

## PRIVACY POLICY

Effective Date: [1<sup>st</sup> February 2021]

### Overview and Scope

We at Sikanai (the “**Company**,” “**we**,” “**our**,” or “**us**”) recognize the importance of protecting the privacy of personally identifiable information (“**Personal Information**” or “**PII**”) collected about you and other users (collectively, “**Users**”) of our website and services (collectively, the “**Service**”). We are committed to ensuring that your privacy is protected. To that end, this Privacy Policy (“**Policy**”) discloses our practices regarding the collection, use, and disclosure of the PII we receive through Users’ use of the Service. By using the Service, you accept the terms of this Policy.

This Policy applies to the Service, which includes any services provided by us and the [www.sikanai.com] website, its subdomains, and all of the websites and internet properties owned or operated by us, as well as regardless of the medium by which the Service is accessed by Users (e.g., via a web or mobile browser).

### Information We Collect

We collect several types of information from and about Users of the Service, including Personal Information. We may collect PII from you when you complete forms, navigate web pages, and in connection with other activities, services, features, or resources we make available on the Service. PII means any information that is linked or reasonably linkable to an identified or identifiable natural person. PII does not include publicly available information from government records, deidentified or aggregate information, or information excluded from the scope of applicable laws.

The type of PII we may collect, use, store, and disclose include the following categories of information:

Category	Type of Information
Identifiers	IP Address
Internet Identifiers and Activities	Browsing History, Search History, Interactions with the Service
Geolocation Data	Geolocation, beacon based location, GPS location <b>You may disable our use of certain internet identifiers and activities through your device or browser settings.</b>
Device Type	User is able to access by smart device and/or computer.

Deidentified Information: We may collect deidentified information from you that may not by itself reasonably identify you as the source when you navigate the Service (“**Deidentified Information**”). Deidentified Information may include: (i) device type, (ii) device operating system, (iii) internet browser type, (iv) internet service provider, (v) referring/exit pages, (vi) date/time stamp, and (vii) clickstream information. We will take reasonable measures to ensure that Deidentified Information we collect is not personally identifiable and may not later be easily used to identify you as required by applicable law.

We also reserve the right to provide anonymized information to third parties for the purpose of evaluating the performance of our Service, improving our Service, or as part of a sales transaction.

Children's Information: We do not offer our services or promote the Service to, nor do we intentionally collect or retain PII from, children who are younger than 13 years of age. If we discover that we have inadvertently collected information from a child under 13 years of age, we will promptly take all reasonable measures to delete such information from our systems.

### **How We Collect Information**

The information we collect depends on what Users do when they visit or utilize the Service. We collect PII and Deidentified Information in various ways, including:

Directly from You: We collect PII and Deidentified Information when you voluntarily submit PII and Deidentified Information to us. The PII and Deidentified Information we collect depends on what you do when you visit or utilize the Service or how you choose to communicate with us.

Through Your Use of the Service: We may collect PII and Deidentified Information that your browser transmits when you use the Service. We may also collect PII and Deidentified Information about how you access and interact with the Service through the use of automated tracking technologies, such as session cookies, persistent cookies, and web beacons.

A cookie is a small data file that is transferred to an internet browser, which enables the Service to remember and customize your subsequent visits. We may use session cookies to make it easier for you to navigate the Service. Session cookies expire when you close your browser. We may also use persistent cookies to track and target your interests to enhance your experience on the Service. Persistent cookies remain on your device for an extended period of time.

Most internet browsers automatically accept cookies. However, you can instruct your internet browser to block cookies or to provide you with a warning prompt before you accept cookies from the Service. Please refer to your internet browser's instructions to learn more about these functions. If you reject cookies, the functionality of the Service may be limited and you may not be able to participate in several of the Service's features.

Additionally, we may use web beacons, which are single-pixel, electronic images embedded in the Service that allow us to gather information about your browsing activities on the Service.

From Third Party Services: We may collect PII about you from third parties whose privacy practices may differ from the practices described in this Policy. We do not make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available through third parties. Your use of third parties' services and/or third party websites is governed by and subject to the terms and conditions of those third parties and/or third party websites. We encourage you to carefully review the privacy policies and statements of such third parties and/or third party websites.

### **How We Use Information**

We may use Users' PII for lawful business purposes to help enhance their experience. These purposes include:

Customer Service: We may use your PII and/or Deidentified Information to help us deliver our services to you.

Service Optimization: We may use your PII and/or Deidentified Information to improve the content on our web pages, to customize the content and layout of our web pages, in managing our everyday business needs, and to improve our Service and its efficacy and overall quality. All of this is done with the intention of making the Service more useful for you and our customers.

We will not collect additional categories of PII or use PII we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **How We Disclose Information**

We may disclose Users' PII to third parties for a business purpose as described below. Otherwise, we do not sell or rent PII and will not disclose Users' PII to third parties without your permission.

To Service Providers: We may disclose your PII to third party service providers that assist us in providing user support, communicating with Users, and promoting our services, as well as third party service providers that provide other services to us relating to our services and/or the Service.

Law Enforcement, Safety, and Legal Processes: We may disclose your PII to law enforcement or other government officials if it relates to a criminal investigation or alleged criminal activity. We may also disclose your PII: (i) if required or permitted to do so by law; (ii) for fraud protection and credit risk reduction purposes; (iii) in the good-faith belief that such action is necessary to protect our rights, interests, or property; (iv) in the good-faith belief that such action is necessary to protect your safety or the safety of others; or (v) to comply with a judicial proceeding, court order, subpoena, or other similar legal or administrative process.

Sale or Acquisition of Assets: If we become involved in a transaction involving the sale of our assets, such as a merger or acquisition, or if we are transferred to another company, we may disclose and/or transfer your PII as part of the transaction. If the surviving entity in that transaction is not us, the surviving company may use your PII pursuant to its own privacy policies, and those policies may be different from this Policy.

### **Security**

The security and confidentiality of your PII is very important to us. We use commercially reasonable security measures to protect your PII on the Service. However, no data transmitted over or accessible through the internet can be guaranteed to be 100% secure. As a result, while we attempt to protect your PII, we cannot guarantee or warrant that your PII will be completely secure (i) from misappropriation by hackers or from other nefarious or criminal activities, or (ii) in the event of a failure of computer hardware, software, or a telecommunications networks.

### **California Privacy Rights**

California's "Shine the Light" law permits Users of the Service that are California residents to request certain information regarding our disclosure of PII to third parties for their direct marketing purposes. To make such a request, please contact us at the Contact Information provided below.

### **Data Retention**

We will retain Users' PII to the extent necessary to provide the services through the Service. Thereafter, we will keep PII for as long as necessary: (i) to respond to any queries from Users; (ii) to demonstrate we

treated Users fairly; (iii) for ordinary business continuity procedures; or (iv) to comply with any applicable laws. We delete PII within a reasonable period after we no longer need the information for the purposes set out in this Policy.

### **Do Not Track Disclosure**

Some internet browsers may transmit “do-not-track” signals to websites with which the browser communicates. The Service does not currently respond to these “do-not-track” signals.

### **SPAM**

We do not participate in bulk email solicitations that you have not consented to receiving (i.e., “Spam”). We do not sell or disclose customer lists or email address lists to unrelated third parties. Except as otherwise provided herein, we do not share PII with any third party advertisers.

### **Third Party Links**

The Service may contain links to other websites or applications (“**Linked Services**”) that are not owned by us. We do not control the collection or use of any information, including PII, which occurs while you visit Linked Services. Therefore, we make no representations or warranties for—and will not in any way be liable for—any content, products, services, software, or other materials available on Linked Services, even if one or more pages of the Linked Services are framed within a page of the Service.

Furthermore, we make no representations or warranties about the privacy policies or practices of the Linked Services, and we are not responsible for the privacy practices of those Linked Services. We encourage you to be aware of when you leave the Service and read the privacy policies of Linked Services.

### **Modifications**

We reserve the right to update this Policy from time-to-time in our sole discretion. If our privacy practices change materially in the future, we will post an updated version of the privacy policy to the Service. It is your responsibility to review this Policy for any changes each time you use the Service. We will not lessen your rights under this Policy without your explicit consent. If you do not agree with the changes made, we will honor any opt-out requests made after the Effective Date of a new privacy policy.

### **Accessing, Updating, and Controlling Information**

If you ever wish to access, update, change, correct, or delete your PII, you may do so by contacting us at the Contact Information provided below. To help us process your request, please provide sufficient information to allow us to identify you in our records. We reserve the right to ask for additional information verifying your identity prior to disclosing any PII to you. Should we ask for verification, the information you provide will be used only for verification purposes, and all copies of the information will be destroyed when the process is complete.

If you do not wish to receive update messages and/or direct marketing communications from us, you may opt-out by following any instructions included in the communication or by contacting us at the Contact Information provided below. Please be aware that although you may opt-out of update messages and/or direct marketing communications, we reserve the right to email you administrative notices regarding the Service, as permitted under the CAN-SPAM Act.

We will make commercially reasonable efforts to respond to opt-out requests and handle requests to access, update, change, correct, or delete PII as quickly as possible.

#### **Contact Information**

If you have questions about this Policy or wish to contact us with questions or comments, please contact us at:

Attn: Sikanai  
C/O Privacy Office  
827 Aberdeen Rd., Park Hills, KY 41011  
859.479.2872  
barry@sikanai.com

#### **Effective Date**

This Policy was last modified as of the effective date printed above. This version of the privacy policy replaces and supersedes any prior privacy policies applicable to the Service.