### **CAPYBARA PRIVACY POLICY**

Last updated: September 19, 2022

This Privacy Policy describes the privacy practices of Digitribe in connection with the Capybara application (the "Capybara" or "Application").

### WELCOME TO DIGITRIBE'S PRIVACY POLICY!

If you decide not to read this entire Privacy Policy, we want you to walk away with a few key points about Digitribe's privacy practices:

- Capybara is a contact harvesting tool integrated in the form of a button on a web page that enables users to share select email contacts from their address book with the campaign / the partner organizations.
- When the user clicks on the button, they are invited to sign into their email provider of choice which includes Outlook, Gmail, Yahoo and iCloud. On signing in, they see their entire contact list and can check the box next to the name of the contact with whom they want to share information about a campaign/cause.
- We use third-party cloud providers specifically, Heroku (Salesforce) to store e-mails contacts.
- The Application only has access and uploads to a secure database in the Salesforce Cloud (Heroku) the contacts the user selected in the address book while sharing an action.
- The chosen contacts receive an email inviting them to opt-in and subsequently receive newsletters and general information about a cause that you consider of their interest.
- We do not use the e-mail contacts you provide when you use the Application for any reason other than to send them an invitation to take action.

If you have any questions about our privacy practices, please email <u>privacy@capybara.tech</u>.

### PERSONAL INFORMATION WE COLLECT

When you use the Application, we may collect information about your contacts, including:

Names and e-mail addresses you provide when you use the Application, via your email
provider. We obtain only the specific name and email address you chose to share using
the Application; we do not collect all your contacts even if you grant us your access to
your agenda or address book. Please note that while we do not require or request any

metadata attached to the contacts you upload, metadata (including, for example, pictures) may be associated with your contacts by default. We take steps to delete any metadata that may be associated with a contact you provide when you use the Application.

- <u>Application usage information</u>, such as information about how you use the Application and interact with us, including your preferred language, the date and time when you first clicked on the Capybara button and the date and time you last used the Application.
- <u>Device data</u>, such as your computer and mobile device operating system type and version number, manufacturer and model, device ID, push tokens, Google Advertising ID, Apple ID for Advertising, browser type, screen resolution, IP address (and the associated country in which you are located), the website you visited with the Capybara button; and other information about the device you are using to visit the Application.
- Online activity data, such as information about your use of and actions on the Application and the Sites, including pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and certain third parties (e.g., webpage with Capybara button) also may collect this type of information over time and across third-party websites and mobile applications. This information may be collected on our Site using cookies, browser web storage (also known as locally stored objects, or "LSOs"), web beacons, and similar technologies. We may collect this information directly or through our use of third-party software development kits ("SDKs"). SDKs may enable third parties to collect information directly from our Application.

#### HOW WE USE YOUR PERSONAL INFORMATION

We do not use the contacts you provide when you use the Application for any reason other than to notify them about some causes and invite them to participate. We may use information other than names and e-mail addresses for the following purposes:

# To operate and improve the Application:

- Enable you to use the Application's features;
- Communicate with you about the Application, including by sending you announcements, updates, and security alerts, which we may send through a push notification, and responding to your requests, questions and feedback;
- Provide technical support and maintenance for the Application; and
- Perform statistical analysis about use of the Application (including through the use of Segment.com, Google Analytics and Facebook Pixel).

<u>For compliance, fraud prevention, and safety</u>. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or Appropriate to: (a) protect our, your or others' rights, privacy, safety or property

(including by making and defending legal claims); (b) enforce the terms and conditions that govern the Service; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

<u>With your consent</u>. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes.

## HOW WE SHARE YOUR PERSONAL INFORMATION

We do not disclose user emails contacts to third parties (with the exception of uploading a contact to our cloud providers Salesforce (Heroku) to provide the contact sharing features of the Application). We may share your non-emails contacts information in the following circumstances:

<u>Affiliates</u>. We may share Application usage information with our subsidiaries and affiliates, for purposes consistent with this Privacy Policy.

<u>Service providers</u>. We may share your personal information with services providers that perform services on our behalf or help us operate the Application (such as customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy and are prohibited from using or disclosing your information for any other purpose.

<u>Third-party platforms</u>. If you have enabled features or functionality that connect the Application to a third-party platform (providing your API key or similar access token for the Application to a third-party), we may disclose the personal information that you authorized us to share (such as when you elect to upload an e-mail contact from your social media account). We do not control the third-party platforms' use of your personal information, which is governed by that third party's privacy policy and terms and conditions.

<u>Professional advisors</u>. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

<u>For compliance, fraud prevention and safety</u>. We may share your personal information for the compliance, fraud prevention and safety purposes described above.

<u>Business transfers</u>. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

### **COMPLIANCE WITH LAW**

We may be required to use and share your personal information to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities

### YOUR CHOICES

In this section, we describe the rights and choices available to all users.

<u>Opt-out of marketing communications and other push notifications</u>. You may opt out of marketing-related communications and other notifications we may send you via push notification by changing the settings on your device.

<u>Choosing not to share your personal information</u>. Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Application to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We will tell you what information you must provide to use the Application by designating it as required at the time of collection or through other appropriate means.

<u>Third-party platforms</u>. If you choose to connect to third-party platform, you may have the ability to limit the information that we may obtain from the third-party at the time you login using the third-party's authentication service. Subsequently, you may be able to control your settings through the third-party's platform or service. If you withdraw our ability to access certain information from a third-party platform, that choice will not apply to information that we have already received from that third party.

### OTHER SITES, APPLICATIONS AND SERVICES

The Application may contain links to other websites, e-mail providers and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our Application may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications, or online services, and we are not responsible for their actions. Other websites, e-mail providers and online services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

### **SECURITY PRACTICES**

We use commercially reasonable security practices to help keep the information collected through Capybara secure and take reasonable steps to verify your identity before granting you access to your e-mail provider. However, Digitribe cannot ensure the security of any information you transmit to Digitribe or guarantee that information on the Application may not be accessed, disclosed, altered, or destroyed.

Please do your part to help us. You are responsible for maintaining the confidentiality of your login's information and device identifiers, and for controlling access to communications between you and Digitribe, at all times. Your privacy settings may also be affected by changes the social media services you connect to Digitribe make to their services. We are not responsible for the functionality, privacy, or security measures of any other organization.

### RETENTION

With respect to non-e-mail contact information that we may collect, we will retain such information in a personally identifiable format only for as long as necessary to fulfill the purposes we have set out in this Privacy Policy.

#### CROSS-BORDER DATA TRANSFERS

We store the information we collect in connection with the Application on Salesforce (Heroku). For Salesforce (Heroku), we specify the European Economic Area (EEA) as the data storage location. Your personal information may be accessed by our service providers in other locations outside of your state, province, or country. Your device ID (and general Application usage information) may also be accessed by the Company's technical support team in other locations outside of your state, province, or country.

# **AGE**

The App is not directed at people under the age of 16, and our Terms of Use do not allow people under 16 years of age to use the Application. If we learn that we have collected personal information of a person under the age of 16, we will delete it. We encourage parents with concerns to contact us.

### **CHANGES TO THE PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on our website. We may, and if required by law, will, provide notification of changes in another way that we believe is reasonably likely to reach you, such as through the Application.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Application (or as otherwise indicated at the time of posting). In all cases, your continued use of the Application after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

### **YOUR RIGHTS**

Brazilian data protection laws give you certain rights regarding your personal information. If you are located within the Federative Republic of Brazil, you may ask us to take the following actions in relation to your personal information that we hold:

- Access. Provide you with information about our processing of your personal information and give you access to your personal information.
- Correct. Update or correct inaccuracies in your personal information.
- Delete. Delete your personal information.
- Transfer. Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- Restrict. Restrict the processing of your personal information.
- Object. Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to <a href="mailto:privacy@capybara.tech">privacy@capybara.tech</a> or our postal address provided bellow.

If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction.

## **HOW TO CONTACT US**

Please direct any questions or comments about this Policy or privacy practices to <a href="mailto:privacy@capybara.tech">privacy@capybara.tech</a>. You may also write to us via postal mail at:

Digitribe Ltda.

Attn: Legal – Privacy

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