

PRIVACY POLICY

River10Music, LLC ("Company," "we," "our," or "us") respects the privacy of visitors (collectively, "you," and/or "your") to all websites we operate (collectively, the "Website" or "Site") and is committed to protecting it through our compliance with this privacy policy ("Privacy Policy"). This Privacy Policy describes our practices in connection with the types of information we may collect from you or that you may provide, including information that identifies you as a person ("Personal Identifiable Information"), and how we collect, use, and disclose such information, when you visit any of our Websites. This Privacy Policy also applies to the services available via the Website or otherwise (including online and offline third-party services) and information available on the Website or otherwise ("Services"). Please read this Privacy Policy carefully; once you consent to this Privacy Policy and its terms, it creates legal obligations on you and us

By accessing the Website, you acknowledge this Privacy Policy and Cookie Preferences and agree to be bound by the terms hereof, the Terms of Use, the Cookie Preferences, and any other terms or policies we post on the Website. For privacy questions with respect to <https://marc-kinchen.com/> ("MK"), contact: mk@threesixzero.com . If at any time you do not agree to this Privacy Policy, please do not use the Website or provide us with any Personal Information. If at any time you seek to adjust the manner in which we use Cookies with respect to your use of our Website, please make the adjustments to the "Preferences" tab in the Cookie Preferences option.

Our Website contains links to other websites for your convenience and reference. We are not responsible for the privacy practices or the content of those sites.

We reserve the right to change or update this Privacy Policy by posting such changes or updates to the Website or emailing you notice of the changes. Amendments to this Privacy Policy will be posted at this URL and will be effective when posted. Your continued use of the Website following the posting of any amendment, modification or change shall constitute your acceptance thereof.

WHAT PERSONAL INFORMATION DO WE COLLECT FROM THE PEOPLE THAT VISIT OUR BLOG, WEBSITE OR APP?

When ordering or registering on our site, as appropriate, you may be asked to enter your name, e-mail address, mailing address, phone number, credit card information or other details to help you with your experience. This information consists of the following:

Personal Information. The Personal Information we collect may include the following:

- Your name;
- Your phone number;
- Your e-mail address;
- Your name (and/or company name, as applicable);
- Your shipping and billing address;
- Device identifiers, such as cookies and IP addresses;

- Device information, such as hardware and software settings;
- IP addresses and log information, such as your device's name, the type and version of your web browser, and referrer addresses that can function to identify a user device; and
- Tracking information that we, or a third party, may collect.

Anonymous Information. Our Website also collects, processes, and/or uses information that does not identify you or your devices, including Personal Information that has been made anonymous by: (i) removing identifying fields and aggregating the information with other information so that individual subjects of the information cannot be re-identified, or (ii) anonymizing the information with techniques that remove or modify the identifying data so as to prevent re-identification of the anonymized information (collectively, "Anonymous Information"). Information that meets these criteria might include, for example, demographic information, statistical information (e.g., page views and hit counts), and general tracking information.

Treatment of Combined Information. If we combine Non-Personal Information or Anonymous Information with Personal Information, we treat the resulting combination as Personal Information.

WHEN DO WE COLLECT INFORMATION?

We collect information from you when you register on our site, place an order, subscribe to a newsletter, fill out a form, Use Live Chat, enter information on our site, or automatically as you navigate our Website. We collect the above information through the following means and technologies:

- *Contacting our Company.* You can contact us with questions or comments -- for example, you can contact us to learn more about our products and services. In order to communicate with us, you must provide certain Personal Information.
- *Information Provided to Third Parties.* As explained further in How We Share Your Information -- Our Service Providers," we may engage third parties to perform certain services for us or on our behalf, including but not limited to verification, payment processing, shipping, customer service, etc. Any communication by you on the Website may be managed by such third parties, and we may obtain those communications by the applicable service provider your information that you provide.
- We may offer newsletters and other content about our Company, our services and products, and other issues that we believe may be of interest to You. We will use Your Personal Information to provide You with this content. You can opt-out of receiving this content, by following the instructions set out in Your Right to Opt-Out; Right of Access; Object to Processing; Deleting Information.
- *Device Identifiers; Logs; IP Addresses.* To determine whether your device is supported by the Website and Services, we may collect certain information about your device and network, including your IP address, your operating system and browser, your device model, information about your use of the Website or Services, as well as the presence of any software that the Website or Services may require to operate with your device, or

other third party software or mobile apps on your device. We automatically receive and record this information in log files, and this is generally Non-Personal Information.

- A cookie is a small amount of data that is sent to your browser from a website's computers and stored on your computer's hard drive. Cookies can be used to provide you with a tailored user experience and to make it easier for you to use a website upon a future visit. We may include cookies on the Website and use them to recognize you when you return to the Website. You may choose not to accept cookies. Important: Any adjustments you may make to the settings in your browser software concerning the acceptance or refusal of cookies may modify your browsing on the Internet and your terms of access to certain services requiring use of these cookies. For example, by refusing certain essential cookies, you may no longer be able to place orders on our Website. If you choose to refuse the registration of cookies on your terminal or if you delete cookies that are already registered, we decline all responsibility for any consequences relating to the degraded performance of our services resulting from the fact we are unable to register or consult the cookies required for their performance and which you have refused or deleted.
- *Beacons and Tags.* The Website may use certain data collection technologies that rely on (i) beacons; (ii) pixel tags and object hyperlinking tags; and (iii) other means to link an object to an Internet address, a remote software application, a remote database, or other remote means of receiving or processing information. We may use these technologies to tell us what parts of the Website have been visited or to measure the effectiveness of searches that users perform on the Website. These technologies also enable us to send e-mail messages in a format users can efficiently read, to learn whether these e-mail messages have been opened, and to help ensure, for example, that our messages are of interest to our users. These technologies provide us with Anonymous Information, Non-Personally Identifiable Information and, in certain instances, Personal Information.
- *Click-Throughs.* We may send e-mail messages or display links that use a "click-through URL" linked to the Website or to another resource. When you click one of these URLs, you pass through our web server before arriving at the destination website page or other resource. Click-throughs may use and collect Anonymous Information and Non-Personally Identifiable Information. We may track this click-through data to help determine interest in particular topics and measure the effectiveness of our user communications.
- *Links to Third-Party Sites.* The Website may also contain links or produce search results that reference links to third party websites (collectively "Linked Sites"), such as those to visit our pages on social media websites. Our Company has no control over these Linked Sites or their content and does not assume responsibility or liability for any content, opinions, material available on Linked Sites, or such Linked Sites' privacy practices with respect to information that you provide to the Linked Sites. Our Company does not endorse the content of any Linked Site, nor does our Company warrant that a Linked Site will be free of computer viruses or other harmful code that can impact your computer or other web-access device. By using the Website to search for or link to another site, you agree and understand that such use is at your own risk. For example, if

you submit Personal Information to a Linked Site, then the information that you submit shall be governed by the Linked Site's privacy policy and/or terms of use, and not by our Company's Privacy Policy, and Terms and Conditions.

- *Other Technologies and Data Sources.* We may combine Personal Information that you provide to us with other data, including demographic information (such as age, job industry, or job title) for purposes of responding to your inquiries, and for other purposes specified in this Privacy Policy. If information we combine in this manner includes your Personal Information, we will treat the combined information as your Personal Information for all purposes under this Privacy Policy.
- *Biometric Data.* The Website does collect biometric data, including the use of e-mail addresses in combination with a password or security question answer. In addition, our service providers may collect such data as described in "How We Share Your Information -- Our Service Providers." If you submit Personal Information (including biometric data) to one of our service providers, the information you submit shall be governed by the service provider's privacy policy and terms of use, and not by our Privacy Policy, and Terms and Conditions.

HOW DO WE USE YOUR INFORMATION?

We use the information we collect or process, including Anonymous Information, Non-Personally Identifiable Information, and Personal Information, as permitted under applicable law, including where the use is based on (i) the consent you provide to us at the point of collection; (ii) performance of our agreement to provide you with the Services; (iii) compliance with our legal obligations; and/or (iv) our Legitimate Interests ("Legitimate Interests"), as well as a third party's Legitimate Interests.

More specifically, we use the information we collect for some or all of the following:

Our Uses of the Information	Bases for Our Use
To provide you with the Services You request and, specifically, to allow us to send You e-mail with information	<ul style="list-style-type: none"> • Performance and management of our agreement with you
To conduct fraud monitoring, prevention, and detection activities	<ul style="list-style-type: none"> • Our Legitimate Interests
To respond to your inquiries	<ul style="list-style-type: none"> • Performance and management of our agreement with you • Our Legitimate
To customize your visit to and use of the Website and Services.	<ul style="list-style-type: none"> • Our Legitimate Interests

Our Uses of the Information	Bases for Our Use
To determine which of our products, services, and content (including, if applicable, our newsletter) might interest you and, upon making this determination, to provide you with the associated information.	<ul style="list-style-type: none"> • Your consent • Our Legitimate Interests
To track access to and use of the Website and Services, and conduct data and other analyses, including anonymization and aggregation of Personal Information	<ul style="list-style-type: none"> • Our Legitimate Interests
To perform internal administration, auditing, operation, and troubleshooting for the Website and Services	<ul style="list-style-type: none"> • Our Legitimate Interests
To engage in the activities specified in "How We Share Your Information"	<ul style="list-style-type: none"> • Our Legitimate Interests • Compliance with our legal obligations • Performance and management of our
To evaluate and improve the Website, Services, and our communications, and to develop and test new services and content	<ul style="list-style-type: none"> • Our Legitimate Interests
To comply with Applicable Law	<ul style="list-style-type: none"> • Compliance with our legal obligations

Note that when determining the bases for our use of your information, we rely on what we consider to be the most appropriate basis, even if there are multiple bases available in connection with our use. The retention of your data varies based on use.

HOW WE SHARE YOUR INFORMATION?

We value your privacy. We do not sell, trade, or otherwise transfer to outside parties your Personal Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our Website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety. We share as follows:

Our Service Providers ("Service Providers"). We engage third parties to perform functions on our behalf, and these may include functions such as maintaining the Website, collecting

information, responding to and sending e-mail or other messages, payment processing, and other functions useful to our business. In this capacity, we may provide service providers with Personal Information, Non-Personally Identifiable Information, and Anonymous Information as applicable. The following are examples:

- We may use service providers to provide customer service (where applicable) or marketing support, such as to process and distribute e-mail. These service providers generally require access to your Personal Information in order to perform these services.
- We may use analytics service providers to assist us in understanding and using Non-Personal Information and other information that we collect via the Website. A service we use in this regard is Google Analytics, and information concerning how Google uses the information is available at <https://policies.google.com/privacy/partners>, and opt-out options specific to Google Analytics are available at <https://tools.google.com/dlpage/gaoptout>.
- Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <https://support.google.com/adwordspolicy/answer/1316548?hl=en>
- Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.
- We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Website.
- Our Website includes links to third party websites and other API's offering services that augment those services offered on our Website.
- We may use service providers to anonymize and aggregate Personal Information in order to generate anonymous information.
- We may engage service providers to analyze the interests and attributes of our users and, using techniques based on Anonymous Information and Non-Personally Identifiable Information, identify others who might share those interests and attributes. We then use this information to reach out to relevant market segments to provide them information concerning the Website or Services.

Questions of Harm; Legal Process. We may disclose your Personal Information and Non-Personally Identifiable Information to third parties, including law enforcement agencies, attorneys, and private investigator organizations, where it is necessary, or where we have a good faith belief that it is necessary:

- To comply with legal process;

- To protect and defend our rights and property, including the Website and associated content;
- To protect against misuse or unauthorized use of the Website or Services;
- To protect the personal safety or property of Website users or the public, including your personal safety or property (it being understood that we assume no duty to provide, or monitor the need for, such protections); and
- To cooperate with public and government authorities including, where required, authorities outside your jurisdiction.

While you are not able to opt out of this use of information, we will take reasonable steps to limit such use and disclose only the information we reasonably believe is necessary for the above purposes. If we receive a legal process calling for the disclosure of your Personal Information, we will attempt to notify you within a reasonable amount of time, unless such notification is not permitted.

Transfer of the Website. We shall be entitled to transfer information that we collect (including Personal Information) to a third party in connection with a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition (including a disposition in connection with a bankruptcy or similar proceedings) of all or substantially all assets or stock of the business unit or division responsible for the information under this Privacy Policy; provided the acquiring third party has agreed to safeguard your Personal Information with protections that are compatible with those set out in this Privacy Policy.

Our Affiliates. We may choose to rely on and share the information we collect with our affiliates. By "affiliate" we mean an entity that is closely related to us, such as an entity that controls, is controlled by, or is under common control with, us, our affiliates will be bound by the terms of this Privacy Policy.

HOW DO WE PROTECT YOUR INFORMATION?

We recognize the sensitivity of our users' Personal Information, and we have put in place security systems designed to prevent unauthorized access to or disclosure of this information. Our security systems include physical, technical, and administrative information security controls, and we take commercially reasonable steps to secure and safeguard such Personal Information in accordance with applicable law. To that end, your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology. We use regular Malware Scanning. We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your Personal Information. All transactions are processed through a gateway provider and are not stored or processed on our servers. We cannot guarantee that such information will not be intercepted by third parties, and we will not be liable for any breach of the security of your Personal Identifying Information resulting from causes or events that are beyond our control, including, without limitation, your own act or omission, corruption of storage media, defects in third-party data security products or services, power failures, natural

phenomena, riots, acts of vandalism, hacking, sabotage, or terrorism, and we are not responsible for unauthorized circumvention of any privacy settings or security measures contained on the Website.

Our Retention of Data. We retain Personal Information for the period of time necessary to fulfill the purposes for which we obtained the Personal Information and consistent with applicable law. We use the following criteria to set our retention periods: (i) the duration of our relationship with you; (ii) the existence of a legal obligation as to the retention period; and (iii) the advisability of retaining the information in light of our legal position (for example, in light of applicable statutes of limitations, litigation, or regulatory investigations).

Accuracy and Minimization of Data. We take reasonable steps (i) to maintain the accuracy of the Personal Information we process, and (ii) to limit the Personal Information that we process to that which is reasonably necessary for the purposes for which we obtained the information.

Accessing and Updating Your Information. If you would like to review, correct, or update the Personal Information that you have provided or if you would like to request an electronic copy of this Personal Information for purposes of transmitting it to another company (to the extent applicable law provides you with this right to data portability) you may make such requests via e-mail at mk@threesixzero.com . If you would like to review, correct, or update the Personal Information that you have provided to MK or if you would like to request an electronic copy of this Personal Information for purposes of transmitting it to another company (to the extent applicable law provides you with this right to data portability) you may make such requests via e-mail at mk@threesixzero.com .

Your Right to Opt-Out; Right of Access; Object to Processing; Deleting Information.

Unsubscribing to E-mail. If you no longer wish to receive e-mail messages from MK,, you can opt out of this Service by either (i) following the "unsubscribe" instructions located near the bottom of each e-mail message; or (ii) contacting us at mk@threesixzero.com .

Right of Access. Subject to certain exceptions, you have the right to have access to and/or correct any Personal Information our company holds about your personal data. If you wish to make a Subject Access Request ("SAR"), please contact mk@threesixzero.cpm for any questions related to the right to access and/or correction of Personal Information you have shared.

Deleting Information. If you request, we will take reasonable steps to remove your name and e-mail address from our databases, within the time frames (if any) set out in Applicable Law. Please understand, however, that if you request the deletion of your information, you will no longer be able to receive certain Services. In addition, it may be impractical (or essentially impossible) to remove the requested information completely, due to requirements promulgated by Applicable Law, and/or data backups and records of deletions. As such, certain Personal Information may remain in our databases following the deletion of your account; we will continue to treat the remaining information (if any) in accordance with this Privacy Policy and Applicable Law.

Objections. If you object to our processing of your Personal Information, and a request for us to delete this information is not, in your view, sufficient, please contact us as provided in Contact Us.

Anonymous Information. We will not delete Anonymous Information from our database, and nothing in this Privacy Policy restricts our use of Anonymous Information.

Your "Right to be Forgotten." If you are protected by the GDPR with respect to our use of your information, upon proper request, we may take the steps set out in the GDPR to erase your Personal Information, including information that may be publicly available via the Website. Notwithstanding the above, the Services are not intended for European Union (EU) residents. If you provide us with Personal Information, you understand that your information may be stored in the United States and other countries that may not or do not provide the same level of protection as the EU. By using and accessing our Services, users who reside or are located in countries outside of the United States agree and consent to the transfer and processing of Personal Information on servers located outside of the country where they reside and acknowledge that the protection of such information may be different than required under the laws of their residence or location.

Do not Track. We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Advisory Regarding Participation by Children and Teens. Under U.S. Federal Law (as reflected in the Children's Online Privacy Protection Act), **WE DO NOT COLLECT OR STORE ANY PERSONAL INFORMATION FROM INDIVIDUALS THAT WE KNOW ARE UNDER THE AGE OF 13.** If you wish to receive further information concerning privacy policies in general, and concerning online social networking and safety, you should visit the following website: <http://www.ftc.gov/privacy/index.html>.

Fair Information Practices. The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify you via e-mail:

- Within 7 business days

We will notify the users via in-site notification:

- Within 7 business days

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data

users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

CAN-SPAM Act. The CAN-SPAM Act is a law that sets the rules for commercial e-mail, establishes requirements for commercial messages, gives recipients the right to have e-mails stopped from being sent to them, and spells out tough penalties for violations.

We collect your e-mail address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service
- Market to our mailing list or continue to send e-mails to our clients after the original transaction has occurred.

To be in accordance with CAN-SPAM, we agree to the following:

- Not use false or misleading subjects or e-mail addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party e-mail marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each e-mail.

If at any time you would like to unsubscribe from receiving future e-mails, you can e-mail us at the address listed at the bottom of each e-mail and we will promptly remove you from all correspondence.

DATA SUBJECT RIGHTS

Access To Personal Information

Where applicable, you have the right to obtain from us a confirmation as to whether or not Personal Identifying Information concerning you is processed by us. In addition, where such processing is confirmed, and you request it, we will arrange access to the Personal Identifying Information along with the following information:

- the categories of Personal Identifying Information collected and processed;
- the recipients or categories of recipients to whom the Personal Identifying Information has been or will be disclosed, in particular recipients in third countries (outside of the European Economic Area ("**EEA**") or international organizations;
- the period for which the Personal Identifying Information will be stored, or, if not possible to be determined, the criteria used to determine that period;

- the existence of the right to request from us, rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where Personal Identifying Information was not collected directly from the you, any available information as to its source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- Where your Personal Identifying Information is transferred to a third country, you also have the right to be informed of the appropriate safeguards we have put in place pursuant to Article 46 of the GDPR relating to the transfer.

Copies Of The Data

We may provide, where requested as it applies, a copy of that data, relating to you, which are being processed, subject to the restrictions as noted in Article 23 of the GDPR.

Deletion/Erasure

Where you, as the data subject, wish the erasure of your Personal Information, we will fulfill your request should one of the following grounds apply:

- the Personal Identifying Information is no longer necessary in relation to the purposes for which it was collected or otherwise processed, e.g. the provision of our Services;
- where processing is based solely upon your required consent, and you withdraw this consent on which the processing is based;
- where you object to the processing, and where there are no overriding legitimate grounds for the processing;
- where you can demonstrate that the Personal Identifying Information has been unlawfully processed;
- where you provide notice that the Personal Identifying Information must be erased for compliance with a legal obligation as contained in a stated Union or Member State law to which the controller is subject; or
- where we are unable to demonstrate proper reliance on an exception under 17 (3) of the GDPR.

Right To Erase Data

Where we have publicly disclosed your data and where personal data is held and where you have made a valid request to erase your Personal Information, we will, taking into account the available technology and the cost of implementation, take reasonable steps, including technical

measures, to inform any controllers which are processing that personal data, of your request for erasure.

Data Portability

We shall provide an ability for any client to obtain a copy of all data within their account regarding any created Links, save such data which has been erased by you as a Service user.

NOTICE TO CALIFORNIA CONSUMERS

The following applies to you only if you are a California resident.

Your Rights and Choices

The California Privacy Rights Act ("CPRA") provides consumers who are California residents with specific rights regarding their Personal Information.

Right to Access the Personal Information Collected, Disclosed, or Sold

As a California consumer, you have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request as described below, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of the sources for the Personal Information we collected about you.
- Our business or commercial purpose(s) for collecting, selling, or sharing that Personal Information.
- The categories of third parties to whom we disclose, sell, or share that Personal Information.
- The specific pieces of Personal information we collected about you.

Right to Request Deletion of Personal Information

As a California consumer, you have the right to request that we delete any or all of the Personal Information that we collected from you or about you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your Personal Information from our records and notify all of our service providers or third parties to whom we have sold or shared such Personal Information, to delete your Personal Information, unless this proves impossible or involves disproportionate effort.

We may deny your request to delete your Personal Information if retaining the Personal Information is necessary for us, our service providers, or our contractors to:

- Complete the transaction for which we collected the Personal Information, fulfill the terms of a written warranty or product recall conducted in accordance with applicable law, provide a good or service that you requested, take actions reasonably anticipated

by you within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

- Help to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.)
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the information's deletion is likely to render impossible or seriously impair such research, if you previously provided informed consent
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information.
- Comply with a legal obligation.

Right to Correct Inaccurate Information

As a California consumer, you have the right to request that we correct any inaccurate Personal Information that we have retained about you, taking into account the nature of the Personal Information and the purposes of the processing of the Personal Information.

Right to Limit use and Disclosure of Sensitive Personal Information

As a California consumer, you have the right to direct that we limit our use of your sensitive Personal Information to that use which is necessary:

- To perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services.
- To help ensure security and integrity to the extent the use of your sensitive Personal Information is reasonably necessary and proportionate for these purposes.
- For short-term, transient use, including but not limited to, non-personalized advertising shown as part of your interaction with us, provided that your sensitive Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us.
- To perform services on behalf of us, or service providers, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of us.

- To undertake activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

If you would like to limit the use and disclosure of your sensitive Personal Information with MK, please contact us at mk@threesixzero.com .

Right to Opt-Out of the Sale or Sharing of Personal Information

As a California consumer, you have the right to direct that we not to sell or share (as those terms are defined in the CPRA) your Personal Information. If you would like to opt-out of the sharing or sale of your Personal Information shared with MK, please contact us at mk@threesixzero.com

Right to Non-Retaliation if You Exercise any of Your Rights

As a California consumer, you have the right not to be discriminated against for exercising any of your CPRA rights. Unless permitted by the CPRA, if you exercise any of your California rights, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

How to Exercise Your Rights to Know and to Delete

To exercise your rights to know and/or to delete described above, please submit a verifiable consumer request to us by either:

- Emailing us at mk@threesixzero.com for any privacy questions related to Personal Information shared.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or request to know the Personal Information we disclose to service providers or third parties twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will confirm receipt of your verifiable consumer request within ten (10) business days and provide you with information about how we will process the request, describing our verification process and when you should expect a response. We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period immediately preceding our receipt of your verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is useable and should allow you to transmit the information from one entity to another entity.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Information We Collect From California Consumers

We collect Personal Information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern.
- Deidentified or aggregated consumer information
- Affiliates not under our control.

Within the last twelve (12) months, we have collected the following categories of Personal Information from California consumers. Some of the categories may overlap with each other. The below also shows the categories of Personal Information that we have shared for a business and/or commercial purpose within the last twelve (12) months. When we disclose Personal Information, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

Category of Personal Information	Examples	Shared for a business purpose	Shared for a commercial purpose
Identifiers	A real name, postal address, unique personal or online identifier, Internet Protocol (IP) address, email address, telephone number	YES	NO
Personal Information described in the California Customer Records statute (Cal Civ Code)	All of the Identifiers listed above, plus: Card number, debit card number, or any other financial information	YES	NO
Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	YES	NO
Inferences drawn of other categories of Personal Information	A profile created about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes,	YES	NO
Sensitive Personal Information	Account Log-In Financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	YES	NO

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from information that you provide to us through our online forms, email, or other means.
- Indirectly from activity on our Sites. For example, from website usage details collected automatically.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with Personal Information in order for us to fulfill your product order.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our Sites and present the contents to you.
- For testing, research, analysis and product/service development
- As necessary or appropriate to protect the rights, property or safety of us, our Users, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CPRA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.

We may also use or disclose the Personal Information we collect for the following commercial purpose:

- To advance our commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your Personal Information to a service provider or third party for a business and/or commercial purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates.

- Our service providers
- Third parties to whom you authorize us to disclose your Personal Information in connection with products or services we provide to you.
- Advertising and marketing companies who deliver our advertisements and promotions to you.

Sale of Personal Information

In the preceding twelve (12) months, we have not sold any Personal Information for monetary consideration. We do, however, disclose information for a commercial purpose by working with companies to deliver advertisements to you across the Internet. If you do not wish to have your Personal Information used for this purpose by MK, please click the "Do Not Share My Information" or contact us at mk@threesixzero.com.

We do not knowingly sell or share Personal Information of minors under 16 years of age without affirmative authorization.

Additional Information

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice describing what categories of Personal Information we share with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit an email request to the following email address mk@threesixzero.com if you have shared your Personal Information with MK, and include the words "CALIFORNIA PRIVACY" in the subject line. You must put the statement "Your California Privacy Rights" in the body of the request and state the name of our specific Website with respect to which you are requesting the information as well as your name, street address, city, state, and zip code.

Please note the following:

- Users can visit the Sites anonymously without providing their Personal Information, but we may collect Personal Information, such as IP addresses, automatically through the use of cookies or other tracking technologies;
- We will add a link to this Privacy Notice on our home page, or at a minimum, on the first significant page after entering the Sites;
- Our Privacy Policy link includes the word "Privacy" and can easily be found on the page specified above;
- Users will be notified of any privacy policy changes on our Privacy Policy page;
- Users are able to change their Personal Information by emailing us, by calling us, or updating their Personal Information in their online accounts with us;

- Some Internet browsers include the ability to transmit "Do Not Track" signals that give you control over the collection and use of web browsing information. We will recognize and process such signals in Users' web browsers; and
- We allow the collection of users' behavioral tracking by third parties for analytical and marketing purposes.

Grievances and Complaints

Under California Civil Code Section 1789.3, residents of California who use this Website are entitled to know that they may file grievances and complaints with: the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs, in writing at 400 R Street, Suite 1080, Sacramento, California 95814, or by telephone at (916) 445-1254 or (800) 952-5210, or by email at dca@dca.ca.gov.

Notice to Residents of California Regarding Proposition 65

California's Proposition 65 requires that businesses provide warnings to California residents about products that may contain chemicals that are known to cause cancer, birth defects, or other reproductive harm if those products expose consumers to such chemicals above certain threshold levels. Some of our products, including garments with zippers and buttons, handbags, footwear, wallets, fashion jewelry, and other accessories may contain traces of lead or other chemicals identified by Proposition 65. We provide the following warning to our California customers:

WARNING: Some products sold through our Website may, from time to time, contain chemicals that are known to the State of California to cause cancer and birth defects or other reproductive harm and may be included on the Proposition 65 chemical list. If you need additional information, please email us at mk@threesixzero.com. We will respond as soon as possible and provide you with the information we possess about the materials within our products.

For more information on Proposition 65, please visit <https://oehha.ca.gov/proposition-65>.

NOTICE TO COLORADO, CONNECTICUT, AND VIRGINIA CONSUMERS

Your Rights and Choices

If you are a resident of Colorado, Connecticut or Virginia, the consumer privacy laws in those states provide you with the following rights with respect to your Personal Information.

Right to Access the Personal Information Collected, Disclosed, or Sold

As a Colorado, Connecticut or Virginia consumer, you have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request as described below, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of the sources for the Personal Information we collected about you.

- Our business or commercial purpose(s) for collecting, selling, or sharing that Personal Information.
- The categories of third parties to whom we disclose, sell, or share that Personal Information.
- The specific pieces of Personal information we collected about you.

Right to Request Deletion of Personal Information

As a Colorado, Connecticut or Virginia consumer, you have the right to request that we delete any or all of the Personal Information that we collected from you or about you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your Personal Information from our records and notify all of our service providers or third parties to whom we have sold or shared such Personal Information, to delete your Personal Information, unless this proves impossible or involves disproportionate effort.

We may deny your request to delete your Personal Information if retaining the Personal Information is necessary for us, our service providers, or our contractors to:

- Complete the transaction for which we collected the Personal Information, fulfill the terms of a written warranty or product recall conducted in accordance with applicable law, provide a good or service that you requested, take actions reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the information's deletion is likely to render impossible or seriously impair such research, if you previously provided informed consent
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information.
- Comply with a legal obligation.

Right to Correct Inaccurate Information

As a Colorado, Connecticut or Virginia consumer, you have the right to request that we correct any inaccurate Personal Information that we have retained about you, taking into account the nature of the Personal Information and the purposes of the processing of the Personal Information.

Right to Limit use and Disclosure of Sensitive Personal Information

As a Colorado, Connecticut or Virginia consumer, you have the right to direct that we limit our use of your sensitive Personal Information to that use which is necessary:

- To perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services.
- To help ensure security and integrity to the extent the use of your sensitive Personal Information is reasonably necessary and proportionate for these purposes.
- For short-term, transient use, including but not limited to, non-personalized advertising shown as part of your interaction with us, provided that your sensitive Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us.
- To perform services on behalf of us, or service providers, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of us.
- To undertake activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

If you would like to limit the use and disclosure of your sensitive Personal Information by MK, contact us at mk@threesixzero.com.

Right to Opt-Out of the Sale or Sharing of Personal Information

As a Colorado, Connecticut or Virginia consumer, you have the right to direct that we not to sell or share (as those terms are defined in the respective state consumer privacy regulations) your Personal Information. If you would like to opt-out of the sharing or sale of your Personal Information shared with MK, please contact us at mk@threesixzero.com

Right to Non-Retaliation if You Exercise any of Your Rights

As a Colorado, Connecticut or Virginia consumer, you have the right not to be discriminated against for exercising any of your Respective state consumer privacy rights. Unless permitted by Colorado, Connecticut or Virginia consumer privacy laws, if you exercise any of your Colorado, Connecticut or Virginia rights, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.

- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

How to Exercise Your Rights to Know and to Delete

To exercise your rights to know and/or to delete described above, please submit a verifiable consumer request to us by contacting us at mk@threesixzero.com for any privacy questions.

Only you or a person registered with the Colorado, Connecticut or Virginia Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or request to know the Personal Information we disclose to service providers or third parties twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will confirm receipt of your verifiable consumer request within ten (10) business days and provide you with information about how we will process the request, describing our verification process and when you should expect a response. We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period immediately preceding our receipt of your verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is useable and should allow you to transmit the information from one entity to another entity.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Information We Collect From Colorado, Connecticut or Virginia Consumers

We collect Personal Information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern.
- Deidentified or aggregated consumer information

Within the last twelve (12) months, we have collected the following categories of Personal Information from Colorado, Connecticut or Virginia consumers. Some of the categories may overlap with each other. The below also shows the categories of Personal Information that we have shared for a business and/or commercial purpose within the last twelve (12) months. When we disclose Personal Information, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

Commercial information

Category of Personal Information	Examples	Shared for a business purpose	Shared for a commercial purpose
Identifiers	A real name, postal address, unique personal or online identifier, Internet Protocol (IP) address, email address, telephone number	YES	NO
Personal Information	All of the Identifiers listed above, plus: Card number, debit card number, or	YES	NO
Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or	YES	NO	
Inferences drawn of other categories of Personal Information	A profile created about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes,	YES	NO

Category of Personal Information	Examples	Shared for a business purpose	Shared for a commercial purpose
Sensitive Personal Information	Account Log-In Financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, Precise geolocation.	NO	NO

We obtain the categories of Personal Information listed above from the following categories of sources:

- *Directly from you.* For example, from information that you provide to us through our online forms, email, or other means.
- *Indirectly from activity on our Sites.* For example, from website usage details collected automatically.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with Personal Information in order for us to fulfill your product order.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our Sites and present the contents to you.

For testing, research, analysis and product/service development.

As necessary or appropriate to protect the rights, property or safety of us, our Users, or others.

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in your state's respective consumer privacy laws.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.

We may also use or disclose the Personal Information we collect for the following commercial purpose:

- To advance our commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your Personal Information to a service provider or third party for a business and/or commercial purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Our Affiliates (e.g. Artist, including Artist's management, producer, etc.).
- Our service providers
- Third parties to whom you authorize us to disclose your Personal Information in connection with products or services we provide to you.
- Advertising and marketing companies who deliver our advertisements and promotions to you.

Sale of Personal Information

In the preceding twelve (12) months, we have not sold any Personal Information for monetary consideration. We do, however, disclose information for a commercial purpose by working with companies to deliver advertisements to you across the Internet. If you do not wish to have your Personal Information used for this purpose by MK, please click the "Do Not Share My Information" or contact us at mk@threesixzero.com.

We do not knowingly sell or share Personal Information of minors under 16 years of age without affirmative authorization.

Additional Information

Colorado, Connecticut or Virginia residents are entitled to ask us for a notice describing what categories of Personal Information we share with third parties or corporate affiliates for those

third parties or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a Colorado, Connecticut or Virginia resident and would like a copy of this notice, please submit an email request to the following email address mk@threesixzero.com and include the words "CONSUMER PRIVACY" in the subject line, and you must put the statement "Your Privacy Rights" in the body of the request and state the name of our specific Website with respect to which you are requesting the information as well as your name, street address, city, state, and zip code.

Please note the following:

- Users can visit the Sites anonymously without providing their Personal Information, but we may collect Personal Information, such as IP addresses, automatically through the use of cookies or other tracking technologies;
- We will add a link to this Privacy Policy on our home page, or at a minimum, on the first significant page after entering the Sites;
- Our Privacy Policy link includes the word "Privacy" and can easily be found on the page specified above;
- Users will be notified of any privacy policy changes on our Privacy Policy page;
- Users are able to change their Personal Information by emailing us, by calling us, or updating their Personal Information in their online accounts with us;
- Some Internet browsers include the ability to transmit "Do Not Track" signals that give you control over the collection and use of web browsing information. We will recognize and process such signals in Users' web browsers; and
- We allow the collection of users' behavioral tracking by third parties for analytical and marketing purposes.

NOTICE TO UNITED KINGDOM CONSUMERS

The following applies to you only if you are a resident of the United Kingdom.

The Data We Collect About You

Personal data, or Personal Information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed or anonymized.

We may collect, use, store and transfer different kinds of personal data about you, which we have categorized as follows:

- *Identity Data includes:* first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- *Contact Data includes:* billing address, delivery address, email address and telephone numbers.
- *Financial Data includes:* bank account and payment card details.

- *Transaction Data includes:* details about payments to and from you and other details of products and services you have purchased from us.
- *Technical Data includes:* internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- *Profile Data includes:* your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- *Usage Data includes:* information about how you use our Website, products and services.
- *Marketing and Communications Data includes:* your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

Special Category Data. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How Is Your Personal Data Collected?

Direct interactions. When you use the Website to provide us with information regarding your identity, contact and financial details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Order a product or service;
- Create an account on our Website;
- Subscribe to our service or publications;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey;
- Participate in social media activities and engagements;
- Browse from page to page; or
- Give us feedback or contact us.

In these circumstances we may collect, store and use the personal data that you disclose to us.

Automated technologies or interactions. As you interact with our Website, we will automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using technologies such as cookies and other similar technologies. Please see our Cookie Policy for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties who may collect personal data including usage or statistical data through your use of the Website.

Updating your information. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you want to update the information you have previously given to MK, please contact us at mk@threesixzero.com

How We Use Your Personal Information

Lawful basis for processing your information. We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal obligation.

Purposes for which we will use your personal data. We have set out below, in a table format, some examples of how we may use the information we collect about you and the lawful basis for doing so.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To deliver the Website to you	Identity; Technical; Usage	Performance of a contract with you
To register you as a new customer and to deliver goods and services to you	Identity; Contact; Financial; Transaction	Performance of a contract with you

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <p>(i) Notifying you about changes to our Website, terms or privacy policy</p> <p>(ii) Notifying you of any changes to the services</p>	<p>Identity; Contact; Profile; Marketing and Communications</p>	<p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/</p>
<p>To provide you with email alerts, event registrations and other notices concerning our goods and services</p>	<p>Identity; Contact; Profile; Usage; Marketing and Communications</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our</p>
<p>To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity; Contact; Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</p>
<p>To deliver and improve relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising</p>	<p>Identity; Contact; Profile; Usage; Marketing and Communications; Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing</p>
<p>To use data analytics to improve our Website, products/ services, marketing, customer relationships and experiences</p>	<p>Technical; Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Identity; Contact; Technical; Usage; Profile; Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/ services and grow our business)</p>

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To test, research and conduct analysis, and product/service development	Identity; Usage; Profile; Marketing and Communications	Necessary for our legitimate interests (to develop our products/ services and grow our business)

Marketing communications. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your personal data to help us form a view on what products, services and offers may be of interest to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, or purchased goods or services from us and you have not opted out of receiving that marketing. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us or the third party directly.

Third-party links. Where we provide links to third-party websites, plug-ins and applications that are not affiliated with us, such sites are out of our control and are not covered by this Policy. Clicking on those links or enabling those connections may allow third parties to collect or share data about you, and We do not control these third-party websites. We encourage you to consult the privacy policy of every website you visit.

Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy for further details.

Sharing your personal data. Depending on how and why you provide us with your personal data, we may share it in the following ways:

- We may share your personal data with any member of our company group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- With selected third parties to which we sub-contract to provide various services and/or aspects of the Website's functionality, or any other third parties to whom you directly authorize us to disclose your personal data to;
- With analytics and search engine providers that assist us in the improvement and optimization of this Website as described above
- With advertising and marketing companies who deliver our advertisements, marketing material and promotions to you.

We may also disclose your personal data to third parties in the following events:

- If we were to buy, sell or transfer any business or assets, whether as a going concern or otherwise, in which case we might disclose your personal data as part of that transaction;
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers and contacts will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- In order to enforce or apply the terms of use or terms and conditions of sale of our products and services; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Service Providers (Data Processors). The following is a list of the types of service providers we use:

- Website Analytics Providers: Google Analytics, employing the extension "anonymizelp"
- We use Shopify to power our online store. You can read more about how Shopify uses your Personal Information here: <https://www.shopify.com/legal/privacy>.

Change of purpose. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

International Data Transfers

Some of our service providers and third parties may be based outside of the UK, as a result their processing activities will involve a transfer of your data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards are implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. Such contractual clauses and/or additional safeguards shall be approved by the UK and EU regulators as compliant with the UK and EU GDPR regulations respectively.

By submitting your Personal Information, you agree to this transfer, storing or processing.

Please submit a request by contacting us at mk@threesixzero.com if you want further information on the specific mechanism used by MK when transferring your personal data out of the UK.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for compliance purposes. In some circumstances you can ask us to delete your data: see 'Your legal rights' below.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

As a data subject, you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

- *Right of access.* You may request access to your processed personal data. This entitles you to obtain a copy of the data we hold on you. A copy will be provided by the controller unless it is found that providing a copy will adversely affect the rights and freedoms of others.
- *Right of rectification.* You may request the correction of any personal data that we hold about you. This enables you to have any inaccurate or incomplete data we hold about you corrected, though we may need to verify the accuracy of the new data provided to us.
- *Right to restrict processing.* You may request us to restrict the processing of your personal data in certain circumstances. This enables you to limit the use of your data, unless you have given your consent or there is a legal or public interest which justifies our use of the data. You have the right if you: (i) contest the accuracy of the personal data; (ii) the processing is unlawful; (iii) you believe there is no longer a use by us of your personal data and require access for legal claims; or (iv) you exercise your right to object (see below).
- *Right to erasure/ Right to be forgotten.* You may request the erasure of your personal data. This means that you can ask us to delete any personal data we hold about you in the following circumstances: (i) where we no longer need your data in line with the original reason it was collected; (ii) you have withdrawn your consent (see below); (iii) you have objected to the processing of your data (see below); or (iv) we have used your data unlawfully.
- *Right to withdraw consent.* Where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. This will not however, affect the lawfulness of any processing carried out before you withdrew your consent.
- *Right to object.* You may object to the processing of your personal data at any time. This means that you can stop us from using your data. Please note, this right only arises in certain circumstances including: (i) where we rely on a legitimate interest (or those of a third party) to process your data; (ii) for scientific, historical or statistical purposes; or (iii) for direct marketing purposes. Please note that the exercise of this right does not automatically result in your personal data being erased. In some cases, we may also be able to demonstrate that we have a compelling legitimate reason to process your information, which override your rights and freedoms.
- *Right to object to automated decision making and profiling.* You have the right to request that you are not subject to a decision based exclusively on automated decision making (i.e. without human intervention and participation). In addition, you have the right to be informed about the use of any automated decision making and profiling of your personal data, and to be given meaningful information about the nature of the processing.
- *Right to portability.* You may request that we transmit your personal data to you or to a third-party controller. We will provide you, or your requested third party, with your personal data in a structured, commonly used, machine-readable format. This right only

applies to automated data which you initially provided consent for us to use or that is necessary.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Contact Details

For privacy questions with respect to Marc Kinchen, contact: MK@threesixzero.com

NOTICE TO EUROPEAN ECONOMIC AREA CONSUMERS

The following applies to you only if you are a resident of the European Economic Area.

This policy explains the rights that you have as a data subject pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council (the "GDPR"). It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This policy supplements other notices and privacy policies and is not intended to override them.

By visiting or otherwise using the Website, you agree to its terms (including as amended from time to time) and this Privacy Policy. If, for any reason, you do not agree to the terms of this policy, please stop using this Website.

The Data We Collect About You

Personal data, or Personal Information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed or anonymized.

We may collect, use, store and transfer different kinds of personal data about you, which we have categorized as follows:

- *Identity Data includes:* first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- *Contact Data includes:* billing address, delivery address, email address and telephone numbers.
- *Financial Data includes:* bank account and payment card details.
- *Transaction Data includes:* details about payments to and from you and other details of products and services you have purchased from us.
- *Technical Data includes:* internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- *Profile Data includes:* your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

- *Usage Data includes:* information about how you use our Website, products and services.
- *Marketing and Communications Data includes:* your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

Special Category Data. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

How Is Your Personal Data Collected?

Direct interactions. When you use the Website to provide us with information regarding your identity, contact and financial details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Order a product or service;
- Create an account on our Website;
- Subscribe to our service or publications;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey;
- Participate in social media activities and engagements;
- Browse from page to page; or
- Give us feedback or contact us.

In these circumstances we may collect, store and use the personal data that you disclose to us.

Automated technologies or interactions. As you interact with our Website, we will automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using technologies such as cookies and other similar technologies. Please see our cookie policy for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties who may collect personal data including usage or statistical data through your use of the Website.

Updating your information. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

How We Use Your Personal Data

Lawful basis for processing your information. We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal obligation.

Purposes for which we will use your personal data. We have set out below, in a table format, some examples of how we may use the information we collect about you and the lawful basis for doing so.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To deliver the Website to you	Identity; Technical; Usage	Performance of a contract with you
To register you as a new customer and to deliver goods and services to you	Identity; Contact; Financial; Transaction	Performance of a contract with you
To manage our relationship with you which will include: (i) Notifying you about changes to our Website, terms or privacy policy (ii) Notifying you of any changes to the services	Identity; Contact; Profile; Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/
To provide you with email alerts, event registrations and other notices concerning our goods and services	Identity; Contact; Profile; Usage; Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity; Contact; Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)
To deliver and improve relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising	Identity; Contact; Profile; Usage; Marketing and Communications; Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing)
To use data analytics to improve our Website, products/ services, marketing, customer relationships and experiences	Technical; Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity; Contact; Technical; Usage; Profile; Marketing and Communications	Necessary for our legitimate interests (to develop our products/ services and grow our business)
To test, research and conduct analysis, and product/service development	Identity; Usage; Profile; Marketing and Communications	Necessary for our legitimate interests (to develop our products/ services and grow our business)

Marketing communications. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your personal data to help us form a view on what products, services and offers may be of interest to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, or purchased goods or services from us and you have not opted out of receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us or the third party directly.

Third-party links. Where we provide links to third-party websites, plug-ins and applications that are not affiliated with us, such sites are out of our control and are not covered by this Policy. Clicking on those links or enabling those connections may allow third parties to collect or share data about you, and We do not control these third-party websites. We encourage you to consult the privacy policy of every website you visit.

Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy for further details.

Sharing your personal data. Depending on how and why you provide us with your personal data, we may share it in the following ways:

- We may share your personal data with any member of our company group, which means our subsidiaries, our ultimate holding company and its subsidiaries;
- With selected third parties to which we sub-contract to provide various services and/or aspects of the Website's functionality, or any other third parties to whom you directly authorize us to disclose your personal data to;
- With analytics and search engine providers that assist us in the improvement and optimization of this Website as described above;
- With advertising and marketing companies who deliver our advertisements, marketing material and promotions to you.

We may also disclose your personal data to third parties in the following events:

- If we were to buy, sell or transfer any business or assets, whether as a going concern or otherwise, in which case we might disclose your personal data as part of that transaction;
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers and contacts will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- In order to enforce or apply the terms of use or terms and conditions of sale of our products and services; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Service Providers (Data Processors). The following is a list of the types of service providers we use:

- Website Analytics Providers: Google Analytics, employing the extension "anonymizelp"

- We use Shopify to power our online store. You can read more about how Shopify uses your Personal Information here: <https://www.shopify.com/legal/privacy>.

Change of Purpose. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

International Data Transfers - EU-US Data Privacy Framework Principles & Privacy Policy

On July 10, 2023, the European Commission adopted its Implementing Decision of 10.7.2023 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate level of protection of personal data under the EU-US Data Privacy Framework ('the Adequacy Decision'), which contains in its annex the EU-US Data Privacy Framework ('DPF'). Accordingly, we protect European data according to the Principles of the EU-US DPF Framework and applicable EU, UK, and Swiss law.

We comply with the EU-U.S. Data Privacy Framework (EU-US DPF) and, as applicable, the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework (Swiss-US DPF) as set forth by the U.S. Department of Commerce.

If there is any conflict between the terms in this Privacy Policy and the EU-US DPF Principles, the UK Extension to the EU-US DPF Principles, and/or the Swiss-US DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Pursuant to the Data Privacy Frameworks, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain Personal Information relating to you in the United States. Upon request, we will provide you with access to the Personal Information that we hold about you. You may also correct, amend, or delete the Personal Information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under the Data Privacy Frameworks, should direct their query by contacting us at mk@threesixzero.com for any privacy questions. If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your Personal Information shared with MK, please submit a request or by contacting us at mk@threesixzero.com.

Scope & Commitment. Our adherence to the EU-US DPF and its Principles applies to the personal data that (a) we collect from our EU, UK, and Swiss customers and other visitors to our Website for account management, billing, or marketing purposes ("User Data"); and (b) we process on behalf of our EU, UK, and Swiss customers in providing online services to them under a service agreement ("**Services Agreement**").

Data Collection & Use. The User Data that we collect, use, and share is described in our Privacy Policy. While our customers decide what Services Data to submit, it typically includes information about their own users and how they use the customer's sites, applications, services, and third-party applications. We process Services Data as instructed by our customers and do not own or control Services Data.

Data Processing Purposes. We collect, use, and share Services Data for the purposes described in our Privacy Policy. We process Services Data for the purpose of providing our online services to our customers, which may include accessing and processing the data to provide the services, to correct and address technical or service problems, to follow instructions of the customer who submitted the data, and/or to comply with contractual requirements.

Inquiries & Complaints. In compliance with the EU-US DPF Principles (and, as applicable, the UK Extension to the EU-US DPF and the Swiss-US DPF), we commit to resolve DPF Principles-related complaints about our collection and use of your Personal Information. Individuals from the EU, UK, and Switzerland with inquiries or complaints regarding our handling of personal data shared with MK and received in reliance on the EU-U.S. DPF (and, as applicable, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF) should contact mk@theesixzero.com.

Independent Recourse Mechanism. In compliance with the Data Privacy Framework Principles, we commit to resolve complaints about your privacy and our collection or use of your Personal Information transferred to the United States pursuant to the Data Privacy Frameworks.

Arbitration. If your DPF Principles-related complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for residual claims not resolved by any of the other DPF redress mechanisms.

U.S. Federal Trade Commission Enforcement. The Federal Trade Commission has jurisdiction over our compliance with the EU-US DPF, and, as applicable, the UK Extension to the EU-US DPF, and the Swiss-US DPF.

Data Disclosures & Recipients. We share Services Data with third parties as described in our Privacy Policy. We may share Services Data with third parties under the following circumstances and only in accordance with the applicable customer agreements:

- *Service Providers.* We may employ third party Service Providers and Vendors to administer and provide the Services on our behalf (such as customer support, hosting, website analytics, email delivery, database management services). Our accountability for personal data that it receives in the United States under the Data Privacy Frameworks and subsequently transfers to a third party is described in the Data Privacy Framework Principles. In particular, we remain responsible and liable under the Data Privacy Framework Principles if third-party agents that it engages to process personal

data on its behalf do so in a manner inconsistent with the Principles, unless we prove that it is not responsible for the event giving rise to the damage.

- *Affiliates.* We may disclose Services Data to our subsidiaries and corporate affiliates for use consistent with this Privacy Policy.
- *Legal requirements.* We may disclose Services Data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency, or in the good faith belief that such action is necessary (a) to comply with a legal obligation, (b) to protect or defend our rights, interests or property or that of third parties, (c) to prevent or investigate possible wrongdoing in connection with the services, (d) to act in urgent circumstances to protect the personal safety of customers, their users or the public, or (e) to protect against legal liability.
- *Business Transfers.* As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution, or similar event, Services Data may be part of the transferred assets.

In addition, we may be required to disclose any personal data that we process in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Your Rights to Access, Limit Use, & Limit Disclosures. Individuals in the EU, UK, and Switzerland have rights to access personal data about them, and to limit use and disclosure of their personal data. With our EU-US DPF certification and, as applicable, the UK Extension to the EU-US DPF, and the Swiss-US DPF self-certification, we have committed to respect those rights.

If your personal data includes Personal Information, you can request access to that data and request that we correct, amend, or delete it if it is inaccurate or processed in violation of the DPF Principles by emailing your request to mk@threesixzero.com for any privacy questions related to MK. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

As stated above, if there is any conflict between the terms in this Privacy Policy and the EU-US DPF Principles, the UK Extension to the EU-US DPF Principles, and/or the Swiss-US DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for compliance purposes. In some circumstances you can ask us to delete your data: see 'Your legal rights' below.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

You have the right to make a complaint at any time to a supervisory authority, in particular to the supervisory authority which regulates the Member State of your habitual residence, your place of work, or the Member State in which the alleged infringement of your rights took place if you consider that the processing of personal data relating to you has infringed the terms of the GDPR.

We would, however, appreciate the opportunity to deal with your concerns before you approach your supervisory authority, so please contact us in the first instance.

As a data subject, you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

- *Right of access.* You may request access to your processed personal data. This entitles you to obtain a copy of the data we hold on you. A copy will be provided by the controller unless it is found that providing a copy will adversely affect the rights and freedoms of others.
- *Right of rectification.* You may request the correction of any personal data that we hold about you. This enables you to have any inaccurate or incomplete data we hold about you corrected, though we may need to verify the accuracy of the new data provided to us.
- *Right to restrict processing.* You may request us to restrict the processing of your personal data in certain circumstances. This enables you to limit the use of your data, unless you have given your consent or there is a legal or public interest which justifies

our use of the data. You have the right if you: (i) contest the accuracy of the personal data; (ii) the processing is unlawful; (iii) you believe there is no longer a use by us of your personal data and require access for legal claims; or (iv) you exercise your right to object (see below).

- *Right to erasure/ Right to be forgotten.* You may request the erasure of your personal data. This means that you can ask us to delete any personal data we hold about you in the following circumstances: (i) where we no longer need your data in line with the original reason it was collected; (ii) you have withdrawn your consent (see below); (iii) you have objected to the processing of your data (see below); or (iv) we have used your data unlawfully.
- *Right to withdraw consent.* Where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. This will not however, affect the lawfulness of any processing carried out before you withdrew your consent.
- *Right to object.* You may object to the processing of your personal data at any time. This means that you can stop us from using your data. Please note, this right only arises in certain circumstances including: (i) where we rely on a legitimate interest (or those of a third party) to process your data; (ii) for scientific, historical or statistical purposes; or (iii) for direct marketing purposes. Please note that the exercise of this right does not automatically result in your personal data being erased. In some cases, we may also be able to demonstrate that we have a compelling legitimate reason to process your information, which override your rights and freedoms.
- *Right to object to automated decision making and profiling.* You have the right to request that you are not subject to a decision based exclusively on automated decision making (i.e. without human intervention and participation). In addition, you have the right to be informed about the use of any automated decision making and profiling of your personal data, and to be given meaningful information about the nature of the processing.
- *Right to portability.* You may request that we transmit your personal data to you or to a third-party controller. We will provide you, or your requested third party, with your personal data in a structured, commonly used, machine-readable format. This right only applies to automated data which you initially provided consent for us to use or that is necessary.

If you wish to exercise any of the rights set out above with MK, please contact us at MK@threesixzero.com

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

MODIFICATIONS TO THIS PRIVACY POLICY

We reserve the right to modify and change this Privacy Policy at any time for our business purposes and to comply with changes in applicable law. The new Privacy Policy will be posted

here and have the date of the most recent change. Your access to or use of the Website and/or Services following any changes to the Privacy Policy will constitute your acceptance of such changes. Please feel free to print out a copy of the Privacy Policy for your records.

TEXT MESSAGES AND TELEPHONE COMMUNICATIONS

By providing your phone number and other Personal Identifiable Information, and opting in to receive SMS communications from us, you expressly agree to receive marketing, informational and/or transactional telephone calls, text or audio messages (audio messages and calls include artificial or pre-recorded messages or calls) by or on behalf of us. These communications may be delivered via text message, audio message (including artificial or pre-recorded voice messages), or telephone call, and may be sent using an automatic telephone dialing system or similar technology.

You acknowledge and agree that your phone number and other Personal Identifiable Information may be processed by our third-party service provider, Cobrand. You may receive different types of messages including advertising, transactional, operational, or informational messages at that phone number, including order confirmations; notifications; multi-factor authentication; requests for information; promotional information; event information; event status updates; and event reminders, or other messages in connection with our services.

Providing consent to receive telephone communications and/or SMS messages is not a condition of purchasing any property, goods, or services. Personally Indemnifiable Information collected in connection with any communication or message is subject to the terms contained herein. We will not sell or transfer your consent to receive text messages, electronic messages, or calls to third parties so they can market to you.

By providing your phone number and other Personal Identifiable Information, and opting in to receive SMS communications from us, you also agree to be bound by Cobrand's [Terms of Use](#) and [Privacy Policy](#) which govern the collection, use and sharing of information through their platform.

Message and data rates may apply. You can opt-out of receiving further communications at any time by responding STOP to any SMS communication initiated by us or by emailing mk@threesixzero.com if such communications come from or on behalf of MK. After indicating your preference to stop receiving text messages, you may receive additional communications confirming that your request has been received and processed, and you may continue to receive text messages for a short period while we process your request(s).

CONTACT US

For privacy questions with respect to Marc Kinchen "MK", contact: mk@threesixzero.com

Effective Date: Oct 14, 2025

