

PRIVACY POLICY

Last Updated: September 9, 2020

OkTY C Corporation (“we,” “our,” “us”) is committed to protecting your privacy.

This privacy policy (the “Privacy Policy”) sets out how we handle the information we collect directly from you when you provide it to us or automatically when you use our Services, including information obtained through third parties. In particular, this Privacy Policy sets out how we will handle any personal information that is disclosed, collected or otherwise handled in connection with our Services. This policy applies only to information we collect in the OkTY mobile application (the “App”) or the OkTY website available at www.okty.app (the “Website”), and in email, text and other electronic communications sent through or in connection with the App or the Website. This policy DOES NOT apply to information that we collect offline or on any other websites, including websites you may access through the App or the Website, or the information you provide to or is collected by any third parties.

The App and the Website are only intended for users who are 16 years old or older.

Acceptance of the Privacy Policy; Changes

This Privacy Policy is incorporated into and is subject to our Terms and Conditions (the “Terms”). Capitalized terms used but not defined herein are defined in the Terms. If you do not agree with the Terms or this Privacy Policy, please do not provide us with any information and do not download and install our App, access our Website, or otherwise use our Services. You can find our Terms here: www.okty.app/terms.

This Privacy Policy may change from time to time and it is therefore important that you review it regularly. You can determine when the Privacy Policy was last revised by referring to the “Last Updated” legend at the top of the page. If the changes include material changes that affect your rights or obligations, we will notify you in advance of the changes by reasonable means, which could include notification through our Services or via email. If you continue to use our Services after the changes become effective, then you agree to the revised Privacy Policy.

Our Services

OkTY is committed to empowering the consumer to take control of when, how, and by whom their personal information is used. Through our Website, the App, and other associated applications, you can contribute a wide variety of information relating to yourself, ranging from personal information, financial information, and geolocation data (collectively, “your data” or “user data”). We collect some of this information directly from you when you register or subsequently interact with the Website or the App. You may also contribute information residing on third-party platforms, such as financial institutions (each, a “Third-Party Platform”) or let us track your location. Notably, we only collect this information with your consent, and you control which, if any, you would like to share. Our Services allow you to share information with us and, to a limited extent, third parties, in exchange for OkTY tokens which can be paid out in cash payments and other rewards.

We may use your data to target and send you updates from a variety of third parties (such as a branded message, promotion or digital content sent to a subset of users with certain characteristics) with your consent. In addition, we may send you targeted downloadable coupons, discounts, or other offers. By viewing these branded messages and digital content or making purchases with these downloadable coupons, discounts, or other offers provided by OkTY, you will receive additional OkTY tokens.

We may also share aggregated and/or de-identified data with third parties. Aggregated data is information that the Website or the App generates from individualized information but subsequently maintains and uses in a form that combines together information about numerous individuals so that no individual can be identified. Examples include the number of users who live in a certain geographic area or the categories of purchases most frequently made by users with specific demographic combinations. De-identified information is information from which OkTY has removed any data that personally identifies you. We may disclose aggregated or de-identified data derived from personal information to third parties. We do this to help improve the quality of our services and will always do so in the best interests of our users. By registering for or using our Services, you consent to the collection, use, and sharing of such aggregated and/or de-identified information as OkTY deems appropriate.

What Personal Information Do We Collect?

Personally identifiable information or “personal information” refers to any information that identifies you or could be used to identify you in and of itself or when combined with other information in our possession or control. Personal Information includes any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address or other contact information. It does not include information that has been de-identified or anonymized, for instance data that has been aggregated with other data, such that it is not possible for us to personally identify you.

We may collect and use different kinds of information in the course of providing our Services which we have grouped together as follows:

- **Contact information:** includes your name, age, phone number, email address and your physical address;
- **Sensitive information:** includes information regarding your racial or ethnic origin, religious and philosophical beliefs, political or sexual orientation information, and other sensitive information;
- **Geolocation:** includes your geographic location (e.g., latitude and longitude);
- **Financial transaction information.** We partner with Plaid Technologies, Inc. to gather your data from financial institutions. Banking information shared with us may include ACH authentication information, account and routing numbers, transaction data, identity verification information, transaction details, and account balance details. Your personal and financial information will be transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy located at <https://plaid.com/legal/>.
- **Technical information:** includes username and passwords, internet protocol (IP) address, your login data, browser type, time zone setting and location, third party access tokens and other technology on the devices you use to access our Services;
- **Usage information:** includes information about how you use our Services, the types of Content you interact with, the frequency and duration of time that you use the App’s products and services; and any other platforms from which you link to us;
- **Additional personal or other information** that you agree to provide, including any information that we import from a Third-Party Platform. Such information may include, but is not limited to, data from your accounts with Third-Party Platforms, information from your registered email account, including information in your email communications.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit www.okty.app/CCPA.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Service that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact our Privacy Officer at privacy@okty.app.

How Do We Collect Your Personal Information?

We will collect personal information directly from you wherever it is reasonable and practical to do so. We may collect personal information from you via:

- your use and access of our Services, the Website, and the App, including during your registration and any information you voluntarily provide;
- your response to any surveys or marketing materials we send out;
- cookies and other online tracking technologies.
- interactions between yourself, the Website, the App, and/or our staff.

We may also collect your personal information from third parties including:

- third parties who provide services to us that help us provide our services to you;
- through other third parties using our Services that provide information about you;
- third-party platforms that you provide us with access to; and
- other third parties who provide services via our Services.

Why Do We Collect Your Personal Information?

We provide a platform where users can share information with third parties, in exchange for cash payments and rewards that can later be used to purchase digital products, subscriptions and services. To achieve this goal, we collect your personal information:

- to assess the performance of our Services and to improve our Services we provide;
- administering your account;
- verifying you and your account. OkTY will use information from Third-Party Platforms to verify you and your details.
- providing our Services that you request and process transactions on your behalf.
- responding to your questions and concerns and provide you with effective customer service.
- providing you with payments and rewards (such as gift cards, digital subscriptions, or advertising) or downloadable coupons, discounts, or other offers provided by OkTY that we believe will be of interest to you.
- conduct research and analysis and learn more about our users.
- for the provision of services or the administration of our business (including fulfilling and exercising our obligations and rights, exercising or defending legal claims and managing the relationship with you).

The legal basis for collecting and using personal information will depend on the specific circumstances in which it is collected. However, we will collect personal information from you where:

- you have given consent for our use of the personal information for one or more purposes;
- it is necessary for the performance of a contract to which you are a party;
- it is necessary for the legitimate interests pursued by us and those interests are balanced against your rights to information privacy (e.g., to communicate useful content updates); or
- we have legal obligations that we need to comply with, and are allowed to use your personal information in order to comply with such legal obligations.

How Do We Use Your Personal Information?

We may use the personal information we collect from you to:

- enforce our Terms and this Privacy Policy;
- notify you about any changes in or to our Services or our services;
- fulfill our legal obligations and respond to any litigation or law enforcement/government inquiry;
- ensure that our Services are presented to you in the most efficient manner for you and us;
- improve the design and performance of our Services;
- deliver to you communications, emails, newsletters and marketing materials from us and third parties as you request them or which we feel may interest you, where you have consented to be contacted for such purposes;
- allow you to participate in any interactive features of our Services, when you choose to do so;
- administer our Services and keep it safe and secure;
- facilitate internal operations, including research, statistics, troubleshooting, data analysis, testing, survey and similar purposes;
- share it with third party service providers (as we describe in more detail below);
- disclose as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to protect our operations or those of any of our affiliates; (c) to protect our rights, privacy, safety or property, or property that belongs to you or others; or (d) to allow us to pursue available remedies or limit the damages that we may sustain;
- 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 user data is among the assets transferred;
- fulfil any other purpose disclosed by us when you provide the information; or
- otherwise, with your consent.

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.

Who May We Disclose Your Personal Information To?

We do not sell, dispose, or otherwise transfer your personal information to third parties without your consent except as specifically set forth in this Privacy Policy. However, we may disclose your personal information to various third parties. These third parties may include:

- technology partners in connection with services that these third parties perform for us;
- our lawyers, accountants, professional advisors, and other third-party service providers;
- to our affiliates;
- to law enforcement authorities where we are required to do so by law or pursuant to a legal process, or when we believe disclosure is reasonably necessary or appropriate to prevent harm in connection to a suspected illegal activity;
- to any entity in the event that we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to require that the transferee uses your data in a manner that is consistent with this Privacy Policy; or
- to any other third party with your consent, including when you click on a button or use another mechanism on our Services to initiate the sharing of your personal or other information.

Personal information collected within the European Union may be transferred to and processed by third parties located in a country outside of the European Union. In such instances, we shall ensure that the transfer of such personal information is carried out in accordance with applicable privacy laws and, in particular, that appropriate contractual, technical, and organizational measures are in place.

If you live in the European Union (“EU”), European Economic Area (“EEA”), United Kingdom (“UK”), or Switzerland, you have certain rights regarding your personal data, including:

- You may request access to your personal data and obtain information about our processing of your personal data, with whom we share your personal data, and your rights.
- You may request that we restrict our processing of your personal data.
- You may object to our processing of your personal data.
- Where we process personal data based on your consent, you may withdraw your consent.
- You may correct personal data that is inaccurate and have incomplete personal data completed.
- You may request that we delete your personal data or return or provide a copy of it to you.
- You can deactivate your account at any time by sending us an email at privacy@okty.app.
- To submit a question or concern about your rights, please email us at privacy@okty.app. If you live in the EU, EEA, UK, or Switzerland, and you are unsatisfied with our response, you have the right to lodge a complaint regarding your personal data with an applicable supervisory authority.

Except as otherwise set forth in this Privacy Policy, we will not provide access to your personal information to third parties for any purpose.

What if we can’t collect your personal information?

If you do not provide us with the personal information we need, you will not be able to use our Services, and we may not be able to provide you with targeted content and relevant information.

Information We Collect Through Automatic Data Collection

As you interact with our Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- details of your visits to our Services, including the Website and the App, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Services;

- information about your computer, mobile device, and internet connection, including your IP address, operating system, and browser type, device's unique device identifier, mobile network information, and the device's telephone number;
- real-time information about the location of your device; and
- metadata and other information associated with other files stored on your device, such as photographs, audio and video clips, personal contacts, and address book information.

The information we collect automatically is only statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Services and to deliver a better and more personalized service, including by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customize our Services according to your individual interests;
- speed up your searches; and
- recognize you when you return to our Services.

The technologies we use for this automatic data collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. You may refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our Services. Unless you have adjusted your setting so that it will refuse cookies, our system will issue cookies when you are using our Services.
- **Flash Cookies.** Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Services. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see "Choices About How We Use and Disclose Your Information" below.
- **Web Beacons.** Pages of our Services and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

If you do not want us to collect this information from you, you may opt out at any time by choosing to do so by the certain tools in the App and on the Website, but also, by contacting our Privacy Officer at privacy@okty.app. Note, however, that opting out of the App's collection of location information will disable its location-based features.

We also may use these technologies to collect information about your activities over time and across third-party websites, apps, or other online services (behavioral tracking). However, we will always treat it with the same level of security as the data we collect from you directly.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser or smartphone settings to refuse all or some cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, some parts of our Services may then be inaccessible or not function properly.
- **Location Information.** You can choose whether or not to allow the App to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of our Services may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt out at any time by contacting our Privacy Officer at privacy@okty.app.
- **Promotional Offers from Us.** If you do not wish to have your contact information used by us to promote our own or third parties' products or services, you can opt-out opt out of receiving electronic messages from us at any time by contacting our Privacy Officer via the contact details at the bottom of this Privacy Policy or by using the opt out mechanism included in our electronic marketing messages. If we have sent you a promotional email, you may send us a return email at privacy@okty.app, asking to be omitted from future email distributions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by contacting our Privacy Officer at privacy@okty.app or by using the opt out mechanism included in such advertisements.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to our Privacy Officer at privacy@okty.app. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Data Security

We primarily store your information in the United States. Some information may be stored elsewhere. You authorize us to do so. The personal information and other data we collect about you and your use of our Services may be maintained in servers we control and maintain or in third-party servers. The information you provide may be transferred or accessed by entities in many different countries as described elsewhere in this Privacy Policy. By submitting your information, you agree to the transfer, storage and processing of your data in accordance with this Privacy Policy.

The personal information you provide to us is stored using the AWS service that uses encryption protocols and software and a variety of compliance programs that validate their security protocols. Additional information can be obtained at www.amazon.com/privacy. In addition, we restrict access to user personal information to those of our employees, independent contractors and agents who need to know this information in order to develop, operate and maintain our Services. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Although we take commercially reasonable measures to safeguard against unauthorized disclosures of your information, no e-commerce platform, application, website, electronic database or other format or system is completely secure and, for this reason, we cannot ensure or warrant the security of any information that you transmit to us. You can help protect your personal information by using a combination of letters, numbers and characters in your password, changing your password often, using a secure web browser, and signing off from our Services when you are finished with its use.

When we collect or transmit sensitive information, we use industry standard methods to protect that information.

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

Access and Correction of Personal Information

You can review and change your personal information by logging into our Services and visiting your account profile page. You may also send us an email at privacy@okty.app to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your comments or contributions from our Services, copies of your user content may remain viewable in cached and archived pages, or they might have been copied or stored by other Users. Proper access and use of information provided on our Services, including user content, is governed by our Terms.

You may also contact our Privacy Officer at privacy@okty.app if you wish to obtain further information regarding our privacy practices and the way we handle your personal information.

Other Rights

Subject to certain limitations and restrictions (e.g. depending on circumstances such as where you reside) you may have the right to exercise additional rights in relation to your personal information. These may include the right to:

- request erasure of your personal information;
- object to processing of your personal information;
- request restriction of processing of your personal information;
- transfer your personal information (i.e. the right to data portability);
- not be subject to automatic decision making; or
- withdraw consent.

If you wish to exercise or obtain details of any of the rights set out above, please contact our Privacy Officer at privacy@okty.app. The Privacy Officer may require further information in order to assess the applicability of the right to the relevant circumstances.

Information Retention

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy and in each case in accordance with applicable legal and regulatory requirements in respect of permitted or required retention periods and limitation periods for taking legal action.

Additional Services and Links to Other Sites

From time to time, we may provide links or mechanics to interface with other websites or mobile applications for your information or convenience or offer additional services through separate websites or mobile applications linked to our Services. These websites and mobile applications operate independently from our Service and may be subject to alternative terms of use, including terms concerning use of your personal information. We have not reviewed these third party sites and do not control and are not responsible for any of these websites, mobile applications, their content or their privacy policies. When you submit information or data to third parties, their privacy policies, not ours, will govern their use of your information and data. You should review the privacy policies and terms of service of all such third parties. We do not make any representations regarding the policies or practices of those third parties. If you decide to access or interact with any of the third party sites listed on, or linked to, our Service, you do so at your own risk.

Complaints

We take your privacy concerns seriously. If you have a complaint regarding our handling of your personal information or concerning our privacy practices, you may file a complaint with our Privacy Officer at privacy@okty.app. Our Privacy Officer will confirm receipt of your complaint. If our Privacy Officer believes an investigation is necessary, we will open an investigation into your complaint. Our Privacy Officer may need to contact you to request further details of your complaint. If an investigation has been opened following a complaint made by you, our Privacy Officer will contact you with the result of that complaint as soon as possible. In the unlikely circumstances we are unable to resolve your complaint to your satisfaction, you may be able to may contact the local privacy and data protection authorities.

Contact us

If you have any questions about this Privacy Policy, our privacy practices or if you would like to request access to or correction of any personal information we may hold about you, please contact our Privacy Officer:

Email: privacy@okty.app

Phone: +1 323-391-3736

Address: 110 West 11th Street, Suite 400, Los Angeles, CA, 90015