

Privacy Policy

Last modified: May 1, 2022

Introduction

Comfort Zones Digital, Inc. ("**Company**" or "**We**" or "ComfortZones") respects your privacy and is committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you access our website (www.comfortzonesdigital.com) (the "Website").
- The types of information we may collect or that you may provide when you download, register with, access, or use the ComfortZones mobile application (the "**App**").
- Our practices for collecting, using, processing, maintaining, protecting, disclosing and transferring that information.
- Your rights regarding the Personal Information that we hold about you including how you can access, correct, and request erasure of your Personal Information.

This policy applies only to information we collect in the Website and the App and in email, text, and other electronic communications sent through or in connection with the Website or the App.

This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App.
- You provide to or is collected by any third party (see Third-Party Information Collection).

Our other websites and apps, and these other third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not continue to access the Website, or download, register with, or use the App. By continuing to access the Website, or by downloading, registering with, or using the App, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of the Website or the App after we revise this policy means you accept those changes, so please check the policy periodically for updates.

Children Under the Age of 18

The Website and the App are not intended for use by children under 18 years of age, and we do not knowingly collect Personal Information from children under 18. If we learn we have collected or received Personal Information from a child under 18, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at www.comfortzonesdigital.com/contact-us.

Information We Collect and How We Collect It

We collect information from and about users of our Website and the App:

- Directly from you when you provide it to us.
- Automatically when you use the App.
- Your employer may provide information about you to us.

Information You Provide to Us

When you download, register with, or use the App, we may ask you to provide information:

- By which you may be personally identified, such as name, postal address, email address, or any other identifier by which you may be contacted online or offline ("**Personal Information**").
- That is about you but individually does not identify you, such as your age, gender and categories and topics that you select within the App.

This information includes:

- Information that you provide by filling in forms in the Website or App. This includes information provided at the time of creating or linking an account in the App and subscribing to our service and selecting and prioritizing categories and topics, and requesting further services. We may also ask you for information when you report a problem with the Website or App.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- To the extent you carry out transactions on the Website or App, relating to details of transactions you carry out through the Website or App and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the Website or App.
- Your search queries on the Website or App.

Automatic Information Collection and Tracking

When you download, access, and use the App, it may use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs, usage time and other communication data and the resources that you access and use on or through the App.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- If you do not want us to collect this information do not download the App or delete it from your device.

Information Provided by your Employer

Your employer may provide information to us in order to enable us to provide services or to verify your identity when you use the App as part of an agreement with your employer. If you

do not want your employer to share information with us do not download the App or delete it from your device.

Information Collection and Tracking Technologies

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.
- **Web Beacons.** Pages of the App and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

Third-Party Information Collection

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use this app. 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, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We will only process your Personal Information in accordance with this Privacy Policy unless otherwise required by applicable law. We take steps to ensure that the Personal Information that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

We only process your Personal Information where applicable law permits or requires it in connection with our application functions, where the processing is necessary to comply with a legal obligation that applies to us, for our legitimate interests or the legitimate interests of third parties, or with your consent if applicable law requires consent. We may process your Personal Information for the following legitimate business purposes:

We use information that we collect about you or that you or your employer provide to us, including any Personal Information, to:

- Provide you with the App and its contents, and any other information, products or services that you request from us.
- Fulfill any other purpose for which you provide it.
- Give you notices about your account/subscription, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when App updates are available, and of changes to any products or services we offer or provide through it.

The usage information we collect helps us to improve our Website and App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website or App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Website or App.

We will only process your Personal Information for the purposes we collected it for or for compatible purposes. If we need to process your Personal Information for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your Personal Information without your knowledge or consent only where required by applicable law or regulation.

We may also process your Personal Information for our own legitimate interests, including for the following purposes:

- To prevent fraud.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.

You will not be subject to decisions by your employer based solely on automated data processing without your prior consent.

Collection and Use of Special Categories of Personal Information

Certain special categories of Personal Information are considered sensitive under the laws of some jurisdictions, including the European Union (EU) and European Economic Community (EEC), and may receive special protection. We may collect and process the following special categories of Personal Information when you voluntarily provide them, or we receive them from a third party such as your employer, or with your consent, in order to provide recommendations in the App, or as applicable law otherwise permits:

- Rating and ranking of categories and topics to customize content in the App

Where we have a legitimate need to process special categories of Personal Information about you for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

Disclosure of Your Information

We may process and disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

In addition, we only disclose Personal Information that we collect or you or your employer provide to our subsidiaries and affiliates, and to contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them. These third-party service providers may be located outside of the country in which you live.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your Personal Information consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to process your Personal Information for their own purposes. We only permit them to process your Personal Information for specified purposes in accordance with our instructions.

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ComfortZones Digital's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by ComfortZones Digital about our Website and App users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the App Terms of Use, and for billing and collection.

If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our customers, users, ComfortZones Digital, or others.

Cross-Border Data Transfers

Where permitted by applicable law, we may transfer the Personal Information we collect about you to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country for the purposes set out in this Privacy Notice. If you are located in the EEC, we have implemented standard contractual clauses (SCCs) which have been adopted by the EU Commission or adopted by a supervisory authority and approved by the EU Commission, in our contract with your employer to secure the transfer of your Personal Information to the United States and other jurisdictions. Where we have anonymized Personal Information, cross-border data transfer restrictions do not apply and we may transfer that data to

the United States or other jurisdictions without such SCCs.

Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the Personal Information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Website or App may then be inaccessible or not function properly.
- **Personal Information Collection.** We ask for your consent for all Personal Information that we collect from you in our Website or App.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California residents may have additional Personal Information rights and choices. Please see <http://www.comfortzonesdigital.com/legal/california-privacy-policy> for more information.

Rights of Access, Correction, Erasure and Objection

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes. By law you may have the right to request access to, correct, and erase the Personal Information that we hold about you, or object to the processing of your Personal Information under certain circumstances. You may also have the right to request that we transfer your Personal Information to another party. If you want to review, verify, correct, or request erasure of your Personal Information, object to the processing of your Personal Information, or request that we transfer a copy of your Personal Information to another party, you can review and change your Personal Information by logging into the App and visiting your account profile page.

You may also send us an email at privacy@comfortzonesdigital.com to request access to, correct, or delete any Personal Information that you have provided to us. We cannot delete your Personal Information except by also deleting your user account.

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 some or all of the Personal Information that we hold about you, or we may have destroyed, erased, or anonymized your Personal Information 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 why, subject to any legal or regulatory restrictions.

California residents may have additional Personal Information rights and choices. Please see <http://www.comfortzonesdigital.com/legal/california-privacy-policy> for more information.

Right to Withdraw Consent

Where you have provided your consent to the collection, processing, and transfer of your Personal Information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at privacy@comfortzonesdigital.com

Data Security

We have implemented appropriate physical, technical and organizational security measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Any Personal Information or sensitive Personal Information is encrypted using HTTPS encryption technology. In addition, we limit access to Personal Information to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

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 Website or App, 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 App like message boards. The information you share in public areas may be viewed by any user of the App.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted through our Website or App. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Data Retention

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 we collected it for, as required to satisfy any legal, accounting, or reporting requirements, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Information, we consider our statutory obligations, the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes we process your Personal Information for, and whether we can achieve those purposes through other means. You can find our data retention policy at www.comfortzonesdigital.com/legal/DataRetention.

Under some circumstances we may anonymize your Personal Information so that it can no longer be associated with you. 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.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your Personal Information. To learn more about your California privacy rights, visit <http://www.comfortzonesdigital.com/legal/california-privacy-policy>.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of Personal

Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@comfortzonesdigital.com.

Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users' Personal Information, we will post the new privacy policy on this page with a notice that the privacy policy has been updated and notify you by email to the primary email address specified in your account and with an in-Website or in-App alert the first time you use the Website or App after we make the change.

If we would like to use your previously collected Personal Information for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your Personal Information for a new or unrelated purpose. We may process your Personal Information without your knowledge or consent only where required by applicable law or regulation.

The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and for periodically visiting this privacy policy to check for any changes.

Contact Information

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

To register a complaint or concern, please email privacy@comfortzonesdigital.com. If you are unsatisfied with our response to any issues that you raise, you may have the right to make a complaint with the data protection authority in your jurisdiction by contacting the data protection authority.

Please direct any questions relating to our processing of your Personal Information to us or to our EU representative if you are located in the EU. For contact information for our EU representative please email us at privacy@comfortzonesdigital.com.