

## **Frevora Consumer Privacy Policy**

**Last updated August 17, 2024**

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### **I. Introduction.**

At Frevora, we connect people with the best of their neighborhoods by enabling businesses to meet consumers' needs of ease and convenience, and, in turn, generate new ways for people to earn, work, and live.

This Privacy Policy ("Policy") describes how Frevora, Inc. and its affiliates ("Frevora", "we", "our", or "us") collect, process, retain, and disclose your Personal Information when providing its services, including, but not limited to, its consumer platforms, websites, and mobile applications, any website, platform or application that contains or includes a link to this Policy, and channels of communication (collectively the "Services").

This Policy does not apply to Merchants and Vendors, which are subject to separate privacy policies.

### **II. What Personal Information does Frevora collect or process?**

Personal Information is any information that Frevora can reasonably use to identify you, whether that information identifies you on its own or when combined with other information. Anonymous information and information that has been de-identified such that it cannot identify you is not Personal Information.

We may process the following categories of Personal Information in connection with our Services:

- **Contact Information**, including name, address (such as home address, work address, or other delivery address), email address(es), phone number(s), and other contact information provided to us.

- **Account and Profile Information**, including username and credentials, privacy settings and notification preferences, pictures, and other information you add to your Frevora profile, any subscription information such as Frevora membership, and identifiers that we may link to an account and information received from third-party platforms or authentication services that are linked to our Services.
- **Identification Documentation and Signature for Age-Restricted Products**, including driver's license or other government issued identification documents, which we may process in limited circumstances such as an order for an age-restricted product (such as alcohol) or other products that require age and/or identity verification and for legal and regulatory compliance.
- **Communications with Frevora, and Merchants**, including the content of in-app messages, communications with Merchants through or in-connection with our Services (including, without limitation, through our and third-party platforms), SMS/text messages, phone calls, chats, and emails with us related to our Services, customer support inquiries and outreach, the date and time of communications, method or channel used, call recordings (if applicable), the outcomes, actions, and/or resolutions from the communications, and other information.
- **Content you create or share**, including reviews about experiences on our platform, such as ratings of Merchants you order from, or photos you upload.
- **Payment Information**, including credit card or debit card information and information about the payment methods and services (such as PayPal or Venmo) used to make purchases on or through our Services. Payment information is primarily stored and processed by our third-party service providers, including our payment processors; however, we may store and process limited payment-related information such as the last four digits of a payment card, name of the financial institution, and payment service.
- **Activity and Transactions on or with our Services**, including information about the items and products ordered, order history, items placed in the cart, special instructions included in an order (e.g., dietary preferences, delivery preferences), transaction amounts, promotional codes and discounts used and received, the Merchants ordered from, gift cards ordered, the features and functionality used or interacted with, searches and actions on our Services (including through using session replay technology), loyalty account information for Merchants, responses to our surveys or other market research activities, participation in sweepstakes, promotions, or contests, photos and/or videos that you may send or provide to us related to your activity and transactions on or with our Services, and use gifts, our referral program or other special programs (including information about those you have sent or received gifts to or from or referred).

- **Geolocation Information**, if you have consented by enabling location access, we may receive and store your precise location information, including when our apps are running in the foreground (our app is open and on screen) or background (our app is open, not on screen) of your device. You may use our Services without enabling the collection of precise location information from your device; however, this may impact your experience including the accuracy of deliveries and/or the availability of certain content, features and functionality (e.g., you may have to manually enter your delivery address). If you have not allowed us to receive your precise location, we can only determine your approximate location. To opt-out of location sharing after turning it on, follow the steps below:
  1. Open the Frevora consumer mobile app.
  2. Tap the account icon at the top right of the screen.
  3. Under “Account Settings”, click “Privacy”.
  4. Under “Location Access”, click the arrow “>” next to the current choice.
  5. You will be taken to the app settings screen for Frevora. Here, click the “Location” button.
  6. Select the option to allow location access as desired. You will also have the choice to turn off precise location sharing.
- **Device Information**, including information about the computers, phones, and other devices you use to interact with Frevora or our Services, internet-protocol address, device-based identifiers, operating system and version, preferred language, hardware model identifiers, browser information including type and settings, and other device information.
- **Information from Co-Branded or Third Party Offers**, we may collect information that you use to register for, and your activity with, third parties, in connection with co-branded or third party offers from us and our partners, such as when you enroll for co-branded credit card opportunities with our credit card partners.

Some of the information identified above that you choose to provide us (specifically, government issued identification and your signature, which we receive when we verify age and identity and the authenticity of a submitted government issued ID for certain orders (such as alcohol orders) to prevent fraud and demonstrate legal and regulatory compliance and precise location information, which we receive to facilitate deliveries and certain content, features and functionality within our Services), may be considered sensitive Personal Information under the laws of some jurisdictions. You can turn off Frevora’s ability to collect and use precise location at any time in your app settings. We do not use any sensitive Personal Information for purposes other than as reasonably expected by an average consumer to provide our Services, for legal, security and safety purposes, and without the purpose of inferring characteristics about an individual. For more information on our processing of government issued IDs and data to verify age and identity and the authenticity of a submitted government issued ID, please see the FAQs available at [How is my age verified for alcohol orders?](#)

When we process de-identified information, we maintain and use the information in de-identified form, and do not attempt to re-identify the information, except as permitted by applicable law.

### III. How does Frevora collect or receive Personal Information?

- **From Users of our Services:** We receive information from users of our Services, such as during account or profile creation and updating, placing an order, participation in surveys, participation in sweepstakes, promotions or contests, creating or posting content such as photos or reviews, contacting us, or signing up for additional Services or programs. If a user provides Personal Information for or about others, such as in connection with our referral or gift programs, the user represents that they have all necessary rights and consents to provide the other person's Personal Information to us.
- **Automatically Through Our Services:** When you use our Services, certain Personal Information is collected automatically from your device and browser.
- **Through Cookies and Similar Technologies:** Cookies are small text files that are placed on your device, commonly through your browser, and that are used to record information such as settings. Depending on your settings, certain of our Services, including our website, may receive information about you from or through cookies or similar technologies (such as pixels or software development kits).
- **From our Service Providers:** We may receive Personal Information from service providers whom we engage to perform services on our behalf, including communication services providers (e.g., email, SMS/text message, etc.), payment providers and processors (such as PayPal and Venmo), market research services providers, providers of services promotions, sweepstakes and contests, gift card program providers/vendors, and those that provide us with marketing, advertising, analytics, security, fraud, identity, and age verification services.
- **From Partners:** We may receive Personal Information from our business partners, such as in connection with co-branded or third party offers you participate in with partnership opportunities available from Frevora and its business partners (such as co-branded credit cards).
- **From Employers:** If an employer has signed up for certain programs or Services, such as Frevora for Business (formerly Frevora for Work), we may receive certain Personal Information from them to facilitate your use of our Services.

- **From Merchants:** If a Merchant has integrated its loyalty program with our Services, we may receive Personal Information from the Merchant in connection with such integration, such as to identify users of our Services who are also members of the Merchant's loyalty program to better target or direct communications about the integration to such users or after a user consents to create a link between the user's account with our Services and the Merchant's loyalty program, the Merchant may provide certain Personal Information to enable the user to receive loyalty program benefits and discounts for purchases made through our Services.
- **From Legal Claims, Disputes, Requests, and Orders:** we may collect Personal Information from third parties or persons, such as law enforcement agencies, government agencies or authorities, users and non-users of our Services, and any other person or party who may be involved in the matter.

#### IV. How does Frevora use Personal Information?

Depending on which Services you use and how you interact with us, Frevora may use your Personal Information (as described in Section II above):

- **To Provide and Customize Frevora Services,** including allowing you to place and pay for orders, facilitating the orders you place on or through our Services, recommending and ranking Merchants based on your searches, location, reviews and order history, facilitating participation in promotions, sweepstakes and contests, making promotions, special offers and opportunities available to you, allowing or enabling you to purchase/order our gift cards, displaying reviews, photos and other content you post publicly, and customizing your experience (including, but not limited to, customization based on your preferences, location, and past use of our Services).
- **To Provide Customer Support,** including by exchanging communications, investigating, analyzing, and remediating support issues including as it relates to delivery of orders, evaluating our customer support and making improvements, and ensuring that support issues are handled in accordance with our internal standards, processes, and requirements and according to applicable law.
- **To Develop, Analyze, and Improve our Services,** including debugging or troubleshooting our Services, understanding how you and other customers use our Services and your preferences, improving the Services, and developing new Services or initiatives to provide our users with the best experience possible.

- **To Advertise and Promote Frevora and our Services**, including displaying advertising related to our Services or Merchants on our Services and on third-party websites and platforms, improving, developing and implementing marketing campaigns, analyzing whether our advertising is effective, and showing you ads that are most relevant to you about Frevora and our Merchants. To opt-out of ad personalization on third-party platforms, please see information on the right to opt-out of the sale or sharing below.
- **To Allow and/or Facilitate Communications with Frevora, and Merchants**, including communications about our Services, Service updates, orders and account, changes to our terms and policies, and to allow or facilitate communications with Frevora, and Merchants.
- **For Authentication, Integrity, Security, Quality and Safety**, including verifying your account and identity as applicable to our Services, providing a secure payment and shopping experience, to detect, investigate, and prevent malicious or illegal conduct, bugs, malware, fraudulent activity, illegal or unsafe experiences (such as ensuring age-restricted orders are delivered to the intended recipient), and any other actions we deem necessary to protect your safety and security as well as that of other people, property, and businesses, and to secure our Services.
- **For Legal Reasons and Policy Compliance**, including to comply with our obligations under applicable law and to respond to valid legal process (*e.g.*, requests or orders from law enforcement, courts, regulators and other government agencies), to investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, to enforce or investigate potential or actual violations of our terms, policies or other legal agreements, to investigate, monitor or mitigate any actual or alleged illegal activities in connection with our Services, to comply with any tax obligations, to perform audits and assessments, and to enable you to exercise your rights as legally required.

## **V. Frevora's disclosure of Personal Information.**

Depending on which Frevora Services you use or interact with, Frevora may provide or disclose Personal Information (as described in Section II above) as follows:

- **To Service Providers:** To enable us to meet our business operations needs and to perform our Services, we may provide Personal Information to our service providers and vendors, including, but not limited to, providers of identification and verification services, cloud services, payment services, gift card program services, auditing services, security services, marketing and advertising services, promotions, sweepstakes and contest services, market research services, communication services, analytics services that help us understand usage of our Services, market enrichment services, location and mapping services, and customer support functions. These service providers may access, store and process your personal information outside of the jurisdiction in which you

reside, including, without limitation, outside of Australia, Canada (and if you reside in the Province of Quebec, outside of Quebec), New Zealand and the United States.

- **To Merchants:** We disclose Personal Information to Merchants in connection with the Services including, without limitation, disclosing Personal Information for the preparation of the order (such as making the food item, selecting and preparing the product or good), facilitating the delivery, for fraud, trust, and safety concerns or matters (such as in connection with orders of age-restricted products or items), and in connection with a Merchant's loyalty program if you choose to link your account with our Services to a Merchant's loyalty program. By placing an order, you acknowledge and agree that, if the Merchant is responsible for the delivery of an order, the Merchant may use your Personal Information to facilitate the delivery of the order to you (including using your contact information to communicate with you via phone calls, emails and/or SMS/text messages about the order and delivery). The Merchant is solely liable and responsible for all communications initiated or sent by the Merchant to you. If you are picking up an order from a Merchant who is using a Frevora provided tablet or device and you have enabled the collection and processing of location information, we may use your location information to let the merchant know that you have arrived or are close to arriving to pick-up your order.
- **Publicly:** We display content and information that you share publicly, or permit or authorize us to share publicly, such as reviews about Merchants or photos of things you have ordered, so that others can read and learn about your experiences with Merchants on our platform and our Services.
- **To Marketing and Advertising Partners:** We may use third-party marketing and advertising partners to deliver advertising to you on behalf of Frevora and/or our Merchants, including advertising that may be personalized based on your interactions with our Services as well as your activity on third-party services.
- **For Actual or Potential Corporate Transactions:** If we are involved in strategic transactions including any sale, merger, acquisition, joint venture, assignment, transfer, reorganization, bankruptcy or receivership, we may disclose your Personal Information and other information in the diligence process with counterparties and others assisting with the transaction and transferred to a successor or affiliate as part of that transaction along with other assets.
- **To Government Authorities or where Legally Required or Permitted:** We and our service providers (including domestic and foreign service providers) may share your Personal Information, including information about your interaction with our Services, with third parties such as government authorities, industry peers, or other third parties if legally required or permitted, or as necessary to enforce our agreements, prevent fraud, or protect the rights, property, or safety of our

business, employees, merchants, customers, or other persons or parties. These disclosures may include lawful access by Canada or foreign courts, law enforcement, or other government authorities.

- **Frevora's Group of Companies:** We may disclose your Personal Information to our corporate subsidiaries and affiliates in connection with our Services and business activities for use in connection with the purposes and uses described in this Policy.
- **Other Third Parties or Persons:** We may disclose or provide your Personal Information to other third parties or persons, such as with your consent or at your direction, including to individuals to whom you send a gift through our gift program or to whom you refer Frevora or the Services, in connection with co-branded opportunities, in connection with you linking accounts with third parties to your account with us or signing into your account with us through third-parties, or to your employer if you are using our Services through your employer's use of our Frevora for Business service (formerly Frevora for Work).

## VI. Your Privacy Rights and Choices.

### Your Privacy Rights.

We offer you tools and processes to manage and make choices regarding your Personal Information. Depending on your jurisdiction, and subject to certain exceptions, exemptions, and restrictions, you or your authorized agent may exercise the following rights:

- **Access/Portability:** You may have the right to request access to your Personal Information and receive it in a portable and machine-readable format.
- **Deletion:** You may have the right to ask us to delete your Personal Information, including your Frevora account, although this may impact your ability to use the Services. Please note that we will keep a record of all rights requests and therefore will retain limited Personal Information in connection with such record.
- **Correction:** You may have the right to correct, rectify, or update inaccurate Personal Information that we hold about you.
- **Opt-Out of Sale or Sharing (Targeted Advertising or Ads Personalization):** We may disclose Personal Information (e.g., identifiers and service and platform usage) to advertising partners to provide you with personalized ads on third-party platforms, which may constitute a

“sale” or “sharing” of your Personal Information. You have the right to opt-out of our selling or sharing (for purposes of targeted advertising) of your Personal Information. To opt-out of the sale or sharing of Personal Information, send an email to us at [admin@planetofy.com](mailto:admin@planetofy.com) with your request.

- **Right to Appeal:** You may have the right to appeal decisions that we make with regards to a rights request.
- **Right to Withdraw Consent:** You have the right to withdraw consent when consent is legally required (subject to our legal or contractual restrictions and reasonable notice). If you withdraw consent, we may not be able to provide certain services to you.

Frevora will not discriminate against you for exercising any of your applicable rights. We reserve the right to deny your request if we cannot verify your identity or if an exemption or exception applies.

#### Exercising Rights:

Unless otherwise stated above, if you have a Frevora, you can exercise certain of your rights directly through your account. We provide you with the ability to update and correct your information through your account. To exercise either the right to access or delete your Personal Information through your account

If you have questions on how to exercise your rights, or if you do not have an account or are unable to exercise an applicable right through your account, please contact us at [admin@planetofy.com](mailto:admin@planetofy.com). We will provide a timely response in accordance with applicable law. When contacting us, please provide your first and last names, email address, and address of residency, identify the right(s) that you wish to exercise and identify whether you are a user, a non-user, or in another category or grouping.

For rights requests from authorized agents, the requests should be submitted to [admin@planetofy.com](mailto:admin@planetofy.com) and include the following: (i) first and last names and email addresses for the data subject and the authorized agent, (ii) evidence of the authority granted to the agent (such as a power of attorney), (iii) information on the data subject's relationship with Frevora (e.g., registered user, a non-user), (iv) the specific right(s) being exercised, and (v) “Authorized Agent Request” in the subject-line.

These Consumer Health Data Privacy Disclosures supplement this Policy and describe our collection, use, and disclosure of Personal Information that may identify your past, present, or future physical or mental health status ("**Consumer Health Data**").

## **1. Our Collection of Consumer Health Data.**

We collect Personal Information as described in Section II (**What Personal Information does Frevora collect or process**) of this Policy, which may include the following Consumer Health Data about you or those you are purchasing on behalf of:

- **Allergies or other conditions:** When using our Services to place orders for certain items (e.g., food, etc.), you may be able to use free-text fields to provide special instructions. In the free-text

fields, you may disclose information that may indicate health status (e.g., allergies or other conditions).

- **Product Purchase Information:** Your purchase history of health-related products ordered through our Services may indicate information regarding your health status, including, but not limited to, contraceptives, at-home diagnostic tests, and diabetic testing supplies.
- **Activity on or with our Services:** When using or interacting with our Services we may collect information that may indicate health status such as when you place health-related products in to your cart, conduct searches for, browse, or take other actions related to health-related products, when you interact with content, features, functionality or programs related to health-related products, and/or when you submit photos or videos of health-related products to us or through our Services.

When we process de-identified information, we maintain and use the information in de-identified form, and do not attempt to re-identify the information.

## **2. Sources of Consumer Health Data.**

We collect Personal Information from the sources described in Section III (**How does Frevora collect or receive Personal Information**) of this Policy, which may include collecting Consumer Health Data from the following sources:

- **From your use of our Services:** We may receive Consumer Health Data about you or someone you are purchasing for when you place an order through our Services (e.g., consumer platform(s)) that identifies Consumer Health Data and in connection with your interactions with our Services.
- **From a Frevora Account Holder acting on your behalf:** We may receive Consumer Health Data about you when a Frevora account holder uses our Services to place an order on your behalf, although we may not know that this information is associated with you.
- **From you when you communicate with us:** We may receive Consumer Health Data about you when you submit it to us or communicate with us, such as when you submit or make a customer support inquiry, request, or communication.

## **3. Purposes for the Collection and Use of Consumer Health Data.**

We use your Personal Information as described in Section IV (**How does Frevora use Personal Information**) of this Policy and Consumer Health Data may be used:

- **To Provide Frevora Services**, including, without limitation, allowing you to place and pay for orders, facilitating the orders you place on or through our Services (which includes communicating Consumer Health Data to Merchants), and making recommendations or offers to you on our Services.
- **To Provide Customer Support**, including by or in connection with exchanging communications, investigating, analyzing, and remediating support issues, evaluating our customer support and making improvements, and ensuring that support issues are handled in accordance with our internal standards, processes, and requirements and according to applicable law.
- **To Develop, Analyze, and Improve our Services**, including debugging or troubleshooting our Services, understanding how you and other customers use our Services and your preferences, improving the Services, and developing new Services or initiatives to provide our users with the best experience possible.
- **For Integrity, Security, Quality and Safety**, including to detect, investigate, and prevent malicious or illegal conduct, bugs, malware, fraudulent activity, illegal or unsafe experiences, and any other actions we deem necessary to protect your safety and security as well as that of other people, property, and businesses, and to secure our Services.
- **For Legal Reasons and Policy Compliance**, including to comply with our obligations under applicable law and to respond to valid legal process (*e.g.*, requests or orders from law enforcement, courts, regulators and other government agencies), to investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, to enforce or investigate potential or actual violations of our terms, policies or other legal agreements, to investigate, monitor or mitigate any actual or alleged illegal activities in connection with our Services, to perform audits and assessments, and to enable you to exercise your rights as legally required.

#### 4. Our Sharing of Consumer Health Data.

We may share your Personal Information as described in Section V (**Frevora's disclosure of Personal Information**) of this Policy and we may share your Consumer Health Data as follows:

- **To Merchants:** We may disclose Consumer Health Data to Merchants in connection with your order from or in connection with the Services, such as your name (such as first name and last initial or first and last names), delivery address (depending upon whether the Merchant is providing the

delivery) and order information (including, but not limited to, products purchased, allergies, special instructions and/or other delivery instructions).

- **To Service Providers:** We may disclose Consumer Health Data to our service providers for business needs and to perform our Services, which includes, without limitation, disclosing data to providers of cloud and IT services, payment-related services, communication services, customer support services, safety, fraud and security services, and auditing services.
- **To Frevora's Group of Companies:** We may disclose Consumer Health Data to our corporate subsidiaries and affiliates in connection with our Services and business activities.
- **To Government Authorities or where Legally Required or Permitted:** We and our service providers (including domestic and foreign service providers) may share your Consumer Health Data, including products purchased through our consumer platform(s), with third parties such as government authorities, industry peers, or other third parties if legally required or permitted, or as necessary to enforce our agreements, prevent fraud, or protect the rights, property, or safety of our business, employees, merchants, customers, or other persons or parties. These disclosures may include lawful access by US or foreign courts, law enforcement, or other government authorities.
- **For Actual or Potential Corporate Transactions:** If we are involved in strategic transactions including any sale, merger, acquisition, joint venture, assignment, transfer, reorganization, bankruptcy or receivership, we may disclose your Consumer Health Data and other information in the diligence process with counterparties and others assisting with the transaction and transferred to a successor or affiliate as part of that transaction along with other assets.
- **Other Third Parties or Persons:** We may disclose or provide your Consumer Health Data to other third parties or persons, such as with your consent or at your direction, including, without limitation, in connection with you linking accounts with third parties to your account with us.

## 5. Your Privacy Rights

### Rights:

Frevora will not discriminate against you for exercising any of your applicable rights. Subject to certain exceptions, exemptions and restrictions, you may have the privacy rights provided in Section VI (**Your Privacy Rights and Choices**) of this Policy. Those rights include, without limitation, the following:

- **Access:** You may have the right to request access to your Consumer Health Data and receive it in a portable and machine-readable format.
- **Deletion:** You may have the right to ask us to delete your Consumer Health Data.
- **Right to Withdraw Consent:** You have the right to withdraw consent to any collection or sharing of Consumer Health Data.

#### Exercising Rights:

If you have a Frevora account, you can exercise certain of your rights directly through your account (e.g., access, deletion, and correction).

If you have questions on how to exercise your rights, or if you do not have an account or are unable to exercise an applicable right through your account, please contact us at [admin@planetofy.com](mailto:admin@planetofy.com). We will provide a timely response in accordance with applicable law.

For rights requests from authorized agents, the requests should be submitted to [admin@planetofy.com](mailto:admin@planetofy.com) and include the following: (i) first and last names and email addresses for the data subject and the authorized agent, (ii) evidence of the authority granted to the agent (such as a power of attorney), (iii) information on the data subject's relationship with Frevora (e.g., registered user, a non-user), (iv) the specific right(s) being exercised, and (v) "Authorized Agent Request" in the subject-line.

## 2. Canada.

### *a. Privacy Governance Policies and Practices.*

We are committed to protecting your Personal Information and have implemented policies and practices that govern our treatment of Personal Information, including:

- Designated roles and responsibilities in connection with handling Personal Information in our custody and control;
- Policies and procedures regarding the protection of Personal Information, including safeguards designed to protect Personal Information against loss or theft and unauthorized access, disclosure, copying, use, and modification;
- Processes for responding to data subject requests and complaints;
- A framework for the retention and disposition of information designed to ensure compliance with our legal obligations.

In addition, we have designated our Canadian Privacy Officer as being responsible for overseeing our compliance with applicable privacy laws, and we provide our employees with privacy training and awareness.

*b. Canadian Privacy Officer.*

If you have any questions or concerns relating to this Policy or our privacy and security practices, including the manner in which we and/or our service providers (including service providers outside of Canada and if you are living in the Province of Quebec, outside of Quebec) collect, treat, process and disclose your personal information, or the scope of any consents requested by Frevora, please contact our Canadian Privacy Officer using the contact information in Section XII of this Policy.

### **VIII. Security and Retention.**

We use commercially reasonable administrative, organizational, technical and physical security controls to protect your Personal Information from unauthorized access, modification, disclosure, or destruction. However, we are not able to guarantee that your Personal Information is absolutely secure, since no Internet or email transmission is ever fully secure or error free. You should take special care in deciding what information you send to us via our Services or when you communicate with us through email, SMS/texts, chat, or other modes of communication. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on our Services or those on third-party websites. Please recognize that protecting your Personal Information is also your responsibility and we urge you to take precautions to protect your Personal Information. If you have reason to believe that your Frevora account or any interaction with us is no longer secure please let us know immediately by contacting Frevora support or as indicated below in Section XII (How to Contact Us) of this Policy.

We retain your Personal Information for only as long as required to provide our Services to you and engage in the uses described in this Policy, unless a different retention period is required by applicable law.

The criteria used to determine our retention periods include the type of Personal Information being processed, along with:

- The time necessary to fulfill the purposes for which we collected the information;
- The duration and status of your relationship or connection with us, including whether your account is active;
- Any retention period required for our compliance with legal, regulatory, or government requirements, including the period during which civil claims or regulatory actions may be filed or otherwise commenced and the period needed to resolve ongoing legal proceedings; and
- Our internal obligations, contractual commitments, including with Merchants, and other requirements.

### **IX. Cross-Border Transfers of Personal Information.**

The Personal Information processed in connection with this Policy, including, without limitation, by us and/or our third-party service providers, may be stored and processed on systems and servers and accessed by persons and parties, located outside of the jurisdiction where you live,

including storing, accessing, and processing the Personal Information in the United States and other global locations whose data protection laws may differ from those where you live.

#### **X. Personal Information from Children.**

Our Services are not intended for individuals under the age of majority in the applicable jurisdictions, which includes for clarification, that our Services are not intended for individuals under the age of 18. Therefore, we do not knowingly process Personal Information from individuals under 18 years old. For clarification, for compliance with the California Consumer Privacy Act of 2018 (as amended), Frevora also does not have knowledge that it sells or shares the Personal Information of consumers under 16 years of age. For clarification, we do not knowingly collect Personal Information of or about individuals living in the Province of Quebec, Canada who are under the age of 14. If a parent or legal guardian of a child under the applicable legal age believes that we have collected Personal Information from or about such an individual, please contact us at [admin@planetofy.com](mailto:admin@planetofy.com)

#### **XI. Third-Party Sites.**

Our Services may link to other third-party websites that are not controlled by Frevora, such as when you sign up for a loyalty card on a Merchant's website. These third parties are not under our control and we are not responsible for their privacy policies or practices. If you provide any Personal Information to any third party or through any such third-party websites, it will be subject to the privacy policies and practices of that third party.

#### **XII. How to Contact Us.**

For questions or concerns related to this Policy, please contact us at [help@frevora.com](mailto:help@frevora.com) or:

Frevora,  
Planetofy Inc.  
Attn: Legal  
25 Cole Suite, Suite 1908  
Toronto, CANADA – M5A 4M3

#### **XIII. Changes to this Privacy Policy.**

We may update this Policy periodically to account for changes in how we collect and process your Personal Information. Any updates to this Policy will be posted on our website with a revised "Last Updated" date at the top, and we will provide additional notice in the event of any significant changes in how we use your Personal Information. Your continued use of our Services after any updates to this Policy constitutes your agreement and acceptance of this Policy as updated.