

PRIVACY POLICY

Last updated May, 10, 2024

This privacy notice for RyteBox, LLC (“**Company**,” “**we**,” “**us**,” or “**our**”), describes how and why we might collect, store, use, and/or share (“**process**”) your information when you use our website located at <http://rytebox.com> (the “**Website**”) or our online services (collectively with the Website, the “**Services**”), such as when you:

- Visit our Website or any website of ours that links to this privacy notice
- Engage with us in other related ways – including any sales, marketing, or events

Questions or concerns? Reading this privacy notice in full will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@rytebox.com.

Any “In Short” descriptions set forth in this notice are provided as a convenience only and are not a substitute for the detailed disclosures set forth herein. Please read the “In Short” descriptions in conjunction with the full text of this privacy notice at all times.

If you are located in the European Union, you may have additional rights with respect to your personal information pursuant to those jurisdictions’ laws. Please consult our European Privacy Notice linked below in our [Table of Contents](#).

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EUROPEAN PRIVACY NOTICE

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- email addresses
- names
- mailing addresses
- job titles

Sensitive Information. We do not process sensitive information as part of our Services.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you use our Services. We may also use cookies and other tracking technologies to collect and store your information.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your name or contact information but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information, which we and our service providers may associate with you. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

The information we collect includes:

- ***Log and Usage Data.*** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and

settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings).

- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- *Location Data.* We collect location data such as information about your device’s location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Google Analytics

We use Google Analytics, a service provided by Google, Inc. (“**Google**”) for various purposes, including potentially to analyze traffic on our Website, to grow our business, to improve and develop our services, to monitor and analyze use of our services, to aid our technical administration, to increase the functionality and user-friendliness of our services, and to verify that users have the authorization needed for us to process their request. Google may collect your IP address, and other information (although typically not your name), and utilizes the data collected to track and examine the use of our Website, and to prepare reports for us based on your activities online, among other uses. As part of Google Analytics, Google tracks many variables, including what website you visited prior to coming to our Website, how long you stay on a particular page, and your geographic location. Please be aware that Google uses the data it collects from our Website for its own purposes, and we do not control or direct such usage. Please visit Google’s privacy policy to understand how Google uses the information it collects: <https://policies.google.com/privacy?hl=en-US>

You can customize your experience with advertisements through Google services by visiting <https://support.google.com/ads/answer/2662856/control-the-ads-you-see-android?hl=en>. You can opt out of having your website activity available to Google Analytics by visiting <https://support.google.com/analytics/answer/181881?hl=en> and installing the Google Analytics opt-out browser add-on available at <https://chrome.google.com/webstore/detail/google-analytics-opt-out/flloajicojecljbmefodhfapmkgchcbnh?hl=en>. You may also be able to opt out of the use of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>.

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt out of interest-based advertising by advertisers on our Services visit <http://www.aboutads.info/choices/>.

2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested Service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To save or protect an individual's vital interest.** We may process your information when necessary to prevent harm to us or any other party.

We prefer to keep your personal information accurate and up to date. If you would like to change your contact information, please contact us at support@rytebox.com. We will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable (but we may retain prior information as business records).

3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

***In Short:** We may share information in specific situations described in this section and/or with the following third parties.*

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Law Enforcement.** We may share your information with law enforcement or regulatory bodies to comply with a legal obligation.

4. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Our servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see “**WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**” above), in the United States, and other countries. If you are located in the European Union, please see our notices in the EU section of this policy regarding international transfers.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). Subject to the foregoing legal requirements, no purpose in this notice will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE AIM TO KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented technical and organizational security measures designed to protect the security of any personal information we process. However, despite our efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will aim to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at christian.puopolo@rytebox.com.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions, such as the European Union (EU), you have rights that allow you greater access to and control over your personal information. If you are located in the European Union, you may have additional rights with respect to your personal information pursuant to those jurisdictions' laws. Please consult our European Privacy Notice linked in our [Table of Contents](#). In addition, you may review, change, or terminate your account at any time.

9. CALIFORNIA RESIDENTS

California Civil Code Section 1798.83, also known as the "*Shine The Light*" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below in the "**HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**" section.

10. DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

11. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to reflect our data handling practices and/or comply with applicable laws.

We may update this privacy notice from time to time. The updated version will be indicated by a revised “last updated” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are handling your information.

12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our representative, Christian Puopolo, by email at christian.puopolo@rytebox.com, by phone at +1 (212) 920-2690, or by post to:

RyteBox, LLC
Christian Puopolo
1440 Broadway
4th Floor
New York, NY 10018 USA
United States

EUROPEAN PRIVACY NOTICE

The General Data Protection Regulation (“GDPR”) imposes certain rules in respect of data protection of individuals, and these rules apply to organisations who process personal data related to the offering of goods and services to individuals in the European Union (the “EU”).

RyteBox, LLC (and referred to herein as “RyteBox” or the “Company”). RyteBox is committed to complying with the GDPR, and this privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information, and how to contact us and supervisory authorities in the event that our European customers have a complaint.

This section of the privacy notice (the “GDPR Policy”) applies solely to persons located in the EU at the time of personal data collection by or on behalf of the Company.

INTRODUCTION

The Company respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data when you visit our website at <http://rytebox.com> (the “Website”) and as we provide our services (collectively, together with the Website, the “Services”), regardless of where you visit it from, tells you about your privacy rights and how the law protects you, and about how we process your personal data as part of our business. Please see the **Glossary** (below) for more information regarding the terms used herein.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how the Company collects and processes your personal data as part of our business, including any data you may provide through the Services.

This Website is not intended for children and we do not knowingly collect data relating to children under 18 years of age.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

RyteBox, LLC is the controller and responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

Please contact our representative below, with any inquiries relating to this GDPR Policy.

RyteBox, LLC
Christian Puopolo
1440 Broadway
4th Floor
New York, NY 10018 USA
United States
christian.puopolo@rytebox.com
+1 (212) 920-2690

HOW TO COMPLAIN

We hope that we can resolve any query or concern you raise about our use of your information.

The GDPR also gives you the right to lodge a complaint with a supervisory authority in the country or state where you work, normally live or where any alleged infringement of data protection laws occurred within the EU.

YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on April [REDACTED], 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, as used in this GDPR Policy, means any information about a European individual from which that person can be identified. It does not include data where the individual's identity has been removed (anonymous or de-identified data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes: name, job title.
- **Contact Data** includes: name, physical address, email address.
- **Technical Data** includes: IP address, geolocation data, browser and device characteristics.
- **Financial Data** includes: bank account and payment card details.
- **Transaction Data** includes: details about payments to and from you and other details of products and Services you have purchased from us.
- **Profile Data** includes: your username and password, purchases or orders made by you, your feedback.
- **Usage Data** includes: information about how you use our Website, products and Services.
- **Marketing and Communications Data** includes: your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data by law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of our Services. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Transaction, Profile, and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - inquire about, or seek to purchase or pay for, our services;
 - communicate with our personnel;
 - seek support services from us;
 - subscribe to receive communications from us or our service providers;
 - engage with us as a service provider; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical and Usage Data.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
 - Identity, Contact, and Transaction Data from your employer who is our customer.
 - Identity, Contact, and Transaction Data from our customers who you are doing business with.
 - Identity, Technical, Usage, and Marketing and Communications Data from our analytics and advertising providers.
 - Identity and Contact Data from publicly available sources.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you, your employer, or your business associates, including to provide your employer or business associates with services they have requested from us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- With your or your employer’s consent.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to use of cookies, or sending third party direct marketing communications. You have the right to withdraw consent to marketing at any time by contacting us as set forth in **Contact Details**.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us as set forth in **Contact Details** if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enroll you or your employer as a new customer	(a) Identity (b) Contact (c) Financial	Performance of a contract with our customer
To provide our services, including: (a) To manage our customers’ contracts and catalogues	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract (b) Necessary for our legitimate interests (for running our business, managing our network security,

<p>(b) To manage revenues and royalties for our customers</p> <p>(c) To support, and provide our services to customers and their business associates, and their respective representatives</p> <p>(d) To communicate and coordinate with our customers and their business associates, and their respective representatives</p> <p>(e) To communicate and coordinate with our service providers</p> <p>(f) To manage our relationships with our customers and our service providers</p> <p>(g) To make suggestions and recommendations about goods or services that may be of interest to our customers and prospective customers</p>	<p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Profile</p> <p>(g) Marketing and Communications</p>	<p>managing our business relationships)</p>
<p>To notify you about changes to our terms or privacy notice</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To administer and protect our business and our Website (including for information security purposes, and customer support)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p>	<p>(a) Necessary for our legitimate interests (for running our business, providing support services, for managing network security)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To make suggestions and recommendations to you about</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>Necessary for our legitimate interests (to develop our products/services and</p>

goods or services that may be of interest to you or your employer	(c) Transaction (d) Usage (e) Marketing and Communications	grow our business)
To comply with reporting requirements	(a) Identity (b) Contact (c) Technical (d) Financial (e) Transaction	Necessary to comply with a legal obligation
For own our internal analytics and business intelligence	(a) Identity (b) Contact (c) Technical (d) Transaction (e) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established, and you may utilize, the opt-out procedures and preferences set forth in our **privacy notice**.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage, and Transaction Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third-

party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time. To opt-out of our marketing communications, please see our **Contact Details**. To opt-out of third parties' marketing communications, please consult such parties' respective terms and privacy policies.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us as set forth in **Contact Details**.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your

personal data in the same way as set out in this GDPR Policy.

To the extent within our control, we request that all third parties who process your personal data on our behalf respect the security of your personal data and treat it in accordance with the law, and only process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Your personal data will be transferred outside the EU.

Whenever we transfer your personal data out of these areas, we will do so in accordance with the GDPR, which may mean that we will process your personal data in countries which the EU has designated as “adequate” or using other permissible transfer mechanisms, such as the Standard Contractual Clauses.

Please contact us as set forth in **Contact Details** if you want further information on the specific mechanism used by us when transferring your personal data outside of the EU.

7. DATA SECURITY

We have put in place security measures designed to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

Please see the **“HOW LONG DO WE KEEP YOUR INFORMATION?”** section in the main body of our privacy notice.

In some circumstances you can ask us to delete your data. Please see **Request erasure** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. DATA PRIVACY FRAMEWORK

RyteBox, LLC, commits to comply with the EU-U.S. Data Privacy Framework (the “EU-U.S. DPF”), as set forth by the U.S. Department of Commerce. RyteBox has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. DPF Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this privacy notice and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

To confirm our participation, you may search for our company name on the Data Privacy Framework website, at <https://www.dataprivacyframework.gov/s/participant-search>.

If you have a complaint about our handling of your personal data, please reach out to our contact below:

RyteBox, LLC
Christian Puopolo
1440 Broadway
4th Floor
New York, NY 10018 USA
United States
christian.puopolo@rytebox.com
+1 (212) 920-2690

In compliance with the EU-U.S. DPF, RyteBox commits to cooperate and comply respectively with the advice of our United States-based third-party dispute resolution provider, TRUSTe (a service offered by TrustArc Inc.). You may contact TRUSTe (free of charge) with any complaints at <https://feedback-form.truste.com/watchdog/request>.

You may also, under certain conditions, as set forth in the EU-U.S. DPF, be able to invoke binding arbitration through the International Centre for Dispute Resolution-American Arbitration Association.

We commit to perform onward transfers of EU personal data solely subject to mechanisms approved by the applicable European authorities, and accept all liability for such onward transfers under applicable law.

Our Company, and its compliance with the EU-U.S. DPF, are subject to the investigatory and enforcement powers of the Federal Trade Commission.

Please note that, under some circumstances, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.]

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact us as set forth in [Contact Details](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request, in an effort to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us as set forth in [Contact Details](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract, including providing you services you have requested.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

INTERNAL THIRD PARTIES:

- Our affiliates, including Axispoint, Inc.

EXTERNAL THIRD PARTIES:

- Service providers acting as processors based in the United States who provide information technology, data storage, account management, and payment processing services.
- Professional advisers acting as processors or joint controllers including lawyers, advisors, and accountants based in the United States who provide legal, accounting, financial, and consultancy services.
- Regulators and other authorities acting as processors or joint controllers based in the United States and the EU, who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

Please contact us as set forth in **Contact Details** to exercise any of the following rights. You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have

compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.