



Privacy Policy

Updated: August 2023

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P97 Networks, Inc. Privacy Policy

Effective as of August 2023

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1. Introduction

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Thanks for choosing P97.

At P97, we want to give you the best possible experience to ensure that you enjoy our service today, tomorrow, and in the future. To do this we need to understand your interests and web history, so we can deliver an exceptional and personalized service, specifically for you. That said, your privacy and the security of your personal data is, and will always be, enormously important to us. So, we want to transparently explain how and why we gather, store, share and use your personal data - as well as outline the choices you have around when and how you choose to share your personal data.

2. About this Policy

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This Policy sets out the essential details relating to your personal data relationship with P97. The Policy applies to the P97 website and any associated website services (referred to as the ‘P97 Website’). The terms governing your use of the P97 Website are defined in our [Terms of Use](#) (the “Terms of Use”).

If we change the way we collect or process your personal data, we will provide you with more information and additional terms or policies. Unless stated otherwise when we introduce these new or additional services, they will be subject to this Policy.

The aim of this Policy is to:

1. Inform you of what personal data we collect about you, the reasons why we collect and use it;
2. Explain the way we use the personal data that you share with us to give you a great experience when you visit the P97 Website; and
3. Explain your rights and choices in relation to the personal data we collect and process about you and how we will protect your privacy.

We hope this helps you to understand our privacy commitments to you. For further clarification of the terms used in this Policy please contact us (please see the [‘How to Contact Us’ Section 14](#) below).

Please note that certain functions of the P97 Website require you to provide and us to collect and use certain of your personal information. Therefore, if you do not agree with the content of this Policy, we will be unable to provide, and you will be unable to use such functions of the P97 Website.

3. Your rights and your preferences: Giving you choice and control

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Some jurisdictions give you a right to make the following choices regarding your personal information:

- **Access To Your Personal Information.** You may request access to your personal information or confirmation that we have information about you. In certain limited

circumstances, you may also request to receive access to your data in a portable, machine-readable format.

- **Changes To Your Personal Information.** We rely on you to update and correct your personal information. If our website does not permit you to update or correct certain information, you can contact us at the address described below in order to request that your information be modified. You may ask us to correct information that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.
- **Deletion Of Your Personal Information.** You may request that we delete your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another business purposes.
- **Online Tracking.** We do not currently recognize the “Do Not Track” signal.
- **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in emails that you receive.
- **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying “STOP.”
- **Revocation Of Consent.** Where we process your personal information based upon consent, you may revoke consent. Please note, if you revoke your consent for the processing of personal information then we may no longer be able to provide you with all the functionality of the P97 Website.

Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. We will not discriminate against individuals who exercise their privacy rights under applicable law.

If you have any questions, please contact our Data Protection Officer (please see the [‘How to Contact Us’ Section 14](#) below). We will respond to your request within a reasonable period upon verification of your identity. If you are unhappy with the way we are using your personal data, you can also contact and are free to lodge a complaint with your local Data Protection Authority.

4. How do we collect your personal data?

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We collect your personal data in the following ways:

1. When you sign into the P97 Website - when you sign into the P97 Website, you may provide, and we may collect certain personal data such as your name, email address, birth date, gender, and location/country.
2. Through your access and use of the P97 Website - when you access and use the P97 Website, you provide, and we collect personal data about your use of the P97 Website, such as the information listed in Section 5, below.
3. Personal data collected that enables us to provide you with additional features/functionality - from time to time, you also may provide us with additional personal data or give us your permission to collect additional personal data to provide you with more features or functionality. You will always have the option to change your mind and withdraw your consent at any future time.

We will use your personal data either where you have provided your consent to P97 to do so or where P97 has a legitimate interest in doing so to provide you with the P97 Website. In addition, we use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, creating marketing and promotion models, improving the P97 Website and services, and developing new features and functionality within the P97 Website and services.

5. What personal data do we collect from you?

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We collect information about you in a variety of ways depending on how you interact with us and our websites and mobile applications, including:

- Directly from you when you provide it to us, such as when you sign up to receive communications from us, or contact us by phone, email, or otherwise.
- Automatically through the use of cookies, server logs, and other similar technologies when you interact with our websites, mobile applications, advertisements, and emails.
- From other sources, including, for example, our affiliates, business partners, service providers, social media interactions, and other third parties, or from publicly available sources.

The following provides examples of the type of information that we may collect in a variety of contexts and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Business Contact Information	We collect the name, and contact information, of our business contacts and their employees with whom we may interact.	We use this information to contact our clients and communicate with them concerning normal business administration such as marketing, projects, services, and billing.
Cookies and First-Party Tracking	We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a website is viewed.	We use this information to make our website operate efficiently.

Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We use this information to understand how you interact with our communications to you.
Email and Text Message Content	If we send you, or if you send us, an email or text message, we collect information such as the subject line, sender, recipient, and content of the email or text.	We use this information to understand how you interact with our communications to you.
Feedback/Support	If you provide us feedback or contact us for support, we will collect your name and email address, as well as any other content that you send to us, in order to reply.	We use this information to receive, and act upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists, we collect your email address.	We share information about our products and services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our products or services.
Mobile Devices	We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website.	We use this information to identify unique visitors and understand how users interact with us on their mobile devices.
Surveys	When you participate in a survey, we collect information that you provide through the survey. If the survey is	We use this information to understand your opinions and collect information relevant to our organization.

provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.

Sweepstakes or Contests

When you participate in a sweepstakes or contest, we collect information about you which includes contact information to notify you if you are selected.

We use this information to operate the sweepstakes. In some contexts, we are also required by law to collect information about those that enter into our sweepstakes, and we use this information to comply with those laws.

Mobile App Crash Logs

We download crash logs from our apps to monitor our mobile app performance. This may include your device ID and other mobile app related information.

We use this information to better improve our mobile app and understand the performance of our mobile app.

Website Interactions

We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.

We use this information to understand how you interact with our website to better improve it, and to understand your preferences and interests in order to select content that you might find most useful. We also use this information to detect and prevent fraud.

Web Logs

We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.

We use this information to monitor our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.

We may also collect and use the following types of personal data about you:

- Website Sign-In Data (e.g., when you sign into the P97 Website, you may provide, and we may collect certain personal data such as your name, email address, birth date, gender, and location/country);
- Marketing Data (e.g., personal data to enable P97 and our partners / service providers to send you marketing communications either via email, while using the P97 Service and/or direct from the third party);
- Device Information (e.g., we may collect information about your computer or mobile device, including, for example, the hardware model, operating system and version, software and file names and versions, preferred language, advertising identifiers, serial number, device motion information, and mobile network information);
- Call and SMS Data (e.g., to facilitate communications between Users and Drivers, we receive call data, including the date and time of the call or SMS message, the parties' phone numbers, and the content of the SMS message); and
- Camera and Microphone Data (e.g., the P97 Website may request permissions to use data from camera sensor and microphone, which will not be sent unless you explicitly share a photo or video using the sharing functions of the P97 Website).

6. What do we use your personal data for?

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How We Use Information

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites.
- To provide information regarding our products and services.
- To improve our services and product offerings.
- To conduct analytics.
- To communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback.
- To send marketing and promotional materials including information relating to our products, services, sales, or promotions, or those of our business partners.
- To detect and protect against malicious, deceptive, fraudulent, or illegal activity, including violation of our policies and terms and conditions, security incidents, and harm to the rights, property, or safety of our company and our users, employees, or others.
- To debug, identify and repair errors that impair existing intended functionality of our website and services.
- To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

- For internal administrative purposes, as well as to manage our relationships.
- To provide, personalize, and improve your experience with the P97 Website and other services and products provided by P97, for example by providing customized, personalized, or localized content, recommendations, features, and advertising on or outside of the P97 Website and services;
- To understand how you access and use the P97 Website to ensure technical functionality of the P97 Website, and analyze your use of the P97 Website, including your interaction with applications, advertising, products, and services that are made available, linked to, or offered through the P97 Website;
- To communicate with you, either directly or through one of our partners, for marketing, research, participation in contests, surveys and sweepstakes, and promotional purposes, including via emails, notifications, or other messages, consistent with any permissions or consents you may have given us; and
- To provide you with features, information, advertising, or other content which is based on your specific location.
- For such other purposes as you may consent (from time to time).

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose.

To the extent we maintain and use personal information in a deidentified form, we will not attempt to reidentify the information, except for the purpose of determining whether our deidentification processes satisfy our legal obligations.

In each case, the basis for our processing of your personal data are legitimate interests (such as improving our P97 Website) and / or your consent.

7. Sharing your personal data

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As a general rule, P97 does not share your personal data with third parties. The following exceptions may apply:

- Analytics and Advertising Services Provided by Others with your prior consent (e.g., we may allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our P97 Service, as well as when you visit other online sites and services);
- Law Enforcement and Data Protection Authorities (e.g., we will share your personal data when we in good faith believe it is necessary for us to do so to comply with a legal obligation under applicable law, or respond to valid legal process, such as a search warrant, a court order, or a subpoena, or believe that it is necessary for our own, or a third

party's legitimate interest relating to national security, law enforcement, litigation, criminal investigation, protecting the safety of any person, or to prevent death or imminent bodily harm); and

- Purchasers of our business (e.g., if we share your personal data in those cases where we sell or negotiate to sell our business to a buyer or prospective buyer, we will continue to ensure the confidentiality of your personal data and give you notice before your personal data is transferred to the buyer or becomes subject to a different Privacy Policy).

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We keep your personal data only as long as necessary to provide you with the functionality of the P97 Website and for legitimate and essential business purposes, such as maintaining the performance of the P97 Website, making data-driven business decisions about new functionality, complying with our legal obligations, and resolving disputes. We keep some of your personal data (e.g., your account information) for as long as you are a user of the P97 Website.

If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless, we are legally allowed or required to maintain certain personal data, including situations such as the following:

- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests.

9. Transfer to other countries

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P97 may also subcontract processing to third parties located in countries other than your home country. Your personal data, therefore, may be subject to privacy laws that are different from those in your country of residence.

Personal data collected within the European Union and Switzerland may, for example, be transferred to and processed by third parties located in a country outside of the European Union and Switzerland. By accessing and using the P97 Website, you consent to such transfers. If you do not consent to such transfers, please do not submit your personal data and/or refrain from accessing and using the P97 Website.

For further details of the security measures we use to protect your personal data, please see the ['Keeping your personal data safe' Section 11](#) of this Policy.

10. Links

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We may display advertisements from third parties and other content that links to third-party websites. We cannot control or be held responsible for third parties' privacy practices and content. If you click on a third-party advertisement or link, please understand that you are leaving the P97 Service and any personal data you provide will not be covered by this Policy. Please read their privacy policies to find out how they collect and process your personal data.

11. Keeping your personal data safe

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We are committed to protecting our users' personal data. We implement appropriate technical and organizational measures to help protect the security of your personal data; however, please note that no system is ever completely secure. We have implemented various policies including anonymization, pseudonymisation, encryption, access control, and retention policies to guard against unauthorized access and unnecessary retention of personal data in our systems.

12. Children

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Only persons aged 16 or older have permission to access our P97 Website. The P97 Website is not directed to children under the age of 13 years.

We do not knowingly collect personal data from children under 13 years of age. If you are under 13 years of age, please do not use the P97 Website, and do not provide any personal data to us.

If you are a parent of a child under 13 years of age and become aware that your child has provided personal data to P97, please contact us to exercise of your applicable rights detailed in the ['Your rights and your preferences: Giving you choice and control' Section 3](#) of this Policy.

If we learn that we have collected the personal data of a child under the age of 13 years, we will take reasonable steps to delete the personal data.

13. Additional Information for California Residents

California law requires us to disclose the following additional information related to our privacy practices. If you are a California resident, the following privacy disclosures apply to you in addition to the rest of the Privacy Policy.

- **California Shine the Light.** If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, please submit a written request to us using the information in the **Contact Information** section below.
- **Notice of Collection.** The table below describes the categories of personal information we collect, disclose for a business purpose, “sell” and/or “share” (as those terms are defined by California law). Please note, in addition to the recipients identified below, we may disclose any of the categories of personal information we collect with government entities, as may be needed to comply with law or prevent illegal activity. For details regarding how we use personal information, please see the **Information We Collect** Section of the Privacy Policy. For information regarding how long we retain personal information, please refer to the **Data Retention and Deletion** Section of the Privacy Policy.

Category of Personal Information

Disclosures for a Business Purpose

Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers.

- Affiliates or subsidiaries
- Business partners
- Data analytics providers
- Internet service providers
- Joint marketing partners
- Operating systems and platforms
- Other Service Providers
- Professional services organizations, this may include auditors and law firms
- Social networks

Characteristics of protected classifications – this may include age and/or gender.

- Affiliates or subsidiaries
- Business partners

- Operating systems and platforms
- Professional services organizations, this may include auditors and law firms
- Other Service Providers
- Payment processors and financial institutions
- Affiliates or subsidiaries
- Business partners
- Data analytics providers
- Internet service providers

Commercial information – this may include information about products or services considered or searched or other consuming histories or tendencies.

- Joint marketing partners
- Operating systems and platforms
- Other Service Providers
- Payment processors and financial institutions
- Professional services organizations, this may include auditors and law firms
- Social networks

Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.

- Affiliates or subsidiaries
- Business partners
- Data analytics providers
- Internet service providers
- Joint marketing partners

- Operating systems and platforms
- Other Service Providers
- Payment processors and financial institutions
- Professional services organizations, this may include auditors and law firms
- Social networks

- Affiliates or subsidiaries
- Business partners
- Data analytics providers
- Internet service providers
- Joint marketing partners

Geolocation data

- Operating systems and platforms
- Other Service Providers
- Payment processors and financial institutions
- Professional services organizations, this may include auditors and law firms
- Social networks

- Affiliates or subsidiaries
- Business partners
- Data analytics providers
- Internet service providers

Inferences drawn from any of the information listed above

- Joint marketing partners
 - Operating systems and platforms
 - Other Service Providers
 - Payment processors and financial institutions
 - Professional services organizations, this may include auditors and law firms
 - Social networks
-
- **California Sensitive Information Disclosure.** We collect the following categories of sensitive personal information (as defined under California law): precise geolocation, account log in. This information is collected in order to process communications and transactions, comply with laws, manage our business, or provide you with information about our products and services. Note that we do not use such information for any purposes that are not identified within the California Privacy Rights Act Section 1798.121. We do not “sell” or “share” sensitive personal information.

14. Changes to this Privacy Policy

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We may occasionally make changes to this Policy.

When we make material changes to this Policy, we’ll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice on the P97 Website or by sending you an email. We may notify you in advance.

Please, therefore, make sure you read any such notice carefully.

If you want to find out more about this Policy and how P97 uses your personal data, please contact our Data Protection Officer (please see the [‘How to Contact Us’ Section 14](#) below) to find out more.

15. How to contact us

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Thank you for reading our Privacy Policy. If you have any questions about this Policy, please contact our Data Protection Officer at DPO@P97.com or by writing to us at the following address:

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