#### **Bundlr**

## **Privacy Policy**

Bundlr ("Bundlr," "Company," "We," "Our") respects your privacy and is committed to protecting it through our compliance with this policy. This document details the types of information we may collect or that you may provide when you access, use or register with Bundlr's website and mobile application (collectively "Services") and our practices for using, maintaining, protecting and disclosing that information.

Please read this carefully to understand our policies and practices regarding your information and how we will treat it. By using or registering with our Services, you agree to this Privacy Policy. Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates as it may change from time to time.

#### **Information We Collect and How We Collect It**

We collect information from and about users of our Services:

- Directly from you when you provide it to us.
- Automatically when you use the Services.

## Information You Provide to Us

When you use or register with the Services, we may ask you to provide information by which you may be personally identified, such as your name, email address, telephone number, location, and any other identifier by which you may be contacted or identified online or offline ("Personal Information").

This information includes:

• Information that you provide by filling in forms in the Services. This includes information provided at the time of registering to use the Services, using the Services and requesting help.

- Details of transactions you carry out through the Services and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the Services or receiving payment.
- Records and copies of your correspondence (including e-mail addresses and phone numbers), if you contact us. We may also ask you for information when you report a problem with the Services.
- Your responses to surveys that we might ask you to complete for research and development purposes.

## **Automatic Information Collection**

When you download, access or use the Services, it may use technology to automatically collect:

- Usage Details. When you access and use the Services, we may automatically collect certain details of your access to and use of the Services, including traffic data, location data, logs and other communication data and the resources that you access and use on or through the Services.
- Device Information. We may collect information about your computer, mobile device and internet connection, including the computer or mobile device's unique device identifier, IP address, operating system, browser type, mobile network information and the device's telephone number.

# Local Storage, Cookies, Web Beacons, and Tracking

Our Services use local storage and cookies, which are small text files that are intended to make the Services better for you to use. In general, cookies are used to retain preferences, store information for things like shopping carts, and provide tracking data to third-party applications like Google Analytics. You may, however, disable cookies on the Services. The most effective way to do this is to disable cookies in your browser. We suggest consulting the help section of your browser or doing your own web research on how to disable cookies.

Please note that linked third-party websites may also use cookies. We cannot control the use of cookies by these third-party websites. For example, when you link from our website or app to a third-party website, that website may have the ability to recognize that you have come from

Bundlr by using cookies. If you have any questions about how third-party websites use cookies, you should contact such third parties directly.

We may also employ software technology known as "web beacons" or "clear GIFs," which helps us keep track of what content on our service is effective. Web beacons are small graphics with a unique identifier that are used to track the online movements of Internet users. Web beacons are embedded in the web pages you review, so they are not stored on your hard drive. The web beacons we may use will not track or collect any personally identifiable information about you and they are in no way linked to your personally identifiable information.

The Services also use third-party analysis and tracking services to track the performance of our services, understand how you use our services, and offer you an improved and safer experience. Such usage information will be deleted as soon as this information is no longer required for the purpose collected, and will not be shared with third parties until after being anonymized.

#### **Use of Personal Information We Collect**

We may use the information we collect from You in the following ways:

- To set up your account with us.
- To perform transactions through the Services and third-party service providers.
- To personalize your user experience and to allow us to deliver the type of content and offerings in which you are most interested.
- To deliver service messages and other services and content you request and send information related to accounts and services, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages, and to enable user-to user communication.
- To conduct an aggregated analysis of the performance of our Services, including referral data if you arrive at our website from an external source.

All the data we collect at Bundlr is necessary for us to deliver the services you use. The amount

we collect has been minimized wherever possible to respect your privacy.

Should you still disagree with the collection and processing of this data, we recommend you stop using our services or contact us at <a href="mailto:support@bundlrco.com">support@bundlrco.com</a> to delete your account.

## **How We May Share Information We Collect**

We may share personal information as follows:

- We may share personal information with your consent. For example, you may let us share personal information with third parties for their own marketing uses. Those uses will be subject to the third-party privacy policies.
- To provide to third party service providers that perform services on our behalf, such as third-party payment platforms or other vendors to complete purchase orders.
- We may share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding. However, this information will be in the aggregate and anonymized to protect your personal information.
- We may share information to respond to lawful requests and legal processes, and with banking partners as required by credit card association rules.
- We may share information to protect the rights and property of Bundlr, our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use.

- We may share information in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- We may share information with those who need it to do work for us, but we will first obtain your consent.

## **Legal Basis for Processing Personal Information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you; (ii) where the processing is in our legitimate interests and not overridden by your rights; or (iii) where we have your consent to do so. We have a legitimate interest in operating our Services and communicating with you as necessary to provide these Services, for example when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities.

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

#### **Data Retention**

We retain personal information we collect from You where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process personal information, we will either delete or anonymize it or, if this is not possible (for example, because personal information has been stored in backup archives), then we will securely store personal information and isolate it from any further processing until deletion is possible.

# **Security of Your Personal Information**

The security of your Personal Information is important to us. When you enter sensitive information (such as credit card number) on our Services, we encrypt that information using secure socket layer technology (SSL).

Bundlr takes reasonable security measures to protect your Personal Information to prevent loss, misuse, unauthorized access, disclosure, alteration, and destruction. Please be aware, however, that despite our efforts, no security measures are impenetrable.

If you use a password on the Services, you are responsible for keeping it confidential. Do not share it with any other person. If you believe your password has been misused, please notify us immediately.

# **Your Data Protection Rights Under The General Data Protection Regulation (GDPR)**

If You or a User are a resident of the EEA, you have the following data protection rights:

- You may access, correct, update, or request deletion of your personal information.
- In addition, you can object to the processing of your personal information, ask us to restrict the processing of your personal information, or request portability of your personal information.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

 You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. To exercise any of these rights, please contact us at <a href="mailto:support@bundlrco.com">support@bundlrco.com</a>.

# Your Data Protection Rights under the California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act ("CCPA") provides consumers with specific rights regarding their Personal Information. If you are a California resident, you have the right to:

- Request we disclose to you free of charge the following information covering the 12 months preceding your request: (a) the categories of Personal Information about you that we collected; (b) the categories of sources from which the Personal Information was collected; (c) the purpose for collecting Personal Information about you; (d) the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and (e) the specific pieces of Personal Information we collected about you;
- Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception;
- If the business sells Personal Information, you have a right to opt-out of that sale.

Consistent with California law, if you choose to exercise your applicable CCPA rights, we won't charge you different prices or provide you a different quality of services. If we ever offer a financial incentive or product enhancement that is contingent upon you providing your Personal Information, we will not do so unless the benefits to you are reasonably related to the value of

the Personal Information that you provide to us. If you are a California resident and wish to exercise your rights under the CCPA, please contact us at <a href="mailto:support@bundlrco.com">support@bundlrco.com</a>.

## **Updating and Accessing Your Personal Information**

If your Personal Information changes, we invite you to correct or update your information. We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account, request that we no longer use your information to provide you services, or delete your Personal Information, you may do so through your account settings, or contact us at <a href="mailto:support@bundlrco.com">support@bundlrco.com</a>. We will respond to your request to have your Personal Information updated as soon as possible. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

#### **Choices About Use of Your Information**

You can request that your account be deleted, however, certain financial record keeping information may be maintained in our systems because we have a legitimate legal and financial interest in maintaining such records.

You may unsubscribe from receiving certain promotional emails from us. If you wish to do so, simply follow the instructions found at the end of the email. Even if you unsubscribe, we may still contact you for informational, transactional, account-related, or similar purposes, including messages about your current Bundlr account and services.

Many browsers have an option for disabling cookies, which may prevent your browser from accepting new cookies or enable selective use of cookies. Please note that, if you choose not to accept cookies, some features and the personalization of our Services may no longer work for you. You will continue to receive advertising material but it will not be tailored to your interests.

#### **Third-Party Disclosure and Links**

The Services may include links to other websites whose privacy practices may differ from those of Bundlr. If you submit Personal Information to any of those sites, your information is governed

by their privacy statements. We encourage you to carefully read the privacy statement of any

third-party websites you visit.

**Notice Concerning The Information Of Children** 

Bundlr is not directed to children under the age of 13 and does not intentionally collect any

information from children under the age of 13. Please contact us if your child has provided

Personal Information to us and we will delete the information.

**International Data Transfers** 

We may transfer personal information to countries other than the country in which the data was

originally collected. These countries may not have the same data protection laws as the country

in which you initially provided the information. When we transfer your personal information to

other countries, we will protect that information as described in this Privacy Policy.

**Changes to This Policy** 

Bundlr may change this Policy from time to time. If we make any changes to this Policy, we will

change the "Last Updated" date below and may notify you by email (sent to the e-mail address

specified in your account). We encourage you to review this Policy whenever you visit the

Services to understand how your Personal Information is used.

**Questions About This Policy** 

If you have any questions about this Policy, our practices related to the Services, or if you would

like to have us remove your information from our database, please feel free to contact us at

support@bundlrco.com.

Last Update: March 24, 2023