

PRIVACY POLICY

PRIVACY POLICY – Corporate

VRTCAL Markets, Inc. (“VRTCAL, we, our or us”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive when you visit the www.vrtcal.com site (the “Site”). This Privacy Policy applies only to information that you provide to us through the Site. This Privacy Policy does not govern the collection and use of data on our advertising technology, see our Privacy Policy - Advertising.

This Privacy Policy may be amended or updated from time to time. You are advised to consult this Privacy Policy – Corporate regularly for any changes.

A. Information Collection

How we use the personal information we collect:

Some areas of our corporate website may ask you to provide us with personal information about you voluntarily. For example, we may ask you to provide your contact details when you: register an account with us, subscribe to our marketing communications, submit enquiries to us, request market reports, request access to a demo, or apply for a job.

We use your personal information such as email address, name and phone number for purposes of administering and expanding our business activities, providing customer service and making available other products and services to our customers and prospective customers.

Occasionally, we may also use the information we collect to notify you about important changes to our website, new services and special opportunities we think you will find valuable where this is in accordance with your expressed marketing preferences. You may notify us at any time if you do not wish to receive these offers by emailing us at info@vrtcal.com.

How we use the Digital Identifiers we collect:

VRTCAL may use the Digital Identifiers it collects from visitors to its website to serve targeted ads to those visitors. We may also use Digital Identifiers to:

- prepare reports that summarize visitor activity
- report on ad performance, campaign reporting, and campaign forecasting
- determine user responses to advertisements and promotions

VRTCAL’s use of Digital Identifiers benefits visitors by enabling VRTCAL to deliver ad content that is relevant to visitors’ interests.

B. Opt Out

To learn more about your opt out choices more generally and how to opt out of tailored advertising across a number of services, please visit <http://www.networkadvertising.org/choices/>.

For more information on mobile specific opt-out choices, please visit <http://www.networkadvertising.org/mobile-choices>.

To opt out of cookie tracking when you visit our website: <https://www.vrtcal.com/opt-out/>

Alternatively, you can contact the VRTCAL team at: info@vrtcal.com.

C. Our Policy Toward Children

We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at info@vrtcal.com. If we become aware that a child under 13 has provided us with Personal Information, we will delete such information from our files.

D. Information Sharing and Disclosure

We do not rent, sell or disseminate personal information to third parties for promotional purposes without consent. We will only share this voluntarily-provided personal information to enable third party service providers to assist or facilitate in the services we provide; to comply with applicable laws and regulations or to respond to a subpoena, search warrant or other lawful request for information we receive; to enforce an agreement or to protect our rights; with any parent, affiliated or successor entity; in connection with any asset sale, transfer, divestiture or liquidation; in connection with strategic alliances, partnerships or other business arrangements to permit the offering of products or services we think may be of interest to you or where we have determined that the information will be used in a responsible manner by the third party; or as permitted under any agreement with you.

VRTCAL does not otherwise rent, sell, or disseminate information collected from visitors to its corporate website to third parties.

E. Changing or Deleting Your Information

We make good faith efforts so all of our registered users may review, update, correct or delete the Personal Information, if not required to be retained by law or for legitimate business reasons. You may withdraw your consent for the collection, use and transfer of data (including location data) by asking us to do so through the following email info@vrtcal.com; if you request a complete deletion of all such information, your account may be

deactivated. We may retain an archived copy of your records as required by law or for legitimate business purposes.

In addition, we may delete any information provided by you or related to you, pursuant to our policies as then in effect.

California Residents:

If you are a resident of California, please review the additional privacy disclosures in this section, which apply where we collect and disclose information as a “business” under California law.

VRTCAL does not “sell” or “share” personal information related to visitors to our website or other business contact information as those terms are defined under California law.

Category of Personal Information	Categories of Recipients	Purpose of Disclosure
Name, email address and other contact details	Fraud prevention partners, cloud-based service providers, event organizers, fulfillment service providers	<ul style="list-style-type: none">• To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.• To enable services for events admissions, promotions, and other sweepstakes and activities;• To process job applicant submissions• To respond to your requests or to provide you with information requested by you;• To communicate with you about updates to our products and services; changes to our Site;• For other business purposes, such as surveys and, research;• To comply with applicable legal

		requirements
Pseudonymous identifiers	Data analysis partners, fraud prevention partners, cloud-based service providers	<ul style="list-style-type: none"> • To compile statistics for our internal business purposes about your use of our Site and to better tailor content to you; • To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; • For other business purposes, such as determining the effectiveness of our marketing, and to enhance, customize and improve our websites, products and services through surveys, research

EEA, UK, Switzerland Residents:

If you are a resident of a country in the EEA, the UK, or Switzerland, you have certain rights and protections under the law regarding the collection, processing, and use of information about you. Specifically, you may have the right: (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information.

If you would like to exercise any of these rights, please email us at the contact details provided below. You may also opt out of receiving marketing communications from VRTCAL by clicking on the “unsubscribe” in the marketing e-mails

F. Security

We use many different measures to help ensure the security of all information, including the use of passwords, firewalls, encryption and remote servers, and routinely evaluate our practices to identify security threats or opportunities for the improvement of our services. However, please note that no transmission of information is guaranteed to be completely secure.

G. Third Party Websites

We are not responsible for the practices employed by websites or applications (including widgets) linked to or from our website nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the users of our website. Please remember that your browsing and interaction on any other website, including websites which have a link on our website, is subject to that website's own rules and policies.

H. International Processing or Transfer

VRTCAL commits to comply with the EU-US, the UK extension and Swiss-US Data Privacy Frameworks as set forth by the US Department of Commerce with respect to personal information concerning individuals from the EEA, UK and Switzerland. Please see our **Data Privacy Framework** located at https://www.vrtcal.com/docs/data_privacy_framework.pdf to learn more.

If there is any conflict between the terms in this Privacy Policy and the Data Privacy Framework Principles, the Data Privacy Framework Principles shall govern.

I. Contacting Us

If you have any concerns or questions about this Privacy Policy - Corporate, please contact us at info@vrtcal.com or by post:

VRTCAL Markets, Inc.
Attn: Privacy Team
104 W Anapamu Street, Suite F, Santa Barbara, CA 93101, USA