

PRIVACY POLICY

Last Modified 09.09.2022

HUZK LTD dba SIGNALALL (“**Company**” or “**We**”) is committed to protect your privacy. This privacy policy (“**Privacy Policy**”) describes our practices of processing data from **(i)** visitors to our site available at: www.signalall.com and the mobile application available at <https://huzk.app/project/signalall/> (“**Website**”); **(ii)** our Customers using our Services (all as detailed and defined below); and **(iii)** our affiliates and merchants (“**Business Partners**”).

We have included below information about which data is collected, how we process and use your data, but before, we would like to explain the basis on which we do so:

1. Where a Business Partner registers for any of our Services, we process a Business Partner’s Personal Information in order to perform our contract with the Business Partner;
2. Where a Customer uses our Services to facilitate payment to our Business Partners or purchase the good and services we offer, we process the Customer’s Personal Information in order to perform our contract with the Customer;
3. When visitors access our site, we collect certain online identifiers which we have a legitimate interest in processing such data;
4. For direct marketing of either our Business Partner or Customers we have legitimate interest to process such data; or
5. We will also process your Personal Information where you have provided us with consent to do so.

Information Collection

Depending on your interaction with us (meaning, if you are just browsing our Website, or if you have registered to our Services and opened an account, etc.), we may collect two types of information you, as follows:

- **Non-Personal Information:** The *first type* of information is non-identifiable information which may be made available or gathered through your use of the Services. To clarify, we are not aware of your identity due to such information (“**Non-Personal Information**”). The Non-Personal Information which is being collected may include your aggregated usage information and technical information transmitted or automatically collected such as (but not limited to): the time and date you access our Website, your actions within our Services (e.g., registration, pages viewed, etc.), type of operating system, type of browser, language preference and approximate geo-location (country level).
- **Personal Information:** The *second type* of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Information**”). Personal Information includes either: (i) contact information such as your name, phone number, address, email address, etc., which you have submitted voluntarily; (ii) your Internet Protocol (“**IP**”) address and MAC address or other Online Identifiers. Note that, while IP and MAC address are considered personally identifiable information in many jurisdictions (such as the EEA), there are some jurisdictions in which such data is not considered as Personal Information. Therefore, we treat such information as Personal Information, in accordance with applicable laws; (iii) payment information such as, individual taxpayer number, BIN and last four digits of the credit card number. All payment information is handled through industry standard secure protocols and where appropriate in accordance with relevant Payment Card Industry (“**PCI**”) compliance standards.

You are not required by law to provide us with any information. You can always avoid providing us certain Personal Information; however, you acknowledge that it may prevent us from providing you certain Services.

In the event we combine Personal Information with Non-Personal Information, the combined information will be treated as *Personal Information* for as long as it remains combined.

Information we collect from visitors of our Website

Type of Information	How Do We Use It?
In the event you contact us for support or other inquiries, either through the Website, by sending us an email or by other means of communications we make available, you will be requested to provide us your name and email address.	We will use this information solely for the purpose of responding to your inquiries and provide you with the support or information you have requested.
	Your provision of personal information in connection with recruiting is voluntary, and you determine the extent of information you provide us. We do not request or require sensitive personal information concerning religion, health, sexual orientation, or political affiliation in connection with recruiting. We will use the information you have provided solely to communicate with you, to manage our recruiting and hiring processes, and for compliance with corporate governance and legal and regulatory requirements. If you are hired, the information may be used in connection with employment and corporate management.
If you voluntarily subscribe to our newsletter you will be asked to provide us with your email address. You can unsubscribe at any time using the unsubscribe option within the body of the newsletter or rather or by contacting customer support at support@signalall.com	We will use your email address in order to send you information related to our Services and to keep you up to date regarding new Services, as well as provide you with tips related to sales strategy.
IP or other online identifiers such as cookies, agents, device identifiers, etc. (" Online Identifiers ")	We either directly or indirectly may collect our visitors' IP. We use this for our legitimate interests of (i) operating, providing, maintaining, protecting, managing, customizing and improving our Website and Services and the way in which we offer them; (ii) enhancing your experience with the Services; and (iii) our legitimate interests of auditing and tracking usage statistics and traffic flow.
We also collect certain technical Non-Personal Information (as detailed above) which relates to your use of the Website.	We use this technical data in order to operate and manage our Website.

Information We Collect from Business Partners

Type of Information	How Do We Use It?
You can sign up as a Business Partner through our site, during which you will be required to register and open an account. During the registration flow you will be requested to provide us with certain information such as your full name, email address, phone number, company name and address. Further, during the registration process, you will be required to create a password, at which time you thereby represent and warrant that you are responsible for maintaining the confidentiality of your details and password. You represent and warrant that you will not provide us with inaccurate, misleading or false information.	We will use this information for the purpose of performing our contract with you, provide you with the Services you have requested, and designate your account. We will use your email address and phone number in order to send you needed information related to the Services and our business engagement (e.g., send you a Welcome message, to notify you regarding any updated to our Services, send applicable invoices, and additional occasional communications related to the Services) as well as verify your identity.

We also collect certain technical Non-Personal Information (as detailed above) as a visitor to the Website and as detailed above.	see the table above.
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Information We Collect from Customers of the Service

Type of Information	How Do We Use It?
When you purchase a product through our Service you will be requested to provide us with certain information such as your full name, email address, postal code, email address, country and payment information.	We will use this information for the purpose of performing our contract with you, provide you with the Services you have requested and facilitate your payment to the goods, products or services you purchase.
We also collect certain technical Non-Personal Information (as detailed above) as a visitor to the Website and as detailed above.	see the table above.

Sharing Personal Data

We do **not** share any **Personal Information** collected from you with third parties or any of our partners except in the following events:

- **Third Party service providers**- share your information with third parties that perform services on our behalf (e.g. API providers, payment process, tracking, servers, service functionality and support, marketing, etc.) these third parties may be located in different jurisdictions;
- **Law Requirement**- we will share your information, solely to the extent needed to comply with any applicable law, regulation, legal process or governmental request (i.e., to comply with courts injunction, etc.);
- **Policy Enforcement**- we will share your information, solely to the extent needed to enforce our policies including investigations of potential violations thereof or to detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- **Company's Rights**- we will share your information, solely to the extent needed to establish or exercise our rights to defend against legal claims;
- **Third Party Rights**- we will share your information, solely to the extent needed to prevent harm to the rights, property or safety of us, our users, yourself or any third party or for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.
- **Corporate Transaction**- We may share Personal Information, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy.

We may store Non-Personal and Personal Information on our servers or our cloud servers, use or share Non-Personal Information in any of the above circumstances, as well as for the purpose of providing and improving our Service as detailed above. Furthermore, we reserve the right to use, disclose or transfer (for business purposes or otherwise) aggregated and processed data to third parties, including, inter alia, affiliates, for various purposes including commercial use. This information may be collected, processed and analyzed by us and transferred in a combined, collectively and aggregated manner (i.e., your information is immediately aggregated with other users) to third parties.

Data Retention

We retain the information we collect as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until an individual expresses a preference to opt-out. We may at our sole discretion, delete or amend information from our systems, without notice to you, once we deem it is no longer necessary for such purposes.

Safeguard your Information

We take great care in implementing and maintaining the security of Company's Website, Services and your information. We employ PCI compliance (all systems are PCI Level 1 Service Provider certified. Company is PCI-DSS level 1 requirements compliant), we have implemented, technical organizational monitoring protections, and established an extensive information and cyber security program, all with regards to Personal Information processed by Company.

Further, in the event of a data incident, in which we discover your Personal Information may be at risk, then we will take reasonable efforts to notify you and the applicable authority (if required, subject to applicable laws).

Your Rights, Choices and Controls of Your Personal Information

Individuals have the right to know what information we hold about them and, in some cases, to have such information communicated to them. Individuals may also ask for our confirmation as to whether or not we process their Personal Information. Subject to the limitations in applicable law, individuals may also be entitled to obtain from us the Personal Information they have provided to us in a structured, commonly-used, and machine-readable format, and may have the right to transmit such Personal Information to another party.

The principal rights under applicable data protection law in relation to Personal Information are as follows:

- the right to access any information which is provided to us;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to complain to a supervisory authority; and
- the right to withdraw consent (to the extent applicable).

We provide you with the ability to exercise certain choices and controls in connection with our treatment of your Personal Information, depending on your relationship with us.

If you wish to exercise any or all of the above rights, please contact us by email at: support@signalall.com and let us know that you wish to exercise your right of access and specify what Personal Information you would like to receive. Where we are not able to provide you with the information for which you have asked, we will endeavor to explain the reasoning for this. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law. In addition, the process of locating and deleting the data may take up to one (1) month in accordance with applicable law. Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply.

How We Collect Information

Depending on the nature of your interaction with the Services, we may collect information as follows:

1. **Automatically** – we may use Cookies (as elaborated in the Section below) to gather some information automatically.
2. **Provided by you voluntarily** – we will collect information if and when you choose to provide us with the information, such as through a registration process, contact us communications, payment process, etc.

Cookies When you access or use the Website, or interact with our Services, we may use "cookies" (or similar technologies), which store certain information on your device (i.e., locally stored) and which will allow us to customize the Service and content as well as enhance your experience of the Services. The use of cookies is a standard industry-wide practice. A "Cookie" is a small piece of information that a website assigns and stores on your device while you are viewing a website. The cookies used by the Website do not include any Personal Information about you. Cookies are very helpful and can be used for various different purposes such as allowing you to navigate between pages efficiently and making the interaction between you and our Services quicker and easier. For more information about cookies and your controls in this regard, you may review the following links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies some features of the Services may not operate properly and your online experience may be limited.

We may permit third parties to use cookies or other technology to collect information about your online and application usage activities across our Services, such as:

- **Google Analytics** this cookie is placed in order to track and analyze the use of our Services, for internal purposes. To learn more about how Google uses data from our use of Google Analytics Cookies, we recommend you review Google's policies located at: www.google.com/policies/privacy/partners. We also encourage you to review the Google Analytics' currently available opt-outs for the web tool available at: <https://tools.google.com/dlpage/gaoptout>.
- **Bing** which privacy policy can be found at: <https://privacy.microsoft.com/en-us/privacystatement>
- **Yahoo** which privacy policy can be found at: <https://policies.oath.com/us/en/oath/privacy/index.html>

Third Parties

Occasionally, SIGNALALL receives information from third parties to compare it to information that you had provided to SIGNALALL for fraud prevention purposes. In addition SIGNALALL may (and you hereby acknowledge and consent hereto) transfer your signup information to such third parties (such as sponsor brokers) and business partners who present links on our website in order to better allow them to serve you as a referred client, should you choose to engage their services through links on our site.

Any websites displayed to you by our Website as Internet search results or linked to Internet search results pages provided to you by our Website, including websites owned or operated by our clients, have been developed by third parties over which SIGNALALL exercises no control. SIGNALALL is not responsible for the privacy practices or the content of such websites, including such websites' use of any information collected when you are directed to or click through to such websites. Even though such information might not identify you personally, we strongly encourage you to become familiar with the privacy practices of those websites.

Direct Marketing

We may send our Business Partners and Customers an email or other messages about us or our Services. We may also send our updates or newsletter to individuals who have registered to the newsletter or used our Services. You can remove your Personal Information from our mailing list and stop receiving promotional communications from us by following the unsubscribe link located at the bottom of each communication or by emailing us at support@signalall.com.

Please note that in the event you are our Business Partner, even if you unsubscribe, we reserve the right to send you service-related communications, including service announcements and administrative messages, relating either to your account or to your transactions the Services, without offering you the opportunity to opt out of receiving them unless you terminate and delete your account. If you wish to delete your Account, please contact us at: support@signalall.com.

Note that, even if we will delete your account, we will not delete certain information required under applicable law or otherwise, required for the legitimate purposes of our business. For example, we will not delete any invoices sent to you as we need it for the purpose of managing our financials.

Children

Our Service are not direct or intended for children, as follows: (i) US residents under 13 years of age; (ii) EU residents under 16 years of age; or (iii) as children are otherwise defined under applicable law. We will not knowingly solicit, collect and store Personal Information directly from children. If you are under 18, please be sure to read the terms of this Privacy Policy with your parents or legal guardians. If we later obtain actual knowledge that a User is

considered as a child under applicable law, we will take steps to immediately delete its Personal Information. We request that such individuals do not provide Personal Information through the Services. If you become aware or have any reason to believe that a child has shared any information with us, please contact us at: support@signalall.com.

Policy Changes

We reserve the right to periodically amend or revise this Privacy Policy at our sole discretion; such changes will be effective immediately upon the display of the revised Privacy Policy. The last revision date will be reflected in the "Last Modified" heading. Your continued use of our Services following the amendments constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments. In the event of a material change we will make best efforts to display applicable notification in our Website or if applicable, notify you via email or through your Account.

Do Not Track Disclosure

The Service does not respond to Do Not Track signals. For more information about Do Not Track signals, please see: <http://www.allaboutdnt.com/>.

Data Transfer Outside of the EEA

We may store or process your Personal Information in the United States or in other countries. If you visit our Websites or use our Services from locations outside of the United States, please note that any information you provide to us through your use of our Websites or Service may be transferred to and processed in countries other than the country from which you accessed our Websites or Service, including the United States where our central database is operated. If you are a resident of the European Economic Area ("EEA") we will take appropriate measures to ensure that your personal data receives an adequate level of data protection upon its transfer outside of the EEA. If you are a resident of a jurisdiction where transfer of your personal data requires your consent, then your consent to this Privacy Policy includes your express consent for such transfer of your data.

Commitment

We are committed to privacy and are actively involved in and support current industry initiatives to preserve individual privacy rights on the Internet. Protecting your privacy online is an evolving area, and SIGNALALL Website is constantly evolving to meet these demands.

If you have any comments or questions regarding our Privacy Policy, please do not hesitate to contact us at support@signalall.com.

HUZK LTD
244 CHASE ROAD
N14 6HH, LONDON
UNITED KINGDOM

Data Protection Officer

If you have any requests regarding the data collected under this Privacy Policy, including without limitation, requests to remove, delete, amend, modify or transfer the data, please contact our Data Protection Officer at: support@signalall.com.

Please include your name, address and email address in any correspondence so that we can respond to your inquiry or request.

SIGNALALL MOBILE APPLICATIONS **PRIVACY POLICY APPENDIX**

This privacy policy appendix governs your use of SIGNALALL's applications for mobile devices, such as the "SIGNALALL" ("Application").

What information does the Application obtain and how is it used?

User Provided Information

The Application obtains the information you provide when you download and register the Application. Registration with us is optional. However, please keep in mind that you may not be able to use some of the features offered by the Application unless you register with us.

When you register with us and use the Application, you generally provide (a) your name, email address, age, user name, password and other registration information; (b) transaction-related information, such as when you make purchases, respond to any offers, or download or use applications from us; (c) information you provide us when you

contact us for help; (d) credit card information for purchase and use of the Application, and; (e) information you enter into our system when using the Application, such as contact information and project management information. We may also use the information you provided us to contact you from time to time to provide you with important information, required notices and marketing promotions.

Automatically Collected Information

In addition, the Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application.

Does the Application collect precise real time location information of the device?

This Application does indeed collect precise information about the location of your mobile device. You may elect to opt out from such collection.

Do third parties see and/or have access to information obtained by the Application?

Only aggregated, anonymized data is periodically transmitted to external services to help us improve the Application and our service. We will share your information with third parties only in the ways that are described in this privacy statement.

We may disclose User Provided and Automatically Collected Information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement.
- if B.U.T. is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

What are my opt-out rights?

You can stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also request to opt-out via email, at support@signalall.com.

Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

Changes

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 here and informing you via email or text message. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes. You can check the history of this policy by clicking [here](#).

Your Consent

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United States. If you reside outside the United States your information will be transferred, processed and stored there under United States privacy standards.

Contact us

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at support@signalall.com.

1 Week Subscription lasts for 1 week and is auto-renewing. The price of the 1 year subscription is \$9.99 . User may cancel the subscription up to 24 hours before the auto-renew date.

1 Month Subscription lasts for 1 month and is auto-renewing. The price of the 1 month subscription is \$29.99. User may cancel the subscription up to 24 hours before the auto-renew date.

3 Months Subscription lasts for 3 months and is NOT auto-renewing. The price of the 6 months subscription is \$59.99.

6 Months Subscription lasts for 6 months and is NOT auto-renewing. The price of the 6 months subscription is \$99.99.

1 Year Subscription lasts for 1 year and is NOT auto-renewing. The price of the 6 months subscription is \$299.99.

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