

GiFT Privacy Policy

Last updated: July 20, 2023

When you use Greenfence Consumer LLC, our solutions and our affiliated services (collectively, “GiFT”, “we” or “our”), whether as an individual or an individual duly authorized by an organization or business (collectively, “you” or “your”), you are trusting us with your information. We understand that you care how your information is used and shared and we work hard to protect your information and put you in control.

This Privacy Policy describes how GiFT collects, uses and protects data that you provide, such as account information and usage data. It also applies to the content that you store on GiFT. We will not disclose, move, access or use your data except as described in this Privacy Policy or in our Terms of Use.

By using GiFT and GiFT Services, you accept this Privacy Policy. Please read it carefully.

1. Information We Collect

We collect information to provide and improve our services to you. The information we collect, and how that information is used, depends on how you use our services and how you manage the privacy controls we make available to you.

We may collect information from you as an individual as well as information related to the businesses or organizations you have created, manage or are associated with on GiFT.

Here are the types of information we collect:

Information you create or provide to us

When you create an account, you provide us with personal information that may include your name, email address and/or telephone number and a password. You can also choose to add payment and banking information to your account.

We also store the content you create, upload, or receive from others when using our services. This includes things like messages you write and receive, documents, artwork, policies you provide, and any other content you write, share, upload, or save.

Information we collect as you use our services

We receive and store certain types of information whenever you interact with us. For example, like many websites, we use "cookies," and we obtain certain types of information when you access GiFT via your browser.

When you download or use the services provided by GiFT, we may receive information about your location and your device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as retail locations and promotions. While most devices allow you to turn off location services, doing so may prevent you from receiving information you may want, such as available promotions from brands or retailers in your area.

Information from Other Sources

We may receive information from other sources, such as agents and partners who we are working with to provide you with our GiFT services.

2. Why We Collect Information

Providing and Improving the GiFT Services

We use the collected information to provide and improve our GiFT services, including:

- Account creation and management
- Personalization of your experience
- Technical support and customer service
- System monitoring and troubleshooting
- Analytics and performance optimization

Communication

We may use information we collect to interact with you directly. For example, we may let you know about upcoming changes or improvements to our services, or promotions available to you.

And if you contact us at GiFT, we'll keep a record of your request in order to help solve any issues you might be facing, or to consolidate with similar issues others have experienced to improve the services GiFT provides you.

3. Sharing Your Information

When you share your information

Many of our services involve sharing information or content with you, as well as sharing anonymized information or content with other users such as brands and retailers who may use that information to provide you with promotions.

When GiFT shares your information

Information about you is an important part of our business, but we are not in the business of selling any of your information to others. We share your information only as described below and with affiliated partners that either are subject to this Privacy Notice or who follow practices at least as protective as those described in this Privacy Notice.

GiFT Partners and Service Providers

We partner with other service providers, agents and businesses to provide functionality on our behalf. Examples include creating campaign content, data analysis, banking partners, processing remittances and payments, and transmitting content. These partners and service providers may have access to your information needed to perform their functions, but may not use it for any other purposes.

Business transfers

As we continue to develop our business, we might acquire or sell subsidiaries or businesses. In such transactions, your data may be one of the transferred business assets but it will remain subject to any commitments made in any pre-existing Privacy Policy (unless, of course, you consent otherwise. In addition, in the event that GiFT, or substantially all of our assets are acquired, your data will be one of the transferred assets.

Protection of GiFT and Others

We release your data when we believe release is appropriate to comply with the law; enforce or apply our Terms of Use; or protect the rights, property, or safety of GiFT, our other users, or others. This includes exchanging information with other businesses and organizations for fraud protection. Obviously, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from our users for commercial purposes in violation of the commitments set forth in this Privacy Policy.

4. Keeping Your Information Secure

GiFT is built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. However, as would likely be expected, despite such endeavors by us, such transmission or storage cannot be guaranteed to be secured.

We design our products and services to protect you and GiFT from unauthorized access, alteration, disclosure, or destruction of the information we hold, including:

- We work to protect the security of your information during transmission by using encryption protocols and software;
- We regularly review our information collection, storage, and processing practices, to prevent unauthorized access to our systems;

- We restrict access to your information to GiFT employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Additionally, it is important for you to protect against unauthorized access to your password and to your devices that you use to access GiFT. Please be sure to sign off and close any browser windows, particularly when using a device that others may also use.

5. Retaining your information

We retain your information for as long as necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law.

Some data you can delete, or you can request deletion of, whenever you like, such as your personal information or the content you create or upload, such as photos, documents or content to support a campaign.

6. Your choices

You can always choose not to provide certain optional data, even though it might be needed to create a campaign, conduct a transaction, or take advantage of certain GiFT features.

You can add or update information on pages such as those in your profile or related to a campaign. When you update data, we may keep a copy of the prior version for our records.

If you do not want to receive email notifications from us, please adjust your notification preferences in your profile. You have agreed to our Terms of Use and privacy policy when you sign up or sign into GiFT.

The help feature on many browsers will tell you how to prevent it from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons by changing the add-ons settings or visiting the web site of its owner. Because cookies allow you to take advantage of some of GiFT's essential features, we recommend that you leave them turned on. For instance, if you block or otherwise reject our cookies, you may not be able to use certain features or capabilities.

7. Compliance & Cooperation With Regulators

U.S. state law requirements

Some U.S. state privacy laws like the California Consumer Privacy Act (CCPA) and Virginia Consumer Data Protection Act (VCDPA) require specific disclosures for state residents.

This additional state-specific privacy disclosure ("Disclosure") is effective as of July 1, 2023 and describes the personal information that we collect, the sources from which we collect it, the purposes for which we use it, the limited circumstances under which we share personal information, and with whom we share it. These additional disclosures are required by U.S. state regulations, such as the California Privacy Rights Act and Virginia Consumer Data Protection Act:

a. Categories of personal information collected. The personal information that we collect, or have collected from you in the twelve months prior to the effective date of this Disclosure, falls into the following categories established by the California Privacy Rights Act, depending on which services in GiFT you use:

- identifiers such as your name, alias, address, phone numbers, IP address, your GiFT account log-in information, or a government-issued identifier (e.g. a social security number or driver's license, which may be required for tax or identity verification purposes);
- personal information, such as your bank details or other payment information;
- information you choose to provide that may reveal your age, gender, race, sexual orientation, or other protected classifications;
- commercial information, such as purchase, coupon redemption or other transaction activity;
- internet or other electronic network activity information, including content interaction information, such as coupon and image downloads;
- geolocation data, such as the location of your device or computer which, in some cases, may constitute precise geolocation information;
- audio or visual information, such as images collected or stored in connection with GiFT;
- professional information, for example data you may provide about your business; and;
- inference data, such as information about your purchase preferences.

b. Categories of personal information disclosed for a business purpose. The personal information that we may disclose to third parties about you for a business purpose in the twelve months prior to the effective date of this Disclosure falls into the following categories established by the California Privacy Rights Act, depending on which GiFT service is used:

- identifiers such as your name, address, phone numbers, IP address, or a government identifier, for example if we use a third-party carrier to deliver your order, or if we use a third-party service to verify your identity;
- personal information, such as a credit card number or other payment information, for example if we use a third-party payment processor;

- information that may reveal age, gender, race, sexual orientation, or other protected classifications, for example if you choose to participate in a survey distributed by a survey provider;
- commercial information, such as the details of a product or service you purchased if a third-party service provider is assisting to provide that product or service to you;
- internet or other electronic network activity information, such as if we use a service provider to help us gather crash reports for analyzing the health of our devices and services;
- geolocation data, which may constitute precise geolocation data, such as providing you with a coupon for a retailer near your location;
- professional information, for example if we provide your account details to a service provider for verification as part of enrollment for your bank account; and;
- inference data, for example if we use a service provider to help us optimize the accuracy of your location to make sure relevant coupons are provided to you.

c. Advertising under the California Privacy Rights Act. GiFT may share limited information to help ensure you receive more useful and relevant GiFT coupons and to measure a campaign's effectiveness. Any personal information we may have shared for the purpose of cross-context behavioral advertising, as that term is defined by the California Privacy Rights Act, in the twelve months prior to the effective date of this Disclosure falls into the following categories:

- identifiers such as a cookie, a device identifier, or a code derived from applying irreversible cryptography to other information like an email address; we never share your name or other information that directly identifies you.
- internet or other electronic network activity information, such as whether you downloaded our app or other measures of effectiveness; for example, if you have already downloaded one of our apps, we will share an advertising identifier and data about that event so that you will not be served an ad to download the app again.

d. Advertising under the Virginia Consumer Data Protection Act. The categories of third parties with whom we may share personal information for the purpose of cross-context behavioral advertising may include the processing of personal information for the purposes of targeted advertising as that term is defined under the Virginia Consumer Data Protection Act.

e. Your Data Rights: You may have certain data rights under the California Privacy Rights Act or Virginia Consumer Data Protection Act, including to request information about the collection of your personal information by GiFT, to access your personal information in a portable format, and to correct or delete your personal information. If you wish to do any of these things, please contact us at security@greenfence.com. Additionally, you may have the right to opt out of the processing of your personal data for targeted advertising, as defined by the Virginia Consumer

Data Protection Act, or the sharing of your personal information for cross-context behavioral advertising, as defined by the California Privacy Rights Act. To do so, please contact us at security@greenfence.com. GiFT is not allowed for use by individuals under the age of 18. As such, if you are under 18, you must not use GiFT. You may also have the right to appeal the denial of any of these rights by submitting a form that will be provided to you if we deny a data request. Depending on your data choices, certain services may be limited or unavailable. To ensure the security of your GiFT account, we will generally ask you to verify your request using the contact information you have already provided. If you do not have an account, or if you are an authorized agent under the California Privacy Rights Act, please contact us at security@greenfence.com.

f. No sale of personal information. In the twelve months prior to the effective date of this Disclosure, GiFT has not sold any personal information of consumers, as those terms are defined under the California Privacy Rights Act.

g. California Privacy Rights Act Sensitive Personal Information Disclosure. The categories of data that we collect and disclose for a business purpose may include "sensitive personal information" as defined under the California Privacy Rights Act. GiFT does not use or disclose sensitive personal information for any purpose not expressly permitted by the California Privacy Rights Act.

h. California Privacy Rights Act Retention Disclosure

We keep your personal information to enable your continued use of GiFT, for as long as it is required in order to fulfill the relevant purposes described in this privacy policy, as permitted or as may be required by law, or as otherwise communicated to you. For example, we retain your transaction history so that you can review coupon redemptions, and to improve the relevance of products and content we recommend.

i. California Privacy Rights Act Non-discrimination Statement. GiFT will not discriminate against any consumer for exercising their rights under the California Privacy Rights Act.

j. Virginia Consumer Data Protection Act De-identified Data Disclosure. GiFT may use de-identified data in some instances. GiFT either maintains such data without attempting to re-identify it or treats such data as personal data subject to applicable law.

k. Annual Reporting for 2022.

Access Requests. In 2022, GiFT received 0 requests from our users to initiate the data access process.

Deletion Requests. In 2022, GiFT received 0 requests from our users to initiate the account deletion process.

EU-US and Swiss-US Privacy Shield

We run our operations using AWS. With AWS's EU-approved Data Processing Addendum and Model Clauses, GiFT is in full compliance with EU law. The AWS Data Processing Addendum is available to GiFT and you, whether you are established or resident in Europe, or an authorized user acting on behalf of a company operating in the European Economic Area. For additional information, please visit the [AWS EU Data Protection FAQ](#).

What happens when GiFT receives a legal request

We are vigilant about your privacy. We do not disclose your data unless we're required to do so to comply with the law or a valid and binding order of a governmental or regulatory body. Governmental and regulatory bodies need to follow the applicable legal process to obtain valid and binding orders, and we review all orders and object to overbroad or otherwise inappropriate ones. Unless prohibited from doing so or there is clear indication of illegal conduct in connection with the use of GiFT services, GiFT notifies you before disclosing your content so you can seek protection from disclosure.

We know transparency matters to you, so we will regularly publish a report about the types and volume of data requests we receive.

8. Children's Privacy

GiFT is not allowed for use by individuals under the age of 18. As such, if you are under 18, you must not use GiFT.

9. Contact us

If you choose to use GiFT, your use and any dispute over privacy is subject to this Privacy Policy and our Terms of Use, including limitations on damages, resolution of disputes, and application of the law of the state of Nevada, USA. If you have any concern about privacy at GiFT, please contact us at security@greenfence.com with a thorough description, and we will try to resolve it.

10. Changes to this Privacy Policy

Our business changes constantly, and our Privacy Policy and the Terms of Use will also change. We may email periodic reminders of our notices and conditions, but you should check our web site frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to

make them less protective of your data collected in the past without the consent of affected customers.

We reserve the right to update or modify this privacy policy at any time. The updated policy will be effective upon posting on our website or app. Please review this policy periodically for any changes.