### PRIVACY POLICY

Last Updated December 9, 2020

Thank you for visiting Social Stack Pro! This privacy policy (the "Privacy Policy") explains how Social Stack Pro, Inc. ("Social Stack Pro", "we," or "us") collects, uses, shares, and protects information of the users of Social Stack Pro's websites and mobile or other software applications where this Privacy Policy is posted (collectively, the "Site"). This Privacy Policy is designed to fulfill our legal obligations in the places where we operate—including, without limitation and where applicable, the California Consumer Privacy Act (CCPA), the General Data Protection Regulation (GDPR), and Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

By using the Services, you acknowledge you have read and understand the terms of this Privacy Policy and our separate Terms and Conditions. If you do not agree with our practices, do not use or access the Services. Capitalized terms that are not defined in this Privacy Policy have the meaning ascribed to them in the Terms and Conditions.

Please note that this Privacy Policy only applies to the Site, and not to websites, applications, operating systems, or other platforms of third parties (collectively, "**Third-Party Platforms**"), even if such Third-Party Platforms are linked to or accessible from the Site. Each Third-Party Platform will have its own data collection and usage practices, and may use their own cookies, web beacons, and other technology to collect information from you. We are not responsible for the content or practices of any Third-Party Platforms and, if you choose to visit or use them, you do so at your own risk.

### 1. Who controls your information?

Any information or other data provided to or gathered is controlled by:

Social Stack Pro, Inc. 755 Grand Blvd., #B105-285 Miramar Beach, FL 32550 United States contact@socialstackpro.com

### 2. Information We Collect and How We Collect It

"**Information**," as used in this Privacy Policy, means personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular user or household. Examples include your name, mailing address, email address, or IP address.

Social Stack Pro collects and/or has collected the following categories of information about you, and other users of the Site:

### Information You Provide to Us.

We collect information from you when you voluntarily provide it to us through the Site and Services including:

- Account Information. If you create an Account, you will be required to provide a
  username and password. You may also be asked to provide additional information like
  your full name, email address, and profile picture.
- <u>Content You Submit.</u> We collect information from you that you voluntarily submit when using the Services for example, your posts and comments (your "Content"). Your

- Content may include text, links, images, videos, and other personal information that you choose to share, whether with us or publicly (as discussed more fully below).
- Transactional Information. When you purchase the Services, you will be asked to provide a third-party payment processor (e.g. PayPal or Stripe) with certain information for payment to be processed. For example, you may be asked to provide your address, email address, bank account information, credit or debit card information, and/or any other relevant financial information. Our third-party payment processors may transfer this information to us if, for example, we need to verify your purchase, but we will not store or maintain your transactional information.
- Content You Make Public. We collect information from you that you voluntarily upload when using the Services for public display ("Public Information"), such as when you use the Services to post to your Social Media Accounts. Once you post Public Information, neither you nor Social Stack Pro are able to control how it may be used by third parties, even if you and/or we later delete such Public Information. Accordingly, you should carefully consider what personal information you choose to post publicly.
- Other Information. You may choose to provide other information directly to us, such as when you fill out a form for a contest or promotion run on the Site, or when you request assistance through our customer support, or otherwise communicate with us.

# **Information We Collect Automatically**

When you access our Site or use our Services, we may automatically collect information about you, including:

- <u>Device/Internet Connection Information.</u> When you use the Site, we automatically gather information made available by your web browser (such as Microsoft Edge or Google Chrome), internet service provider (such as Comcast or Cox), and device (such as your computer, phone, tablet, or fitness tracker), depending on your settings for each. For example, we may collect your IP address, information about the operating system or type of device you use, the device ID associated with your device, the date and time you access the Site, and your log in attempts.
- <u>Internet Activity Information.</u> We may collect information about your browsing history, search history, and information regarding your interaction with a particular website, application, or advertisement, including the Site.
- <u>Geolocation Information.</u> We may collect information about where you are located, both generally and at the time you access the Site. For example, we may collect your mailing address or ascertain your approximate location from your IP address.
- <u>Cookies.</u> We may receive information from Cookies and similar technologies. For more information about how we use Cookies and how you can disable them, please review Section 3.
- <u>Protected Class Information.</u> Due to the specific nature of Company's services, you may be asked to provide information about your race, ethnicity, nationality, gender, age, marital or family status, sexual orientation, citizenship, immigration status, or religion.
- <u>Education and Employment Information.</u> We may collect information about your educational background, employment, employment history, or salary.
- Inference Information. Company may also create new information about you by drawing
  inferences from the information identified in the categories listed above, such as to
  create a profile about you reflecting your preferences, characteristics, psychological
  trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and
  aptitudes.

<u>Information from Third Party Sources.</u> We may acquire information from third party sources to update or supplement the information that you provide or that we collect automatically or when you connect with us through a third party (including through social networks) based on your registration and privacy settings on those third party sites.

Third Party Analytics and Advertisements. We may also use third party advertisements, analytics, and tracking tools to better understand who is using the Site or Services, how people are using the Site or Services, and how to improve the effectiveness of the Site and Services. These third parties may use technologies such as Cookies, web beacons, pixel tags, or other technologies to collect and store non-personal information. They may also combine information they collect from your interaction with the Site or Services with information they collect from other sources. We do not have access to, or control over, these third parties' use of Cookies or other tracking technologies.

### 3. Cookies

"Cookies" are files that are placed on your computer or other device by websites you visit. The primary purpose of a Cookie is to identify you as a unique user of the websites you visit. Social Stack Pro uses Cookies and web beacon technology to gather device and internet connection information, internet activity information, and geolocation information. We use the following types of Cookies, some of which are placed by third parties, to customize your experience on the Site and Services:

Type of	Purpose of Cookie	
Cookie		
Necessary	Necessary Cookies are essential for the Site and Services to display and perform properly, without them the Services cannot be provided. We use Necessary Cookies to identify you, keep you logged-in, prevent security risks, and to allow you to perform account-related functions.	
Preference	Preference Cookies are used to store preferences set by you about how you like to use the Services and provide you with a more personalized experience. Preferences Cookies improve your experience using the Website.	
Analytics and Performance	Analytics and Performance Cookies collect information about how you and other users interact with the Site and use the Services, for example, pages that you visit and if you receive any error messages. This information does not identify you individually and often is aggregated and used to improve the Site.	
Advertising	Advertising Cookies are used to deliver online advertisements that are relevant to you and your interests and to measure the effectiveness of advertising campaigns. Advertising Cookies may be placed on the Site and/or Services by us or by our advertising partners with our permission.	

You can change your Cookie settings in your Internet browser (e.g., Chrome, Edge, Firefox). If you disable Cookies, some features of the Site may not function correctly. For more information, see https://www.allaboutcookies.org/.

# **Third Party Advertising Cookies**

Like many websites, we use Google services in addition to Cookies to improve the Site and advertise to you, as described more fully below. As such, when you use the Site, your personal information may be shared with Google, and shared by Google with us. You can learn more about how Google uses Cookies, and how to manage your Cookie preferences, and how to revoke your consent to Personalized Ads, by visiting the Google Cookie Policy.

Social Stack Pro may also use the Facebook Cookie to deliver Personalized Ads to you, as that term is described below. You can learn more about how Facebook gathers and uses personal information via Cookies, including how to set your Cookie preferences within Facebook, by visiting the <u>Facebook Cookie Policy</u>.

To learn more about third-party data collection and advertising practices, including how to revoke your consent to Personalized Ads, please visit the following websites:

www.youronlinechoices.com/uk/your-ad-choices

www.networkadvertising.org/choices

www.aboutads.info/choices

## 4. How do we use your information?

We may use the information we've gathered from you or your device, including through Cookies and third parties, for the following purposes:

• <u>Business Purposes.</u> When we use your information for a "Business Purpose," it means such use is reasonably necessary and proportionate to achieve an operational purpose of Social Stack Pro. The following are the Business Purposes for which we may use your information:

Business Purpose	Types of Information
For Security. We use the information we collect from you and other users to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to identify and prosecute those responsible for that activity.	Information Listed in Section 2
To Improve the Services. We use the information we collect from you and other users to improve our product offerings and services. For example, we may consider analytics, demographics, and user feedback collected via the Site in determining whether there is sufficient demand for a new product, subscription plan, or service.	Information Listed in Section 2

To Improve the Site. We use the information we collect from you and other users to provide and improve the Site. We use information to debug and identify and repair errors that impair existing intended functionality of the Site. As explained above, we use Cookies, including those placed by Third Parties, to gather statistical information that helps us understand how you and other users engage with the Site and improve its performance via technological development.	Information Listed in Section 2
To Personalize Your User Experience. We use information gathered from Cookies to authenticate your logins, determine whether you are logged in or not, to allow you to set personal preferences when using the Site, and to make it so you don't have to reenter the same information when you visit the Site several times within a short timeframe.	Information Listed in Section 2
To Communicate with You. We use your information to personalize communication with you, and to respond to your requests regarding your purchases and information on our services. We also use your information to notify you of updates to our Terms and Privacy Policy.	Information Listed in Section 2
To Create Deidentified Aggregate Information.  We may combine your information with that of other users to create "Aggregate Information"—namely, statistical information about all users or a subset thereof. Aggregate Information is pseudonymized and deidentified. In other words, Aggregate Information cannot be used to identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular consumer, including you.	Information Listed in Section 2

• <u>Commercial Purposes.</u> When we use your information for a "Commercial Purpose," it means such use is intended to advance Social Stack Pro's business interests, such as by inducing you to purchase our services. The following are the Commercial Purposes for which we may use your information:

Commercial Purp	oose	Types of Information

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To Advertise to You. We may use information	Information Listed in Section 2
gathered through Cookies and web beacons,	
including those placed by Third Parties, to deliver	
ads to you via the Site, and after you've left the Site,	
including advertisements specific to your personal	
interests. The purpose of this practice, which is	
sometimes called "Personalized Ads," "retargeting,"	
or "remarketing" is to deliver content and advertising	
that is of interest to you, and to avoid displaying	
irrelevant advertising to you.	
To Advertise to Others. We may share your	Information Listed in Section 2
reviews, comments, and other content uploaded by	
you to advertise and market our Site and the	
Services, including by reposting your reviews on the	
Site, in our advertising, or through our social media	
accounts.	
dooding.	

# Scope and Legal Bases for Use

We only process your information to the extent that is necessary to accomplish the above-stated Business and Commercial Purposes, which serves as our legitimate interest. If you reside in a location governed by the GDPR, then the following are Social Stack Pro's legal bases for the processing of your information:

In so far as we have obtained consent for processing operations of information by the data subject, Art. 6(1) lit. a GDPR serves as the legal basis. For the processing of information necessary for the performance of a contract to which the data subject is a party, Art. 6(1) lit. b GDPR serves as legal basis. The same applies to such processing operations which are necessary for carrying out pre-contractual measures. In so far as the processing of information is required to comply with a legal obligation to which our Company is subject, Art. 6(1) lit. c GDPR serves as legal basis. In the event that processing of information may be necessary to protect the vital interests of the data subject or of another natural person, Art. 6(1) lit. d GDPR serves as legal basis. If processing is necessary for the purposes of the legitimate interests pursued by our Company or by a Third Party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, processing operations are based on Art 6 (1) f DSGVO.

### 5. How do we share your information?

Social Stack Pro may share your information with third parties for the following Business and Commercial Purposes:

Third Parties	Business Purpose	Types of Information
Social Media Accounts. When you	See Section 4	Information Listed in
link one or more of your Social Media Accounts, you are authorizing us to		Section 2
share information with the Third Parties who own and operate the		

associated Social Media platforms, such as Facebook and LinkedIn.		
Service Providers. These Third Parties provide services to Social Stack Pro that allow us to operate the Site, provide the Services, communicate with customers, and so forth. Examples include social media websites like Facebook and LinkedIn, payment processors, email fulfillment providers, shipping providers, customer management services, and so forth.	See Section 4	Information Listed in Section 2
Our Affiliated Entities. Affiliated entities are different than Third Parties in that they are businesses that are directly related to us and have common ownership with us. We may disclose, transfer, and sell your information to our affiliated entities, in which event, your information shall be treated by the affiliated companies in accordance with this Privacy Policy. Should we be subject to an acquisition, merger, sale or other change of control or business entity status, we reserve the right to transfer or assign your information as part of that acquisition, merger, or sale.	See Section 4	Information Listed in Section 2
Government Officials and Private Parties Pursuant to Valid Legal Process. We may disclose your information in response to subpoenas, court orders, and other legal processes. In very rare circumstances, we may disclose personal information when we believe it is necessary in order to prevent illegal, fraudulent, or injurious actions that may cause harm to individuals.	See Section 4	Information Listed in Section 2

Third Parties	Commercial	Types of Information
	Purpose	

Advertising Partners. We may disclose your personal information as needed to our Third-Party advertising partners. For example, we may share information gathered through Cookies and tracking technology to allow a Third Party to advertise our products and services to you after you leave the Site.	See Section 4	Information Listed in Section 2
Other Consumers. We may share your reviews, comments, and other content uploaded by you to advertise and market our Site and the Services, including by reposting your reviews on the Site, in our advertising, or through our social media accounts.	See Section 4	Information Listed in Section 2

# 6. Do we sell your information to others?

**NO - Social Stack Pro does not sell consumers' Information** and has not sold consumer Information during the past twelve (12) months.

## 7. How do we protect your information?

Social Stack Pro employs technical, administrative, and physical security measures (such as SSL encryption and HTTPS protocol) that are designed to protect against the loss, misuse, and alteration of the information under our control. We regularly review our security procedures to consider appropriate new technology and methods.

However, no system can be completely secure. Therefore, although we take steps to secure your information, we cannot promise, and you should not expect, that your personal and commercial information, or other communications, will always remain secure.

The safety and security of your information also depends on you. Never share your password with anyone else and notify us at contact@socialstackpro.com if you believe your Account has been breached.

### 8. How long do we keep your information?

We store the information we collect for as long as it is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law. If you request deletion of your information, your request will be processed pursuant to Section 10.

#### 9. Data Transfers

If you are visiting the Site from a location outside of the United States, your connection will be through and to servers located in the United States, and all information you provide will be processed and securely maintained in our web servers and internal systems located within the United States. By using the Site, **you authorize and specifically consent to the transfer of your data to the United States** and its storage and use as specified above.

# 10. Do California residents have specific privacy rights and how can you exercise them?

California residents have the right to access all Information we have collected and retained about them for purposes of correcting, amending, downloading, or deleting such information. Access can be obtained by contacting us at <a href="mailto:contact@socialstackpro.com">contact@socialstackpro.com</a>.

To protect your privacy and security, we may take reasonable steps to help verify your identity before granting access, making corrections, providing you with information, or deleting information.

Below are the specific rights granted to California residents regarding access to your Information:

### **Access and Correction**

The easiest way to access and correct the Information we have collected about you is to contact us at contact@socialstackpro.com.

# Right to Request Disclosure

You have the right to request that Social Stack Pro disclose the following to you:

The categories of Information we have collected about you;

The categories of sources from which the Information is collected;

The business or commercial purpose for collecting or selling Information;

The categories of third parties with whom we share your Information; and

The specific pieces of Information we have collected about you.

To request such a disclosure, please contact us at <a href="mailto:contact@socialstackpro.com">contact@socialstackpro.com</a>.

# **Right to Request Deletion**

You have the right to request that we delete any Information about the you which we have collected from you. To make such a request, please contact us at contact@socialstackpro.com.

### **California Shine the Light Disclosure**

Under California's "Shine the Light" law, California residents who provide Information to the Site may request certain information regarding our disclosure of your Information to third parties for their direct marketing purposes. To make such a request, please contact us at <a href="mailto:contact@socialstackpro.com">contact@socialstackpro.com</a>.

### Cal. Bus. & Prof. Code § 22581 Disclosure

If you are a California resident under the age of 18, and a registered user of any Site where this privacy notice is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please contact us at <a href="mailto:contact@socialstackpro.com">contact@socialstackpro.com</a> with a detailed description of the specific content or information. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

### **Right to Non-Discrimination**

We will not discriminate against you if you exercise your privacy rights under the CCPA.

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us

to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

To exercise these rights, you can contact us by email at <a href="mailto:contact@socialstackpro.com">contact@socialstackpro.com</a>.

### 11. How do we protect the privacy of children?

We will never knowingly collect any personal information about children under the age of 13. If we obtain actual knowledge that we have collected Information about a child under the age of 13, that Information will be immediately deleted from our database. Because we do not collect such information, we have no such information to use or to disclose to Third Parties. We have designed this policy in order to comply with the Children's Online Privacy Protection Act (COPPA).

## 12. How can you receive and opt-out from marketing communications?

By providing your email address to us through the Site or sending us an email directly, you consent to receive emails from us, including information concerning your Account and advertising messages. Depending upon your location, we may obtain additional consent from you via a checkbox disclosure or an email requesting confirmation before you can receive such information.

Providing consent to promotional emails is NOT a condition of purchasing the Services. You can unsubscribe to advertising emails at any time by clicking the unsubscribe link within the email, or by contacting us at <a href="mailto:contact@socialstackpro.com">contact@socialstackpro.com</a>. Please note that, even if you unsubscribe from advertising emails, we will still send you any necessary, non-promotional emails about your purchase, account, or updates to our Privacy Policy and Terms of Service.

## 13. Do we respond to Do Not Track (DNT) Signals?

DNT is a feature offered by some browsers which, when enabled, sends a signal to websites to request that your browsing is not tracked. We do not currently respond to DNT requests.

### 14. How will you know when we change the Privacy Policy?

Each time you use the Site, the then-current version of this Privacy Policy will apply. Although most changes are likely to be minor, we reserve the right to modify this Privacy Policy by posting such modification on this page; however, if changes are significant, we may provide a more

prominent notice or email you. Depending upon your location, we may obtain additional consent from you via a checkbox disclosure or an email requesting consent before you can continue to use the Site.

Unless we receive your express consent, any revised Privacy Policy will apply only to information collected after the effective date of such revised Privacy Policy, and not to information collected under any earlier version.

## 15. How can you contact us regarding this Privacy Policy?

You can contact us via email at <a href="mailto:contact@socialstackpro.com">contact@socialstackpro.com</a>. If needed, your information will be relayed to our third party partners to for the sole purpose of processing any request by you in the communication.