

Introduction

EX MANTRA, INC, a Delaware corporation (“EXM,” “us,” “we,” or “our”), respects the privacy concerns of our customers, the members of EXM-powered businesses, and all users of our websites, exmantra.com, applications, and all other products and services (collectively, the “Product”). We are committed to protecting and respecting your privacy. This Privacy Policy (the “Privacy Policy”) and any other documents referred to in it sets forth the basis on which any personal data we collect from you, or that you provide to us, in connection with the Product will be processed by us. We are providing this Privacy Policy so that you can better understand how we collect, use, and share information that is gathered using our Product.

We may change provisions of this Policy from time to time and will indicate when changes have been made by revising the date at the top of this Policy. We encourage you to review the Policy whenever you access the Product to make sure that you understand our practices. If we make material changes to this Policy, we will provide you with additional notice.

It’s important that you read the following carefully to understand our practices. If you have any questions or unresolved privacy concerns, please contact us at info@exmantra.com.

Data Protection Across the Globe

Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply common protections described in this policy. These protections align with well-known standards such as ISO 27001:2017 and others.

Information that We Collect

Information that you provide to us: We may collect information that you provide when using our Product, such as when you: (1) create an account; (2) subscribe to our Product; (3) connect with another user account; (4) create records of thoughts, comments, and behaviors; (5) interact with our team; (6) fill out surveys; or (7) otherwise communicate with us through or about our Product. The types of personal information that you provide may include your name, email address, telephone number, mailing address, credit card information, and other contact or identifying information that you choose to provide. We also store personal information created by you that may be personal information about you and this information will not be shared without your consent or anonymization. We store, process, and maintain files and content that you

create and/or upload using our Product, as well as other data related to your account in order to provide the Product to you.

We do not store any credit card information we receive except as necessary to complete and satisfy our rights and obligations with regard to such transaction, billing arrangement, and/or as otherwise authorized by you.

Information about use of our Product: Our servers automatically collect usage information about your use of the Product, including the webpages visited, number of log-ins, data displayed or clicked on, actions taken, your language preference, and other login information. We may collect automated error reports in the case of software malfunctions, which may contain some or all of the information in your account and content and may be reviewed to help resolve problems with the Product.

We collect information from the device and application you use to access our Product. Device data mainly means your IP address, operating system version, device type, device ID/MAC address, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

We use a variety of technologies to collect this information, such as first party and third party cookies and tracking services that employ cookies and page tags (also known as web beacons). This data includes usage and user statistics. Emails sent by EXM or by users through our Product also include page tags that allow the sender to collect information about who opened those emails and clicked on links in them.

Like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type and timestamps.

If you arrive at EXM from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

Information from third parties and integration partners: We may obtain personal information from third parties and combine such information with the information that we collect through our Product and such information may be used for the purposes described in the “How We Use the Information We Collect” section below. For example:

- You give permission to those third parties to share your information with us or where you have made that information publicly available online.

- You create or log into your account through a third-party social networking site or one of our integration partners, we will have access to certain information from that service such as your name and account information.
- If you purchase our Product, we may receive information from our third-party payment processors.
- We may collect information from unaffiliated third parties so that we can better understand you and provide you with information and offers that may interest you.

How We Use the Information We Collect

Use of Information: We may use the personal information collected through our Product to:

- Operate and improve our Product;
- Send you advertising or promotional materials;
- Provide and deliver the Product or other services you request, process transactions, and send you related information;
- Send you technical notices, updates, security alerts, and support and administrative messages;
- Respond to your comments, questions, and requests and provide you with requested customer support;
- Monitor and evaluate trends, usage, and activities in connection with our Product;
- Secure our systems, prevent fraud, and help us to protect the security of your account;
- Prevent, detect, and investigate potentially prohibited or illegal activities and to enforce our terms and policies;
- Personalize and improve the Product, and provide content, communications, or features that match users interests; and
- Link or combine with other information we obtain from third parties to help understand your needs and provide you with better service.

We reserve the right at all times to review your content and information to help resolve problems with our software or Product.

Information we may share: We will never “sell” your personal information (as that term is defined in the Massachusetts Consumer Privacy Act). However, we may share your personal information with third parties as follows:

- **Service Providers:** We use other companies, agents, or contractors to perform services on our behalf or to assist us with the provision of services to you. For example, we engage service providers to provide marketing, advertising, communications, security, payment processing, infrastructure and IT services, to customize, personalize, and optimize our Product, to process payment transactions, to provide customer service, and to analyze and enhance data. While providing such services, these service providers may have access to your personal information. These service providers have agreed to maintain the confidentiality, security, and integrity of the personal information that they obtain from us and we do not authorize them to use or disclose your personal information except in connection with providing their services.
- **Protection of EXM and others:** EXM and its service providers may disclose and otherwise use your personal information where we or they reasonably believe such disclosure is needed to (i) satisfy and applicable law, regulation, legal process, or governmental request; (ii) enforce applicable terms of use, including investigation of potential violations; (iii) detect, prevent, or otherwise address illegal or suspected illegal activity, security, or technical issues; or (d) protect against harm to the rights, property, safety of EXM, our users, or the public, as required or permitted by law.
- **Business transfers:** In connection with any reorganization, restructuring, merger, or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to respect your privacy in a manner that is consistent with our Privacy Policy.
- **Other Users:** Content that you create, upload, or copy into our Product, may, if you choose, be read, copied, used, and distributed by people you know, your members, or people you don't know. Information that you disclose using the chat function of the Product may be read, copied, used, and distributed by people participating in the chat. Use care when including sensitive information, such as home addresses or phone numbers, in content you share or chat sessions.
- **With Your Consent:** We may share your personal information when we have your consent.

Whenever in the course of sharing information, we transfer personal information to countries within the European Economic Area or other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection.

Advertising and analytics services provider by others: We may allow others to provide analytics services and display advertisements for our Product. These providers (for example, Google Analytics) may use cookies, web beacons, device identifiers, and other tracking technologies that collect information about your use of our Product. This information may be used by us and others to determine the popularity of our Product, deliver advertising and content targeted to your interests in the Product, and on other websites, apps, and other services, and to better understand your online activity. You can find out more about this practice or opt out of your web browsing activity for interest-based advertising purposes by visiting <https://aboutads.info/choices>. You can opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout>.

Where We Store Your Personal Data

Data Storage: All data that you provide to use through our Product is stored on our secure servers located in the U.S. Any payment transactions will be encrypted using SSL technology; all payment data is stored by our payment processors and is never stored on our servers. Where we have given you (or where you have chosen) a password that enables you to access your account and the Product, you are responsible for keeping this password confidential. We recommend that you not share your password and that you change it frequently.

Data Security: EXM takes reasonable measures to protect your personal information and your content from loss, misuse, and unauthorized access, disclosure, modification, and destruction and to ensure that your content remains protected and available to you. Unfortunately, the transmission of data via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted through the Product. All transmissions are at your own risk.

Data Retention: EXM stores the information we collect for as long as necessary for the purpose for which it was originally collected and in compliance with our legal obligations. The retention periods applied by EXM comply with applicable legislation then in effect, namely:

- For data relating to your account and personal usage, such data will not be retained beyond your request that your account be deleted.

- For transactional data relating to your purchases, such data is kept for the entire period of our contractual relationship, then in accordance with legal obligations and applicable statute of limitations periods. Please note that this data does not include payment card information, which is processed by our third-party payment processors and not EXM.
- For data collected based on your consent to receive marketing communications, we will use the data until you withdraw your consent or applicable law requires that such data is no longer used.
- For data collected in connection with your requests or questions, such data is kept for the period necessary to process and reply to your request or question.
- When cookies or other trackers are placed on your computer, they may be retained for a period of 12 months.

We may retain certain information for legitimate business purposes or as required by law.

Proprietary / trade secrets added by our customers

Customers using our platform may at times upload information that they consider to be proprietary or trade secret to their business or practice. This information will be treated as confidential and proprietary to the customer. Information that you may add to the platform will not be shared with other customers of the platform except for those invited to the platform by the customer in question for the purpose of sharing this information.

Our Customers' Information

In order to power our customers' businesses, we collect and use personal information about their users. Legally speaking, we are a "data processor" and a "service provider" as these terms are used in European and Massachusetts Consumer Privacy Act. We will never use the personal information from our customers' users to independently market or advertise to individuals unless such individuals are also using our Services directly. We also will not "sell" your customers' information, as that term is defined in the Massachusetts Consumer Privacy Act.

Our customers decide how the personal information of their users are processed, so we urge them to make full and complete disclosure about their processing activities. Our customers are advised to, at a minimum, post a privacy policy on their websites that describes how they collect, use, and share the personal information of their users. We

do not provide any customers with legal advice and we urge all of our customers to retain competent legal counsel suitable for their businesses and legal needs.

Third Parties

Third-parties who provide and/or publish content via our Product shall be deemed the data controllers for any personal data contained in the content uploaded by any such party to the Product (“**Third-Party Content**”) and any other personal data processed in relation to such **Third-Party Content**. This Privacy Policy only concerns the processing for which EXM is the data controller. If you have any questions regarding personal data contained in Third-Party Content, please contact the third-party provider responsible for such Third Party Content.

Children Age 16 and Under

EXM’s Product is not directed at children under the age of 16 and we never knowingly collect personal information from children. We recognize the special obligation to protect personally identifiable information obtained from children age 13 and under. **IF YOU ARE 16 YEARS OLD OR YOUNGER, THE COMPANY REQUESTS THAT YOU NOT SUBMIT ANY PERSONALLY IDENTIFIABLE INFORMATION TO THE SITE OR TO EXM.** If we discover that a child age 16 or younger has signed up for our Product or provided us with personally identifiable information, we will delete that child’s identifiable information from our records.

EXM nonetheless encourages parents to go online with their kids. Here are a few tips to help make a child’s online experience safer:

- Teach kids never to give personal information, unless supervised by a parent or responsible adult. Includes name, address, phone, school, etc.
- Know the sites your kids are visiting and which sites are appropriate.
- Look for Website privacy policies. Know how your child’s information is treated.
- Check out the FTC’s site for more tips on protecting children's privacy online.

How We Use “Cookies” and Other Tracking Technologies

We use cookies, which are pieces of information that a website transfers to an individual's computer hard drive for record keeping purposes, and similar tracking technologies on our website and when providing our Product. Cookies make using our website easier by, among other things, saving your passwords and preferences for you. These cookies are restricted for use only on our website, and do not transfer any personal information to any other party.

Your Choices and Rights

You have several options with respect to your personal information, as follows:

- You may terminate your use of the Product at any time. However, please note that EXM may still process your personal information as a service provider to our customers if your personal data.
- If you have created an account, you may at any time access, edit, or delete your personal information. Please note that even if you delete information from your account, or deactivate your account, we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of your information for a certain period of time.
- If you do not have a user account and wish to delete your email address or other personal information that you might have provided through your use of our Product and/or any other services, please email us at: info@exmantra.com with the words "Delete My Information" in the subject line.

Malware/Spyware/Viruses

We do not knowingly permit the use of malware, spyware, viruses, and/or other similar types of software.

Links to External Sites

Our Product may, from time to time, contain links to and from third party websites, such as partners, affiliates, and advertisers. If you follow a link to any external website, it will have its own privacy policy and we are not responsible for the content or practices of such third party websites or their policies. We are also not responsible for any information that you might share with such linked websites. You should refer to each website's respective privacy policy and practices before you submit any personal information.

Transfer of Information Across National Borders:

For users located outside the jurisdiction of the United States, EXM operates and processes data in the United States. Information we collect from you will be processed in the United States, and by using this website you acknowledge and consent to the processing of your data in the United States. The United States has not received a finding of “adequacy” from the European Union under Article 41 of the GDPR. We collect and transfer to the U.S. personal data only with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of ours in a manner that does not outweigh your rights and freedoms. When we transfer your personal information to other countries, we will protect that data as described in this Policy or in our agreement with you and take steps, where necessary, to ensure that international transfers comply with applicable laws.

Residents of the European Economic Area

We provide the representations and information in this section in compliance with European privacy laws, in particular the European General Data Protection Regulation (GDPR). If you are a visitor from the European Territories (including the European Economic Area, Switzerland, and the United Kingdom), our legal basis for collecting and using the personal data described above will depend on the personal information concerned and the specific context in which we collect it.

We will normally collect personal data from you where the processing is in our legitimate interests. In some cases we may collect, and process personal data based on consent.

EU data subjects have certain rights with respect to your personal data that we collect and process. We respond to all requests we receive from individuals in the EEA wishing to exercise their data protection rights in accordance with applicable data protection laws.

- **Access, Correction or Deletion.** You may request access to, correction of, or deletion of your personal data. You can often go directly into the Service under Account Settings to take these actions.
- **Objection.** You may 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes and may do so using the options provided in this

Policy. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Restriction.** You have the right to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Portability.** You have the right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw Consent.** If we have collected and processed your personal data with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- **File a complaint.** You have the right to file a complaint with a supervisory authority about our collection and processing of your personal data. To file a request or act on one of your rights, please contact us at the contact details provided below. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

To submit a request regarding your European Privacy Rights, please see the instructions at the end of this Privacy Policy. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

General Data Protection Regulation (GDPR) - European Representative: Pursuant to Article 27 of the General Data Protection Regulation (GDPR), we have appointed European Data Protection Office (EDPO) as its GDPR representative in the European Economic Area. You can contact EDPO regarding matters pertaining to the GDPR by:

- Sending an email to privacy@edpo.brussels
- Using EDPO's online request form at <https://www.edpo.brussels/contact>
- Writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium

If you are a resident of the European Economic Area and have a data privacy concern that we are unable to resolve, you have the right to file a complaint/inquiry with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see:

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

UK General Data Protection Regulation (GDPR) – UK Representative: Pursuant to the UK GDPR, EXM has appointed EDPO UK Ltd as its UK GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- Using EDPO UK's online request form: <https://edpo.com/uk-gdpr-data-request/>
- Writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

Do Not Track Disclosure

Regulatory agencies such as the U.S. Federal Trade Commission have promoted the concept of Do Not Track as a mechanism to permit Internet users to control online tracking activity across websites through their browser settings. Since no industry standard has been adopted, we currently do not process or comply with any web browser's "do-not-track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit the EXM website or use our Product.

Changes to Our Privacy Policy

We may update this Privacy Policy to reflect changes to our data practices. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on our website or in the Product prior to

becoming effective. We encourage you to periodically review this page for the latest data on our privacy practices.

Contact Information for Complaints or Concerns

We welcome your questions, comments, and requests regarding our Privacy Policy and they should be addressed to info@exmantra.com. In the alternative you may reach EXM customer support at **203-940-3751**. Our physical address is 67 Forest Street, Suite 270 #319, Marlborough, MA 01752 Attn: Data Protection Officer

Your Acceptance of These Terms

By using our website or Product, you accept the policies and restrictions set forth in this Privacy Policy. If you do not agree to this policy, please do not use the website or the Product.