

INNOVO MARKETS INC.

PRIVACY POLICY

Last Updated: March 4, 2024

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws in the United States and, if applicable, the General Data Protection Regulation which applies across the European Union (including in the United Kingdom), and we are responsible as “controller” of that personal information for the purposes of those laws if and when they apply.

1. Key Terms. It would be helpful to start by explaining some key terms used in this policy:

We, us, our, Innovo Markets Inc. or the Company	Innovo Markets Inc. and its affiliates
Personal information	Any information relating to an identified or identifiable individual
Platform	Innovo Markets Inc.'s website, mobile applications, and related services, information, and communications

2. Personal Information We Collect About You. We may collect and use the following personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)	Name, postal address, IP address, email address, passport number, driver's license number, social security information, and account name.
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Name, postal address, IP address, email address, passport number, driver's license number, social security information, account name, and other financial information.
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)	Records of products purchased through the Innovo Marketplace or Services.

Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)	We use cookies to collect certain information about your searching, browsing and purchase activities to recommend additional products based on your prior activity.
Geolocation data	IP address, location of access and purchase.
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	We use cookies to collect certain information about your searching, browsing and purchase activities to recommend additional products based on your prior activity.

This personal information is required to provide products to you. If you do not provide the personal information we ask for, it may delay or prevent us from providing products to you.

3. Information Collection and Tracking Technologies. When you download, access, or use the Platform, it may use technology to automatically collect or utilize:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your computer or smartphone. Cookies are small text strings that the websites visited by a user install on the user's terminal. These strings are then re-transmitted to the site that installed them upon further requests by the user. When the user also receives cookies sent by other sites or web servers during site navigation, those cookies are considered third-party cookies. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your computer or smartphone. However, if you select this setting, you may be unable to access certain parts of our Platform.
- **Web Beacons.** Pages of the Platform 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 us, for example, to count users who have visited those pages or opened an email and for other related Platform statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

4. How Your Information is Collected. We collect most of this personal information directly from you – by phone, text, email, your orders, or via our website. However, we may also collect information:

- From publicly accessible sources (e.g., property records);
- Directly from you when you provide it to us, such as when you make a purchase, visit or use our website, place an order with us, contact us by email, by phone, or by online chat, register for an online account, participate in a contest or sweepstakes, respond to a survey, comment on blog posts, engage in a promotional activity, or sign up for emails, newsletters, or marketing;
- Certain information from third parties, such as social media platforms and networks that you use in connection with our Platform, or that share or allow you to share information with us; service providers that we use that provide us with information about you and the devices you use online; and other third parties that we choose to collaborate with in order to make the Platform and its services available for your use;
- From a third party with your consent (e.g., your bank or credit card company);
- Automatically when you use the Platform, including automatically collected information, but which generally does not include personal information unless you provide it through our website or you choose to share it with us;
- From cookies on our website; and
- Via our IT systems, including automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems.

5. **Third Party Information Collection.** When you use the Platform 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:

- Advertisers, ad networks, and ad servers;
- Analytics companies;
- Your mobile device manufacturer; and
- Your mobile or internet service provider.

These third parties may use tracking technologies to collect information about you when you use the Platform. 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.

The data you provide will not be transferred by us to third countries or international organizations outside the United States. The hosting of the site is also within the United States.

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.

6. **How and Why We Use Your Personal Information.** Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.,:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Innovo Markets Inc.	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations

Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best services for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about orders and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our products to: <ul style="list-style-type: none"> — existing and former customers; — third parties who have previously expressed an interest in our products; — third parties with whom we have had no previous dealings. 	For our legitimate interests or those of a third party, i.e. to promote our business to existing, prospective and former customers

External audits and quality checks, e.g. licensure verification and related audits	For our legitimate interests or a those of a third party, i.e. to maintain licensure so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations
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7. **Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone or mail) about our products, including exclusive offers, promotions or new products.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly. We will always treat your personal information with the utmost respect.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at contact@innovomarkets.com; or
- Using the “unsubscribe” link in emails or “STOP” number in texts.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products in the future, or if there are changes in the law, regulation, or the structure of our business.

8. **Who We Share Your Personal Information With.** We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction. We do not sell, trade or otherwise transfer personal information to outside parties (except to the third parties with whom we have contracted to provide services to us, as detailed in the applicable section below). In addition, we may disclose personal information that we collect or you provide:

- To our affiliates, including companies within the Innovo Markets Inc. group of brands and companies.
- To service providers we use to help deliver our products to you, such as payment service providers, warehouses and delivery companies.
- To other third parties we use to help us run our business, such as marketing agencies or website hosts, which utilize their own terms and conditions and privacy policies:
 - [Google](#)
 - [HubSpot](#)
 - [Amazon Web Services](#)
- To third parties approved by you, including social media sites you choose to link your account to or third-party payment providers.
- To our insurers and brokers.
- To our banks.
- To parties in business transactions, such as 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 our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Platform users is among the assets transferred. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party.
- 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.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

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.

9. Personal Information We Disclosed for a Business Purpose. In the preceding 12 months, we have disclosed for a business purpose to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

10. Where Your Personal Information is Held. Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information with").

11. How Long Your Personal Information Will Be Kept. We will keep your personal information while you have an account with us or while we are providing products to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

12. Accessing and Correcting Your Personal Information. You can review and change your personal information by logging into the Platform and visiting your account profile page.

You may also contact customer support 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 not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

13. Your Rights Under the GDPR, if and only if applicable.

Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object: <ul style="list-style-type: none"> — at any time to your personal information being processed for direct marketing (including profiling); — in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

14. Your Rights Under the CCPA. You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We Collect About You	<p>You have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you; • The categories of sources from which the personal information is collected; • Our business or commercial purpose for collecting or selling personal information; • The categories of third parties with whom we share personal information, if any; and • The specific pieces of personal information we have collected about you. <p>Please note that we are not required to:</p>
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	<ul style="list-style-type: none"> • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or • Provide the personal information to you more than twice in a 12-month period.
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any personal information we may sell or disclose to a third party for a business purpose, you have the right to know:</p> <p>The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and</p> <p>The categories of personal information that we disclosed about you for a business purpose.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records. <p>Please note that we may not delete your personal information if it is necessary to:</p> <ul style="list-style-type: none"> • Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us; • Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; • Debug to identify and repair errors that impair existing intended functionality; • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; • Comply with the California Electronic Communications Privacy Act;

	<ul style="list-style-type: none"> • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; • Comply with an existing legal obligation; or • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
<p>Protection Against Discrimination</p>	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of goods to you, if that difference is reasonably related to the value provided to our business by your personal information.</p>

15. Keeping Your Personal Information Secure. We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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

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 Platform. 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.

16. How to Exercise Your Rights. If you would like to exercise any of your rights as described in this Privacy Policy, please email us at contact@innovomarkets.com

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by email, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driver's license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

17. How to File a GDPR Complaint. We hope that we can resolve any query or concern you raise about our use of your information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

18. Changes to This Privacy Notice. This privacy notice was published on March 7, 2024 and last updated on the date set forth above. We may change this privacy notice from time to time—when we do, we will inform you via our website or other means of contact such as email.

19. How to Contact Us. Please contact us by email if you have any questions about this privacy policy or the information we hold about you. Our contact details are shown below:

Our Contact Details
contact@innovomarkets.com

20. Do You Need Extra Help? If you would like this notice in another format (for example: audio, large print, braille) please contact us (see "How to contact us" above).