

Data Privacy

Privacy Policy

Nosey Pepper, LLC (hereinafter referred to as “the Company”) values and respects your right to privacy. We are committed to protect the privacy of our website visitors. We will only collect, record, store, process, and use your personal information in accordance with data privacy laws including the California Consumer Protection Act 11 CCR § 7000 (“CCPA”) and General Data Protection Regulation (EU) 2016/679 (“GDPR”) as transposed into the United Kingdom national law by operation of Section 3 of the European Union (Withdrawal) Act of 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendment etc.) (EU Exit) Regulations 2019 (“UK GDPR”), together with the Data Protection Act 2018, and any subordinates, related implementing domestic legislation; in each case, as amended or replaced from time to time (collectively, “Data Privacy Laws”).

This Privacy Policy informs you of updates in our corporate policies regarding the collection, use, storage, disclosure, and disposal of personal information we receive and collect from our customers, and any individual who communicates, raises inquiries and concerns, as well as transacts with us through our authorized representatives.

We will only use your data based on the limitations set by this policy. The outline below provides the manner by which we manage the personal information that we will obtain from you if you visit our website.

Personal Information

Personal Information refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual. Sensitive Personal Information is any attribute of your personal information that can discriminate, qualify, or classify you such as your age, date of birth, marital status, government-issued identification numbers, account numbers, and financial information. Privileged Information is any and all forms of information which, under the Rules of Court and other pertinent laws, constitute privileged communication.

You have the following rights:

1. Right to be informed – you may request the details as to how your personal information is being processed or have been processed by the Company, including the existence of automated decision-making and profiling systems;
2. Right to access – upon written request, you may demand reasonable access to your personal information, which may include the contents of your processed personal

information, the manner of processing, sources where they were obtained, recipients and reason of disclosure;

3. Right to dispute – you may dispute inaccuracy or error in your personal information in the Company systems through our contact center representatives;
4. Right to object – you may suspend, withdraw, and remove your personal information in certain further processing, upon demand, which include your right to opt-out to any commercial communication or advertising purposes from the Company;
5. Right to data erasure – based on reasonable grounds, you have the right to suspend, withdraw or order the blocking, removal or destruction of your personal data from the Company's filing system;
6. Right to secure data portability – you have the right to obtain from the Company your personal information in an electronic or structured format that is commonly used and allows for further use;
7. Right to be indemnified for damages – as data subject, you have every right to be indemnified for any damages sustained due to such violation of your right to privacy through inaccurate, false, unlawfully obtained or unauthorized use of your information; and
8. Right to file a complaint – you may file your complaint or any concerns with our legal compliance division: legal@sosana.io

Collection of Personal Information

We collect the following categories of Personal Data about Site visitors, clients, prospective clients, and other third parties:

Device data: Computer Internet Protocol (IP) address, unique device identifier (UDID), cookies and other data linked to a device, and data about usage of our website (Usage Data)

We will only collect your personal information if you voluntarily submit the information to us. If you choose not to submit your personal information to us or subsequently withdraw your consent to our use of your personal information, we may not be able to adequately respond to your inquiries or avail of our services.

When we receive data from our clients about employees, customers or other individuals, the client is responsible for ensuring that any such data is transferred to us in compliance with applicable data protection laws.

Use of Personal Data

The purposes for which we use Personal Data are as follows:

1. To manage our business operations, the website, and our client relationships. For this, we use basic and client service data, registration data, and marketing data.
2. To make our Site intuitive and easy to use. For this, we use device data. It is necessary for our legitimate interests to monitor how our Site is used to help us improve the layout and information available on our website and provide a better service to our website users.
3. To protect the security and effective functioning of our website and information technology systems. For this, we use basic and client service data, registration data, transaction data, and device data. It is necessary for our legitimate interests to monitor how our website is used to detect and prevent fraud, other crimes and the misuse of our website. This helps us to ensure that you can safely use our website.
4. To provide relevant marketing, such as providing you with information about events or services that may be of interest to you including services, updates, client conferences or networking events, and groups of specific interest. For this, we use registration and marketing data, basic and client service data, as well as device data. It is necessary for our legitimate interests to process this information in order to provide you with tailored and relevant marketing, updates and invitations.
5. To address compliance and legal obligations, such as complying with the Company's reporting obligations, checking the identity of new clients and to prevent money laundering and/or fraud. For this, we use compliance data, basic and client service data, registration data, transaction data, and device data.

Your privacy settings can be used to limit the publication of your information on our website and can be adjusted using privacy controls on the website.

We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

Sharing of Personal Data

We may share Personal Data with the following categories and recipients:

Mandatory disclosures and Legal Claims: We share Personal Data in order to comply with the Company's tax reporting obligations, comply with any subpoena, court order or other legal process, to comply with a request from regulators, governmental request or any other legally enforceable demand. We also share Personal Data to establish or

protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.

Data Retention and Disposal

We typically retain Personal Data related to marketing activities for as long as you accept marketing communications from us, and we will securely delete such data in accordance with applicable laws upon request. For Personal Data that we collect and process for other purposes, we will typically retain such Personal Data for as long as it is necessary to fulfill the purposes outlined in the Privacy Policy, Cookies Policy, as well as the Terms of Use. Deletion of such data may be done at any time upon your request.

Cookies Policy

Our website uses cookies to optimize user experience.

What are cookies?

Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. Some cookies are deleted once you close your browser, while other cookies are retained even after you close your browser so that you can be recognized when you return to a website.

How do we use cookies?

We use cookies in order to gather information about your usage patterns when you navigate the Site in order to enhance your personalized experience, and to understand usage patterns to improve our Site's services.

Categories of cookies on our Site:

1. **Analytical/Performance Cookies:** These allow us to recognize and count the number of users of our Site and understand how such users navigate through our Site. This helps to improve how our Site works, for example, by ensuring that users can find what they are looking for easily. These cookies are session cookies which are erased when you close your browser.
2. **Functional Cookies:** These improve the functional performance of our website and make it easier for you to use. For example, cookies are used to remember that you have previously visited the website and asked to remain logged into it. These cookies qualify as persistent cookies, because they remain on your device for us to use during a next visit to our website. You can delete these cookies via your browser settings.

What are your options if you do not want cookies on your computer?

You can review your Internet browser settings, typically under the sections "Help" or "Internet Options," to exercise choices you have for certain Cookies. If you disable or delete certain Cookies in your Internet browser settings, you might not be able to access or use important functions or features of this Site.