#### PRIVACY POLICY

Last Updated Date: November 2021

At the Listen Collectibles Auction and Shop (the "LCAS"), accessible at <a href="https://nft.listencampaign.com">https://nft.listencampaign.com</a> (the "Site"), one of our main priorities is the privacy of our visitors ("you" or "User"). This Privacy Policy document contains types of information that are collected and recorded by Listen Communications Ltd., domiciled in the United Kingdom at the address 19 Church Road, London, England, SW13 9HE (the "Company" or "we"), and how we use it.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us at support-nft@listencampaign.com.

This Privacy Policy applies only to our online activities and is valid for Users of the Site with regard to the information that they shared and/or collect at the Site. This Privacy Policy is not applicable to any information collected offline or via channels other than the Site.

If you see an undefined term in this Privacy Policy, it has the same definition as in our Terms of Use <a href="https://nft.listencampaign.com">https://nft.listencampaign.com</a>.

**Notice to EU/UK individuals:** This Privacy Policy is intended to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of the European Union 27 April 2016 (the "General Data Protection Regulation" or "GDPR"), and the UK equivalent (the "UK GDPR"), and provide appropriate protection and care with respect to the treatment of your information in accordance with the GDPR.

**Notice to California residents:** This Privacy Policy is intended to comply with the California Consumer Privacy Act ("CCPA") and other applicable California law.

## 1. Consent

PLEASE BE AWARE THAT ACCESSING THE SITE AND/OR CLICKING ACCEPT YOU HEREBY AGREE TO, ACCEPT TO BE BOUND BY, AND UNDERSTAND THIS PRIVACY POLICY AND OUR TERMS OF USE <a href="https://nft.listencampaign.com">https://nft.listencampaign.com</a>. IF YOU CHOOSE TO USE OUR SITE, THEN YOU AGREE TO THE COLLECTION AND USE OF INFORMATION IN RELATION WITH THIS PRIVACY POLICY.

#### 2. Types of Data We Collect

We collect Personal Data, Anonymous Data, information you provide us, information collected via technology, and information collected from third parties, as described below:

**Definition:** Personal Data is data that allows someone to identify you as an individual or household, including, but not limited to: name, address, telephone number, e-mail, IP addresses, geolocation, blockchain and/or side chain address, internet activity, Account password, as well as any other non-public information about you that is associated with or linked to any of the foregoing data.

**Definition:** Anonymous Data is data, including aggregated and de-identified data, that is not associated with or linked to your Personal Data. Anonymous Data does not, by itself, permit the identification of individual persons.

### (a) Information You Provide To Us

- We may collect Personal Data from you, such as your first and last name, e-mail and mailing addresses, payment details, telephone number, and password when you create an account to login to our network ("Account").
- If you use the Site on a mobile device, we may collect your phone number and the unique device ID number to provide your requested services.
- For your convenience, we may allow you to store preferences like how your content is displayed, your location, safe search settings, notification settings, and favorite widgets. We may associate these choices with your ID, browser or mobile device, and you can edit these preferences at any time.
- When connecting to our Site via a service provider that uniquely identifies your mobile device, we may receive this identification and use it to offer extended services and/or functionality.
- Certain services, such as two-factor authentication, may be provided which require our collection of your phone number. We may associate that phone number to your mobile device identification information in order to facilitate such a service.
- If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail in order to send you a reply.
- We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via e-mail regarding Site support so that we can assist in the matter(s).
- We may also collect Personal Data at other points during use of the Site that state that Personal Data is being collected for any of the following reasons: auditing, security, performing Services, internal research for technology development, repair, quality, and safety.

#### (b) Information Collected Via Technology

As you navigate through and interact with the Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

Information Collected by Our Servers: In order to make the Site more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol ("IP") address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.

Log Files: We follow a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable and, thus, is Anonymous Data. The purpose of gathering this Anonymous Data is for analyzing trends, administering the Site, tracking users' movement on the Site, and gathering demographic information.

**Cookies:** Like any other website, the Site uses "Cookies." Cookies are small pieces of information that the Site sends to your computer's hard drive while you are viewing the Site. We may use both "session" Cookies (which expire once you close your web browser) and "persistent"

Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs.

**Web Beacons:** We may use "Web Beacons" (also known as Clear Gifs, Pixel Tags, or Web Bugs). Web Beacons are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Users. In contrast to Cookies, which are stored on a User's computer hard drive, Web Beacons are embedded invisibly in the Site's pages. Web Beacons also allow us to send e-mail messages in a format Users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to Users. We may use this information to reduce or eliminate messages sent to a User. We do not tie the information gathered by Web Beacons to our Users' Personal Data.

**How We Respond to Do Not Track Signals:** Some web browsers or smartphones can set "Do Not Track" requests to block activity from being tracked across web pages or devices. As there is yet an industry-wide standard to do so, we do not currently respond to "Do Not Track" signals or other mechanisms that might enable Users to opt out of tracking on the Site.

Local Shared Objects (LSOs): When we post videos, third parties may use certain LSOs known as "Flash Cookies" to store your preferences for volume control or to personalize certain video features. Flash Cookies are different from "session" Cookies because of the amount and type of data and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies. To learn how to manage privacy and storage settings for Flash Cookies, click

here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\_man ager07.html.

Analytics Services: In addition to the tracking technologies we place, other companies may set their own cookies or similar tools when you visit the Site. This includes third party analytics services, including but not limited to Google Analytics ("Analytics Services"), that we may engage to help analyze how users use the Site. We may receive reports based on these parties' use of these tools on an individual or aggregate basis. We use the information we get from Analytics Services only to improve the Site. The information generated in this manner about your use of the Site (the "Analytics Information") is transmitted to the Analytics Services. The Analytics Services use Analytics Information to compile reports on User activity. The Analytics Services may also transfer Information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Services' ability to use and share Analytics Information is restricted by such Analytics Services' Terms of Use and Privacy Policy. By using the Site, you consent to the processing of data about you by Analytics Services in the manner and for the purposes set out above. For a full list of Analytics Services, please contact us at support-nft@listencampaign.com.

#### (c) Information Collected from Third Party Companies

We may receive Personal and/or Anonymous Data about you from companies that provide services on the Site by way of a co-branded or private-labeled website or companies that offer their products and/or services on the Site. In particular, when Users choose to use a third party wallet your blockchain and/or side chain address(es) is provided to us as well as other information you choose

to share with the third party wallet provider. These third-party companies may supply us with Personal Data. We may add this to the information we have already collected from you via the Site in order to improve it. We do not collect Personal Data automatically, but we may tie the information that we collect automatically to Personal Data about you that we collect from other sources or that you provide to us.

## 3. Use of Your Personal Data

## (a) General Use

In general, Personal Data you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We may use your Personal Data in the following ways:

- facilitate the creation of and secure your Account on our network
- identify you as a User in our system
- provide improved administration of the Site
- provide the services you request, including but not limited to facilitating your cryptocurrency transactions
- improve the quality of experience when you interact with the Site
- send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created
- protect you and other Users from any conduct that violates the Terms of Use <a href="https://nft.listencampaign.com">https://nft.listencampaign.com</a> or to prevent abuse or harassment of any User
- display your full name (if available) next to the digital assets you created and own
- verify your identity as the creator and owner of your digital assets, and display a securehashed format of this information
- send you administrative e-mail notifications, such as security or support and maintenance advisories
- respond to your inquiries related to employment opportunities or other requests
- make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback
- in any other way we may describe when you provide the Personal Data in question
- send newsletters, surveys, offers, and other promotional materials related to the Listen Campaign and for other marketing purposes of the Company.

## (b) LCAS and/or Third Party Marketing

We may use your Personal Data to contact you about our own and select third parties' goods and services that may be of interest to you.

#### (c) Creation of Anonymous Data

We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyze request and usage patterns so that we may improve content and use of the Site. We reserve the right to use Anonymous Data for any purpose and to disclose Anonymous Data to third parties without restriction.

# 4. Disclosure of Your Personal Data

We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

## (a) Third Party Service Providers

We may share your Personal Data with third party service providers to:

- o provide you with the services (e.g., payment processing) that we offer you through the Site
- to conduct quality assurance testing
- o to facilitate creation of Accounts
- to provide technical support
- o to provide other services to the Company

## (b) Affiliates

We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under a common control ("Affiliates"), in which case we will require our Affiliates to honor this Privacy Policy.

## (c) Corporate Restructuring

We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

#### (d) As Legally Required

Regardless of any choices you make regarding your Personal Data (as described below), the Company may disclose Personal Data if it believes in good faith that such disclosure is necessary:

- o in connection with any legal investigation
- to comply with relevant laws or to respond to subpoenas or warrants served on the Company
- o to protect or defend the rights or property of the Company or Users
- to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use

### (e) Other Disclosures

We may also disclose your Personal Data:

- o to fulfill the purpose for which you provide it
- o for any other purpose disclosed by us when you provide it
- with your consent

#### 5. How We Protect Your Information

We take reasonable technical and organizational measures to guard against unauthorized or unlawful processing of your Personal Data and against accidental loss or destruction of, or damage to, your Personal Data. While no system is completely secure, we believe the measures implemented by the Site reduce our vulnerability to security problems to a level appropriate to the type of data involved. We

have security measures in place to protect our user database and access to this database is restricted internally. However, it remains your responsibility to do all of the following:

- Protect against unauthorized access to your use of the Site and/or the App
- Ensure no one else uses the Site and/or the App while your machine is logged on to the Site (including by logging on to your machine through a mobile, Wi-Fi or shared access connection you are using)
- Log off or exit from the Site when not using it
- Where relevant, keep your password or other access information secret. Your password and login details are personal to you and should not be given to anyone else or used to provide shared access over a network
- Maintain good internet security

You should keep all of your Account details secure. If you think that any of your accounts — online or otherwise — has been compromised, you should change your Account credentials with us. In particular, make sure that any compromised account does not allow access to your Account with us. You should also tell us as soon as you can about any such breaches, so that we can try to help you keep your Account secure and, if necessary, warn anyone else who could be affected.

#### 6. Third Party Websites

The Site may contain links to third party websites. When you click on a link to any other website or location, you will leave the Site and go to another site, and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

## 7. Your Choices Regarding Information

You have several choices regarding the use of information on the Site:

## (a) Changing or Deleting Your Personal Data

All Users may review, update, correct or delete the Personal Data furnished by a User in their User account (including any imported contacts) by contacting us, or by editing their profile via the Site. If you completely delete all of your Personal Data, then your Account may become deactivated. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes, such as information stored in blockchain technology for the purpose of verifying authenticity and value of digital assets.

You may access, correct, amend, or delete Personal Data we have about you by logging into your Account and navigating to your Account page. If you wish to cancel your Account, you may do so through your Account page. If you do, personally identifiable information associated with your Account will be deleted as soon as is reasonably practical or as required by applicable law. Please note that we may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law.

We may use some of the information we collect for marketing purposes, including to send you promotional communications about new LCAS features, products, events, or other opportunities. If you wish to stop receiving these communications or to opt out of use of your information for these purposes, please follow the opt-out instructions by clicking "Unsubscribe" (or similar opt-out language) in those communications. You can also contact us at <a href="mailto:support-nft@listencampaign.com">support-nft@listencampaign.com</a> to opt out.

#### (b) Email Communications

We may periodically send you free newsletters and e-mails that directly promote matters concerning the use of the Site. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly at <a href="mailto:support-nft@listencampaign.com">support-nft@listencampaign.com</a>. Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or this Privacy Policy.

## (c) How You Can Control Cookies (Opt-Out)

If you decide at any time that you no longer wish to accept Cookies from our Site for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser's technical information. If you do not accept Cookies, however, you may not be able to use all portions and/or functions of the Site. If you have any questions about how to disable or modify Cookies, please let us know at <a href="mailto:support-nft@listencampaign.com">support-nft@listencampaign.com</a>.

#### 8. CCPA Privacy Rights (Do Not Sell My Personal Information)

Under the CCPA, among other rights, a User that is a California resident has the right to:

- Request that we disclose the categories and specific pieces of Personal Data that we have collected about the User
- Request that we delete any Personal Data that we have collected about User
- In the situation where the Company was selling a User's Personal Data, request that that Personal Data not be sold

If a California-resident User makes a request, we will make every effort to promptly respond to the request. To exercise any of these rights, please contact us at <a href="mailto:support-nft@listencampaign.com">support-nft@listencampaign.com</a> or via post at: Listen Communications Ltd., 19 Church Road, London, England, SW13 9HE.

#### 9. GDPR Data Protection Rights

We would like to make sure you are fully aware of all of your data protection rights. For every User subject to the GDPR or the UK GDPR, they are entitled to the following:

- The Right to Access You have the right to request copies of your Personal Data. We may charge you a small fee for this service.
- The Right to Rectification You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.

- The Right to Erasure —You have the right to request that we erase your Personal Data, under certain conditions.
- The Right to Restrict Processing You have the right to request that we restrict the processing of your Personal Data, under certain conditions.
- The Right to Object to Processing You have the right to object to our processing of your Personal Data, under certain conditions.
- The Right to Data Portability You have the right to request that we transfer the Personal Data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we will make every effort to promptly respond to your request. If you would like to exercise any of these rights, please contact us at <a href="mailto:support-nft@listencampaign.com">support-nft@listencampaign.com</a> or via post at: Listen Communications Ltd., 19 Church Road, London, England, SW13 9HE.

#### 10. Minors and Children

One of our top priorities is helping ensure that children are protected while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity. The Site is not intended for use by children under the age of 18, and we do not knowingly collect personal information, including but not limited to Personal Data, from children under the age of 13. If we learn we collected Personal Data from a child under 13, we will delete that information from our files. Do not use the Site if you are under the age of 18.

#### 11. Important Limitations and Disclosures

Your Personal Data may be processed in the country in which it was collected and in other countries where laws regarding the processing of Personal Data may be less stringent than the laws in your country. By providing your Personal Data, you consent to such transfers.

In addition, nothing in this Privacy Policy restricts our ability to:

- Comply with applicable law, rules, or regulations
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or lawful court order
- Cooperate with law enforcement agencies about conduct we reasonably and in good faith believe may violate the law
- Protect our rights or our property
- Enforce our Terms of Use
- Prevent behavior that is (or that we think may be) illegal or unethical

# 12. Changes to This Privacy Policy

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy at <a href="https://nft.listencampaign.com">https://nft.listencampaign.com</a>. The date the Privacy Policy was last revised is identified at the beginning of this Privacy Policy under the heading of Last Updated Date. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this Privacy Policy to check for any changes.