

EUROPEAN UNION – UNITED KINGDOM NOTICE (EU/UK NOTICE)

If an organization with which you are associated (an “Organization”) signs up to use our Service, we may receive personally identifiable information about you in connection with our provision of the Service to your Organization. To the extent we process (as defined below) that personally identifiable information solely in order to provide the Service to your Organization, under the European Data Protection Laws, to the extent applicable, we will act as a processor (as defined in the European Data Protection Laws) on behalf of your Organization in respect of that personally identifiable information; this General Privacy Policy will not apply to the processing of that personally identifiable information; and your Organization will act as a controller (as defined in the European Data Protection Laws) in respect of that personally identifiable information and is responsible for obtaining all necessary consents and providing you with all requisite information as required by applicable law. To the extent we process your personally identifiable information for any other lawful business purpose of ours, under the European Data Protection Laws, to the extent applicable, we will act as a controller of such personally identifiable information and this General Privacy Policy will apply to the processing of such personally identifiable information.

To the extent that the Website and Services with Collectively are available to individuals located in the European Economic Area or the United Kingdom, this General Privacy Policy sets out our practices under the European Data Protection Laws. As used in this General Privacy Policy (a) “GDPR” means the General Data Protection Regulation (EU) 2016/679; (b) “UK Data Protection Laws” means the UK GDPR and the UK’s Data Protection Act 2018 (“UK DPA 2018”); (c) “UK GDPR” means the UK equivalent of the GDPR, as defined in section 3(10) (and as supplemented by section 205(4)) of the UK DPA 2018; and (d) “European Data Protection Laws” means the GDPR and/or UK Data Protection Laws, in each case to the extent applicable.

1. HOW INFORMATION IS COLLECTED, USED AND DISCLOSED

1.1 Personal Information

When we use the term "Personal Information" in this General Privacy Policy, we mean information such as your first/middle initial or name, last name, e-mail address, street address, mailing address if different, town or city, state, zip code, telephone number, and any other information that would allow someone to identify you or contact you including information collected through cookies and other technology. We collect information from you when you voluntarily provide it, using automated technology, and through third party sources as further detailed below.

Personal Information includes information collected and maintained through your use of our Website. When you browse our Website, we also collect information about you through your browser, computer hardware and software. This information can include your IP address, device ID, browser type, domain names, access times and dates, number of clicks, pages viewed, one or more cookies (as described below) that may uniquely identify your browser, and referring

website addresses. We also collect and maintain aggregate anonymous information about usage of and visitors to our website. For more information about our collection practices, please see [Annex 1](#).

1.2 How We Use Your Personal Information

We use the information collected to provide the Service to you, to help us understand who uses the Service, for internal operations such as operating and improving the Service, to contact you for customer service and billing purposes, and, unless you opt out (to the extent permitted by applicable law), so that we and third parties acting on our behalf can contact you about products and services that may be of interest to you. For more information about our collection practices, please see [Annex 1](#).

Unless you opt out (to the extent permitted by applicable law), we may send you electronic newsletters, contact you about the Service and products, services, information and news that may be of interest to you, provide you with marketing materials, and provide you with targeted feedback. If you no longer desire to receive these communications, we will provide you with the option to change your preferences in each communication we send to you. You may also inform us by email to: **privacy@collectivelyinc.com**.

If you identify yourself to us by sending us an e-mail with questions or comments, we may use your information (including personally identifiable information) to respond to your questions or comments, and we may file your questions or comments (with your information) for future reference.

We may also use the information collected to send announcements and updates regarding the Service or, if applicable, about your Organization's billing account status. You will not be able to unsubscribe from these important Service announcements and notices as they contain important information relevant to your use of the Service and are necessary for the performance of our contract with you or your Organization.

2. How We Disclose Your Information

Legal Obligations

We may disclose Personal Information to outside parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our (or others') rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations.

Professional Advisors.

We may provide your information to professional advisors, such as lawyers, auditors, bankers, and insurers, where necessary in the course of the professional services that they render to us.

Service Providers.

We may employ independent contractors, vendors, and suppliers (collectively, "Service Providers") to provide specific services and products related to the Service, such as hosting and maintaining the Service and developing applications for the Service. In the course of providing products or services to us, these Service Providers may have access to information collected through the Service, including your personally identifiable information. We use reasonable efforts to ensure that these Service Providers are capable of protecting the security of your personally identifiable information, including entering into requisite agreements to safeguard your PII as required under applicable law.

Sale of Business.

We reserve the right to transfer information to a third party in connection with a sale, merger, or other transfer of all or substantially all of the assets of Collectively or any of its Corporate Affiliates (as defined below), or that portion of Collectively or any of its Corporate Affiliates to which the Service relates, or in connection with a strategic investment by a third party in Collectively, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding.

Corporate Affiliates.

We may disclose information (including personally identifiable information) about you to our Corporate Affiliates, including our parent company, Brandtech Influence Marketing Group Inc, and our ultimate parent, The Brandtech Group LLC. For purposes of this General Privacy Policy: "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with Collectively, Inc. and/or Collectively UK Limited, whether by ownership or otherwise; and "control" means possessing, directly or indirectly, the power to direct or cause the direction of the management, policies or operations of an entity, whether through ownership of fifty percent (50%) or more of the voting securities, by contract or otherwise.

Third Parties

We may provide to third parties aggregated, de-identified non-PII of users and visitors to our Website.

3. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

We will only use your personally identifiable information to the extent that the law allows us to do so. Pursuant to the European Data Protection Laws we rely on the following legal bases for processing your personally identifiable information:

- where you have given consent to the processing, which consent may be withdrawn at any time without affecting the lawfulness of processing based on consent prior to withdrawal;

- where it is necessary to perform the contract we have entered into or are about to enter into with you (whether in relation to the provision of the Service or otherwise);
- where it is necessary for us to comply with a legal obligation to which we are subject; and/or
- where it is necessary for the purposes of our legitimate interests (or those of a third party) in providing, improving, or marketing the Service and your interests or fundamental rights and freedoms do not override those legitimate interests.

4. RETENTION OF PERSONAL INFORMATION

We will retain your Personal Information for as long as it is necessary for the purposes set out in this Policy and to the extent necessary to comply with our legal obligations (for example, if we are required to retain your Personal Information to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

5. SECURITY

We have adopted reasonable and appropriate security procedures to help protect against loss, misuse, and unauthorized access to the information you provide to us. Please note, however, that no data transmission or storage can be guaranteed to be 100% secure. As a result, while we strive to protect your information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to the Site and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information.

6. COOKIE POLICY

We may collect information passively using “cookies” and “action tags”. “Cookies” are small text files that can be placed on your computer or mobile device in order to identify your web browser and the activities of your computer on the Service and other websites. Cookies can be used to personalize your experience on the Service (such as dynamically generating content on webpages specifically designed for you), to assist you in using the Service (such as saving time by not having to reenter your name each time you use the Service), and to allow us to statistically monitor how you are using the Service to help us improve our offerings.

In addition to cookies that we may place on your computer or mobile device, cookies might also be placed on your computer or mobile device by third parties that we use to collect information in order to provide analytics-related and other services. In the course of providing such services, such third-party providers could place or recognize unique cookies on your browser.

You do not have to accept cookies to use the Service. Although most browsers are initially set to accept cookies, you may reset your browser to notify you when you receive a cookie or to reject cookies generally. Most browsers offer instructions on how to do so in the "Help" section of the toolbar. However, if you reject cookies, certain features or resources of the Service may not work properly or at all and you may experience some loss of convenience.

For the avoidance of doubt, the Service may use third-party service platforms (including to help analyze how users use the Service). These third-party service platforms may place cookies on your computer or mobile device. If you would like to disable "third party" cookies, you may be able to turn them off by going to the third party's website.

We have utilized and engaged with Google as a Service Provider by turning on restricted settings. This limits the information provided to Google. For more information about how your information is disclosed to Google, please visit Google's privacy policy:

<https://www.google.com/policies/privacy/>

"Action tags," also known as web beacons or gif tags, are a web technology used to help track website usage information, such as how many times a specific page has been viewed. Action tags are invisible to you, and any portion of the Service, including advertisements, or e-mail sent on our behalf, may contain action tags.

By using cookies and action tags together, we can gain valuable information to improve the Service and measure the effectiveness of our advertising and marketing campaigns. We may also combine information collected from cookies with information that you may provide, such as information provided in a form that you complete. Information collected from some cookies placed on the website is used to deliver advertisements to Collectively Site visitors when such visitors are visiting other websites, including Facebook and LinkedIn.

Finally, you should be aware that third parties may use their own cookies or action tags when you click on a link to their websites or services on or from the Service. This General Privacy Policy does not govern the use of cookies or action tags or the use of your information by such third-party websites or services.

Log Files.

We also collect information through our Internet log files, which record data such as user search queries, IP addresses, browser types, domain names, and other anonymous statistical data involving the use of the Service. This information may be used to analyze trends, to administer the Service, to monitor the use of the Service, and to gather general demographic information. We may link this information to personally identifiable information for these and other purposes such as personalizing your experience on the Service and evaluating the Service in general.

7. CROSS-BORDER DATA TRANSFERS

Your information, including Personal Information, may be transferred to—and maintained on—computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside of the United States and choose to provide information to us, please be aware that your personal data will be transferred to, processed, and stored in the United

States. Data protection laws in the U.S. may be different from those in your country of residence.

To the extent required by applicable law: whenever we transfer your personal data (as defined in the European Data Protection Laws) to third parties (as described in this General Privacy Policy) located in an Inadequate Jurisdiction, we ensure a similar degree of protection is afforded to it; we may use specific contracts approved by the European Commission or the UK Information Commissioner's Office, as applicable, which give personal data the same protection it has in the European Economic Area or the United Kingdom, as applicable, under the European Data Protection Laws; and if we rely on another basis to transfer your personal data to an Inadequate Jurisdiction, we will keep you updated or contact you if required. Please contact us if you want further information on the specific mechanisms used by us when transferring your personal data to an Inadequate Jurisdiction.

Transfers to Third Parties

Courts, tribunals, government authorities and related parties or counterparties with whom we share personal data, third-party vendors and business partners are in some cases located outside the EU. Unless the recipients are located in countries that have been deemed adequate by the European Commission, we put in place data transfer agreements based on the applicable European Commission-approved Standard Contractual Clauses to protect the personal data so transferred. In certain cases, we may rely on statutory derogations for international data transfers.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this General Privacy Policy.

8. YOUR DATA PROTECTION RIGHTS UNDER THE GDPR DATA PRIVACY LAWS

The Data Controller

The Data Controller who collects and processes your Personal Information is:

Collectively, Inc.
1600 Bryant Street
#410750
San Francisco, CA 94141

9. Rights Under GDPR

If you are a resident of the European Economic Area (EEA) or the United Kingdom, you have certain data protection rights. Barring certain situations, you have the following data protection rights:

- **The right to access, update or erasure of the information we have on you.** You have the right to access, update and erase your Personal Information.
- **The right of rectification.** You have the right to have your Personal Information corrected if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Information.
- **The right of restriction.** You have the right to request that we restrict the processing of your Personal Information.
- **The right to data portability.** You have the right to be provided with a copy of the information that we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You have the right to withdraw your consent at any time where we relied on your consent to process your Personal Information.
- **The right to know about automated decision making.** As a data subject you also have the right to not be subject to decisions based on automated decision making alone, including profiling, and which may lead to legal consequences for you. This right does not apply if such processing is necessary in order for us to enter into or fulfill an agreement with you, if such processing is allowed according to applicable legislation, or if the legal basis for such processing is your consent.
- **The right to lodge complaint with supervisory authority.** You have the right to lodge a complaint with a supervisory authority, if you consider that the processing of the data in question breaches the provisions of data protection law. You can assert this right to lodge a complaint with a supervisory authority in the Member State where you are domiciled, at your place of work or at the place of the alleged breach.

We have implemented reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information. If you wish to be informed of the type of Personal Information we hold about you and/or if you wish to remove such Personal Information from our systems, please contact us at:

privacy@collectivelyinc.com or:

Collectively, Inc.

1600 Bryant Street

#410750

San Francisco, CA 94141

Please note that for your safety and security, we may ask you to verify your identity before responding to such requests.