

## **Privacy Policy - PeopleBrowsr Pty Ltd**

*Last Updated April 2023*

The protection of your personal data (hereinafter also referred to in short as “data”) is a major and very important concern for us. Below, we would like to inform you in detail about which data are collected during your visit to our website and your use of our offers there, and how we subsequently process or use these data. We would also like to inform you about the respective protective measures we have taken from a technical and organizational point of view.

Please note that this Privacy Policy may be updated from time to time due to the implementation of new technologies and/or due to legislative changes. We will notify you as appropriate. We will, of course, duly take your interests into account when making changes.

Please also note our data policy in the Terms of Service to which this Privacy Policy applies in addition. The purpose of that policy is to inform you about how personal data are processed when a domain is registered.

Information regarding the EU General Data Protection Regulation (“EU-GDPR”) refers exclusively to citizens of the European Union/European Economic Area.

Information regarding the UK General Data Protection Regulation (“UK-GDPR”) refers exclusively to citizens of the United Kingdoms.

### **A. General information**

#### **1. Controller, Contacts, Data Protection Officer, Representative in EU, Representative in UK**

If you have any questions regarding data protection and/or if you wish to assert your rights under data protection law, you can contact us at the following contact details.

##### **a) Controller**

The controller in accordance with Art. 4 N° 7 of the GDPR is

#### **PeopleBrowsr Pty Ltd**

Level 6, 1 Chifley  
Square, Sydney, NSW  
2000 Australia  
Phone: +1 804 767 7542  
Email: [contact@peoplebrowsr.com](mailto:contact@peoplebrowsr.com)

This entity is represented by John Rich (CEO).

##### **b) Contacts**

1. Janine Pearson  
Finance Manager  
Level 6, 1 Chifley Square, Sydney, NSW 2000 Australia  
Phone - +61 460876675

Email - [janinepearson@peoplebrowser.com](mailto:janinepearson@peoplebrowser.com)

2. Isaac French

Finance Manager  
Level 6, 1 Chifley Square, Sydney, NSW 2000 Australia  
Phone - +61 436926678  
Email - [isaacfrench@peoplebrowser.com](mailto:isaacfrench@peoplebrowser.com)

**c) Data Protection Officer**

You can contact our Data Protection officer at

Data Protection Officer  
Level 6, 1 Chifley Square, Sydney, NSW 2000  
Australia. [andrewhorn@peoplebrowsr.com](mailto:andrewhorn@peoplebrowsr.com)

**d) EU-Representative (EU-GDPR)**

Our representative according to Art. 13 GDPR is

Rickert Rechtsanwaltsgesellschaft mbH  
Colmantstraße 15  
53115 Bonn  
Germany  
[art-27-rep-peoplebrowsr@rickert.law](mailto:art-27-rep-peoplebrowsr@rickert.law)

**e) UK-Representative (UK-GDPR)**

Our representative according to Art. 27 GDPR is

Rickert Services Ltd UK  
PO Box 1487  
Peterborough  
PE1 9XX  
United Kingdom  
[art-27-rep-peoplebrowsr@rickert-services.uk](mailto:art-27-rep-peoplebrowsr@rickert-services.uk)

**2. Personal Data we Process**

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site, place an order, subscribe to the newsletter, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, phone number, credit card information. For details please refer to B. and C.

**3. Relevant Legal Bases for Processing Your Data**

Unless the legal basis is not explicitly stated in the Privacy Policy, the following shall apply to

the processing of data under our responsibility:

- Insofar as we obtain the data subject's consent for the processing of personal data, Article 6 (1) clause 1 lit. a GDPR shall serve as a legal basis.
- If it is necessary to process personal data for the fulfillment of a contract for in return for payment or free of charge, Article 6 (1) clause 1 lit b GDPR shall serve as a legal basis. This shall also apply to processing operations necessary for the implementation of pre-contractual measures.
- If the processing is necessary for the fulfillment of a legal obligation to which we are subject, Article 6 (1) clause 1 lit. c GDPR shall serve as a legal basis.
- If the processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and fundamental freedoms of the data subject do not outweigh the above-mentioned interests, Article 6 (1) clause 1 lit f GDPR shall serve as the legal basis for the processing.

#### **4. Retention Periods**

The data processed by us will be erased or their processing will be restricted in compliance with the legal regulations, in particular according to Articles 17 and 18 GDPR. Unless expressly stated in the context of this Privacy Policy, we will erase data stored by us as soon as they are no longer required for their intended purpose. Data will only be retained beyond the time they are no longer needed for their intended purpose if this is necessary for other legally permissible purposes or if the data must be retained longer due to statutory retention obligations. In these cases, processing is restricted, i.e. blocked, and the data are not processed for other purposes. A statutory retention obligation exists, for example, due to documentation obligations under tax and corporate law. In certain cases, a longer retention period may be necessary, for example, for the purpose of preserving evidence.

#### **5. Processors and Recipients of Data (Do not Sell my Data)**

In some cases, we use external service providers for the processing of your data; as processors according to Art. 4 N° 8 GDPR, they are bound by our instructions under data protection law in accordance with Article 28 GDPR. These service providers are - if not marked as "Third Parties" - our processors and assist with processing of your personal data, for example, to provide this website.

These processors have been carefully selected and authorized and are regularly monitored. The authorizations are based on agreements for data processing in accordance with Article 28 GDPR. The data processors do not perform any independent processing for their own purposes. For information on the processors used, see B. "Processing when visiting our website".

Under B. you will also find information on Third Parties to whom we transfer data. We do not sell, trade, or rent Users personal identification information to others.

#### **6. Your Rights (GDPR)**

Where GDPR is applicable, data subjects may assert the following rights free of charge against any controller for the processing of your personal data in accordance with Art. 4 N° 7 GDPR, including us, in accordance with the statutory provisions:

- The right to withdraw your consent (Art. 7 (3) GDPR)
  - Right of access: You may request access to your personal information that we process according to Art. 15 GDPR.
  - Right to object: You have a right to object for special reasons. You have the right to object to the processing of your personal data at any time for reasons relating to your special situation, which is defined in Art. 6 (1) clause 1 lit. f GDPR. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims. The collection of data for the provision of the website and the storage of the log files are absolutely necessary for the operation of the website.
  - Right to rectification: If the information concerning you is not (or no longer) accurate, you may request a rectification under Article 16 GDPR. If your data is incomplete, you may request their completion;
  - Right to erasure: You can request the erasure of your personal data under Article 17 GDPR.
  - Right to restriction of processing: Under Article 18 GDPR, you have the right to request a restriction on the processing of your personal data.
  - Right to data portability: In the event that the conditions of Article 20 (1) GDPR are met, you have the right to receive or have a third party receive the data that we process automatically on the basis of your consent or in the performance of a contract. The collection of data for the provision of the website and the storage of the log files are absolutely necessary for the operation of the website. They are, therefore, not based on consent under Article 6 (1) lit. a GDPR or on a contract under Article 6 (1) lit. b GDPR but are justified under Article 6 (1) lit. f GDPR. The conditions of Article 20 (1) GDPR are therefore not met regarding these data.

To assert your rights, please refer to the contact details listed above under “Controller”.

Pursuant to Art. 77 et seqq. GDPR, you also have the right to lodge a complaint about the controller's processing of your personal data with a supervisory authority responsible for data protection.

## **7. Data Security**

We use appropriate technical and organizational security measures to protect the data you provide from accidental or intentional manipulation, loss, destruction or access by unauthorized persons.

These security measures are continuously improved in line with technological developments. In addition, all employees and vicarious agents are required to keep data confidential. Our security measures are continuously improved in line with technological developments.

For example, your personal data is securely transmitted by means of encryption. This applies to any entry of personal data via our website. For this purpose, we use the [TLS/SSL encoding](#) system.

## **B. Processing when Visiting our Website**

### **1. Server Log Data**

It is not necessary that you actively provide personal data if you are visiting our website for informational purposes only. In this case, we only collect and use only the data your Internet browser automatically transmits to us. This happens every time you visit our website whether or not you disclose further information, for example, via the contact form. These data include the following:

- Date and time of access
- Host name of the accessing computer
- Website from which the website was accessed (previously visited page)
- Websites accessed from the site
- Pages visited on our website
- Message whether a page retrieval was successful
- Amount of data transferred
- Information about the browser type and version used
- Operating system
- IP address.

The data are processed on our servers; please refer to "Host Provider" below. Unless expressly stated, we do not process these data combined with personal data other than those listed above. It is necessary for the system to temporarily store the IP address to enable the delivery of the website to your computer. Your IP address is only accessible to administrators of this website. After 72 hours at the latest, your log data will be deleted so it is no longer possible to identify you by tracing the Internet connection.

For the offer on a website, the temporary processing of the aforementioned data, in accordance with Art. 6 (1) clause lit. b GDPR, is technically necessary in order to display our website correctly.

We store log files with your anonymized IP address to defend ourselves against threats, to protect our IT security and as evidence of possible attacks. Our legitimate interest in data processing is based on these purposes as well. We do not perform a personal analysis of the data, in particular, for marketing purposes. The legal basis for this is Article 6 (1) lit. f GDPR.

### **2. Host Provider, Content Delivery Network**

Our web pages are stored and provided by the servers of our host provider IBM Cloud. The host provider processes, in particular, inventory data, contact data, content data, contract data, usage data, and metadata as well as communications data of visitors or customers of the website. The legal basis is formed by our legitimate interests in the efficient and secure provision of the website offers according to Art. 6 (1) clause 1 lit. f GDPR. The host provider has been contractually obliged by means of a data processing agreement under Article 28 GDPR to process personal data only according to our instructions.

We use a "Content Delivery Network" (CDN). A CDN is a service that allows the content of an online offer, especially large media files such as graphics or program scripts, to be delivered faster and more securely with the help of regionally distributed servers connected

via the Internet. For this we use the providers Amazon Cloudfront, 410 Terry Avenue North, Seattle, WA 98109, USA; and KeyCDN, Färberstrasse 9, Wollerau, Switzerland. The use is based on our legitimate interests, i.e. interest in a secure and efficient provision, analysis and optimization of our website in accordance with Art. 6 Clause 1 lit. f. GDPR. Cloudfront is certified under the Privacy-Shield-Agreement and thus offers a guarantee to comply with the European data protection law

(<https://www.privacyshield.gov/participant?id=a2zt0000000GnZKAA0&status=Active>).

Further information can be found in the AWS privacy policy at

<https://aws.amazon.com/privacy/>.

Information on KeyCDN's privacy policy and GDPR compliance can be found at

<https://www.keycdn.com/privacy> and <https://www.keycdn.com/gdpr>.

### **3. Contact**

If you have any suggestions or problems with the use of this website or our services, we look forward to any form of contact. You may also contact us if you would like to request a dispute entry.

The processing of your data in the context of contact made by email, a contact form or by telephone takes place on the basis of your (presumed) consent in accordance with Art. 6 (1) clause 1 lit. a, Article 7 GDPR or in accordance with Article 6 (1) clause 1 lit. b GDPR insofar as the contacts are related to contractual performance obligations such as the request of a dispute entry. In order to contact us via our form, we only need the information marked as a required field and in particular your email address in order to be able to reply to you. In addition, the categories of data listed in "log files" are processed. If you want to request a dispute entry, we also need your further contact details (last name, first name, address, name of the company) as well as a description of your request, stating the domain in question.

We will delete your contact requests immediately after processing unless statutory retention periods require continued retention.

### **4. Newsletter**

We would be happy to provide you with further information about our products, promotions or other offers through our newsletter. To be able to send you our newsletter, we process your email address. In order for us to address you in a personalized manner, you are welcome to provide your name or additional data. As part of the registration process, we use the so-called double-opt-in process. After your registration, you will be sent an email to the email address provided in which we ask you to confirm that you would like the newsletter to be sent to you. This is done by clicking on a link included in that email.

The legal basis is your consent, Art. 6 (1) clause 1 lit. a and Art. 7 GDPR. Your data will be deleted as soon as they are no longer necessary for the purpose for which said data were collected. You may withdraw your consent at any time by sending an email to the addresses indicated in this privacy policy or in the legal notice or by following the instructions at the end of an advertising email.

In addition, we are entitled to keep your IP addresses and dates of registration and confirmation in order to prove your registration and, if necessary, to clarify any possible misuse of your personal data. The legal basis for this is Article 6 (1) clause 1 lit. c.

To send the newsletter, we use HubSpot (Hubspot Inc., 25 First Street, Cambridge, MA 02141 USA). For more information about how Hubspot works, please refer to Hubspot Inc.'s Privacy Policy, available at <http://legal.hubspot.com/de/privacy-policy>.

## **5. Cookies and Integrated Third-Party Offers**

We use the cookies technology for our website. Cookies are small text files that are sent to your browser by our web server during your visit to our website and that are kept on your computer for later retrieval. You can determine whether and to what extent cookies can be set and retrieved by adjusting the settings in your browser. Persistent cookies may be stored on your computer after your visit, and our website may access them every time you visit our websites (so-called "ID Cookies").

Some cookies that are stored when you visit our websites may be stored and retrieved by other companies.

We use so-called session cookies (also known as temporary cookies), i.e. those that are cached exclusively for the duration of your visit to one of our web pages. For the full functionality of our website, it is necessary for technical reasons to allow the aforementioned session cookies. The purpose of these cookies is to continue to identify your computer during a visit to one of our websites when switching from one of our web pages to another and to be able to determine the end of your visit.

Persistent cookies are automatically deleted after a predetermined period of time, which may vary depending on the cookie. You may delete the cookies in your browser's security settings at any time.

The legal basis for the use of cookies, plugins and other third party offers is Art. 6 (1) clause 1 lit. f) GDPR, unless otherwise stated. Our legitimate interest lies in optimizing our website and operating it economically.

### **a) Analytics**

#### **1. Google Analytics Cookies**

We use Google Analytics Cookies to help measure how users interact with the website content.

#### **2. Facebook Pixel**

We use Facebook Pixel to improve conversion optimization by creating targeted campaigns for our audience.

### **b) Integrated Plugins, Elements and Tools**



We integrate on our website various elements and tools from providers that we have obliged via a Data Processing Agreement to process your data only on our instructions. When you visit a page, your browser loads it from the provider's servers. Your IP address and the URL (Internet address) of the Internet page visited is transmitted to these servers. You can also prevent the loading of the plugins completely with add-ons for your browser, e.g. with the script blocker "NoScript" (<http://noscript.net/>).

- a. Fonts are loaded at the services "Google Fonts" and "Font Awesome". The use of Google Fonts and Font Awesome is done in the interest of a uniform and attractive design of our website. Further information can be found at <https://developers.google.com/fonts/faq> <https://www.google.com/policies/privacy/> and <https://fontawesome.com/privacy>.
- b. We use the service "ReCaptcha" to recognize bots, for example when entering data in online forms. Provider is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. More information at <https://www.google.com/policies/privacy/> you can opt-out at <https://adssettings.google.com/authenticated>.
- c. Portis Wallet - Allow users to connect a Digital Wallet to their account on NFT Related Applications such as App.NFT.Kred. More information at <https://www.portis.io/faq>
- d. LiveChat - Used as a customer service platform to allow users to report malfunctions on PeopleBrowsr Platforms

### **c) Social Plugins**

We have implemented several social media plugins on our website. When you visit our site, your IP address and the URL (Internet address) of the visited website are sent to the servers of the social media platforms to load content. If you are a member of the social networks, it is possible that the operators record your visit to our website and assign it to your profile. This can also happen if you are not logged into your social media profile. You can also prevent the loading of the plugins completely with add-ons for your browser, e.g. with the script blocker "NoScript" (<http://noscript.net/>).

1. Twitter Social Plugin - Used to allow users login to PeopleBrowsr's Applications via Twitter Platform, as well as to have users' social interactions scored under a Social Influence and Outreach Score on Kred Platform. This Plugin is provided by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103. For the purpose and scope of data collection and the further processing and use of the data by Twitter, as well as your rights in this regard and setting options to protect your privacy, please check the Twitter's privacy policy: <https://twitter.com/privacy>
2. Facebook Social Plugin - Used to compute users' social interactions scored under a Social Influence and Outreach Score on Kred Platform. Facebook is provided by Facebook Inc, 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). An overview of the Facebook plugins and

their appearance can be found here:

<https://developers.facebook.com/docs/plugins>. For the purpose and scope of data collection and the further processing and use of the data by Facebook, as well as your rights in this regard and setting options to protect your privacy, please check Facebook's privacy policy: <https://www.facebook.com/policy.php>

3. Vimeo - Used to play videos on PeopleBrowsr Sites. This service is provided by Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA. For more information on how to handle user data, please refer to the Vimeo Privacy Policy at <https://vimeo.com/privacy>.
4. YouTube - Used to play videos on PeopleBrowsr Sites. YouTube is a service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. More information can be found at <https://policies.google.com/privacy>.

## **6. Automated Decision Making, Profiling**

We do not use automated decision making, including profiling, when you visit our website.

## **7. Third party websites**

You may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

## **C. Processing of Personal Data for the Fulfillment of Contractual Obligations**

### **1. Description of Processing, Legal Basis, Purposes**

We process your data on the legal basis of Article 6 (1) clause 1 lit. b GDPR for the fulfillment of contracts or the implementation of pre-contractual measures, i.e. for the administration, planning, execution and handling of business relationships, to which the data subject is a contractual party. This also applies to processing operations necessary for the performance of pre-contractual measures.

For the purpose of order organization and execution, we process, for example, contact data (first name, last name, email address, telephone numbers, company name, customer number) of contact persons, payment and invoice data, order data including order history (order and confirmation date, order number, customer number), data on maintenance as well as warranty and guarantee work and those categories of data which we require for the enforcement or defense of legal claims. We may use the email address to send information and updates pertaining to their order. It may also be used to respond to their inquiries, questions, and/or other requests.

If you decide to opt-in to our mailing list, you will receive emails that may include company news, updates, related product or service information, etc. You may withdraw your opt-in at any time. Legal basis is Article 6 (1) clause 1 lit. a, Article 7 GDPR.

On the basis of Article 6 (1) clause 1 lit. f GDPR, we process your data to protect our legitimate interests, for example to carry out marketing measures, market analyses, surveys, insofar as this is necessary to assert legal claims and for legal defence, or for accounting purposes.

Please note that you can object to the processing based on our legitimate interests at any time.

## **2. Recipients**

We may use the information Users provide about themselves when placing an order only to provide service to that order. We do not share this information with outside parties except to the extent necessary to provide the service or where there is a legal obligation to do so, for example to pass on information to authorities. This concerns in particular the transfer of your payment data to payment providers.