

Shift Interactive, LLC Digital Privacy and Cookies Policy

Introduction and scope of policy

This Digital Privacy and Cookies Policy (“Policy”) applies to your interaction with, Shift Interactive, LLC, or any of its subsidiaries (“us,” “our”), at any online site or application that we own and control (“Site”), unless a different online policy is posted at a particular site, or is made available to you and by its terms supplants this Policy. Other privacy policies may also apply in addition to the terms of this Policy. You may also receive an additional privacy notice in connection with your use of a particular site or relationship with a specific business. This Policy also explains certain data use and data protection functionalities and practices of our sites. Please note that where we have another type of presence on a site owned by a third party, such as a page or handle on a social media site, that third party's privacy policy and terms of use, rather than this Policy, will govern, unless specifically stated otherwise. Please read the privacy statements of each website you visit. Examples of such policies are:

- Facebook Privacy Policy: <https://www.facebook.com/policy.php>
- Twitter Privacy Policy: <https://twitter.com/en/privacy>
- Instagram Privacy Policy: <https://privacycenter.instagram.com/policy>
- LinkedIn Privacy: <https://www.linkedin.com/legal/privacy-policy>

Agreement to policy

By using a Site's page or account on a third-party site, you consent to this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy.

Gathering, using, and sharing information

Types of information

You may interact with us in a variety of ways online. We may offer sites or applications that permit browsing and do not require registration. We may also

offer the ability to enroll, register or access your accounts online. Information that we may collect about you through online interaction includes information that you input, such as your name, address, email address, other contact information; data resulting from your activity, such as transaction information; and location information. We may also gather additional information, such as the type of device and browser you are using, the IP address of your device, information about your device's operating system, and additional information associated with your device. We may also gather information collected through cookies, tags, and other technologies, as described further below.

About “cookies”

Cookies are pieces of data stored on your device. Browser cookies are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server.

We may use cookies and information gathered through their use to make your experience with us and certain other sites richer and more personalized based on the products, services, or other interaction you have with us and other sites. Information gathered through use of cookies may be used to make offers to you via email, U.S. mail, or telephone, subject to the privacy preferences you have on file with us. We also use cookies, sometimes in conjunction with service providers, in online advertising either on our own Site or on third party sites. We respect consumers' ability to exercise choice in receiving these types of ads on third party sites. We honor your choice as follows: If you receive an ad delivered on a third-party site in part based on information gathered through the use of cookies, you may opt out of receiving such ads by clicking the displayed icon and following the instructions or by visiting <http://www.aboutads.info/choices/>. This opt-out works via cookies, so if you delete cookies, use a different device, or change web browsers, you will need to opt out again. Please note that we respect your choice via participation in the Advertising Options Icon/aboutads.info program. Information that we collect about you from one particular browser or device may be used to provide advertising or collect information on another browser or device. It may also be transferred to a third party for advertising or information collection on behalf of Shift Interactive, LLC. Please note that your choice to opt out on a particular browser or device will apply only to the collection and use of information from that particular browser

or device. Opting out on a particular device will not opt you out of information collection on other devices, nor will it limit cross device sharing on those other devices. Industry standards are currently evolving and we may not separately respond to or take any action with respect to a “do not track” configuration set in your internet browser.

Other parties that may collect information about your web browsing behavior when you use our Site are generally limited to service providers who may only use any information collected to provide services and marketing for us and not to provide services or advertising for any other party. Note, however, that we also provide certain widgets or tools on our sites, such as tools that allow web surfers to easily share information on another platform, such as a social media platform. At other times, information from a third party may be embedded on our Site, such as a map or information streaming from another site, including communications streaming from a third-party social media platform. These widgets, tools, and informational items often function through the use of third party cookies utilized by the third party site, such as the social media platform. As a result, these third parties may have access to information about your web browsing on the pages of our Site where these widgets, tools, or information are placed. You may wish to review information at third party sites, such as social media platforms where you have an account, to determine how these third parties treat data that they obtain through the use of cookies.

We also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our Site; monitoring online promotions; and anti-fraud and information security purposes.

Do you have to accept cookies?

You may be able to set your browser to reject browser cookies. However, if you choose to reject cookies, you may have issues accessing your accounts online with us. Therefore, if you set your browser options to disallow cookies, you will limit the functionality we can provide when you visit our Site. The latest versions of internet browsers provide cookie management tools, such as the ability to delete or reject cookies. We recommend that you refer to information supplied by browser providers for more specific information, including how to use these tools. For guidance on how to control cookies for common browsers please see

<http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>.

Additional cookies

Cookies is a term also used to describe other locally stored objects, such as cookies stored in an Adobe folder on your device. These cookies will not be deleted when you clear cookies from your browser. We may use this technology for purposes such as information security and fraud prevention. We do not use this technology for online behavioral advertising purposes. Please refer to information provided by Adobe for information on how to disable and control Flash objects. If you choose those options, you may limit the functionality we can provide when you visit our Site.

Additional technologies

We may also use additional technologies such as pixel tags, web beacons, and clear GIFs, and may permit our third-party service providers to use these technologies. We use these technologies for purposes such as measuring the effectiveness of our advertisements or other communications, determining viewing and response rates, and determining which offers to present to you on our own or on third party sites.

Using information

In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving our Site, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing or personalizing the presentation of our products and services to you; tracking website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our sites; and using read-receipt notifications in our email communications.

Sharing Information

We may share information with service providers with whom we work, such as data processors and companies that help us market products and services to you. When permitted or required by law, we may share information with

additional third parties for purposes including response to legal process, including to meet national security or law enforcement requirements.

Children's privacy

From our web pages, we do not knowingly collect personal information from individuals under the age of 13 without obtaining verifiable consent from their parents. We request that such individuals do not provide personal information through the services.

For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: www.ftc.gov.

Notice to Residents of Countries Outside the United States

Shift Interactive, LLC, is headquartered in the United States. Personal information may be accessed by us or transferred to us in the United States or to our business partners, service providers, vendors or consultants elsewhere in the world. If you are located outside of the United States, be advised that any information you provide to us will be transferred to and stored in the United States and that, by submitting information to us, you explicitly authorize its transfer and storage within the United States. We will treat personal information according to this Privacy Policy regardless of where it is processed or stored.

California Privacy Rights

Pursuant to Section 1798.83-.84 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, what types of personal information, if any, the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information in the immediately preceding calendar year. To access this information, please contact us by emailing privacy@shiftdsm.com with CA Privacy Requests in the subject line. Please note that, under the law, we are not required to respond to your request more than once in a calendar year, nor are we required to respond to any requests that are not sent to the above-designated email address.

Regarding Residents of the European Union & GDPR

We seek to comply with all applicable privacy laws and regulations that apply to residents of the European Union ("EU"). Residents of the EU may only use our Services after providing us your freely given, informed consent for us to collect, transfer, store, and share your Personal Data, as that term is defined in the EU's General Data Protection Regulation ("GDPR"), or to the extent we have a legitimate basis to collect, transfer, store, and share your Personal Data. We seek to comply with the EU GDPR and make it easy for EU residents to exercise their rights described in that regulation. The purposes for which we collect your Personal Information, which is defined in the GDPR as Personal Data, the categories and specific types of Personal Data we collect, and our practices and policies regarding your Personal Data are described in this Privacy Policy. As discussed throughout this Privacy Policy, we make it easy for you to access, correct, delete, or demand deletion of your Personal Data. You may object to our processing of your Personal data by emailing us, although if you prohibit our processing, it may make some of our Services either impossible to offer or less useful. Any of those requests should be sent to privacy@shiftdsm.com. Should you ever wish to leave and take an electronic copy of the Personal Data and information we have collected about you, you may make that request at privacy@shiftdsm.com. EU residents may contact their country's Data Protection Authority to raise concerns about our implementation of GDPR or our facilitation of the exercising of your privacy rights.

International Data Transfers

If you are located outside of the United States, please note that we may transfer your personal data outside your country of origin. By providing or making available your personal data, you consent to that transfer. We will take steps to ensure that your data is subject to appropriate safeguards required under this Privacy Policy, applicable data protection laws, and appropriate legally recognized data transfer adequacy mechanisms which may include entering into European Commission-approved standard contractual clauses related to transfers of personal information (available at http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index_en.html). For residents of the European Economic Area and Switzerland, we will execute standard contractual clauses among our affiliates or Partners for the purpose of its lawful transfers of personal data to the United States.

Jurisdiction

The Federal Trade Commission (FTC) has jurisdiction over Shift Interactive, LLCs' compliance with this Privacy Policy.

Data Retention

We will retain your Personal Information only for as long as reasonably necessary for the purposes described in this Privacy Policy. Please be aware that we may also be required to retain your Personal Information for legal and accounting reasons.

How to Contact Us

If you have any questions about this Privacy Policy, please contact us via email at: privacy@shiftdsm.com.

Policy updates and effective date

If we make updates to this Policy, we will update the Policy with the changes and revise the "date of most recent update" posted at the top of this Policy.

Any updates to the Policy become effective when we post the updates on the Site. Your use of the Site following the update to the Policy means that you accept the updated Policy.

Date of most recent update: October 12, 2022