

PRIVACY POLICY

Effective Date: March 5, 2023

This Privacy Policy or “**Policy**” explains how use of the website (the “**Website**”) of Headframe Technologies – FZCO (the “**Headframe**” or “**us**” or “**we**”) collect and protect Website user’s (“**you**”) Personal Information (as defined below).

1. Updates and Changes to Our Privacy Policy

Please note that, in the event of a change in policy, a revised Policy will promptly be posted to the Website. You agree to accept posting of a revised Policy electronically on the Website as actual notice to you. Any dispute over our Policy is subject to this notice.

2. How and Why We Gather Information

When you sign up to participate on a Website, you may be asked to provide information such as your full legal name, address and date of birth, along with other Personal Information that is required to verify your identity and fulfill our legal and regulatory requirements. This information will also be used to transact your business and communicate with you. From time to time, we may request additional information to help us further assess your needs and preferences (the “**Personal Information**”).

3. How We Protect Your Information

We limit access to the Personal Information you provide us to those employees who need access to that information. In keeping with industry standards and practices, we maintain appropriate physical, electronic and procedural safeguards, and controls designed to protect your Personal Information.

We have invested in software, systems and procedures aimed at offering you a safe and secure transaction environment and protect your personal, financial and historical transaction information. While no security system is absolutely impenetrable, we plan to constantly review, refine and upgrade our security technology as new tools become available.

4. The Importance of Being Accurate

We have security standards and procedures in place designed to prevent unauthorized access to your Personal Information. A key part of this process helps ensure that the Personal Information we have about you is accurate and up-to-date. If you ever discover inaccuracies in our data or if your Personal Information changes, we urge you to notify us immediately. We only use your Personal Information as appropriate to provide you with quality services and to ensure security. For example, we may use the information collected from you to verify your identity and contact information.

5. An Ongoing Commitment to Your Privacy

We are committed to protecting your privacy. If you choose to stop receiving updates and messages from Headframe, your Personal Information will continue to be protected by the privacy policies and principles described in the then-current version of this Policy.

6. We Limit the Sharing of Information

To protect your privacy, we limit the sharing of your Personal Information outside of Headframe and our direct subsidiaries. We conduct our business with great respect for

the confidential nature of the information being provided. We will not share Personal Information about you except as outlined below:

- To help us provide our services to you and/or to improve our services, we engage qualified and reputable third parties to help us to carry out certain functions such as account processing, client services and/or data collection relevant to our business.
- We may share information with our affiliates if the information is required to provide the services you request. An affiliate is a company that we own or control, or with which there is common ownership with us.
- Headframe also reserves the right to disclose your Personal Information where required by law to regulatory, law enforcement or other government authorities, including during routine regulatory examinations. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

7. Reviewing, Changing or Correcting Information

You are responsible for helping us to maintain the accuracy and completeness of your Personal Information and other data. We urge you to review your information regularly to ensure that it is correct and complete. If you would like to review your Personal Information or if you believe that any of your Personal Information is incorrect, or if you have any questions regarding your Personal Information, or this Privacy Policy, please contact us at support@headframe.io.

8. Third Party Websites

If at any time you choose to purchase a product or service offered by another company, any Personal Information you share with that company will be subject to the privacy policies of the applicable third-party companies and will not be controlled by our Privacy Policy. Other than as described above, we are not responsible for the privacy policies or the content of third party websites and/or services (each, a “**Third Party Service**”) we link to, and have no control of the use or protection of information provided by you or collected by those Third Party Services. Whenever you elect to hyperlink to a Third Party Service, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third-party, and you should familiarize yourself with the privacy policy provided by that party.

9. Privacy and the Internet

The following additional information will be of interest to you if you access a website and/or one of our affiliates’ products or services through one or more of our Websites:

The Websites are built upon an infrastructure with multiple layers of protection, including physical security of our equipment to system intrusion detection capabilities. Within such our sites, we use industry standard encryption technologies to help safeguard your information.

Security is a cooperative effort between us and the users of the Websites. Please remember that your user identification and password are personal to you and should not be made available to any other person. Also, you should discontinue

their use and notify us if you have any reason to suspect that someone else may be using them.

“Cookies” are small text files that may be placed on your web browser when you visit our websites. Cookies make it easier for you to navigate our website by, among other things, “remembering” your identity so that you do not have to input your password multiple times as you navigate between our Website pages and/or access our services. Authentication (i.e., verifying that you are who you say you are) is an essential component of site security. You can set your web browser to inform you when cookies are set, or to prevent cookies from being set. Please note that if you decline to use cookies, you may experience reduced functionality, slower site response times, and declining to use our authentication-related cookies may prevent you from using our Website altogether.

Web surfing data (e.g., information regarding which of our Websites’ web pages you access, the frequency of such access, and your product and service preferences) may be collected by Headframe, or by our service providers. This may be accomplished by using cookies, web beacons, page tags or similar tools that are set when you visit our Website. Web surfing data and similar information may be shared internally within Headframe and used: for administrative purposes; to assess the usage, value and performance of our online products and services; to improve your experience with our Websites; and as otherwise permitted by applicable law or regulation. If you are a Headframe client, this information helps us suggest products or service offerings that may be of interest to you. This information may be processed by us for the purposes described above, or on our behalf by Third Party Services, solely in accordance with our instructions.

Websites may include social media features (“**Features**”), such as various social media ‘like’ buttons and widgets, so called ‘share this’ buttons or interactive mini-programs that run on our Websites (“**Widgets**”). These Features and Widgets may collect your IP address, which page you are visiting on a Website, and may set a cookie to enable the Feature or Widget to function properly. Social media Features and Widgets are either hosted by a third party or hosted directly on a Website. Your interactions with these Features and Widgets are governed by the privacy policy of the company providing it.

10. Do Not Track Signals

We do not currently respond to web browsers’ ‘do not track’ signals that provide a method to opt out of the collection information about visitors’ activities on the Websites, and across other websites. If we do so in the future, we will provide all relevant information in this Privacy Policy.

11. Third Party Data Collection

We may authorize certain third parties, including, without limitation, Google Analytics, Chartbeat and Mixpanel, to track usage and collect information about users and their activities on the Websites.