

SPREAD PRIVACY POLICY

Last Updated: September 11, 2023

At Spread, we believe that privacy is a right. In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, Spread Technologies, (“**Spread**”, “**we**”, “**our**” or “**us**”) use, collect and store personal information that we collect or receive from or about you (“**you**”) in connection with <https://joinspread.com/> (the “**Website**”), the mobile application (the “**App**”) and the services provided therein (the App, Website, Platform and services provided, shall, collectively, be referred to as the “**Services**”).

Spread’s mission is to enable access to the ideas that matter by designing a platform for superior discovery and productive information gathering (the “**Platform**”).

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 information.

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 App or by other means and take any additional steps as required by applicable law.

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

(i) We Process the Following Personal Information:

- a. **Information you decide to provide us with.** We collect personal information that you voluntarily provide, such as when you create an account on the Website or the App, or when you decide to join our Waitlist. The personal information will include your full name, email address, profile picture provided by you or your chosen log-in provider (such as Google or Apple) as well as any other information that you decide to provide us.
- b. **Information provided when using the Services.** When you use the Services and/or submit any content, we collect and process the personal information submitted, such as posts, reports or any other content that you choose to upload to the Services. We also process any other personal information made available as part of your interaction with the Services, like the lists of accounts followed by you on the Platform and/or any actions you take with regard to the content you or other users post, such as reposting other users content.

- c. **Information automatically collected.** We may automatically collect certain information through your use of Spread's Services, such as cookie, pixels, tracking technologies and similar identifiers ("Technologies"), your Internet protocol (IP) address, 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 from Other Sources.** Spread 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. Such information may include profile pictures, lists of followers or any other information made available to us by you and the applicable third party.
- e. **Information you provide to us in person.** For example, when you 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.

(ii) **We process information for the following purposes:**

- a. **To provide you with the Services.** We will use the information, including, without limitation, for the following purposes: (i) allow you to create an account; (ii) to provide you the Services and to process your requests; (iii) communicate with you about your use of the Services; (iv) fulfill any instruction and/or request made by you in the context of the Services; (v) send you push notifications and/or emails and notifications regarding your account or certain features of the Services, including, updates pertaining to your subscription, and related to the services we provide you with; (vi) to personalize your experience with our Services; (vii) to allow you to create more users and administrate your users; (viii) to generally administer and improve the Services;
- b. **To allow you to make use of our Website and App.** We will use your information to allow you to make use of our Website and/or App, including, (i) to answer your questions and to allow you to communicate with us (e.g., by using the Website chat); (ii) to analyze your use of our Services and to improve our Website and/or App; and (iii) to customize your experience.
- c. **For Administrative Purposes.** Spread 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 Spread Services; (iii) for internal quality control purposes; (iv) to establish a business relationship; (v) to generally administer Spread Services;
- d. **To Market our Services.** Spread may use information to market Spread Services. Such use includes (i) notifying you about offers and services that may be of interest to you; (ii) tailoring content (iii) developing and marketing new products and services, and to measure interest in Spread's Services; (iv) other purposes disclosed at the time you provide information; and (v) 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 Spread 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 Spread Services, use 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 cookies and similar technologies we employ on the Services, you may do so by blocking, deleting, or disabling them as your browser or device permits.

(iii) **The lawful bases we rely on for processing personal information are (if and when applicable):**

- a. The data subject has given consent to the processing of his or her personal information;
- b. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; and/or
- c. Processing is necessary for the purposes of the legitimate interest.

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

We may share your information as follows:

- 3.1. The information Spread 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 Services;
 - 3.3.3. With email providers, marketing, CRM, other similar tool providers;
 - 3.3.4. With analytic companies, in order to help us understand and analyze information we collect in accordance with this policy; and
- 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 Spread, 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. The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by specific laws):
 - i. You have the right to withdraw consent to the processing, where consent is the basis of processing.
 - ii. You have the right to access the personal information that we hold and request further details about how we process it, under certain conditions.
 - iii. You have the right to demand rectification of inaccurate personal information about you. We will promptly correct any information found to be incorrect.
 - iv. You have the right to object to unlawful data processing under certain conditions.
 - v. You have the right to the erasure of past data about you (your “right to be forgotten”) under certain conditions.
 - vi. You have the right to demand that we restrict the processing of your personal information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, the processing is no longer necessary, or if you believe your personal information is inaccurate.
 - vii. You have the right to data portability of personal information concerning you that you provided us in a structured, commonly used, and machine-readable format, subject to certain conditions.

- viii. The personal information we collect is not used for automated decision-making and profiling, except for automated processes in the context of marketing. As stated above, you can opt out of direct marketing by Spread by contacting Spread directly or by following the instructions through the unsubscribe options in our email messages.
 - 4.2. You can exercise your rights by contacting us at privacy@joinspread.com. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent 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 require further information in order to fulfil 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 initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
 - 4.3. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing privacy@joinspread.com. If you terminate your account, any association between your account and personal information 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.
 - 4.4. **Marketing emails – opt-out:** You may choose not to receive marketing email of this type by sending a single email with the subject "BLOCK" to privacy@joinspread.com. Please note that the email must come from the email account you wish to block OR if you receive an unwanted email from us, 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.** In order to run our business and provide our Services to you, we transfer personal information 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 information 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 information 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 information; 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@joinspread.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.** We use a tool called “Google Analytics” to collect information about use of the Services. Google Analytics collects information such as how often users visit the Website or the App,

what pages they visit when they do so, and what other websites they used prior to coming to the Website. We use the information we get from Google Analytics to maintain and improve the Services. 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 the Services 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/>.

- **Mixpanel.** We collect information such as your email address and your user activity through the use of Mixpanel. Mixpanel's ability to use and share information is governed by the Mixpanel Terms of Use, available at <https://mixpanel.com/legal/terms-of-use/>, and the Mixpanel Privacy Policy, available at <https://mixpanel.com/legal/privacy-policy/>. You can opt-out of Mixpanel's services by clicking on the following link: <https://mixpanel.com/optout/>.
- **Expo.** We use Expo, a framework for creating mobile apps. Expo may collect anonymous basic usage information (such as device info and crash reports), so they can improve their services. We don't have access to this information. Please refer to Expo's [Privacy Policy](#) for more information about their data collection and processing practices.
- **UXCam.** We use UXCam, which is an analytics solution. UXCam may record: Screens visited, Interaction patterns (such as screen actions, gestures: taps, scrolls), and Device details (Type, Version, Model, Operating System). We are using the information collected by UXCam to improve our app. UXCam does not collect personally identifiable information and does not track your browsing habits across apps. For more information see [Privacy Policy](#) for Information Collected by the UXCam Service.
- Through our Services we may allow third party advertising partners to set technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as "interest-based advertising" or "online behavioral advertising". We may allow access to other data collected by the services to share information that may be useful, relevant, valuable or otherwise of interest to you.
- 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. **California Privacy Rights:** California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@joinspread.com. Please note that we are only required to respond to one request per customer each year.
- 9.2. **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, but we may allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer's online activities over time and across different web sites when a consumer uses the Services.

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@joinspread.com.
