

PIKCIO GENERAL PRIVACY POLICY

LAST UPDATED: DECEMBER 07, 2018

1. Purpose

Your privacy is important to us. We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. This Privacy Policy (“Policy”) explains how information about you is collected, used and disclosed by Pikcio AG and its subsidiaries and affiliated companies (“Pikcio”, “we”, “us”, “our”). It also describes the choices available to you regarding the use of, your access to, and how to update and correct your Personal Information, as defined below.

Our Pledge to You: We are committed to maintaining your trust and pledge the following:

Transparency. We will keep you informed of our privacy practices.

Keeping your information safe. While we cannot promise perfection, we have implemented security tools that are designed to safeguard your information in accordance with industry standards.

This Privacy Policy is incorporated by reference into the Pikcio Terms of Service (the “Terms”)

2. Scope

This Privacy Policy applies to Personal Information we collect when you use or access www.pikcio.com, Pikcio mobile and PC applications, and other Services offered by Pikcio that link to or reference this policy (together, with any and all future online and offline offerings operated by or on behalf of Pikcio, the “Services”).

For particular privacy policy regarding the use of one of the Services (data collection and process for example), please refer to the dedicated privacy policy of this product.

“Personal Information” is any information relating to an identified or identifiable natural person.

All individuals whose responsibilities include the Processing of Personal Information on behalf of Pikcio are expected to protect that data by adherence to this Policy. This Policy is intended to meet requirements globally, including those in North America, Europe, APAC, and other jurisdictions.

3. Collection of Information: Types of Information We Collect

As you interact with the Services, we may collect Personal Information from you. The types of Personal Information we may collect (directly from you or from Third-Party sources) depend on the nature of the relationship you have with Pikcio through the Services and the requirements of applicable law.

Information You Provide to Us

We collect information you provide directly to us, including:

To provide Service requested. When you use the Services or engage in certain activities, such as registering for an account with Pikcio, requesting services or information, verifying your identity through our Services, or contacting us directly, we may collect information from you such as your name, user name and password, email address, telephone number(s), mailing

address, Social Security number, account numbers, payment information, government issued identification documents (e.g., passports, driver's license, etc.), selfie image, biometric information, IP Address, utility bills, and statements to prove your current residence (e.g. bank statements).

In surveys. From time to time, we may contact you to participate in online surveys. If you do decide to participate, you may be asked to provide certain information which may include Personal Information. All information collected from your participation in our surveys is provided by you voluntarily. We may use such information to improve our Services and in any manner consistent with the policies provided herein.

Facial Biometric Identity Verification. Facial biometric identity verification is performed by comparing two or more captured images of faces. For example, we may compare the face on a government-issued photo ID against a "selfie" that you capture and send to us. The biometric identifiers used to perform this comparison are derived from the photographs that you submit.

Information We Collect Automatically When You Use Our Services

In addition to the Personal Information described above, we may collect certain information about your use of our Services.

Log Information. We collect log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services.

Device Information. We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.

Location Information. We may collect information about the location of your device each time you access or use our Services or otherwise consent to the collection of this information.

Information Collected by Cookies and Similar Technologies. We, as well as Third Parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies ("Technologies") to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a "device") that allow us to record certain pieces of information whenever you visit or interact with our sites, services, applications, messaging, and tools, and to recognize you across devices.

Cookies. Cookies are small text files placed in visitors' computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.

Analytics. We may also use analytics tools to collect information regarding visitor behavior and visitor demographics on some of our Services, and to develop website content. This analytics data is not tied to any Personal Information.

Our uses of such Technologies fall into the following general categories:

Operationally Necessary. We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;

Performance Related. We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools;

Functionality Related. We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;

Advertising or Targeting Related. We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

If you would like to opt out of the Technologies we employ on our sites, services, applications, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits.

Information We Collect From Other Sources

We may also collect information about you from additional online and offline sources including commercially available third-party sources, such as consumer reporting agencies, for the purposes of verifying eligibility and securely offering our Services to you. We may combine this information with the personal and other information we have collected about you under this Privacy Policy.

4. Use of Information

We acquire, hold, use, and Process Personal Information about Individuals for a variety of business purposes, including:

To Provide Products, Services, or Information Requested: Pikcio may use information about you to fulfill requests for products, Services, or information, including information about potential or future Services, including to:

Generally manage Individual information and accounts;

Respond to questions, comments, and other requests;

Provide access to certain areas, functionalities, and features of Pikcio's Services;

Allow you to register for events.

Administrative Purposes: Pikcio may use Personal Information about you for its administrative purposes, including to:

Measure interest in Pikcio's Services;

Develop new products and Services or improve existing products and Services;

Ensure internal quality control;

Verify an Individual's identity;

Communicate about Individual accounts and activities on Pikcio's Services and systems, and, in Pikcio's discretion, changes to any Pikcio policy;

Send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance;

Process payment for products or Services purchased;

Process applications and transactions;

Comply with regulatory requirements, including collecting and using information relating to adverse effects you have experienced when using our products;

Prevent potentially prohibited or illegal activities;

Enforce our Terms of Use.

Marketing Pikcio Products and Services: Pikcio may use Personal Information to provide you with materials about offers, products, and Services that may be of interest, including new content or Services. Pikcio may provide you with these materials by phone, postal mail, facsimile, or email, as permitted by applicable law. Such uses include:

To tailor content, advertisements, and offers;

To notify you about offers, products, and services that may be of interest to you;

To provide Services to you and our sponsors;

For other purposes disclosed at the time you provide Personal Information; or

Otherwise with your consent.

You may contact us at any time to opt out of the use of your Personal Information for marketing purposes, as further described below.

Research and Development: Pikcio may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services. From time to time, Pikcio may perform research (online and offline) via surveys. We may engage Third-Party service providers to conduct such surveys on our behalf. All survey responses are voluntary, and the information collected will be used for research and reporting purposes to help us better serve Individuals by learning more about their needs and the quality of the products and Services we provide. The survey responses may be utilized to determine the effectiveness of our Services, various types of communications, advertising campaigns, and/or promotional activities. If you participate in a survey, the information given will be used along with that of other study participants. We may share anonymous Individual and aggregate data for research and analysis purposes.

Direct Mail, email and Outbound Telemarketing. Individuals who provide us with Personal Information, or whose Personal Information we obtain from Third Parties, may receive

periodic emails, newsletters, mailings, or phone calls from us with information on Pikcio's or our business partners' products and services or upcoming special offers/events we believe may be of interest. We offer the option to decline these communications at no cost to the Individual by following the instructions below.\

Mobile Devices. Pikcio may collect certain information that your mobile device sends when you use Services designed for mobile devices, like a device identifier, user settings and the operating system of your device. Mobile versions of Pikcio's Services may require that users log in with an account. In such cases, information about use of mobile versions of the Services may be associated with user accounts. Pikcio's mobile application stores Personal Information directly on your device in order to verify your identity. Personal Information may be transferred to Pikcio to enable identity verification. In the case that Personal Information is transferred to Pikcio, it will be retained as described below.

Anonymous and Aggregated Information. Pikcio may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Pikcio's Services, or other analyses we create.

Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the Services.

Anonymized or aggregated information is not Personal Information, and Pikcio may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Pikcio and with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

Information Submitted Via Services. You agree that Pikcio is free to use the content of any communications submitted by you via the Services, including any ideas, inventions, concepts, techniques, or know-how disclosed therein, for any purpose including developing, manufacturing, and/or marketing goods or Services. Pikcio will not release your name or otherwise publicize the fact that you submitted materials or other information to us unless: (a) you grant us permission to do so; (b) we first send notice to you and you consent that the materials or other information you submit to a particular part of a Service will be published or otherwise used with your name on it; or (c) we are required to do so by law.

Other Uses. Pikcio may use Personal Information for other purposes for which we have a legitimate interest, such as Individual or market research, anti-fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent. We may also use data that we collect on an aggregate or de-identified basis for various business purposes, where permissible under applicable laws and regulations.

5. Third-Party Sites and Social Media Platforms

Our Services may contain links to other websites and other websites may reference or link to our Services. These other domains and websites are not controlled by us, and Pikcio does not endorse or make any representations about Third-Party websites or social media platforms.

We encourage our users to read the privacy policies of each and every website and application that they interact with. We do not endorse, screen, or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Our Services may also contain links and interactive features with various social media platforms. If you already use these platforms, their cookies may be set on your device when using our Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform, or

otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by third parties for any number of purposes.

6. Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

To verify Your Identity on our Services. In order to verify your identity on our Services, we may share Personal Information about you. We may share Personal Information about you with document validator companies to verify your government issued identification document (ID card, passport, ...) and with mobile providers if you use our mobile services or platforms. **YOU AUTHORIZE US TO REQUEST YOUR MOBILE CARRIER TO USE YOUR MOBILE SUBSCRIBER DETAILS FOR VERIFYING YOUR IDENTITY.** Information provided to the mobile carrier may include name, address, email, phone number, and location information if available.

We Use Vendors and Service Providers. We may share any information we receive with vendors and service providers. The types of service providers (processors) to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of information and Services you have requested; (iii) payment processing; and (iv) customer service activities; (v) fraud prevention; and (vi) in connection with the provision of the Services. Pikcio has executed appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements. Vendors and Service providers may be localized in Europe, Switzerland, United Kingdom, United States and Australia.

Business Partners. Pikcio may share Personal Information with our business partners, affiliates, and for our affiliates' internal business purposes or to provide you with a product or Service that you have requested. Pikcio may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with Pikcio's. Pikcio requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which Pikcio provided it to them.

Marketing. Interest-Based Advertising and Third Party Marketing. Through our websites (pikcio.com and other Pikcio-controlled websites), we may allow Third-Party advertising partners to set tracking tools (e.g., cookies) to collect information regarding your activities (e.g., your IP address, page(s) visited, time of day). We may also share such de-identified information as well as selected Personal Information (such as demographic information and past purchase history) we have collected with Third-Party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit non-Pikcio related websites within their networks. This practice is commonly referred to as "interest-based advertising" or "online behavioral advertising. We may allow access to other data collected by the Services to facilitate transmittal of information that may be useful, relevant, valuable, or otherwise of interest to you.

Note that Pikcio does not engage in interest-based advertising on its mobile app, and does not use information gathered from its mobile app for interest-based advertising.

If you prefer that we do not share your Personal Information with Third-Party advertising partners, you may opt-out of such sharing at no cost by following the instructions below.

Disclosures to Protect Us or Others (e.g., As Required by Law and Similar Disclosures). We may access, preserve, and disclose your Personal Information, other account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce Pikcio policies or contracts; (v) to collect amounts owed to Pikcio; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.

In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. Should such an event occur, Pikcio will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Policy in effect at the time such Personal Information was collected. We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

7. Retention

Pikcio retains the Personal Information we receive as described in this Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our products and Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

8. Security

We take our responsibility to protect the privacy and confidentiality of your information, including Personal Information, very seriously. We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on www.pikcio.com or sending an e-mail to you. You may have a legal right to receive this notice in writing.

If you have any questions about the security of your Personal Information, you can contact us

at privacy@pikcio.com.

9. Your Choices

Communications Preferences

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain communications regarding Pikcio and our Services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms of Service or this Policy).

Sharing Preferences

We may give you choices regarding the sharing of Personal Information with affiliates and third parties. Choices you have about the sharing of your Personal Information will be described in the privacy policies or notices you receive in connection with the products or Services you obtain from us.

Rights of Access, Rectification, Erasure, and Restriction

You may inquire as to whether Pikcio is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend, or delete your Personal Information where it is inaccurate. Where otherwise permitted by applicable law, you may send an e-mail to privacy@pikcio.com or use any of the methods set out in this Policy to request access to, receive (port), restrict Processing, seek rectification, or request erasure of Personal Information held about you by Pikcio. Such requests will be processed in line with local laws.

Although Pikcio makes good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which Pikcio is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual's privacy in the case in question or where it is commercially proprietary. If Pikcio determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Pikcio will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

Cookies and Interest-Based Advertising

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from our data partners and our other advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at <http://optout.networkadvertising.org>, or <http://www.youronlinechoices.eu/> and www.aboutads.info/choices/. You can also choose not to be included in Google Analytics here.

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted-out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device. Advertisements on Third-Party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on anonymous, non-Personal Information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners' use of this information for interest-based advertising purposes.

We tell you when our privacy policies and practices change.

We may change this Privacy Policy from time to time. If we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new "Last Updated" date. All changes will become effective when posted unless indicated otherwise. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

10. Children's Privacy

We do not knowingly collect, maintain, or use Personal Information from children under 18 years of age, and no part of our Services are directed to children under the age of 18. If you learn that your child has provided us with Personal Information without your consent, you may alert us at privacy@pikcio.com. If we learn that we have collected any Personal Information from children under 18, we will promptly take steps to delete such information and terminate the child's account.

11. International Users

By using the Services, Pikcio will transfer data to Europe (including Switzerland). By choosing to visit or utilize the Services or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of Switzerland and the adjudication of any disputes arising in connection with Pikcio or the Services will be in accordance with the Terms.

If you are visiting from outside the European Union, please note that you are agreeing to the transfer of your information to the European Union and Switzerland and Processing globally. By providing your Personal Information, you consent to any transfer and Processing in accordance with this Policy.

12. Redress/Compliance and Accountability

If after reviewing this Policy, you would like to submit a request or you have any questions or privacy concerns, please contact us as described below.

Pikcio will address your concerns and attempt to resolve any privacy issues in a timely manner.

13. Other Rights and Important Information

Changes to Our Privacy Policy and Practices

Revision to the Privacy Policy. We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to visit or use Pikcio Services made available to you

after such changes have been made, you hereby provide your consent to the changes.

Posting of Revised Privacy Policy. If there are any material changes to this Policy, Pikcio will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.

New Uses of Personal Information. Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. Where consent of the Individual for the Processing of Personal Information is otherwise required by law or contract, Pikcio will endeavor to comply with the law or contract.

14. Definitions

The following capitalized terms shall have the meanings herein as set forth below.

“Agent” means any Third Party that Processes Personal Information pursuant to the instructions of, and solely for, Pikcio or to which Pikcio discloses Personal Information for use on its behalf.

“Employee” refers to any current, temporary, permanent, prospective or former employee, director, contractor, worker, or retiree of Pikcio or its subsidiaries worldwide.

“Personal Information” is any information relating to an identified or identifiable natural person (“Individual”).

“Process” or “Processing” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

“Sensitive Data” or “Sensitive Personal Information” is a subset of Personal Information which, due to its nature, has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information includes Personal Information regarding EU residents that is classified as a “Special Category of Personal Data” under EU law, which consists of the following data elements: (1) race or ethnic origin; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) genetic data; (6) biometric data where Processed to uniquely identify a person; (6) health information; (7) sexual orientation or information about the Individual’s sex life; or (8) information relating to the commission of a criminal offense.

“Third Party” is any company, natural or legal person, public authority, agency, or body other than the Individual, Pikcio, or Pikcio’s Agents.

15. Contact Us

If you have questions or concerns about this Privacy Policy, please contact us through the information below:

PRIVACY@PIKCIO.COM