

1. INTRODUCTION

SECTION 1.01 PURPOSE

(a) The information below describes the privacy and security practices (the “Privacy Policy”) of First Approval California corporation (“First Appoval inc.”, “us”, “our” or “we”). This Privacy Policy describes the types of information First Approval may collect from you or that you may provide when you visit our website or mobile site at firstapproval.io (including sub-domains, web pages within the site or any equivalent mirror, replacement, substitute, or backup website), or any other website, mobile site or application that links to this Privacy Policy (the “Website”). For purposes of the Privacy Policy, the “Services” means any of First Approval’s services, e.g., making or purchasing goods via the Websites in furtherance of First Approval’s activity.

(b) We understand your concerns about safety and security and want to assure you that we make every effort to safeguard your privacy when you use our Websites or our Services. Our mission is to help you support us and charity, anywhere online – in a convenient and secure manner.

(c) If you have any questions about the Privacy Policy, please contact us via the methods listed in Section 7.02 below. If you do not agree with any of the terms and conditions in the Privacy Policy, please discontinue using the Websites and the Services.

2. GENERAL PROVISIONS

SECTION 2.01 SECURITY

(a) We take reasonable security precautions to protect the personal information that we collect and you provide to us. We meet industry-accepted reasonable standards for online payment protection. To the extent possible and available, we use up-to-date industry-accepted tools and technology protocols, including but not limited to, firewalls and encryption, to protect against the loss, misuse and unauthorized alteration of the information we collect. First Approval helps to protect your information by working with our service providers who provide a secure and safe environment for credit card payments. Please remember that the safety and security of your information also depends on you. Where we have given you (or you have chosen) a logon ID or password to access certain services or areas of the Websites, you are responsible for keeping this ID and/or password confidential. We ask that you should not share such information with anyone or allow anyone to sign-in using your credentials.

(b) Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we put in place for your protection.

3. HOW WE COLLECT AND USE INFORMATION

SECTION 3.01 COLLECTED INFORMATION

(a) As discussed in greater detail below, we collect two types of information: personal information you submit to us voluntarily and information we collect automatically when

you use our Websites or Services. We refer to “personal information” as information and data that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with you, including, a name, an identification number, location data, phone number, mailing address, email address and payment information. We outline data we collect in more detail below. We may also collect information such as your organization’s name, your title within the organization, industry type and status, and other business information about the organization. We may collect information from you when you use our Websites, such as when you sign up for First Approval’s account, subscribe to our newsletters, register to attend a webinar, meeting or event, or make a payment.

(b) When you submit payment information to us via the Websites, you consent to providing your payment information to us and to our service providers processing the payment to the extent required to provide our Services to you. When we collect payment information directly from you, we transmit this payment information directly to our service provider. For payments, we store the last four digits of the card number and the expiration date.

(c) We collect the following types of information:

1. Contact Information: name, mailing address, email address and telephone number;
2. Professional Information: organization name, your title within the organization, industry type, status, and other scientific and business information about the organization;
3. Account Information: contact information as set forth above, username, password, and any other information you choose to include in your profile;
4. Payment Information: billing address, email address, payment information, records of transactions; payment card number (credit or debit card), expiration date, or other financial account number and account details;

5. Publishing information: all data provided during the publishing process, drafts files, information about coauthors, access conditions and all records about uploading and downloading of data and publications.
6. Marketing Preferences, Marketing Activities and Customer Feedback: Marketing preferences, or responses to voluntary customer satisfaction surveys. To improve our marketing communications, we may collect information about interaction with, and responses to, our marketing communications;
7. Attendance Information: registration information, record of attendance at a webinar or another event; contact information;
8. Other Information You Provide to Us: for example, if you write a review of our Services or provide other information to us in the course of your use of our Websites or Services.

(d) The information above may be provided:

1. in the course of communications between you and us (including by phone, email, chat, any or otherwise);
2. when you register for an account and/or fill out an application form;
3. when you inquire about our Services;
4. when you make a payment;
5. when you register to attend one of our webinars, meetings or other events;
6. when you sign up for our e-newsletter or other materials;
7. when you post on our Websites' publicly available features, such as online blogs; and
8. when you report a problem with our Websites or Services.

(e) We also collect information from you automatically. Like most website administrators, we use log files that record information such as Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and page navigation. We gather this information to track website visitor movement in the aggregate, and to gather broad demographic information for aggregate use. Our goal in gathering this information is to learn how our customers and the public are using our Services. IP addresses that are recorded by our log files are not linked to personal identifiers.

SECTION 3.02 FROM WHOM INFORMATION IS BEING COLLECTED

(a) We may collect personal information directly from you. We may also receive personal information from other sources, including from our service providers, any of the other websites we operate or the other services we provide (if you use any of them); information we obtain from publicly available sources such as Facebook or LinkedIn; information from public records in order to conduct due diligence or for conducting fraud prevention checks or to supplement your profile (i.e., zip code); information from your employer if you are using our Services through an employer-run program; information from corporate partners if you are using our Services through a corporate partner program.

SECTION 3.03 LINKS AND THIRD PARTY WEBSITES

(a) The Websites contain links to other sites and in certain circumstances, we may use third parties to provide you with certain services. Please be aware that First Approval is not responsible for the privacy practices of such other sites or companies. We encourage our users to be aware when they leave our Websites and to read the privacy statements of each and every website that collects personal information.

SECTION 3.04 COOKIES

(a) For all website users, as you navigate through and interact with our Websites, we may automatically collect certain information about your equipment, browsing actions and

patterns, including details of your visits to our Websites, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Websites; information about your computer and internet connection, including your IP address, operating system and browser type; and other information obtained through third-party analytics tools, such as Google Analytics:

1. First Approval uses Google Analytics, a web analytics service provided by Google Inc. (“[Google](#)”). Google Analytics uses “cookies”, text files that are stored on your computer, to analyze your use of the Websites. The information generated by the cookie about your use of the Websites (including your shortened IP address) is transmitted to a Google server in the United States and stored there. Google will use this information to evaluate your use of the Websites, compile reports on website activity for us, and to provide other services related to the Websites and internet use. Google may also transfer this information to third parties if required by law, or where third parties process these data on behalf of Google. For more information about Google Analytics, or to opt out of Google Analytics, please go to the [Google Analytics Opt Out Settings](#) page;
2. We use cookies in order to bring you more relevant messaging with Google Display and Search Advertising (e.g., Remarketing or Google Display Network Impression Reporting);
3. We use third-party vendors, including Google, Facebook, LinkedIn, and Bing, in order to show ads on third-party sites across the Internet;
4. First Approval along with third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on past visits to our Websites and to report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to the Websites;
5. We use data from Google Analytics Demographics, Interest Reporting, and third-party audience data to help us understand how people find and use our Websites;
6. Visitors can opt-out of Google Analytics for Display Advertising, customize Google Display Network ads using Google’s [Ads Settings](#) page;
7. Visitors can customize their LinkedIn advertising settings using LinkedIn’s [Ads Settings](#) page;
8. Visitors can customize their Facebook advertising settings using Facebook’s [Ads Settings](#) page;
9. Visitors can customize their Bing advertising settings using Bing’s [Ads Settings](#) page.

10. Cookies do not allow the Websites to access personal information that you haven't already provided to us;
11. First Approval may use third party analytics services like Crazy Egg's Analysis Service or FullStory, which provide us with a clearer picture of how you use the Websites, such as where you click on the Websites, non-sensitive text entered into the Websites, and mouse movements. Your use of the Websites is also subject to Crazy Egg's and FullStory's privacy policies. You can visit Crazy Egg's privacy policy at: <https://www.crazyegg.com/privacy> and their opt-out feature on Crazy Egg's Opt Out Settings page. You can read FullStory's privacy policy here: <https://fullstory.com/legal/privacy>. If you wish to opt out of our use of FullStory with respect to your use of the Websites, you may do so by visiting <https://www.fullstory.com/optout/>.

SECTION 3.05 SHARED INFORMATION

(a) We may use the collected information for the following purposes:

1. to provide you with the Websites and the Services that you request and to communicate with you regarding your use of the Websites and Services;
2. to process your payments and publications and communicate with you and our partners about your payments and publications
3. to respond to your inquiries and to contact you about changes to the Websites and the Services;
4. to manage complaints, feedback and queries;
5. to send you notices or our e-Newsletter (if you have signed up to receive it);
6. to notify you about new publications options;
7. to send you information about our programs, Services and other offerings;
8. to provide and maintain the Websites, help diagnose problems with the Websites, and to administer and audit usage of the Websites;
9. to improve the quality of the Websites and the Services;
10. for statistical analysis and internal purposes such as identifying fundraising trends;
11. to comply with legal or regulatory obligations (including in connection with a court order and to meet our reporting requirements);
12. to enforce or apply the agreements concerning you (including agreements between you and us);

13. for any other purposes disclosed at the time the information is collected or to which you consent; and
14. as otherwise specifically described in the Privacy Policy.

SECTION 3.06 PROFILES AND ACCOUNTS

(a) When you submit your contact information to sign up for a First Approval's profile or to use the Services, you agree and consent that First Approval may send you communication relating to our programs, events, or recommended charity projects. Please contact us via the methods listed in Section 7.02 below to opt out of receiving such communication or, if available, you may opt out by clicking on the "unsubscribe" link at the bottom of our emails.

SECTION 3.07 INFORMATION YOU PUBLICLY POST

(a) To the extent applicable, if you decide to participate in our Websites' features, such as online blogs, by posting content, you understand that this information is publicly available.

(b) The Websites may allow you to access social networking sites including Facebook®, Twitter®, and LinkedIn®.

4. HOW WE SHARE INFORMATION

SECTION 4.01 RECIPIENT PARTIES

(a) We may disclose your information to our professional advisers, including accountants, lawyers, and other professional advisers that assist us in carrying out our activities.

SECTION 4.02 COMPLIANCE WITH LAWS

(a) Though First Approval makes every effort to preserve your privacy, we may need to disclose personal information when we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order, or legal process served on us. We also may disclose your personal information to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating any agreement with us, including our [Terms of Use](#).

SECTION 4.03 DISCLOSURE OR TRANSFER OF DATA TO AFFILIATES OR SUBSIDIARIES OR IN CONNECTION WITH ORGANIZATION CHANGE

(a) We may disclose personal information that we collect or you provide to us, with our affiliates or subsidiaries that require access to your personal information for business purposes.

(b) We may disclose personal information that we collect or you provide as described in the Privacy Policy to any accepting party 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 users of our Websites is among the assets transferred.

SECTION 4.04 DISCLOSURE OR TRANSFER OF DATA TO SERVICE PROVIDERS

(a) We may use service providers to help operate and improve our Websites, assist us in providing products or services to you, to process and collect payments, to provide analytics, or provide tools we embed into our Websites, products, and services. We may share information we have about you with such service providers, solely for their use to provide services to us. Please be aware that such service providers have their own privacy policies, which govern their use of your information collected directly from you. For a full list of such service providers and their privacy policies, please contact us via the methods listed in Section 7.02 below.

5. PROCESSING INFORMATION

SECTION 5.01 DO NOT TRACK REQUESTS, THIRD-PARTY TRACKING

(a) First Approval does not currently take actions to respond to Do Not Track signals sent by your web browser because a uniform technological standard has not yet been

developed. We continue to review new technologies and may adopt a standard once one is created. Third parties, other than our service providers (such as our website analytics providers), do not have authorization from us to track which websites you visited prior to and after visiting the Websites. That said, we cannot control third-party tracking and there may be some third-party tracking that occurs without our knowledge or consent.

SECTION 5.02 NOTICE TO RESIDENTS OF COUNTRIES OUTSIDE THE UNITED STATES

(a) We are based in the United States of America. Any personal information you provide may be stored and maintained in a secure database in the United States or transferred to a secure database outside the United States. Personal information may be accessed by us or transferred to us in the United States or to our affiliates, partners, or service providers elsewhere in the world.

(b) If you are located outside of the United States, be advised that any information you provide to us will be transferred to and stored in the United States and that, by submitting information to us, you explicitly authorize its transfer and storage within the United States. We will protect the privacy and security of personal information according to the Privacy Policy regardless of where it is processed or stored.

SECTION 5.03 NO SERVICES FOR MINORS

(a) We do not knowingly collect information from minors. To use the Websites, you must be the age of legal majority in your place of residence. By using the Websites, you hereby represent that you are at least the age of legal majority in your place of residence. We do not use an application or other mechanism to determine the age of users of the Websites. We will use commercially reasonable efforts to delete information associated with a minor as soon as practicable if we learn that a minor has submitted information to us. If you believe we might have any information from or about a child under 18, please contact us via the methods listed in Section 7.02 below.

SECTION 5.04 ACCESSING, MODIFYING, CORRECTING AND DELETING YOUR INFORMATION

(a) If you would like to access, modify, correct, or delete your personal information, please contact us via the methods listed in Section 7.02 below. When you contact us, you may be required to provide us some details to verify your identity in this case. We may not accommodate a request to change or delete information if we believe the change would violate any law or legal requirement, cause the information to be incorrect, or we are unable to verify your identity. If we have received your information from a third party, we may not be able to modify, correct or delete your information.

SECTION 5.05 YOUR CALIFORNIA PRIVACY RIGHTS – SHINE THE LIGHT

(a) California Civil Code Section § 1798.83 permits users of our Websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. Under Section § 1798.83, we currently do not share any personal information with third parties for their direct marketing purposes. If you have any questions about this Section, please contact us via the methods listed in Section 7.02 below.

SECTION 5.08 COOKIES

(a) In addition to provisions of Section 6.04 below, First Approval uses “session cookies” while a visitor is making a payments via First Approval hypertext links, sometimes referred to as payment buttons. “Cookies” are bits of information that are stored by your browser on your hard drive. We use “session cookies” to help us verify the identity of participants as they move from one payment page to the next. Information collected by these session cookies is not linked to personal identifiers.

6. EU/EEA PRIVACY PROVISIONS

SECTION 6.01 INTRODUCTION

(a) Provisions of this Article 6 provide supplemental information with respect of personal information and individuals (who interact with First Approval by means of use of the Websites and the Services) located in the European Union (“EU”) and the European Economic Area (“EEA”).

(b) Unless stated otherwise, the provisions of this Article 6 shall be interpreted, supplemented by and applied in conjunction with other applicable provisions of the Privacy Policy.

SECTION 6.02 DATA CONTROLLER

(a) First Approval is the personal data controller in respect of your personal information collected and used through your use of the Websites and the Services.

SECTION 6.03 COLLECTION OF INFORMATION

(a) We collect and use personal information about you in the course of providing access to the Websites and providing the Services. The information that you provide to us may include the following:

1. Contact Information: name, mailing address, email address and telephone number;
2. Professional Information: organization name, your title within the organization, industry type, status, and other scientific and business information about the organization;
3. Account Information: contact information as set forth above, username, password, and any other information you choose to include in your profile;
4. Payment Information: billing address, email address, payment information, records of transactions; payment card number (credit or debit card), expiration date, or other financial account number and account details;
5. Publishing information: all data provided during the publishing process, drafts files, information about coauthors, access conditions and all records about uploading and downloading of data and publications.

6. Marketing Preferences, Marketing Activities and Customer Feedback: Marketing preferences, or responses to voluntary customer satisfaction surveys. To improve our marketing communications, we may collect information about interaction with, and responses to, our marketing communications;
7. Attendance Information: registration information, record of attendance at a webinar or another event; contact information;
8. Other Information You Provide to Us: for example, if you write a review of our Services or provide other information to us in the course of your use of our Websites or Services.

The information above may be provided:

1. in the course of communications between you and us (including by phone, email, chat, any or otherwise);
2. when you register for an account and/or fill out an application form;
3. when you inquire about our Services;
4. when you make a payment;
5. when you register to attend one of our webinars, meetings or other events;
6. when you sign up for our e-newsletter or other materials;
7. when you post on our Websites' publicly available features, such as online blogs; and
8. when you report a problem with our Websites or Services.

(b) We also collect information from you automatically. Like most website administrators, we use log files that record information such as Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and page navigation. We gather this information to track website visitor movement in the aggregate, and to gather broad demographic information for aggregate use. Our goal in gathering this information is to learn how our customers and the public are using our Services. IP addresses that are recorded by our log files are not linked to personal identifiers.

(c) We may also collect personal information about you through your use of the Websites and the Services. This information includes online activity information and technical information about your usage activities, to the extent that such information constitutes

personal information. We collect technical information automatically through your electronic device, such as your IP address (i.e. your computer's address on the internet), operating system type (Windows or Mac) and version, internet browser type and version, internet service provider (ISP), and language. We also collect information about your use of our Websites, e.g., dates and times of log-in and out to your account, time spent on pages and the pages visited. We use this information to ensure that the Websites and the Services function properly.

(d) We may also receive personal information from other sources, such as:

1. any other websites we operate or other services we provide (if you use any of them);
2. information we obtain from publicly available sources, e.g., via social media resources like Facebook or LinkedIn , ORCID;
3. information from public records in order to conduct due diligence or for conducting fraud prevention checks or to supplement your profile (i.e., zip code);
4. information from your employer if you are using our Services through an employer-run program;
5. information from corporate partners if you are using our Services through a corporate partner program.

SECTION 6.04 COOKIES

(a) The Websites uses cookies to distinguish you from other users of the Websites.

Cookies are pieces of information stored directly on the device you are using. Cookies allow us to recognize your device and to collect information such as internet browser type, time spent using Services, and pages visited. This helps us to provide you with a good experience when you browse the Websites and also allows us to improve the Websites.

(b) We use Google Analytics, a web analytics service provided by Google, Inc. For more information about Google Analytics, or to opt-out of Google Analytics, please go to Google Analytics Opt-Out Settings page here <https://tools.google.com/dlpage/gaoptout>.

(c) We use cookies in order to bring you more relevant messaging with Google Display and Search Advertising (e.g., Remarketing or Google Display Network Impression Reporting).

(d) We use third-party vendors, including Google, in order to show ads on third-party sites across the Internet.

(e) We, along with third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on past visits to our Websites and to report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to the Website.

(f) We use data from Google Analytics Demographics, Interest Reporting, and third-party audience data to help us understand how people find and use our Website.

(g) Visitors can opt-out of Google Analytics for Display Advertising, customize Google Display Network ads using Google's Ads Settings page.

(h) Cookies do not allow the Websites to access personal information that you haven't already provided to us.

(i) We may use third party analytics services like Crazy Egg's Analysis Service or FullStory, which provide us with a clearer picture of how you use the Websites, such as where you click on the Websites, non-sensitive text entered into the Websites, and mouse movements. Your use of the Websites is also subject to Crazy Egg's and FullStory's privacy policies. You can visit Crazy Egg's privacy policy at:

<https://www.crazyegg.com/privacy> and their opt-out feature on Crazy Egg's Opt Out Settings page. You can read FullStory's privacy policy here:

<https://fullstory.com/legal/privacy>. If you wish to opt out of our use of FullStory with respect to your use of the Websites, you may do so by visiting

<https://www.fullstory.com/optout/>.

(j) You can refuse to accept the cookies we use by adjusting your browser settings. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Websites and or our Services.

SECTION 6.05 USE OF INFORMATION

(a) We use your personal information in the course of providing access to the Websites and providing the Services. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for below purposes.

(b) For each of these purposes, we have set out the legal basis on which we use your personal information:

1. To communicate with you and other individuals: For our legitimate business purposes (i.e., to procure access to the Websites and the Services);
2. To procure access to the Websites and the Services: For our legitimate business purposes (i.e., to procure access to the Websites and the Services), and depending on the circumstances, to perform an agreement between you and us;
3. To process your payments and communicate with you: For our legitimate business purposes (i.e., to procure access to the Websites and the Services), and depending on the circumstances, to perform an agreement between you and us;
4. To notify you about changes to the Websites or the Services: For our legitimate business purposes (i.e., to procure access to the Websites and the Services);
5. To audit and monitor the use of the Websites: For our legitimate business purposes (i.e., to procure access to the Websites and the Services). We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law (e.g., in relation to our use of certain cookies);
6. To improve the quality of the Websites and the Services: For our legitimate business purposes (i.e., to procure access to the Websites and the Services);
7. To manage complaints, feedback and queries: For our legitimate business purposes (i.e., to procure access to the Websites and the Services);
8. To carry out market research and analysis: For our legitimate business purposes (i.e., to procure access to the Websites and the Services). We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law;
9. To carry out satisfaction surveys and analysis: For our legitimate business purposes (i.e., to procure access to the Websites and the Services). We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law;
10. To provide you with information about the Services we offer (including details of any services which we believe may be of interest to you, including notifying you of opportunities for future publications) in accordance with your preferences as

indicated when you entered into any agreement with us, including any marketing consent preferences: For our legitimate business purposes (i.e., to procure access to the Websites and the Services). We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law;

11. To compile aggregate statistics about how our Websites and Services are being used: For our legitimate business purposes (i.e., to procure access to the Websites and the Services);
12. To comply with any legal or regulatory obligations (including in connection with a court order and to meet our reporting requirements): For our legitimate business purposes and for compliance with our legal obligations;
13. To enforce or apply the agreements concerning you (including agreements between you and us): For our legitimate business purposes and for compliance with our legal obligations.

(c) We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfill the terms of our agreement with you or in preparation of us entering into an agreement with you. If you do not provide the relevant personal information to us, we may not be able to procure access to the Websites and the Services to you.

(d) Where we rely on our legitimate business interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will include:

1. pursuit of our activities and objectives, or those of a third party;
2. compliance with applicable legal and regulatory obligations and any codes of conduct;
3. improvement and development of our operations and service offering, or those of a third party; or
4. protection of our directors, employees and customers, or those of a third party.

SECTION 6.06 DISCLOSURE OF INFORMATION

(a) We may disclose and transfer your information by means as set forth in Articles 4 and 5 above.

SECTION 6.07 PROTECTION OF INFORMATION

(a) We take reasonable security precautions to protect the personal information that we collect and you provide to us. We use industry-accepted tools, including technology protocols, to protect against the loss, misuse, and unauthorized alteration of the information we collect. We help to protect your information by working with our vendors who provide a secure and safe environment for credit card payments. Please remember that the safety and security of your information also depends on you. Where we have given you (or you have chosen) a login ID or password to access certain of our Services or areas of the Websites, you are responsible for keeping such ID and/or password confidential. We ask that you not share such information with anyone or allow anyone to sign in using your credentials.

(b) Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Websites and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorized access.

SECTION 6.08 RETAINING OF INFORMATION

(a) We will retain your personal information for as long as is necessary for purposes for which it was collected. The precise period will depend on the reason why it was collected. Those periods are also based on the requirements of applicable data protection laws, applicable legal and regulatory requirements and periods relating to the commencement of legal actions.

SECTION 6.09 GDPR RIGHTS

(a) First Approval undertakes to respect the following data protection rights available to you under the EU General Data Protection Regulation (GDPR):

1. Right of Access to Your Personal Information: you have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions;
2. Right to Rectify Your Personal Information: you have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete;
3. Right to Erasure Of Your Personal Information: you have the right to ask that your personal information be deleted in certain circumstances, e.g., (i) where your personal information is no longer necessary in relation to the purposes for which it is being collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation;
4. Right to Restrict Use of Your Personal Information: you have the right to suspend our use of your personal information in certain circumstances, e.g., (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal

information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection;

5. Right to Data Portability: you have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of an agreement, and when the use of your personal information is carried out by automated (electronic) means;
6. Right to Object to Use of Your Personal Information: you have the right to object to the use of your personal information in certain circumstances, e.g., (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes;
7. Right to Withdraw Consent: you have the right to withdraw your consent at any time where we rely on consent to use your personal information;
8. Right to Complain to the Relevant Data Protection Authority: you have the right to complain to the relevant data protection authority where you think we have not used your personal information in accordance with data protection law.

7. MISCELLANEOUS PROVISIONS

SECTION 7.01 CHANGES TO THE POLICY

(a) First Approval periodically reviews and updates the Privacy Policy. If we decide to change the Privacy Policy, we will post those changes to our Websites so our donors and customers are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We may also, in our sole discretion, notify you of such changes via our e-Newsletter or email to your email address that we have in our records. Any updates or changes to the Privacy Policy will become effective upon posting. By continuing to access or use any of our Websites after those changes become effective, you agree to be bound by the revised Privacy Policy.

SECTION 7.02 CONTACT DETAILS

(a) If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by:

FIRST APPROVAL INC.

Full Address: 254 Chapman Rd, Ste 209, Newark DE 19702

Electronic mail: info@firstapproval.io