

POPID PRIVACY POLICY

LAST UPDATED: October 31, 2022

OUR COMMITMENT TO PRIVACY

PopID, Inc. (“PopID,” “we,” “us,” and “our”) knows that you care about how your personal information is used and shared, and we take your privacy seriously. Our primary goal is to provide you with exceptional service, and we understand that you may have questions or concerns regarding your personal information and how it will be used. To make this privacy policy easy to find, we make it available from the home page of the PopID website at popid.com (the "website") and through our mobile applications. You may also email us at privacy@popid.com with any privacy-related questions you have.

APPLICABILITY OF PRIVACY POLICY

This privacy policy applies to all information we collect through our Services from current and former PopID and PopPay users, including you. “Site” or “Services” means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by PopID, Inc., including PopPay. When you are no longer our user or customer, we continue to share your information as described in this policy.

DEFINITIONS

Capitalized terms used in this Privacy Policy have the definition provided in this Privacy Policy. Capitalized terms used in this Privacy Policy that are not specifically defined have the definition provided in the PopID and PopPay User Agreement.

THE INFORMATION WE COLLECT

The Service contains connections to websites, applications, loyalty programs, payment systems, entry systems, and similar platforms, as well as services provided by our partners or third-party service providers, such as NEC, Amazon, Dwolla, Plaid, Heartland, and our credit card/debit card/electronic funds transfer (e.g. ACH) processing partners (collectively, the “Third-Party Services”) that are provided or hosted by PopID’s Merchant partners, service providers, and other third parties (collectively, “Third Parties,” and each a “Third Party”).

You acknowledge that in registering for a PopID Account or PopPay Account, and through use of the Site, or certain portions of the site, including but not limited to PopPay and your registration and use of an Account, we will receive information from you and Third Parties which is personal to you including, without limitation, your name, contact information, bank account details, loyalty data, food ordering data, items purchased and prices, as well as “Biometric Information,” including images of you, biometric identifiers, and other biometric information (collectively, “Personal Information”). Personal Information is information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been aggregated and/or anonymized so that it does not identify a specific user.

Through your use of your PopPay Account, we will also receive and collect information of an aggregate and anonymous information (“Non-Personal Information”).

Additionally, in order to continually enhance our technology-based system and support our ongoing efforts to improve the performance of the Services, we may temporarily store images taken by PopPay and PopID devices. You expressly consent to our collection of Personal Information, including Biometric Information, Third Parties’ collection of Personal Information, including Biometric Information, and the sharing of Personal Information, including Biometric Information with Third Parties, for the purpose of authenticating your identity in relation to your use of the Site and Third-Party Services.

You expressly consent to the use of your Personal Information and Non-Personal Information in accordance with this Privacy Policy. You acknowledge and agree that: (a) we may collect your Personal Information and Non-Personal Information; (b) we may share your Personal Information and Non-Personal information with your Bank, the Merchants at which you use the Services, and our partners and Third-Party Service providers, including our payment processors, as reasonably necessary (collectively the “Authorized Receivers,” and each an “Authorized Receiver”); and (c) the Non-Personal Information, without limitation, with any other person or entity.

You further acknowledge and agree that: (i) the Third Parties are solely and exclusively responsible for the Third-Party Services and any content offered on or in connection therewith; (ii) Your use of the Third-Party Services is subject to and conditional upon your acceptance of any terms, conditions or policies implemented by the applicable Third Parties, from time to time; (iii) under no circumstances shall we be liable in any way for any disconnections to, content provided by, or errors or omissions in, the Third-Party Services; (iv) we will share your identity and personal information (including your Biometric Information) with such Third Parties solely in relation to your use of the Third-Party Services; and (v) we reserve the right, in our sole and absolute discretion, to discontinue and/or remove any Third-Party Services from the Service.

When you visit the website or use one of our mobile applications, or other Services we collect your IP address, and standard web log information, such as your browser type and the pages you accessed on our website. We also may collect Geolocation Information (defined below). If you do not agree to our collection of this information, you may not be able to use our Service. If you open a PopID Account, we may collect the following information from you:

- Account and Profile Information - text-enabled cellular/wireless telephone number, machine or mobile device ID and other similar information and may include name, email address, phone number, address, company name, state, country, date of birth, SSN (or other governmental issued verification numbers), biometric identifiers, biometric information, and vectors.
- Service Information: When you use our Services, we receive information generated through the use of the Services, either entered by you or others who use the Services, or from the Services infrastructure itself. This information may include, but is not limited to, name, username, company/organization, company/organization address, email address, phone number, IP address, MAC address, latitude, longitude, device name(s), device ID(s), and directory ID or other information you place within the Services.

- Device Information - information about you: (a) from your mobile device or computer such as your device type, machine or mobile device identification number, Geolocation Information, time zone, language setting, browser type, and IP address, and (b) from third parties for purposes of transaction processing, identity verification, fraud detection or prevention and other similar purposes. For fraud prevention purposes, we also may link your machine ID with the machines of others who use your same payment cards.
- Geolocation Information - information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. We will collect this data for fraud and risk purposes. In addition, some of our Services may ask you for permission to share your current location within your device settings to enhance our Services. If you do not agree to our collection of Geolocation Information, our Services may not function properly when you try to use them. For information about your ability to restrict the collection and use of Geolocation Information to enhance our Services, please refer to the settings available in your device.
- Financial Information - bank account online login information, bank account and routing numbers and credit cards linked to your PopPay account.
 - If you are a merchant, as part of your business relationship with us, we may receive financial about you such as your date of birth and government identifiers associated with you and your organization (such as your social security number, tax number, or Employer Identification Number), bank account online login information, bank account and routing numbers and credit cards linked to your PopPay account.
 - If you are a user, when you make payments or conduct transactions through a PopID merchant we will receive your transaction information. Depending on how the PopID implements our Services, we may receive this information directly from you, or from the PopID merchant or third parties. The information that we collect will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method. Different payment methods may require the collection of different categories of information.
 - Information from Third Parties: We receive information from third party business partners such as the contact details of prospects and sales leads. In addition, we collect information from public databases or other data you may have made publicly available, such as information posted on professional networks and social media platforms.

We are committed to providing a safe, secure and all-around great service. Therefore, before permitting you to use the Services, we may require additional information from you we can use to verify your identity, address, or other information or to manage risk and compliance throughout our relationship. We may also obtain information about you from third parties such as identity verification, fraud prevention and similar services. When you are using the Services, we collect information about your account transactions and we may collect Geolocation Information and/or information about your computer or other access device for fraud prevention and other similar purposes. Finally, we may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to your contact with

our customer support team, store results when you respond to a survey, or when you use PopPay or another PopID service.

INFORMATION FROM CHILDREN

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform parents and legal guardians (as used in this policy, "parents") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("children"). COPPA and the GDPR also require us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information. We do not collect any personal identifiable information from children. At any time, you or the parents may review the child's personal information maintained by us, require us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child's information by logging into the child's account or contacting us as indicated in the Contact section of this Policy.

The Services are not directed to children under the age of 13. If we obtain actual knowledge that we have collected personal information from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us as indicated in the Contact section below if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

HOW WE USE COOKIES

When you visit or use our Services, or visit a third-party website for which we provide online services, we and certain business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies"). Cookies (or browser cookies) are small files placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.

Flash Cookies. Certain features of our website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

We use Cookies to recognize you as a customer; customize Services, other content, and advertising; measure the effectiveness of promotions; perform a wide range of analytics; mitigate risk and prevent potential fraud; and to promote trust and safety across our Services. Certain Services are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of certain Services may be limited or not possible. Do Not Track: Do Not Track ("DNT") is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

HOW WE PROTECT & STORE PERSONAL INFORMATION

We store and process your personal information using third party servers located in data centers in the United States. This information is protected by physical, electronic, and procedural safeguards in compliance with applicable US federal and state regulations. We also use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our office and files, and we authorize access to personal information only for those employees who require it to fulfill their job responsibilities. We strive to ensure security on our systems. Despite our efforts, we cannot guarantee that personal information may not be accessed, disclosed, altered, or destroyed by breach of our administrative, managerial, and technical safeguards. Therefore, we urge you to take adequate precautions to protect your personal data as well, including never sharing your PopPay Account. If PopPay learns of a systems security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Services, you agree that PopPay may communicate with you electronically. PopPay may post a notice on the website or mobile application if a security breach occurs. We may also send an email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice of a security breach), please email us at privacy@popid.com.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, fun, and customized experience. We may use your personal information to:

- provide the services and customer support you request;
- process transactions and send notices about your transactions or your network activity;
- resolve disputes, collect fees, and troubleshoot problems;
- prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement through the use of our risk and fraud tools which may include use of Account Information, Identification Information, Financial Information, Device Information, and Geolocation Information;
- create an account connection between your PopPay account and a third-party account or platform;
- customize, personalize, measure, and improve our services and the content and layout of our website;
- send you updates about new products and services that we are offering to customers;
- compare information for accuracy and verify it with third parties;
- perform other duties as required by law; and
- if you elect to share your Geolocation Information, we will use this information to enhance the security of the Services and we may use this information to provide you with location-specific options, functionality, offers, advertising, search results, or other location-specific content.

HOW WE SHARE PERSONAL INFORMATION WITHIN THE POPPAY PLATFORM

To register for an PopID Profile, PopPay Account, or a Merchant Account, and to process Transactions on PopPay, we need to share some of your personal information with the person or company that you are paying or is paying you. Your contact information, date of sign-up, the number of payments you have received and other verification metrics like social graph activity may be provided to users or companies when you transact with, on, or through PopPay. We work with vendors to enable them to accept payments from you using PopPay. In doing so, a vendor may share information about you with us, such as your mobile phone number or PopPay username, when you attempt to pay that vendor. We use this information to confirm to that vendor that you are a PopPay customer and that the vendor should enable PopPay as a form of payment for your purchase. Regardless, we will not disclose your credit card number or bank account number to anyone you have paid or who has paid you through PopPay, except with your express permission or if we are required to do so to comply with a subpoena or other legal process. You agree that we have the right to share your Personal Data with Businesses that the you elect to use PopID to authenticate identity.

HOW WE SHARE PERSONAL INFORMATION WITH OTHER PARTIES

PopID does not share your personal information with third parties for their promotional or marketing purposes. Some personal information is public information and may be seen by anyone on the internet, whether or not they have a PopPay Account. Public information may also be seen, accessed, reshared, or downloaded through PopID's APIs or third-party services that integrate with our products.

- Public information for personal profiles may include your PopPay username, profile photo, first and last name, month and year of PopPay account creation, and public transactions in which you've been involved.

We may share your personal information with:

- PopID, Inc. and affiliates and subsidiaries it controls, but only for purposes allowed by this document.
- Companies that PopID, Inc. plans to merge with or be acquired by or, in the event of any bankruptcy, a bankruptcy estate. Should such a combination occur, we will require that the new combined entity follow this privacy policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice and the opportunity to communicate preferences you may have, if applicable.
- Law enforcement, government officials, or other third parties if PopID is compelled to do so by a subpoena, court order or similar legal procedure, when it is necessary to do so to comply with law, or where the disclosure of personal information is reasonably necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of the PopPay User Agreement, or as otherwise required by law.
- Third party service providers who assist us in providing services to you or who provide fraud detection or similar services on our or any vendor's behalf.
- The other PopPay user or merchant participating in the transaction and, depending on the privacy setting of each PopPay account transaction, your PopPay friends and the PopPay

friends of the other user participating in the transaction, or the public, through the PopPay feed on our website and mobile application and elsewhere on the internet.

- Service providers under contract who help with parts of our business operations (for example, fraud prevention, payment processing, or technology services). Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- Analytics and search engine providers that assist us in the improvement and optimization of our site.
- Other third parties with your consent or at your direction to do so, including if you authorize an account connection with a third-party account or platform.
 - For the purposes of this privacy policy, an "account connection" with such a third party is a connection you authorize or enable between your PopPay account and a non-PopPay account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, PopPay and the third-party will exchange your personal information and other information directly. Examples of account connections include, without limitation: linking your PopPay account to a social media account or social messaging service; connecting your PopPay account to a third-party data aggregation or financial services company, if you provide such company with your PopPay account log-in credentials; or using your PopPay account to make payments to a merchant or allowing a merchant to charge your PopPay account.
 - If you connect your PopPay account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and account and transactional information, such as purchases and funds transfers. If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this privacy policy.
 - Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your personal information as part of the account connection. For example, personal information that PopPay shares with a third-party account or platform may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

PopID does not send your personal information to third-party social networks unless you have specifically requested or authorized us to do so. When you broadcast information to such third-party social networks, such information is no longer under the control of PopID and is subject to the terms of use and privacy policies of such third parties.

WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our site; any

transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION

You can review and update your personal information in your Account settings at any time by logging in to your Account.

HOW LONG WE RETAIN AND USE YOUR PERSONAL INFORMATION

You acknowledge that to use the Site, you must provide certain personal information to us, including, but not limited to, with respect to the registration and use of your Account, certain Personal Information, as well as biometric identifiers and other biometric information (collectively, the “Biometric Information”). You expressly consent to our collection of the Biometric Information, Third Parties’ (as defined below) collection of the Biometric Information, and the sharing of the Biometric Information with Third Parties (as defined below), for the purpose of authenticating Your identity in relation to your use of the Site and Third-Party Services. The Biometric Information will be collected, stored, and used up to the date that it is destroyed as specified in our Privacy Policy.

We determine the date to destroy your Biometric Information based on the following criteria: except as provided, we will delete your Biometric Data on the earlier date of the following: (a) three years from the last date of your use of the Site; (b) within the time provided under applicable law, following our agreement to comply with you request to delete your Biometric Information, when applicable law provides you with a right to make such a request, or (c) when it is no longer reasonably necessary for one or more of the purposes disclosed for our collecting, storing, and using your Biometric Information. Notwithstanding these criteria, we reserve the right to retain your Biometric Data for so long as it is reasonably necessary to (i) to complete your transactions, including the period allowed for any chargebacks or returns, (ii) to help ensure security and integrity of our Site, including preventing individuals from committing fraud or other illegal conduct, (iii) to debug to identify and repair errors that impair existing intended functionality of the Site, (iv) for internal uses that are compatible with reasonable consumer expectations or the context in which the information was provided, (v) to comply with a legal obligation, exercise legal claims or rights, or defend legal claims, or (vi) any other exception provided under applicable law, including California Civil Code sections 1798.105(d) and 1798.145.

Additionally, in order to continually enhance our technology-based system and support our ongoing efforts to improve the performance of the Services, we may temporarily store images taken by PopPay and PopID devices.

LINKS TO OTHER SERVICES OR SITES

The Services may contain links to (or allow you to link to) other third-party services or websites. PopPay does not control the information collection of third-party services or websites that can be reached through such links. We encourage our users to be aware when they are linking to a third-party service or website and to read the privacy statements of any third-party service or website

that collects personally identifiable information. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or their collection or use of Personal Information.

CHANGES TO OUR PRIVACY POLICY

PopID is always improving. As the Services evolve, we may occasionally update this privacy policy. If we modify this privacy policy, we will post the revised privacy policy to the website, and we will also revise the "last updated date" stated above.

We may update this Privacy Policy from time to time. In the event we make any material changes to this Privacy Policy, we will notify you by posting the revised policy on our corporate website (www.popid.com). When we update this Privacy Policy, we will note the date the most recent revision was posted below, at the end of the policy. Any revisions will become effective upon immediately upon posting on our corporate websites. It is your responsibility to periodically review the Privacy Policy posted on the website. Your use of the Site, including PopPay, after the posting on the updated Privacy Policy constitutes your agreement to the terms of the updated Privacy Policy.

HOW TO CONTACT US

If you have questions or concerns regarding this privacy policy, or any feedback pertaining to your privacy and the Services that you would like us to consider, please email us at privacy@popid.com, use the Contact page located at <https://www.popid.com/pay#contact>, call us at (626) 639-0559, or write to us at PopID, Inc., Attn: Legal Department, 6800 Owensmouth Avenue, Suite 350, Canoga Park, CA 91303.

CONSUMER PRIVACY NOTICE

PopPay is a service provided by PopID, Inc.

Facts	What does PopID do with your personal information?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security number and account balances • Payment history or transaction history • Credit history or credit scores When you are no longer our customer, we continue to share your information as described in this notice.

Facts	What does PopID do with your personal information?
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons PopID chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PopID share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes —to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes —information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes —information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Who we are	
Who is providing this Privacy Policy?	This privacy notice is provided by PopID, in connection with its provision of PopPay, and is applicable to your personal PopID and PopPay accounts, and your use of the PopPay service.

What we do	
How does PopID protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does PopID collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account or provide account information • link your credit or debit card to your PopID account or give us your contact information • use your PopID account to send or receive funds <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes— information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.</p>

What we do	
How does PopID protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does PopID collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account or provide account information • link your credit or debit card to your PopID account or give us your contact information • use your PopID account to send or receive funds <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes— information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you

What we do

State laws and individual companies may give you additional rights to sharing. See below for more information on your rights under state law.

Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: If your PopID account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

Vermont: If your PopID account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

California Consumer Privacy Act Notice

In this notice, we are addressing specific disclosure requirements under the California Consumer Privacy Act (CCPA) for California residents even though the CCPA does not currently apply to us. This notice should be read together with PopID's Privacy Policy and applies to all California residents who visit our Sites or use the Services.

Personal Information Collection and Purposes of Use

We collect, use, and share personal information regarding California residents as described in this notice. **We did not sell any consumers' personal information in the preceding 12 months.**

California Residents' Privacy Rights

California residents have rights to request access to certain personal information collected about them over the past 12 months, or deletion of their personal information, subject to certain exceptions, and may not be discriminated against because they exercise any of their rights under the California Consumer Privacy Act. We may require you to provide additional personal information to verify your identity before we process your request; we may not process your request if we are unable to verify your identity. You or your authorized agent may contact us at privacy@popid.com or using the Contact Us form at <https://www.popid.com/pay#contact>.

<p>In the preceding 12 months, we have collected the following categories of personal information from California Residents:</p>	<p>We have collected such personal information from the following categories of sources:</p>	<p>We collected such personal information to use for the following purposes:</p>	<p>In the preceding 12 months, we shared such personal information with the following categories of third parties:</p>
<p>a. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> • from you when you use our Services • merchants • service providers • financial institutions 	<ul style="list-style-type: none"> • provide the Services and customer support • process transactions and send notices about your transactions or your network activity • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • financial institutions • merchants • third party accounts or platforms • parties to the transaction • other PopID users • internet users (some personal information is public information including your PopID username, PopID profile photo, PopID profile first and last name, month, and year of PopID account creation, and public transactions in which you’ve been involved, and may be seen by anyone on the internet, whether or not they have a PopID account) • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties

<p>In the preceding 12 months, we have collected the following categories of personal information from California Residents:</p>	<p>We have collected such personal information from the following categories of sources:</p>	<p>We collected such personal information to use for the following purposes:</p>	<p>In the preceding 12 months, we shared such personal information with the following categories of third parties:</p>
<p>b. Any categories of personal information described in subdivision (e) of Section 1798.80: “Personal information” means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. “Personal information” does not include publicly available</p>	<ul style="list-style-type: none"> • from you when you use our Services • merchants • service providers • financial institutions 	<ul style="list-style-type: none"> • provide the Services and customer support • process transactions and send notices about your transactions or your network activity • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • financial institutions • merchants • third party accounts or platforms • parties to the transaction • other PopID users • internet users (some personal information is public information including your PopID username, PopID profile photo, PopID profile first and last name, month, and year of PopID account creation, and public transactions in which you’ve been involved, and may be seen by anyone on the internet, whether or not they have a PopID account) • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties

<p>In the preceding 12 months, we have collected the following categories of personal information from California Residents:</p>	<p>We have collected such personal information from the following categories of sources:</p>	<p>We collected such personal information to use for the following purposes:</p>	<p>In the preceding 12 months, we shared such personal information with the following categories of third parties:</p>
<p>information that is lawfully made available to the general public from federal, state, or local government records.</p>			
<p>c. Characteristics of protected classifications under California or federal law.</p>	<ul style="list-style-type: none"> • from you when you use our Services • service providers 	<ul style="list-style-type: none"> • provide the Services • prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • financial institutions • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties
<p>d. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • from you when you use our Services • merchants • service providers • financial institution 	<ul style="list-style-type: none"> • provide the Services and customer support • process transactions and send notices about your transactions or your network activity • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited or illegal activities, and 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • financial institutions • merchants • third party accounts or platforms • parties to the transaction • other PopID users • internet users (some personal information is public information including your PopID username,

<p>In the preceding 12 months, we have collected the following categories of personal information from California Residents:</p>	<p>We have collected such personal information from the following categories of sources:</p>	<p>We collected such personal information to use for the following purposes:</p>	<p>In the preceding 12 months, we shared such personal information with the following categories of third parties:</p>
		<p>enforce our User Agreement</p> <ul style="list-style-type: none"> • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 	<p>PopID profile photo, PopID profile first and last name, month, and year of PopID account creation, and public transactions in which you've been involved, and may be seen by anyone on the internet, whether or not they have a PopID account)</p> <ul style="list-style-type: none"> • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties
<p>e. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.</p>	<ul style="list-style-type: none"> • from you when you use our Services • merchants • service providers 	<ul style="list-style-type: none"> • provide the Services and customer support • process transactions and send notices about your transactions or your network activity • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited or illegal activities, and 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • financial institutions • third party accounts or platforms • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties

<p>In the preceding 12 months, we have collected the following categories of personal information from California Residents:</p>	<p>We have collected such personal information from the following categories of sources:</p>	<p>We collected such personal information to use for the following purposes:</p>	<p>In the preceding 12 months, we shared such personal information with the following categories of third parties:</p>
		<p>enforce our User Agreement</p> <ul style="list-style-type: none"> • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 	
<p>f. Geolocation data.</p>	<ul style="list-style-type: none"> • from you if you elect to share this information • service providers 	<ul style="list-style-type: none"> • to enhance the security of Services, provide you with location-specific options, functionality, offers, advertising, search results, or other location-specific content • prevent potentially fraudulent, prohibited or illegal activities, and 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties

<p>In the preceding 12 months, we have collected the following categories of personal information from California Residents:</p>	<p>We have collected such personal information from the following categories of sources:</p>	<p>We collected such personal information to use for the following purposes:</p>	<p>In the preceding 12 months, we shared such personal information with the following categories of third parties:</p>
		<p>enforce our User Agreement</p>	
<p>g. Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<ul style="list-style-type: none"> • from you when you use our Services 	<ul style="list-style-type: none"> • provide the Services and customer support • process transactions • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement • compare information for accuracy and verify it with third parties • perform other duties as required by law 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties
<p>h. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitude.</p>	<ul style="list-style-type: none"> • from you when you use our Services • merchants • service providers 	<ul style="list-style-type: none"> • provide the Services • prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties

<p>In the preceding 12 months, we have collected the following categories of personal information from California Residents:</p>	<p>We have collected such personal information from the following categories of sources:</p>	<p>We collected such personal information to use for the following purposes:</p>	<p>In the preceding 12 months, we shared such personal information with the following categories of third parties:</p>
		<p>and services that we are offering to customers</p> <ul style="list-style-type: none"> • perform other duties as required by law 	

YOUR RIGHTS UNDER THE GDPR

The GDPR does not generally provide rights to residents of the United States. If, however, the GDPR provides rights to you, then this section applies to you.

For purposes of this section, “Data Protection Laws” means any Applicable Law relating to the processing, privacy, and use of Personal Data, including (a) California Consumer Privacy Act (CCPA) for California residents, (b) in the United Kingdom, (i) the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, SI 2003/2426, and any laws or regulations implementing Directive 95/46/EC (Data Protection Directive) or Directive 2002/58/EC (ePrivacy Directive); and/or (ii) the General Data Protection Regulation (EU) 2016/679 (GDPR), and/or any corresponding or equivalent national laws or regulations (Revised UK DP Law) (c) in member states of the European Union, the Data Protection Directive or the GDPR, once applicable, and the ePrivacy Directive, and all relevant member state laws or regulations giving effect to or corresponding with any of them; and (d) any judicial or administrative interpretation of any of the above, any guidance, guidelines, codes of practice, approved codes of conduct or approved certification mechanisms issued by any relevant Supervisory Authority;

For this Section, “Personal Data” means any information relating to an identified or identifiable natural person (“Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and where referred to in this policy includes special categories of Personal Data.

Under certain circumstances, you have the right to:

- Request access to your Personal Data (commonly known as a “subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

- Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data in certain circumstances.
- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your Personal Data to another party.
- If you want to review, verify, correct, or request erasure of your Personal Data, object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please contact us as indicated in the Contact section of this Policy.

To exercise any of the above rights, you can contact PopID using the information in the Contact Us section above. You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

PRIVACY SHIELD FRAMEWORKS FOR EU, UNITED KINGDOM, AND SWISS CITIZENS

PopID complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries (including Iceland, Liechtenstein, and Norway), the United Kingdom, and Switzerland transferred to the United States pursuant to Privacy Shield. PopID has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program please visit <https://www.privacyshield.gov/>

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, PopID is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the Privacy Shield Frameworks, the EU, United Kingdom, 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 may 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 Privacy Shield, should direct their query to privacy@popid.com. If requested to remove data, we will respond within a reasonable timeframe. We will provide an individual opt-out or opt-in choice 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, please submit a written request to privacy@popid.com.

In certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

PopID's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, PopID remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless PopID proves that it is not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, PopID commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union, United Kingdom, and Swiss individuals with Privacy Shield inquiries or complaints should first contact us by email at info@popid.com, or using the mailing address listed above.