Last Updated: 01/07/2023

Genesis Data Technologies is committed to protecting and processing your personal information responsibly. We value the data you share with us and treat it with respect.

This Privacy Notice describes how Genesis Data Technologies collects, uses, and shares your personal information. Additionally, it outlines how you can access and control your personal information. Just complete this form to request a copy of your data and/or to remove your data from our service.

If applicable to you, by accessing and using the Services, or providing information to us in other formats, you agree and accept the terms of this Privacy Policy as amended from time to time and consent to the collection and use of information in the manner set out in this Privacy Policy. We encourage you to review this Privacy Policy carefully and to periodically refer to it so that you understand it and any subsequent changes made to it. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, PLEASE STOP USING THE SERVICES IMMEDIATELY.

Genesis Data Technologies collects personal information related to your profession, similar to the information you would find on a business card or in a business email signature block. We store this information in our database, and make it available to our customers, who use this information to conduct their own business-to-business (B2B) sales, marketing, and recruiting activities.

What is Genesis Data Technologies and what do we do?

Who we are

Genesis Data Technologies is a brand under the company Al Digital Ventures Ltd is an limited company established in the United Kingdom, with its registered office at The Maltsters, Ground Floor, Suite B-D, Wetmore Road, Burton-Upon-Trent, Staffordshire, DE14 1LS, United Kingdom. Al Digital Ventures Ltd and/or its affiliates ("Genesis Data Technologies", "we", "us") are responsible for processing Data as described in this Privacy Notice.

To contact us, and for more information, see below.

What types of information do we collect?

We collect and process Data:

Data about Contacts

We process business-related Data about Contacts. This Data is limited to what you would normally find on a business card or in a business email signature block, or to what is necessary to contact an individual with a business social network profile or to verify the authenticity of such a profile. We then provide this Data to our Customers to fulfil their legal business needs.

Our B2B Database relies on Data retrieved or derived from information from the following sources:

- Our affiliates and group members: We receive Data from affiliates, i.e. subsidiaries, parent companies, joint ventures, and other corporate entities under common ownership or in the same corporate group.
- **Publicly available sources**: Our proprietary algorithm scans publicly available sources and retrieves public information to understand standard corporate email patterns (e.g. firstname.lastname@company.com). We use this Data only after we have verified it in accordance with our internal processes.
- Third parties (for information about companies): We rely on business partners to collect company information about and maintain a verified list of existing companies. We use this information to

ensure that the Data we process relates to business details obtained from the above is only collected if it relates to business details (as opposed to personal contact details). We are strictly only concerned with data relating to individuals in their professional capacity.

If you opt-out, we will also remove your Data from our B2B Database and hold it on our suppression list.

Data we process about End Users

We collect Data directly from End Users where they interact with us. For example, this is the case when End Users create an account, use our Services, contact us via our website or support channels. The Data includes:

- name
- professional email address
- professional phone number
- professional mailing address
- location
- user activity
- any other information you provide us voluntarily when you communicate with us.

Data our Payment Partner Collects

For End Users and Licensees that pay for the Services by credit cards, our service provider <u>Stripe Inc.</u> processes your payment information, while we do not have direct access to it. We have an agreement with Stripe to ensure that your payment information is processed in a secure and confidential way.

How and why do we use your Data?

Data about Contacts

Context of processing	Purpose of processing	Legal basis
Purposes related to the provision of our Services	Jei vices	 Our legitimate interest in fighting against identity theft and online fraud Our legitimate interest in providing accurate and up to date Contact Data, allowing our End Users and Licensees to engage with other businesses and business representatives in meaningful and effective online and offline interactions
Purposes related to the analysis and improvement of our Services	 Responding to your questions, support requests or feedback 	Our legitimate interest in operating a successful business
Purposes related to compliance with regulations and the fight against fraud	fraudulent and illegal activity, or	 Our legitimate interest in ensuring the safety and proper functioning of our Services Our legitimate interest in ensuring that our Terms of Use and other policies are complied with

Data about End Users

Context of processing	Purpose of processing	Legal basis
Purposes related to the use of the Services, the creation and management of your account	 Registering, maintaining and managing your user account or membership with us Verifying your registration to the Services and approve your email address Communicating with you regarding the purchase, inquiries, support request, feedback, or questions Processing your order, including sending you any necessary emails related to the purchase of any paid Services Sending you important announcements in relation to security, privacy, or the administration of our Services Personalizing our Services to ensure its content is presented in the most effective manner for you and your device 	 Our legitimate interest in providing accurate and up to date Business Contact information, allowing our End Users and Licensees to engage with other businesses in meaningful and effective online and offline interactions, pursuant to the Agreement with a Licensee Compliance with our legal obligations, including those applicable to our Payment Partner as a payment service provider, such as anti-money laundering, anti-corruption, and credit card fraud Where applicable, your consent
Purposes related to the analysis and improvement of our Services	Conducting troubleshooting, Data analysis, testing, research, statistical and survey analysis	Our legitimate interest in ensuring the safety and proper functioning of our services
Purposes related to the promotion of our Services	 Signing you up for our newsletters or alerts If you opted in to marketing, communicating with you about our latest updates, upgrades, and services Building and maintaining our End User and Licensee community 	 Our legitimate interest in promoting our Services Where applicable, your consent

 Detecting and preventing fraudulent and illegal activity, or any other type of activity that may jeopardize or negatively affect the integrity of the Services Responding to your requests regarding your Data Investigating violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process, or respond to a government authority's request 	 Our legitimate interest in ensuring the safety and proper functioning of our services Our legitimate interest in ensuring that our Terms of Use and other policies are complied with Our legitimate interest relating to the exercise of our rights or the defense of our legal rights Compliance with our legal obligations, including those applicable to our Payment Partner as a payment service provider, such as anti-money laundering, anti-corruption, and credit card frau
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Information about End Users and Visitors

Context of processing	Purpose of processing	Legal basis
Purposes related to the analysis and improvement of our Services	 Conducting troubleshooting, Data analysis, testing, research, statistical and survey analysis Ensuring our services are working properly 	Our legitimate interest in ensuring the safety and proper functioning of our services

How we share your information

We may share information with third parties in the ways and for the purposes described above.

- With our End Users and Licensees (Contacts only): We share Contacts stored in our B2B Database with our End Users and Licensees, for the purpose of providing our Services and allowing access to authentic, current, and up to date business contact information.
- Within Genesis Data Technologies or our Payment Partner: We may share your information within Genesis Data Technologies. To the extent permitted by law and taking into account the protection of your rights and freedoms with respect to the processing of your Data, and the consent you have given (if any), your Data will only be accessible by a limited and defined number of recipients within Genesis Data Technologies (such as employees) or our Payment Partner.

In particular, we will provide your Data to service providers or suppliers as part of our normal business operations. Such service providers include (i) hosting services providers, (ii) data analytics providers, (iii) payment processors, and (iv) security services providers.

We may also share your Personal Information and other information in special cases if we have good reason to believe that it is necessary to: (1) comply with law, regulation, subpoena or court order; (2) detect, prevent or otherwise address fraud, security, violation of our policies or technical issues; (3) enforce the provisions of this Privacy Policy or any other agreements between you and us, including investigation of potential violations thereof; (4) protect against harm to the rights, property or safety of us, our partners, our affiliates, users, or the public.

How long do we keep your Data?

Genesis Data Technologies has implemented a retention policy, setting retention periods taking into account the type of information that is collected and the purpose for which it was collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

We only keep your Data for the time necessary for the purposes described above.

- **Contacts**: We retain your Data for the duration necessary to provide our Services and, thereafter in archives, to comply with our legal obligations, resolve disputes and enforce our policies.
- End Users: We retain your Data for the duration of your active account on Genesis Data Technologies. We may keep your Data for 3 years following the last activity in your account in order to comply with our legal and contractual obligations or to protect ourselves from any potential disputes (as required by laws applicable to record-keeping and to have proof and evidence concerning our relationship, should any legal issues arise following the termination of your account), all in accordance with our Data Retention Policy.

Lastly, we retain Data in our suppression list for the duration necessary to provide our Services, which includes ensuring that any Contacts who have exercised their right to opt-out remain excluded from our B2B Database.

Once the retention period has passed, Genesis Data Technologies takes the appropriate and adequate measures to dispose of all and any Data in a secure and lawful manner.

How to opt-out or access, rectify, and/or erase your Data Genesis Data Technologies allows you to access your Data, edit or obtain Data collected about you by contacting our <u>privacy team</u> or completing <u>this form</u>.

Note that we maintain a suppression list which may include personal data, for the sole purpose of ensuring that opt-out requests are respected and that your contact information no longer appears in the Genesis Data Technologies B2B Database in the future if you have opted-out.

In particular, you may request:

- Information and access to a copy of your Data: you may obtain confirmation as to whether or not your Data is processed by Genesis Data Technologies. As applicable you may get more information on the Data we hold and how your Data is processed and get a copy of your Data.
- Rectification of your Data: you may rectify your Data if it is inaccurate or incorrect or out-of-date. You may also have incomplete Data completed.
- Erasure of your Data: you may request the erasure of your Data, e.g. if you object to the processing of
 your Data. However, we may have legal or legitimate reasons for retaining the Data depending on the
 context. Upon complying with your request, we shall also inform the customers that purchased your
 data.
- Limitation of processing: you may request a limitation of your Data, e.g. in case of issue or audit. We will mark your Data to limit their future processing.
- Data portability: you may receive the Data that you have provided to Genesis Data Technologies, in a structured, commonly used and machine-readable format, and you have the right to transmit this Data to another data controller without hindrance from us. This right only applies where the processing of your Data is based on your consent or is Data you have provided to us for the performance of the Genesis Data Technologies terms of service.

You may also object to the processing of your Data for certain purposes.

- To stop receiving marketing communications from us: you may demand that we stop any direct
 marketing to you, at any time. You will find a link or instructions to unsubscribe in any such
 communications from us.
- For other purposes: you may object to the processing of your Data where such processing is based on legitimate interest as described above. Please describe the reasons relating to your particular situation to justify your request. If applicable, we will stop the processing unless we have compelling legitimate grounds.

If you have given us your consent, you may withdraw that consent at any time for future processing. This will not affect the lawfulness of the processing prior to the withdrawal of consent.

Minors

The products and services of Genesis Data Technologies are not targeted to or intended for children under the age of 18. In the event that we become aware that a Contact or End User is under the age of 18, we will discard such information. If you have any reasons to believe that a minor has shared any information with us, please contact us at compliance@genesisdatatechnologies.com.

How do we safeguard and transfer your Data?

We will take all steps reasonably necessary to ensure your information is treated securely and in accordance with this Privacy Notice.

Once we receive your information, we take all appropriate technical and organizational measures, reasonable precautions, and follow industry best practices to safeguard your information against loss, theft, unauthorized use, access, or modification.

We use industry-standard information, security tools, and measures, as well as internal procedures and strict guidelines to prevent information misuse and data leakage. Our employees are subject to confidentiality obligations. We use measures and procedures that substantially reduce the risks of data misuse, but we cannot guarantee that our systems will be absolutely safe. If you become aware of any potential data breach or security vulnerability, you are requested to contact us immediately. We will use all measures to investigate the incident, including preventive measures, as required.

Information Warranty Disclaimer

Notwithstanding anything else in this Policy, we are not responsible for the accuracy, correctness, and security of any of the information we gather, store, and disclose to you or to anyone else.

Our policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

Changes to this Privacy Policy

This Policy may be revised from time to time at our sole discretion, so check it regularly. The last revision will be reflected in the "Last Updated" heading. Any change of this policy will be posted on the Site. Your continued use of the Services following any such changes will be considered as you consent to the amended Privacy Policy.

Contact Us

If you feel that your privacy was not treated in accordance with our Privacy Policy, or if you believe that your privacy has been compromised by any person in the course of using the Services, contact us at compliance@genesisdatatechnologies.com and our Privacy Officer shall promptly investigate.