

GUTSY PRIVACY POLICY

Last Updated: November 13, 2023

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, **Gutsy.io Inc** (“**Gutsy**”, “**we**”, “**our**” or “**us**”) use, collect and store personal information that we collect or receive from or about you (“**you**”) in connection with www.gutsy.com (“**Website**”), Gutsy platform (“**Platform**”) and the information and services provided therein (the Website, Platform and provided services, collectively, the “**Services**”).

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your information, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means and take any additional steps as required by applicable law.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

1.1. We Process the Following Personal Information:

- a. Information You Provide Directly to Us through the Services. We collect personal information that you provide directly to us, including, without limitation, information when you browse and make use of our Services, such as, full name, work e-mail, phone number and company name, as well as any other information that you decide to provide us.
- b. Information from Other Sources. Gutsy may also obtain information about you from other sources, including publicly or commercially available information, and through third-party data platforms, partners and service providers.
- c. Automatic Data Collection. We may automatically collect certain information through your use of the Services, such as your Internet protocol (IP) address, cookie identifiers and other device identifiers that are automatically assigned to your device, browser type and language, geo-location information, hardware type, operating system, internet service provider and other information about actions taken through the use of the Services.
- d. Information you provide to us in person. For example, when you visit one of our exhibition booths or attend one of our events and you provide us with your contact details. We will use this information to answer your enquiries or provide additional information to you.
- e. Information we collect from online interactions. For example, if you attend a webinar, contact us via social media or otherwise interact with our business, including as a representative of a current / prospective customer, supplier or partner, we track and make a record of those interactions, which may contain your contact details, such as full name, email address, messages and any other information that you decide to provide us with.

1.2. We process information for the following purposes:

- a. To allow you to make use of our Website. We will use your personal information to allow you to make use of our Website, including, (i) if you request a demo, we will use your personal information to process and answer your request for a demo; (ii) to answer your questions and to allow you to communicate with us (e.g., by using the Website forms); (iii) to analyze your use of our Website and to improve our Website; and (iv) to customize your experience.
- b. To provide you with the Services. Gutsy will use your information to: (i) provide the Services and to process your requests; (ii) communicate with you about your use of the Services (e.g., alerts, notifications and updates) and for support purposes; and (iii) to generally administer and improve the Services.
- c. For Administrative Purposes. Gutsy may use your information (i) to respond to your questions, comments, and other requests for customer support, or information, including information about potential or future services; (ii) to provide you with the Services; (iii) for internal quality control purposes; (iv) to establish a business relationship; (v) to generally administer the Services; and (vi) to provide you with information about Gutsy's products and Services.
- d. To Market our Website, Platform and the Services. Gutsy may use information to market the Services. Such use includes (i) notifying you about offers and services that may be of interest to you; (ii) developing and marketing new products and services, and to measure interest in Gutsy's products and services; (iii) other purposes disclosed at the time you provide information; (iv) as you otherwise consent;
- e. Security purposes. Some of the above mentioned information will be used for detecting, taking steps to prevent and prosecuting fraud or other illegal activity; to identify and repair errors; to conduct audits; and for security purposes. Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims.
- f. De-identified and Aggregated Information Use. In certain cases, we may or will anonymize or de-identify your Information and further use it for internal and external purposes, including, without limitation, to analyze and improve Gutsy's products and services (including through the use of artificial intelligence) and for research purposes. We may use this anonymous or de-identified information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them and/or to develop new product features and improve existing offerings).
- g. Cookies and Similar Technologies. We, as well as third parties that provide content, advertising, or other functionality on the Website, Platform and Services, may use cookies, pixel tags, local storage, and other technologies ("**Technologies**") to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your device that allow us to record certain pieces of information whenever you visit or interact with the Services. If you would like to opt out of the Technologies we employ on the Services, you may do so by blocking, deleting, or disabling them as your browser or device permits.

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL INFORMATION

- 2.1. Security. We have implemented and maintain reasonable technical, organizational and security measures designed to protect your information. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. Retention of your information. Your information will be stored until we delete our records, and we proactively delete it, or if you send a valid deletion request. Please note that in some circumstances we may store your information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, and/or (iii) if we reasonably believe there is a prospect of litigation relating to your information or dealings.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

In addition to the recipients described above, we may share your information as follows:

- 3.1. The information Gutsy gathers is shared with our partners and other third parties.
- 3.2. We may also share information with our affiliated companies about you.
- 3.3. We may use third party service providers to process your information for the purposes outlined above, including, without limitation:

- 3.3.1. With cloud service providers for hosting purposes;
 - 3.3.2. With websites and web content creation platforms in order to help us manage our Website;
 - 3.3.3. With email providers, marketing, CRM, other similar tool providers; and
 - 3.3.4. With analytic companies, in order to help us understand and analyze information we collect in accordance with this policy
- 3.4. To the extent necessary, with regulators, courts, banks or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order, as well as for internal compliance procedures and to protect the safety, security, and integrity of Gutsy, our Services, customers, employees, property, and the public.
- 3.5. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your information to such third party (whether actual or potential) in connection with the foregoing events (including, without limitation, our current or potential investors). In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your information in connection with the foregoing events.
- 3.6. Where you have otherwise provided your consent to us for sharing or transferring your information.

4. YOUR PRIVACY RIGHTS

- 4.1. **Rights.** You can exercise your rights by contacting us at privacy@gutsy.com. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent with written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we need further information in order to fulfill your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 4.2. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing privacy@gutsy.com. If you terminate your account, any association between your account and personal data we store will no longer be accessible through your account.
- 4.3. **Marketing communications – opt-out:** you can unsubscribe from our marketing communications by emailing us to privacy@gutsy.com or you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails, and we will process your request within a reasonable time after receipt.

5. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION.

- a) In order to run our business and provide our Website, Platform and Services to you, we transfer Personal Data to certain countries around the world, including to our affiliates and service providers, many of whom are located outside of your jurisdiction. Therefore, your Personal Data may be processed in countries with privacy laws that are different from privacy laws in your country. Whenever we make such transfers, we will use commercially reasonable efforts to implement an appropriate level of protection to your Personal Data by implementing at least one of the following safeguards:
- i. making sure the destination country has been deemed to provide an adequate level of protection for Personal Data; and/or
 - ii. by executing implement data onward transfer instruments such as data processing and protection agreements.

6. **USE BY CHILDREN.** We do not offer our products or services for use by children and, therefore, we do not knowingly collect information from, and/or about children under the age of 18. If you are under the age of 18, do not provide any information to us without the involvement of a parent or a guardian. In the event that we become aware that you provide information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@gutsy.com.

7. INTERACTION WITH THIRD PARTY PRODUCTS. We enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. ANALYTIC TOOLS/COOKIES

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.

9. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- 9.1. **Our California Do Not Track Notice:** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

10. CONTACT US. If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@gutsy.com.
