

PRIVACY POLICY

Last updated on August 5, 2022

At SPTech Group, Inc. (“SocialPass,” “we,” “us,” and “our”), we respect your privacy and are committed to protecting it.

This privacy notice explains how SocialPass collects, uses, discloses, and protects information that we collect about you and your rights with respect to that information.

This notice covers information we collect from or about you when you give it to us, visit our website <https://socialpass.io/>, or use any services offered on or through our web site or web application services, including creating, organizing, promoting, registering, ticketing, and token-gating events (the website and web application including all content, functionality, and services provided by us through the website or web application are the “Solution”) or interact with our advertisements. It also covers information that we may receive from other persons or entities who have received your information and can share it with us.

If in any case our privacy practices differ from those explained in this notice, we will let you know at the time we ask for or collect your information.

1. Quick links

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2. What information we collect

We may collect the following types of information about you, which we have grouped together as follows:

- **Identity Information.** Examples include first name, last name, marital status, title, date of birth and gender.
- **Contact Information.** Examples include addresses, email addresses, and telephone numbers.
- **Financial Information.** Examples include details on payment cards or other forms of payment.
- **Transaction Information.** Examples include details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Information.** Examples include internet protocol (IP) address, your login information, your digital wallet address and contents, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Solution.
- **Profile Information.** Examples include your username and password, purchases or orders made by you, events for which you registered or sought to register, your interests, preferences, feedback and survey responses.
- **Usage Information.** Examples include information about how you use our Solution.
- **Marketing and Communications Information.** Examples include your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Demographic Information and Preferences.** Examples include personal characteristics and preferences, such as your age, marital and family status, number of children, shopping preferences, income level, languages spoken, loyalty and rewards program information, household demographic data, data from social media platforms, education and professional information, hobbies and interests and propensity scores from third parties (likelihood of purchase, experiencing a life event, etc.).
- **User Content.** Examples include messages, information, reviews, and feedback that you provide to us on or through the Solution or on our social media channels. If you choose to provide User Content, it may be made available to other users of the Solution, on public areas of the Solution, or on or through our social media channels.

Some of the information we collect about you may be personal information, or personal data, that can be used to identify you including, for example, your name, email address, mailing address or delivery address. In some jurisdictions, certain unique identifiers like IP addresses and other usage or technical information may be considered personal information. Personal information does not include data where your identity has been removed so that we can no longer identify you (anonymous data), which we may use for any purpose.

3. Children's online privacy

Our Solution is not intended for persons under 18 years of age. No one under age 18 may provide any information to or on our Solution. We do not knowingly collect personal information from persons under 18 years of age. If you are under 18, do not access or use any Solution, provide any information on or through the Solution, or on or through any interactive or public comment features of the Solution, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a person who is under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 18, please contact us at privacy@socialpass.io.

4. How we collect your information

We collect information from and about you in the following ways:

- **When you provide it to us.** You may give us information about you by filling in forms or by communicating with us by email or otherwise. This includes information you provide when you register for an account, subscribe to one of our newsletters or other communications, register for an event, write a review, or when you otherwise contact us about our Solution or other products or services.
- **From our Solution and emails.** As you interact with our Solution or other services, use our web apps, interact with websites using our cookies, or our emails, we may automatically collect Technical Information about your equipment, browsing actions and patterns. We collect this information by using cookies, server logs, web beacons, and other similar technologies. Our [Cookies and automatic data collection technologies](#) section contains more information and options to control or opt-out of certain data collection or uses.
- **From others.** We may receive information about you from third parties including, for example, event organizers, our affiliated companies, business partners, subcontractors, analytics providers, and service providers. We may also receive information about you from commercially available sources such as data aggregators and public databases.

5. Cookies and automatic data collection technologies

Our Solution uses automatic data collection technologies to distinguish you from other users. This helps us deliver a better and more personalized service when you browse our Solution. It also allows us to improve our Solution by enabling us to:

- Estimate our audience and customer size and usage patterns.
- Store your preferences so we may customize our Solution according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Solution.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). For more information, see the [Interest-based advertising](#) section of this privacy notice.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. For information about managing browser settings to refuse cookies, see [Your rights and choices](#).

- **Flash Cookies.** Certain features of our Solution may use Flash cookies (local stored objects) instead of browser cookies to collect and store information about your preferences and navigation to, from, and on the Solution. For information about managing Flash cookies see [Your rights and choices](#).
- **Web Beacons.** Our Solution pages, advertisements, and e-mails may contain small transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count page visitors or email readers, or to compile other similar statistics such as recording content popularity or verifying system and server integrity. For information about managing web beacons, see [Your rights and choices](#).

We may use Google Analytics to provide certain analytics services for us. More information about Google Analytics can be found in the [Google Analytics Terms of Use](#) and the [Google Analytics Privacy Policy](#).

We do not respond to or honor “do not track” (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

6. How we use your information

We may use your information to conduct our business operations including for the following purposes:

- To create and manage your account.
- To provide you with the Solution and other products and services you request or purchase from us.
- To allow you to enter a sweepstake, contest, promotion, other program that we may offer.
- To conduct market research.
- To develop and provide advertising tailored to your interest and to determine the effectiveness of our advertising.
- To provide you with the information or support that you request from us, including to send you newsletters.
- To improve our Solution, other products or services, marketing, customer relationships, and experiences.
- To develop new products and services.
- To notify you of special offers, discounts, updates, and products and services that we think may be of interest to you. To learn more about your choices with regards to these communications see [Your rights and choices](#).
- To manage our relationship with you which may include notifying you about changes to our terms or privacy notice, providing you notices about your account, asking you to leave a review or take a survey, addressing any concerns you may have about our products or services.
- To provide you with the information, products, services or support that you request from us or to fulfill any other purpose for which you provide it.
- To deliver relevant content, advertisements, and messaging to you and to measure or understand the effectiveness of such content, advertisements, and messaging.
- To make suggestions and recommendations to you about our own and third-parties’ products or services that may be of interest to you. If you do not want us to use your information in this way or for more information on how to adjust your preferences, see [Your Rights and Choices](#).
- To carry out our obligations and enforce our rights and to protect our Solution, customers, and other individuals including to protect against or identify possible fraudulent transactions.
- For any other purpose as may be permitted by law, or that we describe when you provide the information.

We may use information that is not personal information for any purpose. For example, we may aggregate usage data from many people in a way that does not identify any individuals to calculate the percentage of users accessing a feature on our Solution.

7. Disclosure of Your Information

We may share non-personal information without restriction. We may share your personal information with:

- any member of our corporate group, which means, if and as applicable, our subsidiaries, affiliates, our ultimate holding company and its subsidiaries, and affiliates;
- contractors, service providers, and other third parties we use to support our business, which may include sharing:
 - your identity or contact information, transaction information, and financial information to our service providers who facilitate and processes payments on our behalf.

- o your identity or contact information and transaction information to our service providers who assist us with email marketing campaigns, as applicable.
- o your identity or contact information, technical information, profile information, marketing and communications information, usage information, and/or your user contributions to our website host and the marketing agency who supports our website and social media channels.
- o your transaction information and usage information available to our marketing partners.
- o your technical information and usage information to our website analytics providers.
- our business partners who provide services on our behalf but who may also use the information we provide for their own commercial purposes. For example, some of our advertising partners may use information to market other parties' products and service to you. For more information see [Interest-based advertising](#);
- public or government (including enforcement) authorities;
- an actual or prospective buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, where one of the transferred assets is the personal information we hold; and
- our co-sponsor if we offer a co-branded promotion;

We may also disclose your personal information:

- to fulfill the purpose for which you provide it to us;
- to comply with any court order, law, or legal process, including responding to any government or regulatory request;
- to enforce our *Terms or Use* (found [here](#)), *Event Organizer Terms and Conditions*, and other agreements with you, as applicable;
- to protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection and credit risk reduction;
- to investigate suspected violations of any law, rule or regulation, or the terms or policies for our Solution; and
- for any other purpose as may be permitted by law or that we describe when you provide the information to us.

Depending upon where you live, we may also use your information to contact you about our own and third-parties' products and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile or opt-out as directed when you receive such an email from us. For more information, see [Your rights and choices](#).

8. Interest-based advertising

Some content or applications on our Solution, including event information and advertisements, are served by third parties, including event organizers, advertisers, ad networks and servers, content partners, or application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Solution. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. Our partners may use non-cookie technologies on which browser settings that block cookies might have no effect. Your browser may not permit you to block such technologies.

For this reason, keep in mind, you can block the collection and use of information related to you by advertising companies for the purpose of serving interest-based advertising by visiting the following platforms of self-regulatory programs of which those companies are members:

- The NAI's opt-out platform is available [here](#).
- The DAA's opt-out platform is available [here](#).
- The DAA's Canadian page is available [here](#).

9. Third Party Content, Apps, and Links

Some content or applications on our Solution may be served by event organizers and other third parties, content providers and application providers including the following:

- a. **Plugins.** Our Solution may include the option for you to use “plugins” that are operated by social media companies. If you choose to use one of these plugins, then it may collect information about you and send it back to the social media company that owns it. This may happen even if you do not click on the plugin, if you are logged into the social media website that owns the plugin when you visit our Solution. Information collected by a plugin is subject to the privacy policy and terms of the social media company that makes it. If you do not want the social media company who owns a plugin to collect information about you when you visit our Solution, sign out of the social media network before visiting. By interacting with a plugin when you are on our Solution (for example, clicking the Facebook “Like” button), you are intentionally transferring information to that social media company. Further, if you are logged into a social media website when you visit our Solution, then you are directing us to share your data with the social media company that owns the plugin.
- b. **User Content.** Our Solution may allow you to upload your own content to public areas of the Solution or to areas accessible to other users of our Solution. Any information you submit becomes public information, and we do not control how others may use the content you submit. We are not responsible for uses that may violate our Terms of Use, Event Organizer Terms and Conditions, privacy policy, the law, or your intellectual property rights.
- c. **Third-party links.** Our Solution may contain links to websites of event organizers and other sites, which we do not control. Those websites have their own privacy policies and terms.

10. Your Rights and Choices

Your rights may vary depending on where you are located. We have created mechanisms to provide you with the following control over your information.

- **Marketing.** If you do not want us to use your email address or other contact information to promote or recommend our own products and services, or third parties’ products or services, you can opt-out by checking the relevant box located on the form where we collect your contact information or, if presented with the option to opt-in, do not opt-in. If you have an account with us, you may be able to log in and check or uncheck relevant boxes. If you do not have an account, you can adjust your preferences by contacting us as set forth below in the *Contact Us* section. You may also opt-out of further marketing communications by replying to any promotional email we have sent you or following the opt-out links on that message. This opt-out may not apply to information provided to us in connection with your registration to any event, product or service experience, or other transactions.
- **Accessing, Updating and Deleting Your Information.** If you have an account with us, you may have the ability to access your information and make updates to or delete your data. If not, you can contact us as set forth in the *Contact Us* section below to request access to, correction of, or deletion of personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or negatively affect the information’s accuracy.
- **Cookies and Automatic Data Collection Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Flash cookies are not managed by the same browser settings as are used for browser cookies. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on [Adobe’s website](#). However, if you disable or refuse cookies, please note that some parts of the Solution may become inaccessible or not function properly. If you do not want Google Analytics to be used in your browser, Google Analytics provides an opt-out tool which can be found [here](#). In some cases, you may be able to set your browser or email program to not download web beacons.
- **Interest Based Advertising.** Please see [Interest-based advertising](#) above for information on how to opt-out of interest-based advertising.
- **Nevada Residents.** If you are a Nevada resident, please see our Nevada privacy section below for more information about our information practices.
- **Canada Residents.** If you are a Canadian, you may have additional personal rights and choices. Please see our Canada privacy section below for additional information.

11. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Solution, you are responsible for keeping this password confidential. We ask you

not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Solution like message boards. The information you share in public areas may be viewed by any user of the Solution.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Solution. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Solution.

12. Your Nevada privacy rights

Nevada residents have the right to opt out of the sale of certain "covered information" collected by operators of websites or online services. We currently do not sell covered information, as "sale" is defined by such law, and we do not have plans to sell this information.

13. Your Canada privacy rights

We comply with applicable Canadian privacy laws and regulations, including the Personal Information Protection and Electronic Documents Act (PIPEDA), in connection with processing Canadian personal information.

We will only use your personal information for the purposes described in this privacy policy unless (1) we have obtained your consent to use it for other purposes; or (2) we are otherwise permitted or required by applicable law to use it for such other purposes.

A. Transferring your personal information outside of Canada

We may transfer personal information that we collect, or that you provide, to third parties (including affiliates, service providers and others) as described in the [Disclosure of your information](#) section above.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law, such as to the United States. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country.

You are welcome to contact us if you have questions regarding the collection, use, disclosure or storage of personal information by our service providers and affiliates outside Canada, and/or to obtain access to written information about our policies and practices with respect to service providers (including affiliates) outside Canada.

For questions about our privacy practices, please contact privacy@socialpass.io as directed in the Contact Us section of this policy.

B. Data Retention

Your personal information will be accessible to our employees and service providers in the United States and elsewhere who have a "need to know" such information for the purposes described in this privacy notice.

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and/or for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you, either directly or indirectly, alone or in combination with any other information. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

C. Accessing and correcting your personal information

By law you have the right to request access to and to correct or rectify the personal information that we hold about you, subject to certain exceptions as required or permitted by applicable law.

If you have any account, you can review and change your personal information by logging into your account and visiting the pages that correspond to the information you want to review and change.

If you want to access, review, verify, correct, rectify, update, or withdraw consent to the collection, use or disclosure of your personal information you may also contact us as directed in the [Contact Us](#) section of this policy to make such a request.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.



We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to all of some of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons, subject to any legal or regulatory restrictions.

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions may include (without limitation):

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that would reveal the personal information or confidential commercial information of another person.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct the information provided, you may contact us as described in the [Contact Us](#) section of this policy.

14. Changes to our privacy policy

We will post any changes we may make to our privacy policy on this page. If the changes materially alter how we use or treat your information we will notify you by email to the primary email address specified in your account (if you have an account with us) and/or through a notice on the Solution home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring that you periodically visit our Solution and this page to check for any changes.

15. Contact Us

If you have any comments or questions about our privacy policy, please reach out to us at privacy@socialpass.io.