



Privacy Policy

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OVOU Inc. (“OVOU,” “we,” “us”) has created this Privacy Policy (“Policy”) in order to inform you (“you,” collectively “Users”) how we collect, use, and disclose Personal Information through the OVOU websites located at ovou.com and ovou.me (the “Websites”), mobile site, and our OVOU services, which allows Users to share account information and Personal Information (defined below) through our services (together with our Websites, the “Services”).

By accessing, browsing, or otherwise using the Services in any manner or providing Personal Information to OVOU, you acknowledge that you accept the practices and policies outlined in this Policy and you hereby consent to the collection, use, and disclosure of your Personal Information in accordance with this Policy.

This Privacy Policy does not apply to persons outside the United States or Canada, including in the EEA/ European Union. OVOU does not intend to offer goods and services to persons outside of the United States and Canada.

I. WHAT DOES THIS POLICY COVER?

This Policy covers our collection, use, and disclosure of information about identifiable individuals (“Personal Information”), including registered users of our products (“Registered Users”), as well as prospective customers and users that may interact with our Services through a Registered User (“Visitor”).

OVOU also acts as a service provider to businesses which may purchase our product for their businesses (collectively, our “Enterprise Clients”). To the extent that we collect Personal Information about you on behalf of our Enterprise Client, that Personal Information is subject to the Enterprise Client’s privacy policy. This Privacy Policy does not apply to the practices of our Enterprise Clients or any other third-party companies that we do not own or control, including those practices of third-party organizations or individuals with whom you choose to share Personal Information.

II. COLLECTION AND USE OF PERSONAL INFORMATION AND OTHER DATA

We may collect the following types of information about you which are described in more detail below: (A) information you provide to us, (B) information we may automatically collect, and (C) information we may receive from third parties. All of the information listed in (A)-(C) above, are detailed below, and hereinafter referred to as “Personal Information.”

A. Personal Information You Provide Us

In using our Services, you may provide us with Personal Information, including, without limitation:

- Contact information, e.g., name, email address, postal address, phone number;
- Industry category;
- Account information and log in credentials, including unique identifiers such as username and password;
- Payment and transaction information including credit or bank card information, or shipment information;
- Work related information such as company, job title, and work contact information; and
- Additional information as otherwise described to you at the point of collection or pursuant to your consent.

Additionally, the OVOU Services allow certain users to create profile pages. Personal Information you provide to us when creating a profile page may include links to your accounts on third-party platforms (e.g., LinkedIn), image files such as a profile image, and any other information you choose to include on the profile page you create.

B. Personal Information We May Automatically Collect About You

Our Services may automatically collect certain Personal Information about you. We use this information to help us design our Services to better suit our users' needs. This information may include:

- IP address, which is the number associated with the service through which you access the Internet, like your ISP (Internet Service Provider);
- URL history, created data, browser type, webpage title, host name, host path, and search parameters;
- Profile views and unique views using UTM to distinguish QR code scan vs NFC scan;
- Date and time of your visit or use of our Services;
- Domain server from which you are using our Services;
- Type of computer, web browsers, search engine used, operating system, or platform you use;
- Data identifying the web pages you visited prior to and after visiting our Websites or use of our Services;
- Your movement and activity within the Websites, which is aggregated with other information;
- Mobile device information, including the type of device you use, operating system version, and the device identifier (or "UDID").

C. Cookies & Technologies Used to Collect Information About You

We collect the above Personal Information directly and through the use of third parties. We collect this information by using certain technologies, such as cookies, web beacons, and other technologies. Third-party service providers, advertisers, and/or partners may also view, edit, or set their own cookies or place web beacons. The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Policy, except as required by law.

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. Most web browsers automatically accept cookies. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our

Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Websites. Our third-party partners also employ clear gifs, images, and scripts that help them better manage content on our site. In particular, OVOU uses Google, Facebook, and LinkedIn for advertising to reach audiences with targeted advertising in accordance with the privacy policies of such third parties.

- Flash Cookies. We may use local shared objects, also known as Flash cookies, to store your preferences such as volume control or display content based upon what you view on our site to personalize your visit. Third parties, with whom we partner to provide certain features or to display advertising based upon your browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies.
- Web Beacons. Website pages may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity). We also use these technical methods to analyze the traffic patterns, such as the frequency with which our users visit various parts of the Services. These technical methods may involve the transmission of information either directly to us or to a third party authorized by us to collect information on our behalf. Our Services use retargeting pixels from Google, Facebook, and other ad networks. We also use web beacons in HTML emails that we send to determine whether the recipients have opened those emails and/or clicked on links in those emails.
- Analytics. Analytics are tools we use, such as Google Analytics, to help provide us with information about traffic to our Websites and use of our Services, which Google may share with other services and websites who use the collected data to contextualize and personalize the ads of its own advertising network.
- Mobile Application Technologies. If you access our Websites and Services through a mobile device, we may automatically collect information about your device, your phone number, and your physical location.

D. Information We May Receive from Third Parties

We may collect additional Personal Information about you from third-party websites, social media platforms, such as, but not limited to, Facebook, Twitter, Instagram, or LinkedIn (“Social Media Platforms”), and/or sources providing publicly-available information (e.g., from the U.S. postal service, or from websites where you provide publicly viewable information that we are permitted to collect) to help us provide services to you, to help make connections between Registered Users and/or a Registered User and Visitor, help prevent fraud, and for marketing and advertising purposes.

Personal Information we may access about you, with your consent, may include, but is not limited to, your basic Social Media Platform information, your location data, your list of contacts, friends or followers, and certain information about your activities on the Social Media Platform. Please keep in mind that when you provide Personal Information to us on a third-party website or platform (for example, via our applications), the information you provide may be separately collected by the third-party website or the Social Media Platform.

The Personal Information we collect is covered by this Policy, and the information the third-party website or Social Media Platform collects is subject to the third-party website or platform's privacy practices. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your Personal Information.

III.HOW WE USE YOUR INFORMATION

A. Use and Purpose of Processing Your Personal Information

We use and process your Personal Information for things that may include, but are not limited to, the following:

- To provide you with the Services;
- To process your request to become a Registered User including creating an account;
- To allow you to participate in the interactive features of our Service when you choose to do so;
- To facilitate connections between Registered Users, or between Visitors and Registered Users (which includes facilitating a Visitor sharing their contact information with a Registered User);
- To respond to your inquiries and provide you with requested information and other communications;
- To create anonymous reports and better understand how our Services are being used;
- For general or targeted marketing and advertising purposes, including sending you promotional material or special offers on our behalf or on behalf of our marketing partners and/or their respective affiliates and subsidiaries and other third parties, provided that you have not already opted-out of receiving such communications;
- To fulfill contracts we have with you;
- To manage, improve, and foster relationships with third-party service providers, including vendors, suppliers, and parents, affiliates, subsidiaries, and business partners;

- To maintain, improve, customize, or administer the Services, perform business analyses, or other internal purposes to improve the quality of our business, the Services, resolve technical problems, or improve security or develop other products and services;
- To comply with our Terms of Service;
- For analytics for business purposes and business intelligence;
- To comply with any applicable laws and regulations and respond to lawful requests; and/or
- For any other purposes disclosed to you at the time we collect your Personal Information and/or pursuant to your consent.

We may also use information that has been de-identified and/or aggregated for purposes not otherwise listed above.

B. Sharing Your Personal Information

We may share your Personal Information as set forth in the Privacy Policy and in the following circumstances:

- **Third-Party Service Providers.** We may share your Personal Information with OVOU third-party service providers that perform certain functions or services on our behalf (such as to host the Services, fulfill orders, provide products and services, manage databases, perform analyses, process credit card payments, provide customer service, or send communications for us). These third-party service providers are authorized to use your Personal Information only as necessary to provide these services to us. In some instances, we may aggregate Personal Information we collect so third parties do not have access to your particular Personal Information to identify you individually.
- **Disclosure of Information for Legal and Administrative Reasons.** We may disclose your Personal Information without notice: (i) when required by law or to comply with a court order, subpoena, search warrant, or other legal process; (ii) to cooperate or undertake an internal or external investigation or audit; (iii) to comply with legal, regulatory, or administrative requirements of governmental authorities (including, without limitation, requests from the governmental agency authorities to view your information); (iv) to protect and defend the rights, property, or safety of us, our subsidiaries and affiliates and any of their officers, directors, employees, attorneys, agents, contractors, and partners, and the website Service users; (v) to enforce or apply our Terms of Service; and (vi) to verify the identity of the user of our Services.
- **Business Transfers.** Your Personal Information may be transferred, sold, or otherwise conveyed (“Conveyed”) to a third party where we: (i) merge with or are

acquired by another business entity; (ii) sell all or substantially all of our assets; (iii) are adjudicated bankrupt; or (iv) are liquidated or otherwise reorganize. You agree to any and all such Conveyances of your Personal Information.

- **Public Profiles.** Any Personal Information you make available on your smart profile will be published at a publicly accessible URL. Any third party that has the URL will be able to view your OVOU smart profile. This includes individuals that receive the URL by connecting with your Smart Card (whether intentionally or inadvertently), as well as any third party with which the individual may share such URL.
- **Disclosure by Registered Users to Third Parties.** OVOU Services allow Registered Users the ability to choose the third-party organizations and individuals (together, the “Third Parties”) with whom the Registered User wants to share their account information. Accordingly, account information collected by OVOU about a Registered User is made available to those specific Third Parties with whom the Registered User chooses to share their electronic card. Registered Users should consider sharing only account information directly related to their business or networking purpose, or that is otherwise generally publicly available information. Consider carefully who you choose to share your account information with as OVOU cannot control how those Third Parties will handle it once shared.
- **Connecting Registered Users and Visitors.** Our Services allow Registered Users to “connect” with other Registered Users or Visitors. We may use data about you that is stored in our Services (e.g., your contact information, or information from your profile, contacts, or connections), or data that you make publicly available on third-party websites (provided we are permitted to collect such data), to help other Registered Users find you and to help us suggest connections for you. We may also share information about your interests in certain services to help Registered Users connect with you.
- **With Your Consent.** We may share Personal Information consistent with this Privacy Policy with your consent.

Except as provided in this Privacy Policy, we will not sell, exchange, trade, or disclose your Personal Information we have collected without your consent.

IV. LINKS TO OTHER WEBSITES

Our Services may contain links to other websites or services that are not owned or controlled by us, including links to Social Media Platforms such as Facebook, Instagram, Twitter, or LinkedIn, or may redirect you off our Websites away from our Services to other websites for information, other services, or to receive special offers, contests, games, sweepstakes, or for transactions or purchases.

This Policy only applies to Personal Information collected by our Services. We are not responsible for the privacy and security practices of those other websites or Social Media Platforms or the

information they may collect (which may include IP address). You should contact such third parties directly to determine their respective privacy policies. Links to any other websites or content do not constitute or imply an endorsement or recommendation by us of the linked website, Social Media Platform, and/or content.

V. AGGREGATE AND DE-IDENTIFIED INFORMATION

We may aggregate, anonymize, and/or de-identify any Personal Information collected from you so that such Personal Information can no longer be linked to you or your device (“De-identified Information”). OVOU is the owner of all De-identified Information, which we may use for any purpose, including without limitation for research and marketing purposes, and which we may also share with any third parties, including advertisers, promotional partners, and sponsors, in our discretion.

VI. INFORMATION SECURITY

We use commercially reasonable measures to store and maintain your Personal Information in a secure environment. However, you should assume that no data transmitted over the Internet or stored or maintained by us or our third-party service providers can be 100% secure. Therefore, although we believe the measures implemented by us reduce the likelihood of security problems to a level appropriate to the type of data involved, we do not promise or guarantee, and you should not expect, that your Personal Information will always remain private or secure. We do not guarantee that your Personal Information will not be misused by third parties. We are not responsible for the circumvention of any privacy settings or security features. You agree that we will not have any liability for misuse, access, acquisition, deletion, or disclosure of your Personal Information. You further acknowledge and agree that any information you provide on your profile is provided at your sole risk. OVOU has no control over, and will not be responsible or liable for, any third party’s use of information you share in your profile.

If you believe that your Personal Information has been accessed or acquired by an unauthorized person, you shall promptly notify us via support@ovou.com so that necessary measures can quickly be taken.

VII. STORAGE LOCATION AND TRANSFER OF PERSONAL INFORMATION

OVOU stores its data, including Personal Information, on servers located in Canada and the United States. By submitting information, you agree to this transfer, storing or processing of your Personal Information in Canada and the United States.

VIII. DATA RETENTION

We will retain your Personal Information and account information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you.

You can request that OVOU delete your Personal Information and account information at any time. However, we may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally identifiable data, account

recovery, or if required by law. Generally, profile information is retained for a period of up to one (1) year following account de-activation, whereas profile analytics are kept for a period of at least ten (10) years. All retained Personal Information and account information will remain subject to the terms of this Policy.

IX. ACCESSING, CORRECTING, OR DELETING YOUR PERSONAL INFORMATION

You may have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that information. Upon receipt of your written request and following proper authentication and verification, we will provide you with a copy of your Personal Information, although in certain limited circumstances, and as permitted under law, we may not be able to make all relevant information available to you, such as where that information also pertains to another Registered User. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner as required by applicable law.

We will make every reasonable effort to keep your Personal Information accurate and up to date, and we will provide you with mechanisms to update, correct, delete, or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

X. CHILDREN'S INFORMATION

The Services are intended only for users over the age of eighteen (18). If we become aware that a user is under thirteen (13) (or a higher age threshold where applicable) and has provided us with Personal Information, we will take steps to comply with any applicable legal requirement to remove such information. Contact us if you believe that we have mistakenly or unintentionally collected Personal Information from a child under the age of thirteen (13).

XI. EUROPEAN RESIDENTS

In addition to the rights set out above, as User who is a resident of the European Union, you may have the following additional rights:

- * The right to object to us processing Personal Information about you such as processing for profiling or direct marketing.
- * The right to ask us to provide your Personal Information to you in a portable format or, where technically feasible, for us to port that Personal Information to another provider provided it does not result in a disclosure of Personal Information relating to other people.
- * The right to request a restriction of the processing of your Personal Information.
- * The right to address a challenge concerning the personal information handling policies and practices at OVOU.

Where our processing of your Personal Information is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful. You may exercise any of the above rights by contacting support@ovou.com.

If you are a resident of the European Union, you may also lodge a complaint with your local privacy commissioner or other Supervisory Authority with respect to our processing of your Personal Information. The local Supervisory Authority in each European country can be found [here](#).

XII. CALIFORNIA RESIDENTS

This section provides additional details about the Personal Information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act (the CCPA).

For more details about the Personal Information OVOU has collected over the last 12 months, please see the section “COLLECTION AND USE OF PERSONAL INFORMATION AND OTHER DATA” above. We collect this Personal Information for commercial purposes described above. Ada will only share this information when you make a customer support query to another organization, which is a Customer of OVOU and which uses our Services to assist their customer support function. OVOU does not sell (as that term is defined in the CCPA) the Personal Information we collect.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of Personal Information we collect (including how we use and disclose this Personal Information), to delete their Personal Information, to opt out of any “sales” of Personal Information that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at support@ovou.com. We will verify your request using the information associated with your account, if available, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

XIII. CHANGES TO THIS POLICY

We may amend this Policy from time to time. Use of Personal Information we collect is subject to the Policy in effect at the time such information is collected, used, or disclosed. If we make material changes or changes in the way we use Personal Information, we will notify you by posting an announcement on our Websites, sending you an email prior to the change becoming effective. You are bound by any changes to the Policy when you use the Services after such changes have been first posted.

XIV. HOW TO CONTACT US

If you would like to: access, correct, amend, or delete any Personal Information we have about you, register a complaint, or simply want more information, contact our Privacy Compliance Officer at:

Email: support@ovou.com

Phone: (866)-899-6868

Address: 163 – 380 West Hastings St.
Vancouver, BC V6B 1H5

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