

VIBRANT BUSINESS SERVICES LTD
CHAOKEY PRIVACY POLICY

Last updated: January 27, 2021

This Privacy Policy governs how we, VibrantBusiness Services LTD. and its affiliates (“VibrantBusiness”, “ChaoKey”, “we”, “our” or “us”), use Personal Data that we collect, receive and store in connection with your use of ChaoKey, VibrantBusiness’s online and/or mobile marketing research panel/s (“Panel”) which is operated through a Window Edge Extension or Windows application (collectively, the “Panel App”). We collect, receive and store pertaining to you (“you”) in connection with the following use cases:

- (i) When you browse or visit our website, <https://www.chaokey.com/> (“Website”);
- (ii) When you make use of, or interact with, our Website
 - a. When you sign up for an Chaokeyaccount and login
 - b. When you contact us
- (iii) When you make use of the Panel App for its intended use
 - a. When you use our “refer a friend” functionality

Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data as well as non-personal data that we collect, use and store. “Personal Data”, or “personal information” means any information that can be used, alone or together with other data, to uniquely identify any living human being.

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This Privacy Policy may be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy. If we implement significant changes to the use of your personal data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Panel App or by other means.

VibrantBusiness provides an application with data/marketing intelligence and insights into their advertising practices as well as those of their competitors to its customers (the data and insights are always anonymized and does not contain any Personal Information) (the "VibrantBusiness Services"). For the avoidance of doubt, for the purposes of this

Privacy Policy, a "Customer" is an entity which has executed an agreement with VibrantBusiness.

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

We collect the following Personal Data:

| Personal Data we collect | Sources - where we obtain the personal information from (CCPA only, if applicable) | Why is the data collected and for what purposes? | Legal basis for data collection (GDPR only, if applicable) | Third parties with whom we share your data | Consequences of not providing the data |
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| <i>When you browse or visit our Website</i> | | | | | |
| Cookies, analytic tools and log files | We collect this information from you | When you make use of our Website, we will collect information from cookies implemented by third parties, in order to improve our Website and enhance your user experience. | Consent Legitimate interest (e.g., essential cookies) | 3 rd party platforms such as for the following purposes: • Google Analytics | Cannot improve our Website and your user experience. |
| <i>When you make use of, or interact with, our Website</i> | | | | | |
| <i>When you sign up for an account and login</i> | | | | | |
| We collect the following personal data as part of your registration/qualification | We collect this information from you | • To verify your eligibility for participation in the Panel and use of the Panel App; | Performance of a contract to which the data subject is party or in order to | 3 rd party platforms such as for the following purposes: | Cannot verify your eligibility to participate in the Panel; |

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| <p>to the Panel (via the Panel App):</p> <ul style="list-style-type: none"> (i) Name (first, last); (ii) Email address; (iii) Date of birth (iv) Gender (v) Relationship status (vi) country (vii) City (viii) State (US only); and (ix) General demographic and profile information, which we collect from you from the qualification form. | <ul style="list-style-type: none"> • To create your account in the Panel App; • To communicate with you regarding your participation in the Panel | <p>take steps at the request of the data subject prior to entering into a contract (our Terms of Service, available at http://www.chaokey.com/home/about/terms.html)</p> | <ul style="list-style-type: none"> (i) Tremendous: Third party provider of vouchers/ coupons/gift cards or other rewards that you chose to redeem your rewards (ii) Gmail for Business (iii) Webflow - website builder (iv) Mandrill - a marketing platform (v) Mailchimp - a marketing automation platform (vi) Logrocket - a platform for user sessions (vii) Amazon Web Services (AWS), Tencent Cloud and Microsoft Azure - storing your Personal Data. (viii) MongoDB Atlas – managed cloud database provider | <p>Cannot create an account in the Panel;</p> <p>Cannot communicate with you regarding your participation in the Panel;</p> |
| | <ul style="list-style-type: none"> • To verify your eligibility to participate in promotions, sweepstakes, raffles and special offers that VibrantBusiness may, at its discretion, choose to offer from time to time in connection with the Panel and/or Panel App (“Promotions”) and to receive any benefits, discounts and/or rewards that VibrantBusiness chooses to offer in connection with such Promotions • To provide you with access to, and the ability to participate in, Promotions, if you are eligible | <p>Consent</p> | | <ul style="list-style-type: none"> • Cannot verify your eligibility to participate in Promotions and to receive any benefits, discounts and/or rewards that VibrantBusiness chooses to offer in connection with such Promotions • Cannot provide you with access to, and the ability to participate in, Promotions, if you are eligible • Cannot notify you if you are eligible or have won any benefits, discounts and/or rewards that VibrantBusiness chooses to offer in connection with such Promotions • Cannot offer and provide you with benefits, discounts and/or rewards that Vibrant Business may offer in |

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| | | <ul style="list-style-type: none"> To offer and provide you with benefits, discounts and/or rewards that VibrantBusiness may offer in connection with Promotions if you are eligible | | | connection with Promotions if you are eligible |
| <i>When you download and make use of the App for its intended use</i> | | | | | |
| <p>We collect the data when you become an eligible Panel member, after you have installed the Panel App and throughout your participation in our Panel when you use third party application and/or websites, such as Facebook, Instagram, Twitter, YouTube and Amazon:</p> <ul style="list-style-type: none"> A randomly generated device ID and user ID; Data about sponsored campaigns, sponsored posts or advertisements that target you directly or that have been shared with you; General demographic and profile | <p>We collect this information from you</p> | <ul style="list-style-type: none"> To offer and provide you with gift cards in connection with your use of the Panel App (directly or via third party providers). To monitor, identify, analyze and research marketing campaigns and audience analytics from data it collects from your panel. To anonymize your profile data. To use the anonymized data for the purpose of providing our Customers with data intelligence and insights into their advertising practices as well as those of their competitors | <p>Necessary to perform a contract or take steps, at your request, to enter into a contract. In particular, this includes our Terms of Service, available at http://www.chaokey.com/home/about/terms.html.</p> | <p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> (i) Gmail for Business (ii) Webflow - website builder (iii) Mandrill - a marketing platform (iv) Mailchimp - a marketing automation platform (v) Logrocket - a platform for user sessions (ii) Email service providers, like Gmail for Business for communicating with you (vii) Amazon Web Services (AWS) ,Tencent Cloud and Microsoft Azure for storing your Personal Data. (viii) MongoDB Atlas – managed cloud database provider | <p>Cannot offer and provide you with gift cards in connection with your use of the Panel App (directly or via third party providers).</p> <p>Cannot monitors, identifies, analyzes and researches marketing campaigns and audience analytics from data it collects from Panel your panel.</p> <p>Cannot anonymize your profile data.</p> <p>Cannot use the anonymized data in for the purpose of providing our Customers with data intelligence and insights into their advertising practices as well as those of their competitors</p> <p>Cannot participate in our online and/or mobile marketing research Panel</p> |

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| information from your Facebook profile, like your age, your gender, where you live (by region), your relationship status and your general interests, and Additional information you may provide when you answer certain survey questions. | | <ul style="list-style-type: none">● To participate in our online and/or mobile marketing research Panel | | | |
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Finally, please note that some of the abovementioned personal data will be used for fraud detection and prevention, and for security purposes. The abovementioned personal data 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.

2. PERIOD OF STORAGE OF PERSONAL DATA

2.1 Retention Personal Data. Your Personal Data will be stored until: (i) we no longer need the information and proactively delete it; or (ii) you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws. In some circumstances we may store your Personal Data 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, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

2.2 Additional Information on Data Retention. Other circumstances in which we will retain your Personal Data for longer periods of time include: (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, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. We have an internal data retention policy to ensure that we do not retain your personal data perpetually.

3. HOW WE PROTECT YOUR INFORMATION

We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction, loss or the unauthorized disclosure or access to your Personal Data and non-personal data. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers, computers or network. Nevertheless, we make commercially reasonable efforts to make the collection, storage and security of such information consistent with this Privacy Policy and all applicable laws and regulations.

4. WHO WE YOUR SHARE DATA WITH

We share the data that we collect in the following ways:

- 4.1 Through the use of our data intelligence and insights products, we share data on an aggregated, non-personal basis with our customers, partners and any of their affiliates or users, located in various countries around the world.
- 4.2 We share aggregated, non-personal data and insights generated from the data with publications, analysts and other venues, for the purposes of promoting VibrantBusiness affiliates.
or its
- 4.3 To comply with all 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.
- 4.4 If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the extent required) disclose, transfer or assign information to such third party purchaser, including, without limitation, the Personal Data described above, the anonymized, non-personal data, subject to its compliance with this Privacy Policy. In the event of bankruptcy or a comparable event, we reserve the right to disclose, transfer or assign data in connection with the foregoing events.
- 4.5 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 personal data in connection with the foregoing events; and/or
- 4.6 We share your Personal Data with third party voucher/coupon/gift card or other reward providers that you choose to redeem your rewards with.

Other than the situations described above, we will only share your Personal Data with third parties that you have consented to.

5. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION

- 5.1 Storage. We store and process the data on servers at Amazon Web Services (AWS) ,Tencent Cloud and Microsoft Azure facilities in the United States ,HongKong and UK.
- 5.2 As some of these third parties may be located outside the EU/EEA, your personal and non-personal data may be transferred, processed and stored outside your country/ region of residence.

- 5.3 Internal transfers: We securely transfer your data to our local or foreign subsidiaries and affiliates as needed, who are all in compliance with this privacy policy. We ensure transfers within the VibrantBusiness group will be covered by an agreement entered into by members of the VibrantBusiness group (an intra-group agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to;
- 5.4 External Transfers: Where we transfer your Personal Data outside of VibrantBusiness to third party vouchers/coupons/gift cards or other rewards providers, we will obtain contractual commitments from them to protect your Personal Data.

Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

6. PRIVACY RIGHTS; HOW TO DELETE YOUR ACCOUNT

6.1 Rights.

6.1.1 GDPR Rights. The following rights (which may be subject to certain exemptions or derogations), shall apply to individuals who are protected by the GDPR:

- You have a right to access Personal Data held about you. Your right of access is normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we amend any Personal Data we hold that it is inaccurate or misleading.
- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object to or to request restriction of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority
- The right to withdraw your consent, where Personal Data is processed on the legal basis of consent. Please note that there may be circumstances in which we are entitled to continue processing your Personal Data, in particular if the processing is required to meet our legal and regulatory obligations.
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

6.1.2 CCPA Rights. The following rights (which may be subject to certain exemptions or derogations), shall apply to individuals who are protected by the CCPA:

- You have the right to know what personal information is being collected about you in the twelve months preceding your request;
- You have the right to request the erasure/deletion of your personal information (e.g. from our records and the records of our service providers). Please note that there may be circumstances in which we are required to retain your personal information, for example for the establishment, exercise or defense of legal claims;
- You have the right to know whether your personal information is sold or disclosed and to whom;

- You have the right to say no to the sale of your personal information (if applicable);
 - You have the right to equal service and price, even if you exercise your privacy rights;
 - You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence (e.g. the Attorney General in your State). We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
- 6.2 Exercising Your Rights. You can exercise your rights by contacting us at contact@chaokey.com or, if you are an individual protected by CCPA, you may also contact us via our online contact form at: <https://www.chaokey.com/contact>. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. Please note that exercising certain rights may result in your total or partial inability to participate in the Panel and/or benefit from the Rewards. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive, but in any event, under no circumstances will we discriminate against you for exercising any of your CCPA rights.
- 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 initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 6.3 How To Delete Your Account. Should you ever decide to delete your account, you may do so by emailing privacy@chaokey.com. If you terminate your account, any association between your account and personal data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

7 US PRIVACY PROVISIONS

- 7.1 Access Requests. California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@chaokey.com. Please note that we are only required to respond to one request per customer each year.
- 7.2 Our California Do Not Track Notice. We do not track users over time or across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual user's online activities over time and across different web sites when a user uses the Website.
- 7.3 CCPA Sale of personal information. While we believe that we do not technically meet any of the applicability thresholds specified by the CCPA or that any our use of information constitutes a "Sale" under the CCPA, we are committed to providing our Panel Members with as many privacy choices as we reasonably can. Accordingly, If you are a California resident and would like to opt out of the panel, you may do so by following the instructions set forth in Section 6.3 ("How To Delete Your Account") and the Termination clause included in our Terms of Service (available at <https://chaokey.com/termsfuse>).

8 CHILDREN'S PRIVACY

We do not offer our Panel App for use by children. If you are under 18, you may not use the Panel App, or provide us with any information without involvement of a parent or a guardian. We do not knowingly collect personal information from, and/or about children. For the purposes of the GDPR, we do not intend to offer information society services directly to children. If you believe that we might have any such personal information, please contact us at privacy@chaokey.com.

9 LOG FILES

Log files are automatically created as a result of errors in the code of the Panel App that are stored in log entries. We do not control the data transmitted and we do not store or use this data.

10 ANALYTIC TOOLS

- **Google Analytics**. The Panel App uses a tool called “Google Analytics” to collect anonymized and aggregated information about the use of the Panel App. Google Analytics collects various information, such as what pages the users visit and when they do so, and what other sites they visited. We use the information we get from Google Analytics to derive general insights about the use of the Panel App and for statistical purposes. Google’s ability to use and share information collected by Google Analytics about your use of the Panel App and the Panel App is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html>, 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/>.
- **Firebase Analytics**. We also use “**Google Analytics for Firebase**”. By enabling this tool, we enable the collection of data about App Users, including via identifiers for mobile devices (including Android Advertising ID and Advertising Identifier for iOS), cookies and similar technologies. We use the information we get from Google Analytics for Firebase to maintain and improve our App(s). We do not facilitate the merging of personally-identifiable information with non-personally identifiable information unless we have robust notice of, and your prior affirmative (i.e., opt-in) consent to, that merger. Finally, please note that Google Analytics
- **AppsFlyer**. We use a tool called “AppsFlyer”, a mobile attribution and marketing analytics platform to understand the use of our services. AppsFlyer is exposed to the following data: (i) unique identifiers and technical data, such as IP address, User agent, IDFA (Identifier For Advertisers) or Android ID (in Android devices); and (ii) technical data regarding your operating system, device attributes and settings, applications, advertising opt-out signals, Google Advertiser ID, in-app events, device motion parameters and carrier. The use of this data allows us to analyze our campaigns and performance, as well as your habits and characteristics. For example, the data AppsFlyer receives includes downloads, impressions, clicks and installations of their mobile applications, mobile device use and data regarding in-app events. AppsFlyer’s terms of use (available at <https://www.appsflyer.com/terms-of-use/>) and privacy policy (available at <https://www.appsflyer.com/privacy-policy/>) also apply to the use of AppsFlyer.
- **Facebook Pixels and SDKs**. We use Facebook pixels or SDKs, which are tools that provide help to website owners and publishers, developers, advertisers, business partners (and their customers) and others integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please

note that third parties, including Facebook, use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook's ability to use and share information is governed by the Facebook Tools Terms, available at: https://www.facebook.com/legal/technology_terms/. You can prevent your data from being used by Facebook Pixels and SDKs by exercising your choice through these mechanisms: <http://www.aboutads.info/> choices or <http://www.youronlinechoices.eu/>.

We reserve the right to remove or add new analytic tools.

11 LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Panel App may enable you to interact with or contain links to other third party websites, mobile software applications and 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 may collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

12 HOW TO CONTACT US; GDPR REPRESENTATIVE IN THE EUROPEAN UNION

12.1 For more information or for exercising your rights, please contact us at contact@chaokey.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request.

12.2 Pursuant to Article 27 of Europe's General Data Protection Regulation (GDPR), VibrantBusiness has appointed European Data Protection Office (EDPO) as its GDPR representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR by sending an email to privacy@edpo.brussels, using EDPO's online request form, or writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium.