or may not work at all.

### 9. Data Security

9.1 We have implemented measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

#### 9.2 Steps taken to ensure data security:

- (a) All the user information can only be accessed by authorized users;
- (b) Users need to authenticate themselves with a username-password combination; and
- (c) All data is hosted on Amazon AWS servers.

9.3 Unfortunately, the transmission of information via public networks such as the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted through the Services. Any transmission of personal data is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Services.

### 10. Data Privacy Framework

Crowdfire complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and, as applicable the UK Extension to the EU-U.S. DPF, and/or the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union, the United



Kingdom and/or Switzerland to the United States, respectively. Crowdfire LLC and Crowdfire Limited have certified to the Department of Commerce that they adhere to the Data Privacy Framework Principles with respect to such information. If there is any conflict between the terms in this privacy policy and the Data Privacy Framework Principles, the Data Privacy Framework Principles shall govern.

For more information about the Data Privacy Framework Principles and to view Crowdfire's certification, please visit the Data Privacy Framework website at <https://www.dataprivacyframework.gov/>. You may also contact us directly at [hello@crowdfireapp.com](mailto:hello@crowdfireapp.com) to learn more about this certification.

With respect to Personal Data received or transferred pursuant to the Data Privacy Framework, Crowdfire is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In some cases, Crowdfire is potentially liable if its agents process your Personal Data in a manner that is inconsistent with the Data Privacy Framework Principles, including in cases of onward transfers to third parties.

Crowdfire may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

#### 11. Dispute Resolution

Crowdfire will investigate and attempt to resolve complaints and disputes regarding collection, use and disclosure of Personal Data in accordance with the principles contained in this Privacy Policy. EU, United Kingdom, Gibraltar or Swiss individuals with inquiries or complaints regarding our Data Privacy Framework policy should first contact Crowdfire through the following Form.

Crowdfire has further committed to cooperate with EU data protection authorities (DPAs), with the UK Information Commissioner's Office (ICO) (and the Gibraltar Regulatory Authority (GRA) and with the Swiss Federal Data Protection and Information Commissioner, with regard to unresolved Data Privacy Framework complaints concerning Personal Data transferred from the EU, UK (and Gibraltar) or Switzerland, respectively. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs, the ICO (and the GRA) or the Swiss Federal Data Protection and Information Commissioner as applicable for more information or to file a complaint. The services of EU DPAs, ICO (GRA) and of the Swiss Federal Data Protection and Information Commissioner are provided at no cost to you.

Under certain conditions, more fully described on the Data Privacy Framework website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

#### 12. Changes to Our Privacy Policy

It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we treat our users' personal data, we will notify you by e-mail to the

primary e-mail address specified in your account. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this Policy to check for any changes.

13. Contact Information

The data controller responsible for your personal data is Crowdfire Inc. Please contact us by email at [hello@crowdfireapp.com](mailto:hello@crowdfireapp.com) or by post at:

Crowdfire Inc.  
16192 Coastal Highway  
Lewes, DE 19958  
United States

14. Privacy Notice For California Residents

This section applies solely to consumers who reside in the State of California.

If you are a California resident, and you wish to access your personal data, request from us that we delete your personal information, or require information about our disclosure practices, you can choose to send us a verifiable consumer request by email at [hello@crowdfireapp.com](mailto:hello@crowdfireapp.com), in addition to using the means set forth above.

In our assessment, we do not “sell” your personal information to third parties for monetary or other valuable consideration.