

## Privacy Policy

Last updated: 27th Apr 2022

We at My Witty LTD. (the , “**Company**”, “**We**”, “**Us**” or “**Our**”), are committed to protecting the privacy of Our users. As part of this commitment, it is important for Us to be transparent about how We handle the information that We (or others on Our behalf) collect about Our users, when We collect information about them, and how We use such information.

This Privacy Policy (“**Policy**”) applies to all of the websites and apps operated by the Company, including: <https://pixelgroup.io> and <https://optimon.io/> and any additional websites as operated by the Company from time to time (each (the “**Website**”) and the services provided in connection therewith (the “**Services**”) including the Optimon Platform (the “**Platform**”).

In this Policy, you (“**You**”, “**Your**” or “**User**”) may find information about the types of information that We collect about Users of Our Website, when We collect it, how We use it, share it with third parties, maintain it, etc. This Policy does not apply to the processing activities We perform as processors on behalf of Our Customers who use Our services. These activities are addressed in the [Data Security Addendum](#) entered between Us and our customers.

We will uphold the following principles:

- To be transparent in respect of the collection and processing of Personal Data about You:

It is important to Us that You have at all times all the information required for You to make educated decisions about the processing of Personal Data about You. For this purpose, We will make use of various techniques and measures aimed to provide You with relevant information about the processing of Personal Data about You, in the proper manner and timing.

In addition, if We find that You are required to be provided with specific information, We will provide it to You in the appropriate time and place.

We are also happy to answer any questions You may have and to provide You with any clarification You require, subject to legal limitations. For this purpose, You can approach Us by sending an email to the following address: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io).

- To process Personal Data about You solely for the purposes outlined in the Policy:

The purposes for which We may process Personal Data about You include, inter alia, to provide you with Our Services, to customize Our Services to Your needs and preferences, to improve Our Services, to protect Our rights and interests, to offer You content and materials that can be of interest to You, to perform business and administrative activity that supports the provision of Our Services, or to uphold any legal or regulatory requirements that apply to Us. For more information, see section 6 of Our Complete Privacy Policy

- To invest significant resources in order to respect Your rights in connection with Personal Data about You:

We apply significant resources to allow You to exercise Your rights as a data subject. Therefore, You may approach Us at any time You wish to review Personal Data about You, have Us amend it, erase it, cease using it for specific purposes or in general, or transfer it to You or to a third party. We will fulfill Your wishes in accordance with the law.

- To secure Personal Data about You:

While We cannot promise absolute protection of the Personal Data about You, We can promise that We use and will continue to use a wide array of means and measures aimed at ensuring the Personal Data about You is secured.

## **Our Complete Privacy Policy**

In order to view the entire document, please press [here](#).

### **1. The Scope?**

This Policy describes what kind of Personal Data We collect about natural persons, and how We collect it, use it, share it with third parties, secure it, process it, etc.

In this Policy, “Personal Data” refers to any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or in combination with additional information that We have or that We have access to.

In this Policy, the “processing” of Personal Data refers to any operation or set of operations performed on Personal Data, including the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of Personal Data.

You must be at least 18 years old to access or use Our Services or register with Us. In any event, We do not knowingly collect Personal Data about any person under the age of 13.

### **2. Data Controller**

When you contract with the Us, or reach out to Us on the Website, or use the Services as a customer, the Company is the data controller in respect of the Personal Data about You, as provided in the Policy.

When We act on behalf of Our customers, the customer is the Controller and the Company acts as Processor with respect to the customers’ end-users data in accordance with the information provided on the Data Security Addendum.

### **3. When Do We Collect Personal Data About You?**

We collect Personal Data about You whenever You use Our Services, use Our service channels, use the Website, the Services or contact Us.

In some instances, You will actively provide Us with the Personal Data, and in other instances, We will collect the Personal Data about You by examining and analyzing Your use of Our Services or Our service channels.

#### **4. No Obligation To Provide Personal Data To The Company And Its Implications**

You are not obligated to provide Us with any Personal Data about You. However, in some instances, not providing such Personal Data will prevent Us from providing You with the products or services You requested Us to provide You, will prevent your use of the Website and the Services or a part thereof, or will cause the malfunctioning of Our Services.

#### **5. What Personal Data About You Do We Collect?**

##### **Personal Data We collect upon registration with the Website and the Services.**

Upon creation of an account with the Platform, you provide Us with the following information: full name, user name, email address, telephone number and organization. While some of the details mentioned above are required fields in pages of registration, others are not required, but We recommend that you complete them so that We can provide you with the best services We can.

**Personal Data We collect when you use or access the Website.** Whenever you access to or use the Website, We collect from you by way of observation of Your use thereof certain usage information. This information includes online activity log, traffic information (including, without limitation, IP address or device ID, time of access, date of access, web and mobile page(s) visited, language used, software crash reports and type of browser used and information regarding the device you used.

**Personal Data We receive from you:** any Personal Data You provide to Us of your own free will when contacting Us. We may record or document in writing your calls. We may collect Personal Data when You contact Us, including via Our Website, social media networks or any other communications channel, You may provide Us with Your full name, company name, website URL, Your country, certain contact information (such as email address and telephone number) and the content of Your communication with Us.

#### **6. The Purposes Of The Processing Of Personal Data And Their Legal Basis**

The Company processes Your Personal Data for one or more of the purposes outlined in this section and according to the appropriate legal basis.

The Company will not process Personal Data about You unless there is a legal basis for such processing. The legal bases according to which the Company may process Personal Data about You are as follows:

- a. **Your consent that the Company will process Personal Data about You for one or more specific purposes.** By way of example, for the purpose of sending marketing materials to You.

Where the legal basis for the processing of the Personal Data about You is consent, you may at any time withdraw Your consent for the purposes for which you provided Your consent by sending a notice free of charge to the following email address: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io).

Where You withdraw Your consent for the processing of Personal Data about You, We might not be able to provide You with some or all of the Services You requested or in the form intended to be provided to You, and you will have no claim in respect of that.

- b. **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.** This refers to all the information required for Us to provide You or your organization with the Services and grant You access thereto.
- c. **Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party.** By way of example, for the purpose of improving Our Services, or for the exercise or defense of legal claims.

At any time, you may approach Us by sending a notice to the email address [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io), in order to receive information concerning the review performed by Us. This is so You can conclude that We may process the Personal Data about You on account of such processing being necessary for the purposes of the legitimate interests pursued by the Company or by a third party.

The following list outlines the purposes for which We may process Personal Data about You and the legal basis for any such processing:

<b>Purpose</b>	<b>Legal Basis</b>
<p>1 <b>In order to register you with Our Services</b></p> <p>Upon your request to open an account and register to use the Services, We will process Personal Data about you in order to allow Us to perform such request.</p>	<ul style="list-style-type: none"><li>• 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.</li></ul>
<p>2 <b>In order for Us to be able to provide you with Our Services (including the Platform)</b></p> <p>Whenever you request to use Our Services (including the Platform), We will process the Personal Data required for Us to perform such request.</p>	<ul style="list-style-type: none"><li>• 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.</li></ul>

- 3 In order to contact you for the purpose of operational requirements**

In some circumstances, We will contact You in order to update You in respect of certain operational matters—for instance, if We are wish to update You of new Services features. In these circumstances, We will need to use Personal Data about You accordingly.
  - 4 In order to respond to Your queries, requests, or complaints, and to provide You with customer support services**

Processing of Personal Data about You is required in order to respond to queries You have concerning Your use of the Services, and in general to provide you with customer support services.
  - 5 In order to customize the Services to Your Needs and preferences**

We may analyze the data that We gather about You and infer from such analysis additional information about You, in order to make accessible to You a more customized content or services.
  - 6 In order to send you marketing materials**

Inasmuch as you agree to receive marketing materials from Us, We will send You, via the means of communication You consented to, marketing materials relating to Our Services, whether in existence now or in the future, whether similar to Our Services and whether different ones, or products and services of third parties.
- 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.
  - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
  - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
  - Your consent

It is hereby clarified that You may withdraw Your consent at any time, by sending an email free of charge with the title “unsubscribe” to the following email address: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io) or by clicking the unsubscribe option in any marketing material sent to You. Please note that You will be requested to choose from which means of communication (one, some or all) You wish to unsubscribe.

It is hereby clarified that unsubscribing will not cause the deletion of Your contact details, but to cease receiving marketing materials – unless You re-request to receive them.

- 7 In order to provide You with tailor made marketing materials and offers**

We process Personal Data about You in order to adjust the materials presented to you according to your preferences, behavior, characteristics and interests; these materials can be Ours or of third parties. For this purpose, We use Personal Data automated analysis techniques, including profiling.

This activity is made in order to enhance and improve Your user experience and the use of Our Services (including the Platform), and in order to offer you with additional and new products and services (whether of Ours or of third parties).
  - 8 In order to comply with any legal obligations or judicial or administrative orders**

We process Personal Data about you in order to comply with Our various legal obligations.
  - 9 In order to improve the Services, as well as to develop new ones**
- Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
  - Processing is necessary for compliance with a legal obligation to which the Company is subject.
  - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.

We may use Personal Data about you in order to improve the Services. Such processing will include, *inter alia*, any comments and complaints received in respect of the Services, as well as any errors and malfunctions.

- 10 In order to perform and maintain various activities, supporting products and services**

Such activities include back-office functions, business development activities, strategic decision-making, etc.

  - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
  
- 11 In order to analyze the effectiveness of any marketing and advertising campaigns and activities of the Company**

  - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
  
- 12 In order to perform analysis, including statistical analysis**

We use various analytical measures (including statistical ones) to make decisions on various issues.

  - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
  
- 13 In order to protect Our and third parties' interests, rights, and assets, including initiation, exercise, or defense of legal claims**

We may process Personal Data about You in order to protect Our interests, rights, and assets, or those of third parties, according to any law, regulation, or agreement, including any of Our terms and conditions and policies.

  - Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.

## **7. Your Right To Object To The Processing of Personal Data About You For Direct Marketing Purposes**

The Company provides You with offers that are tailored for You specifically, in order to connect You to brands, products and services in ways that are important to You. This may include ads, offers and other sponsored content related to products and services of Ours or of third parties. This is done following the processing of Personal Data about You, in order to

adjust the materials presented to You, on the basis of your preferences, behavior, characteristics and interests. For this purpose, We use Personal Data automated analysis techniques that provide Us with analysis and conclusions concerning You in various aspects, including profiling.

Similar analysis and conclusions are used to the extent that You agreed to receive marketing materials from Us, as such materials are tailored to offer You products and services which We think may be of more interest to You.

Where Personal Data about You is processed for direct marketing purposes, You shall have the right to object at any time to such processing for this purpose, including profiling to the extent that it is related to such direct marketing, by sending a notice to the following email address: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io), in which case We shall cease to process Personal Data about You for such direct marketing purposes.

In addition, You may withdraw Your consent from receiving marketing materials via email at any time, by sending an email free of charge with the title “unsubscribe” to the following email address: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io) or by clicking the unsubscribe option in any marketing material sent to you. You can withdraw your consent from receiving marketing materials via push notifications in your mobile device’s settings page.

Please note that if You opt out of receiving marketing communications from Us, We may still communicate with you from time to time if We need to provide you with non-marketing information about Our Services or for other legitimate non-marketing reasons.

## **8. Transfer Of Personal Data To Third Parties**

The Company may also share Personal Data about You with third parties that provide Us with the following services:

- a. Storage and hosting providers, including cloud computing services;
- b. IP address information;
- c. Analysis of user experience;
- d. Support;
- e. Marketing;
- f. CRM data management;
- g. Accounting and legal services;
- h. Research, analytical, technical, and diagnostic services.

The Company may also share Personal Data about You with its related entities and business partners, which provide it with resources that enable the Company to enrich and improve the level of services and products it provides to its users.

The Company may share Personal Data about You with governmental, local, official, and regulatory authorities, as well as if such disclosure is required to protect Our and third parties' interests, rights, and assets, including initiation, exercise, or defense of legal claims.

In addition, We may disclose Personal Data about You to potential purchasers or investors of, or lenders to, the Company or any company within the group of companies of which the Company is a part, or in the event of any similar transaction (including the sale of assets of the Company or of any company within the group of companies of which the Company is a part), or in connection with any merger, reorganization, consolidation, or bankruptcy of the Company or any company within the group of companies of which the Company is a part.

## 9. Cookies and Third Party Services

**WebTracking Information:** We, and third party service providers that we engage to provide services to us (“Contractors”), may use web tracking technologies such as cookies, web beacons, pixel tags and clear GIFs or any other similar technology in order to operate the Service efficiently and to collect data related to usage of the Service. Such collected data (“**Web Tracking Information**”) may include the address of the websites you visited before and after you visited the Services, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Service You visit and what links You clicked on, and whether You opened email communications we send to You. In order to collect Web Tracking Information and to make Your use of the Service more efficient, we may store cookies on Your computer. We may also use web tracking technologies that are placed in web pages on the Service or in email communications to collect information about actions that users take when they interact with the Service or such email communications, and our Contractors may also do so. We do not correlate Web Tracking Information to individual user Personal Information. Some Web Tracking Information may include data, such as IP address data, that is unique to You. You may be able to modify your browser settings to alter which web tracking technologies are permitted when You use the Service, but this may affect the performance of the Service.

### **Types of cookies:**

The cookies We may use have been classified according to their functionality, as follows:

<b>Type of Cookie</b>	<b>Purpose</b>	<b>Additional Information</b>
Strictly Necessary Cookies	These cookies are strictly necessary to enable You to navigate the Website and the Platform and use features You have requested. They are used to provide you with Our content, products, and services that you have requested.	These cookies collect Personal Data about You, such as user name and last login date, and identify you as being logged in to the Website and the Platform.

Such cookies are essential to help your device download or stream information so that You can navigate around the Website and the Platform, use its features, and return to pages you have previously visited. These cookies are deleted when you close your web browser (session cookies).

**Functionality Cookies** These cookies are used to recognize you when you return to the Website and the Platform and allow Us to remember your choices and preferences. These cookies survive the closing of your web browser, and last until their applicable expiry time.

**Performance Cookies** These cookies are used to provide aggregated statistics in respect of the performance of the Website and the Platform and to test and improve such performance, in order to provide better user experience. In addition, they allow Us to carry out analytical functions on the Website and the Platform. These cookies collect anonymized data that is not related to an identified or identifiable natural person. These cookies are valid for varying periods; some are deleted once you close Your browser, while others have an indefinite validity period.

**Third Party Marketing/Targeting Cookies** These cookies are used to deliver ads and marketing communications, and to display the Website in a manner that is more relevant to You. They are also used to measure the effectiveness of an advertising campaign. These cookies record Your visit to the Website and the pages you have visited. Some of these cookies are provided and used by third parties. These cookies are valid for varying periods; some are deleted once you close your browser, while others have an indefinite validity period.

The Cookies incorporated in our Website [and Platform] are as follows:

<b>Third Party</b>	<b>Name</b>	<b>Retention</b>	<b>Type</b>	<b>Function</b>
Google Analytics	_gid _ga _gcl_au	1 day to 730 days	Third Party Marketing/Targeting Cookies	Contains identifiers used by Google Analytics for targeting and analytical usage statistics

Hotjar	_hj*	2 minutes to 365 days	Third Party Marketing/Targeting Cookies	Contains identifiers used by Hotjar for analytical usage statistics
Facebook	_fbp	90 days	Third Party Marketing/Targeting Cookies	Contains identifiers used by Facebook for targeting and analytical usage statistics
ProveSource	ps*	7 days to 365 days	Third Party Marketing/Targeting Cookies	Contains identifiers used by ProveSource for analytical usage statistics
Reddit	_rdt_uuid	90 days	Third Party Marketing/Targeting Cookies	Contains identifiers used by Reddit for targeting and analytical usage statistics

### Blocking and removal of cookies

You can change your browser settings to block and delete some or all cookies. Please see below links to instructions on how to do this in respect of some of the most popular web browsers:

- [Firefox](#)
- [Internet Explorer](#)
- [Microsoft Edge](#)
- [Google Chrome](#)
- [Safari](#)

Please note, however, that if you do so, some or all of the Website's features and functionalities might not perform as intended.

## 10. Retention Of Personal Data About You

The Company shall retain Personal Data about You for as long as is required to fulfill the purposes of the processing of the Personal Data as outlined in this Policy, or for a longer period as required according to the legislation, regulation, policies, and orders that apply to Us.

In order to ensure that Personal Data about You is not retained for longer than is required, We periodically review Personal Data retained by Us to examine whether any Personal Data can be erased.

## **11. Transfers Of Personal Data To A Third Country Or An International Organization**

Personal Data about You may be transferred to a third country (i.e. jurisdictions other than the one You reside in) or to international organizations. In such circumstances, the Company shall take appropriate safeguards to ensure the protection of Personal Data about You and to provide that enforceable data subject rights and effective legal remedies for data subjects are available.

If You are an EEA resident, please note that these safeguards and protection will be available if any of the following are met:

- a. The transfer is to a third country or an international organization that the EU Commission has decided provides an adequate level of protection to the Personal Data that is transferred to it pursuant to Article 45(3) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("**GDPR**");
- b. The transfer is according to a legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR; or
- c. The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR.

You may request that the Company provide You with details concerning the safeguards employed by it to protect the Personal Data about You that are transferred to a third country or an international organization, by sending an email to the following address: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io).

## **12. Protection Of Personal Data About You**

We implement appropriate technical and organizational measures to ensure an appropriate level of security to Personal Data, taking into account the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored, or otherwise processed.

We may be required, due to legal or other obligations outside Our control, to transfer Personal Data about You to third parties, such as public authorities. In such circumstances, We have limited control over the level of protection provided to the Personal Data about You by such third parties.

Any transfer of Personal Data via the internet cannot be fully secured. Therefore, the Company cannot ensure the protection of Personal Data about You when transferred via the internet to Us.

### **13. Links To Websites of Third Parties**

The Services may provide links to websites or applications of third parties. The Company does not control such websites and applications, nor the collection or processing of Personal Data about You by such websites and applications, and We are not responsible for such websites and applications, nor for their privacy and data protection policies and activities. This Policy does not apply to any actions taken via such websites or applications.

Whenever You access such third parties' websites or applications, We recommend that You carefully review their privacy policies prior to using such websites or applications and prior to disclosing any Personal Data about You.

### **14. Your Rights In Respect Of The Personal Data About You**

Generally, You have the right to request that We provide you with confirmation as to whether Personal Data about You is being collected by Us, to ask to review such data, to rectify the content if applicable and to erase the Personal Data no longer required by Us. You may also restrict Your consent to certain processing of your Personal Data.

You are entitled to the following rights in respect of the Personal Data about You. To exercise such rights, You may send a request to exercise Your rights to the following email address: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io).

#### **Right of access**

You have the right to receive from the Company confirmation as to whether or not Personal Data about You is being processed, and, if that is the case, access to the Personal Data and the following information: (1) the purposes of the processing; (2) the categories of Personal Data concerned; (3) the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, in particular recipients in third countries outside the European Economic Area (EEA) or international organizations; (4) if possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; (5) the existence of the right to request from the Company rectification or erasure of Personal Data or restriction of processing of Personal Data about You or to object to such processing; (6) the right to lodge a complaint with a supervisory authority; (7) if the Personal Data is not collected from You, any available information as to its source; (8) the existence of profiling; and (9) if Personal Data is transferred to a third country outside the EEA or to an international organization, the appropriate safeguards relating to the transfer.

The Company shall provide a copy of the Personal Data undergoing processing and may charge a reasonable fee for any further copies requested by you. If you make the request by electronic means, and unless otherwise requested by You, the information shall be provided in a commonly used electronic form.

The right to obtain a copy of the Personal Data shall not adversely affect the rights and freedoms of others. Therefore, if the request harms the rights and freedoms of others, the Company may not fulfill Your request or do so in a limited manner.

#### **Right to rectification**

You have the right to obtain from the Company the rectification of inaccurate Personal Data about You. Taking into account the purposes of the processing, You have the right for incomplete Personal Data about You to be completed, including by means of providing a supplementary statement.

### **Right to erasure**

You have the right to obtain from the Company the erasure of Personal Data about You if one of the following grounds applies: (a) the Personal Data is no longer necessary in relation to the purpose for which it was collected or otherwise processed; (b) you withdraw Your consent on which the processing is based and there is no other legal ground for the processing; (c) you object at any time, on grounds relating to your particular situation, to the processing of Personal Data about You that is based on the legitimate interests pursued by Us or by a third party, and there are no overriding legitimate grounds for the processing; (d) You object to the processing of Personal Data about You for direct marketing purposes; (e) the Personal Data has been unlawfully processed; or (f) the Personal Data about You has to be erased for compliance with a legal obligation in European Union or Member State law to which the Company is subject.

This right is not applicable to the extent that the processing is necessary (a) for compliance with a legal obligation that requires processing by European Union or Member State law to which the Company is subject; or (b) for the establishment, exercise, or defense of legal claims.

### **Right of restriction of processing**

You have the right to obtain from the Company the restriction of processing of Personal Data about You if one of the following applies: (a) the accuracy of the Personal Data is contested by You, for a period enabling the Company to verify the accuracy of the Personal Data about You; (b) the processing is unlawful and You oppose the erasure of the Personal Data about You and request the restriction of its use instead; (c) the Company no longer needs the Personal Data about You for the purposes of processing, but the Personal Data is required by You for the establishment, exercise, or defense of legal claims; (d) if the processing of Personal Data about You is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, unless We demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims; or (e) if the Personal Data about You is processed for direct marketing purposes, including profiling, to the extent it is related to such direct marketing.

If the processing of Personal Data about You has been restricted following Your request, such Personal Data shall, with the exception of storage, only be processed with Your consent or for the establishment, exercise, or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

### **Right to data portability**

You have the right to receive the Personal Data about You, which you have provided to the Company, in a structured, commonly used, and machine-readable format, as well as the right to transmit such Personal Data to another controller, if (a) the processing is based on Your consent or on a contract to which You are a party, and (b) the processing is carried out by automated means.

In exercising Your right to data portability, You have the right for the Personal Data about You to be transmitted directly from the Company to another controller, where technically feasible. The exercise of Your right to data portability is without prejudice to Your and the Company's rights under Your right to erasure. In addition, the right to data portability shall not adversely affect the rights and freedoms of others.

### **Right to object**

You have the right to object at any time, on grounds relating to Your particular situation, to the processing of Personal Data about You that is based on the legitimate interests pursued by the Company or by a third party, including profiling based on such legitimate interests. In such case, We shall no longer process the Personal Data about You, unless We demonstrate compelling legitimate grounds for the processing that override Your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.

You have the right to object at any time to the processing of Personal Data about You for direct marketing purposes, including profiling, to the extent it is related to such direct marketing.

### **Right to withdraw consent**

You may withdraw Your consent provided to Us for the purpose of processing Personal Data about You at any time, without affecting the lawfulness of processing based on Your consent before its withdrawal.

### **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with a supervisory authority established by a Member State to protect the fundamental rights and freedoms of natural persons in relation to the processing of Personal Data within the European Union.

Your rights in respect of Personal Data about You as outlined in this section 14 may be restricted by European Union or Member State law to which the Company is subject.

We shall provide You with the information requested according to Your rights outlined in this section 14 without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We shall inform you of any such extension within one month of receipt of your request, together with the reasons for the delay.

The information requested according to Your rights outlined in this section 14 shall be provided free of charge, unless stated otherwise in this section 14. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, We may either (a) charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

The Company may require You to provide additional information necessary to confirm Your identity in order to fulfill Your request according to your rights outlined in this section 14, if We have reasonable doubts concerning the identity of the natural person making the request.

**If you reside in California, please read below with respect to the California Consumer Privacy Act (CCPA) rights you have:**

Right	Scope
1 Right to know	<p>You have the right to receive the following information:</p> <ul style="list-style-type: none"> <li>• What types of Personal Data collected;</li> <li>• What are the types of sources of the Personal Data collected;</li> <li>• To what end We collect the Personal Data;</li> <li>• Types of third parties with whom We share Personal Data, if any; and</li> <li>• The specific pieces of Personal Data We have collected about you.</li> </ul>
2 Right of Erasure	<p>You may ask Us to delete your Personal Data and direct Our service providers to do so.</p> <p>Please note that We may not delete your Personal Data if it is necessary to complete Our legal obligation to you to provide the Services or otherwise protect Our legal rights, comply with an existing legal obligation; or use your Personal Data, internally, in a lawful manner that is compatible with the context in which you provided the information.</p>
3 Right to Non-Discrimination for the exercise of your privacy rights	<p>You have the right to not be discriminated against by Us because you exercised any of your rights under the CCPA.</p>
4 Right to designate an authorized agent to submit CCPA requests on your behalf	<p>You may designate an authorized agent to make a request under the CCPA on your behalf. To do so, you need to provide the authorized agent written permission to do so and the agent will need to submit to Us proof that such agent has been authorized by you. We will also require that you verify your own identity, as explained below.</p>

In order to exercise your CCPA right, please contact us using the following details: [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io).

Please note that We may need to receive Personal Data from You in order to verify Your identity prior to allowing You to exercise Your rights.

## 15. Changes To This Policy

We may amend, from time to time, the terms of this Policy. Whenever We amend this Policy, We will notify You of such amendments by publishing the updated Policy on the Platform or Website. In addition, when We make significant amendments to this Policy, We will strive to inform You about such amendments via means of communication We believe are reasonably appropriate to inform You of such amendments and by publishing a notice about such amendments on Our website. Unless stated otherwise, all amendments will enter into force upon publication of the updated Policy on our website or the designated page in the Services.

If you have any questions regarding the information provided on this page and your rights, you may contact us at [privacy-sar@optimon.io](mailto:privacy-sar@optimon.io) and we will address it in due course.