

Privacy Policy

Effective as of May 1, 2021

About this policy

This privacy policy and general privacy notice applies to Alma Labs, Inc. (t/a AlmaConnect) (“AlmaConnect” or “Company” or “We”). Your privacy is extremely important to us and we are committed to fair practices that protect your personal data. We have developed this Privacy Policy to communicate, clearly and transparently, what information we collect, how we collect it and what we do with it when you access and use our websites and products.

By using any of our Sites or Services, you agree that your information will be handled as described in these Policies, to the extent applicable. Your use of our Services, the Site or cookies, and any dispute over privacy, is subject to these Policies and the possible Agreement we have with you, including its applicable limitations on damages and the resolution of disputes.

Influencer Policy (ICM)

If you are a journalist and you believe your information is included in the Alma Labs database, please contact admin@almaconnect.com for additional information regarding our processing of journalist information.

Information We Collect

Alma Labs, Inc. collects several types of information about you directly from you, automatically through your use of the Site or our Services, and through third parties. We collect information from you when you request information from us or otherwise interact with our Site and our Services. The type of information that we collect from you depends on your particular interaction with our Site.

Such information is utilized in providing an efficient and effective experience to all users. When we provide the Services to you, your data is stored on our computers and servers. In some cases, the data may be accessible to people involved with the operation of the site (administration, legal, system administration) appointed, as necessary, as Data Processors by us. We collect the following information:

- Identity Data: may include name, personal or job title and position, location, or similar identifier.
- Contact Data: may include physical address, email address and telephone number.

- Transaction Data: may include requests for products and services you have made to us, or in relation to products or services that we have supplied to you.
- Technical Data: may include IP address, browser type and version, time zone setting and location, operating system, platform and other technology on the devices used to access this Website.
- Usage Data: may include enquiries submitted by you, information supplied, and how you use our website.

We may also collect non-personal data such as aggregated data which is data that may be obtained from your personal data, but which does not directly or indirectly identify you. This may include Profile and Usage Data detailing how you use our Website and areas that you have interacted with.

How do we collect your personal data?

We collect your data from direct interactions with us in person, by phone, email or otherwise or where you have supplied your Identity and Contact Data.

We also collect your data through automated technologies or interactions with our website, including use of the web enquiry form where we may collect in addition Transaction, Technical, Profile and Usage Data and Marketing Data.

Data Accuracy

It is important that the data that we hold about you is accurate and up to date. In the event that your data changes please notify us so that we can update our records.

Use of your information

We may hold and process personal data that you provide to us in accordance with the GDPR.

The information that we collect and store relating to you is primarily used:

- To enable us to provide services to you and to communicate with you. This may include Identity, Contact, and Transactional data.
- To notify you about any changes to our business, such as improvements to our Website or service/product changes, that may affect our service or relationship with you. This may include Identity and Contact Data.
- If you are an existing customer or prospective customer, we may contact you with information about goods and services similar to those that were the subject of a previous sale to you or enquiry made, or a discussion held with you. This may include Identity and Contact Data.

- To tailor the content and information that we may send or display to you, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the Sites or our Services.
- To better understand how users access and use the Services, both on an aggregated and individualized basis, in order to improve our Services to you and everyone.
- To ensure that content from our Site is presented as optimally as possible for you, your computer, and your web browser.
- Where you have consented to receive our e-newsletters to provide that to you. This may include Identity and Contact Data.
- Where we need to comply with a legal obligation. This may include Identity, Contact, Transactional and Technical Data.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This may include all types of data.

We will only use your personal data for a reason other than the purpose for which it was originally obtained if we consider that we need to use it for that other purpose and have a legitimate interest in doing so.

Disclosure of Your Information

We may disclose Personal Information that we collect or you provide as described in this Policy:

- To our service providers, which provide services for us including but not limited to sending emails on our behalf, processing payments, providing analytics services, and helping us provide services as requested by users. Our service providers are bound by law or contract to protect Personal Information and are only allowed to use Personal Information in accordance with the terms of our service agreements with them. We do NOT share, sell, rent, or trade Personal Information with third parties for their own promotional purposes, and we will only share Personal Information as outlined herein or with your consent.
- We may also disclose your Personal Information: (1) To comply with any court order, law, or legal process, including to respond to any government or regulatory request; (2) To enforce or apply our Terms of Services and other agreements, including for billing and collection purposes; and (3) If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Alma Labs, Inc., our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Links

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check their policies before you submit any personal information.

Controlling the use of your data

Where we rely on consent as the lawful basis for processing your data you can revoke or vary that consent at any time.

If you do not want us to use your data or want to vary the consent that you have provided you can email us at admin@almaconnect.com at any time.

Data Security

We use appropriate technical, organizational, and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We will also take all reasonable precautions to ensure that our staff and employees who have access to personal data about you have received adequate training.

Data Retention

We process and store your personal data only for the period necessary to achieve the purpose of storage. If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

Use of cookies

Our websites use cookies (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons, tags and scripts) to uniquely identify your browser and to gather information about how you interact with the websites.

Some cookies collect information about browsing behavior when you access this website via the same computer or device. This includes information about pages viewed, products purchased and your journey around a website. We do not use cookies to collect or record information on your name, address, or other contact details.

We use this information for the following purposes:

- assisting you in navigation;
- assisting in registration, login, and your ability to provide feedback;
- analysing your use of our website; and
- assisting with our promotional and marketing efforts (including behavioral advertising).

How do I disable cookies?

If you want to disable cookies, you can change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

- For Microsoft Internet Explorer:
 - Choose the menu “tools” then “Internet Options”
 - Click on the “privacy” tab
 - Select the setting the appropriate setting
- For Google Chrome:
 - Choose Settings> Advanced
 - Under “Privacy and security,” click “Content settings”
 - Click “Cookies”
- For Safari:
 - Choose Preferences > Privacy
 - Click on “Remove all Website Data”
- For Mozilla Firefox:
 - Choose the menu “tools” then “Options”
 - Click on the icon “privacy”
 - Find the menu “cookie” and select the relevant options
- For Opera 6.0 and further:
 - Choose the menu “Files”> “Preferences”

Alma Labs, Inc. and the GDPR

Your rights as a data subject

You as a data subject have many possibilities to impact how your personal information is being processed. You can:

- Request access to your information we process
- Withdraw your consent if our use of your information is based on consent
- Request that your information to be deleted or for you to be forgotten (right to erasure)
- Request that we correct or change your information. As a customer you may also do this by logging in to your account.
- Limit, restrict or object to our use of your information

- Access your information and/or receive it
- Subject to applicable law, lodge a complaint with your local data protection authority.

Please note that if you request to remove your information, we may retain some of the information for specific reasons, such as to resolve disputes, troubleshoot problems, and as required by law. Furthermore, some information is never completely removed from our databases due to technical constraints and the fact that we regularly back up our systems. Therefore, not all of your personal information will ever be completely removed from our databases.

Controller and Data Protection Officer

This website is provided by Alma Labs, Inc. 3411 Silverside Road, STE 104, Wilmington, New Castle, DE 19810, USA. Alma Labs, Inc. is the controller for the purpose of all applicable data protection legislation and is subject to the investigatory and enforcement powers of the Federal Trade Commission (the “FTC”).

If you have any questions about this Policy or the use of your personal information, you are always welcome to contact us at admin@almaconnect.com. You will also reach our Data Protection Officer, **Dhruv** at the same address.

For our office details, please visit: https://www.almaconnect.com/contact_us

Alma Labs and the APPI

Your rights as a data subject

You as a data subject have many possibilities to impact how your personal information is being processed. You can:

- Request access to your information we process
- Withdraw your consent if our use of your information is based on consent
- Request that your information be deleted (right to erasure) if your information is incorrect, used beyond the necessary scope to achieve the utilization purposes or obtained by deceit or other improper means.
- Request that we correct or change your information if your information is incorrect. As a customer you may also do this by logging in to your account.
- Limit, restrict or object to our use of your information if your information is used beyond the necessary scope to achieve the utilization purposes or obtained by deceit or other improper means.
- Subject to applicable law, lodge a complaint with your local data protection authority.

Please note that if you request to remove your information, we may retain some of the information for specific reasons, such as to resolve disputes, troubleshoot problems, and as

required by law. Furthermore, some information is never completely removed from our databases due to technical constraints and the fact that we regularly back up our systems. Therefore, not all of your personal information will ever be completely removed from our databases.

Identity and contact details of the Data Controller

If you have any questions about this Policy or the use of your personal information, you are always welcome to contact us at admin@almaconnect.com. You will also reach our Data Protection Officer, **Dhruv** at the same address.

For our office details, please visit: https://www.almaconnect.com/contact_us

Alma Labs and the CCPA

Your rights under the CCPA

You have rights which impact how your information is being processed, including:

- The right to know what information is collected, used, shared or sold;
- The right to delete (erasure right) information processed by us;
- The right to opt-out of the sale of your information. If you are under the age of 16, we will only sell your information if you opt-in, with your parent or guardian consenting if you are under 13;
- The specific personal information right to request a copy of the specific personal information collected about you during the past 12 months; and
- The right to non-discrimination in how we provide the Services to you when you exercise any of your rights under the CCPA.

Submitting a personal information or erasure request

You may ask us to disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your identity as a user of our Service, we can disclose that information to you. You may also make a request to have that information erased or deleted.

You can make a request for your information twice every 12 months. If you are making an erasure request, it will help us if you include details of the information you would like erased. We may need to ask you for additional information to fully identify you. If we can't identify you, we may not be able to erase your information.

Please note that if you request that we remove your information, we may retain some of the information for specific reasons, such as to resolve disputes, troubleshoot problems, and as required by law. Furthermore, some information is never completely removed from our

databases due to technical constraints and the fact that we regularly back up our systems. Therefore, not all of your personal information will ever be completely removed from our databases.

We will respond to you on these requests as quickly as received your note but it may take us up to 45 days. If we need more time than that, we will let you know.

Opt-out request

If you are a resident of California and you want to make it clear to us that you do not want us to sell your personal information, contact us at admin@almaconnect.com.

International Data Transfers

Alma Labs, Inc. is a global company and information that we collect from or about you within the European Economic Area (“EEA”), or within any country located outside of the EEA, may be transferred across international borders to third countries outside of the EEA, or the country in which you are located, that do not have laws providing an adequate level of data protection. We as the Data Controller (or Data Exporter) will do our best to ensure that your information is protected no matter where it is transferred to.

To ensure adequate protection for personal information we enter into Data Processing Agreements with our suppliers, including the ones who process your personal information outside of the non-EEA country in which you are located or the EEA. When necessary, we utilize approved transfer mechanisms (such as adequacy decisions or the Standard Contractual Clauses in the EU) to ensure the necessary protection of your personal information.

Opting out of promotional or information emails from Alma Labs

We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the email. If you opt-out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any services you have requested or received from us.

Changes to the Policies

We may change the Policy from time to time due to changed or updated legislation and/or business standards. All changes to this Policy are posted on this page and we encourage you to review our Policy regularly to stay informed.

Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:
admin@almaconnect.com