#### PRIVACY POLICY FOR MT CONFERENCE 2026

## **Website Privacy Policy**

The Effective Date of this Privacy Policy is November 07, 2025

Last Revision Date is November 07, 2025

This privacy policy (the "Privacy Policy") applies to MultiTracks.com LLC ("our", "we", "us") and describes how we use the information you provide to us via email or via our website, <a href="https://app.swapcard.com/login/event/mt-conference/registration">https://app.swapcard.com/login/event/mt-conference/registration</a> (the "Website") or via any mobile applications we make available that are associated with the Website (the "Mobile Apps"). The Website provides information and tickets for the MT Conference 2026 intended to be held at a yet-to-be-determined venue in the Austin, Texas vicinity November 10<sup>th</sup>, 11<sup>th</sup> and 12<sup>th</sup>, 2026 (the "Conference"). The Website and Mobile Apps are collectively referred to in this Privacy Policy as the "Platforms".

#### Introduction

Please read this Privacy Policy carefully before using our Platforms or otherwise before providing information to us through any method or platform. This Privacy Policy governs your access to and use of our Platforms and our Services, both of which are only available for your use on the condition that you agree to this Privacy Policy and our Terms and Conditions of Use. If you do not agree to this Privacy Policy and/or our Terms and Conditions of Use, please do not access or use the Platforms. By accessing or using our Platforms, however, you and the entity you are representing signify your agreement and consent to be bound by this Privacy Policy and our Terms and Conditions of Use.

# What this policy covers

This document is intended to help you understand:

- What information we collect about you
- How we use any personal information
- How we share (or don't share) any personal information
- How we store and secure any personal information
- How you can update and control any personal information
- Other important information relevant to your privacy

### What information we collect about you

Numerous sections of our Website are accessible for browsing without the need to collect any personal information. If you wish to register interest in the Conference to receive more information from us, inquire with questions about the Conference or to purchase tickets to the Conference, however, you must create an account and provide us with the information we need to provide you with the information you requested or to facilitate your ticket purchase (our "Services"). The information we need to complete such a transaction includes your name, name of the company on whose behalf you are inquiring or seeking to engage our Services for, email address, payment and billing information (including credit card numbers, billing addresses, and payment account information), and shipping information (including shipping addresses and contact phone numbers). We may also need to know some technical information about the device(s) on which you want to use our Services (collectively, your "Personal Information").

As is true of most websites, we gather certain information automatically. This information, which is also included in the scope of your Personal Information may include Internet Protocol (IP) addresses, browser type, Internet service provider (ISP), time zone, referring/exit pages, the files viewed on our Platforms (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the Platforms. We collect this type of device information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit http://www.allaboutcookies.org.
- "Log files" track actions occurring on the Platforms, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the Platforms.

Whenever you create an account with us, you agree and acknowledge that you are intentionally providing your Personal Information in compliance with the laws and regulations applicable to you.

If you are from the European Economic Area ("EEA"), our legal basis for collecting and using the personal information described in this Privacy Policy is based on Art. 6(1)(B) of the General Data Protection Regulation ("GDPR") (performance of a contract); Art. 6 (1)(f) GDPR (balancing of interests, based on our legitimate interest in constantly and profitably improving the content, functionality and attractiveness of our Platforms by analyzing your usage); Art. 6 (1)(c) (necessary for compliance with a legal obligation to which we are subject); and/or Art. 6(1)(a) of the GDPR (consent), depending on the Personal Data we collect and the specific context in which we collect it.

We may process your Personal Data because:

- You have given us permission or consent to do so;
- To provide you with our Services as requested by you;
- To process payments;
- To comply with a contract;
- To comply with the legal obligation to which we are subject; and
- Based on interests, based on our legitimate interests in constantly and profitably improving the content, functionality and attractiveness of the Platforms and/or our Services by analyzing your usage of either or both.

### **How we use your Personal Information**

We use the information we collect from you for the following purposes:

- Process transactions and fulfill ticket orders
- Respond to user inquiries and provide customer service
- Communicate important information about the Conference
- Send confirmation emails and electronic tickets
- Verify user identity and prevent fraud
- Improve our products, services, and website functionality
- Send marketing communications, such as email newsletters or special offers, subject to user preferences and applicable laws
- To provide, maintain, and to communication with you about our Services

- To identify your preferences
- To provide you information about our other Services that might be of interest to you
- To comply with our internal record-keeping needs to legal compliance needs
- To notify you about changes to our Services
- To allow you the option to participate in interactive features of our Services
- To detect, prevent, and address technical issues
- To provide you with customer support
- To improve our Services through information analysis
- To protect or otherwise investigate our Services regarding misuse, security breaches, prevention, detection, mitigation, or investigation of fraud, or other potentially prohibited or illegal activities and/or attempts to interfere with the Platforms or Services or to harm others
- With respect to a transfer or sale, including a potential transfer or sale, of any of our assets and/or operations to another party or in the due diligence process in line with a potential transfer or sale
- To determine your level of engagement
- Monitor and improve the information security of the Platforms and/or our Services
- Comply with governmental regulations or to respond to a subpoena or other governmental, court, administrative, Member State, Supervisory Authority or other legal requirement (as those terms are defined by applicable law)
- Hire, train and/or manage our staff/employees
- To enforce our Terms and Conditions of Use and License Agreement, this Privacy Policy or other policies, and to monitor for violations of our policies or applicable laws
- Combined with information we receive from other sources for the purposes set out in this Privacy Policy
- Any other purpose communicated to you at the time of collecting the Personal Information and if required by law for which consent has been obtained

## **Legal Basis for Processing Personal Information**

We process personal information on the following legal bases:

- Performance of a contract when we provide you with products or services, or communicate with you about them
- Our legitimate business interests, such as improving and personalizing our services, marketing new features or products, and preventing fraud
- Compliance with our legal obligations
- Consent you provide where we specifically ask for it

#### How we share (or don't share) any personal information

Your information is not sold, rented or leased to other organizations for commercial/business purposes and has not been in the last 12 months immediately preceding the effective date of this Privacy Policy.

Your Personal Information is only shared with third parties in order to provide the Services you have requested.

Specifically, we work with third-party service providers that supply website and application development, hosting, maintenance, storage, virtual infrastructure, payment processing, analysis, and other services for us, which may require them to access or use your Personal Information.

### Social media and other websites that you visit

This Privacy Policy only applies to our Platforms and Services and does not apply to the following:

- 1. Any social media posts or comments that you make which are about us or addressed to us on social media platforms or websites (for example, Twitter, Instagram, LinkedIn and Facebook). Any such posts or comments will be shared by you under the terms of the relevant social media platform or website on which they are published.
- 2. Links contained on the Sites and Services, including links to any advertisers or other third parties.
- 3. We recommend that you review the terms and conditions and privacy policies of the relevant social media platforms and other websites or apps you visit, to understand how they use your information.

# How you can update and control your Personal Information

You can update certain information related to you and your account through our Platforms. If you wish to have your account deactivated, please contact us at <a href="mailto:support@multitracks.com">support@multitracks.com</a>. If you wish to be removed from our email list either select the "Unsubscribe" link at the bottom of an email received from us or contact <a href="mailto:support@multitracks.com">support@multitracks.com</a>.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. MultiTracks.com LLC aims to take reasonable steps to allow you to update, control, and limit the use of your Personal Data. If you wish to exercise any of these rights, contact <a href="mailto:privacy@multitracks.com">privacy@multitracks.com</a>. You also have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local Data Protection Authority in the European Economic Area (EEA).

### Do not track (including California and Delaware do not track disclosures)

Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, we do not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals.

### Consent to receive electronic notifications

Electronic communication is the most effective and timely way to provide the users of the Platforms and Services with any optional or required notifications and disclosures. In some circumstances, however, applicable laws may require us to send you disclosures or communications in paper format unless you have affirmatively consented to receiving electronic notifications only in advance of the notification. Through this Privacy Policy, pursuant to 15 U.S.C. § 7001, you hereby affirmatively consent to receive electronic notifications and disclosures from us only (without requiring a paper copy) and you represent that, to date, you have not withdrawn such consent. You have the right to change your mind and withdraw your consent at any time. If you would like to withdraw your consent to receive electronic notifications and/or would like to request paper copies of any electronic notifications you receive, you may contact at <a href="mailto:privacy@multitracks.com">privacy@multitracks.com</a> or via mail at Privacy Officer, MultiTracks.com LLC, 1500

Arrow Point Dr. Building VII Ste 701, Cedar Park, TX 78613 To receive electronic records, you will need access to a smart phone, tablet, laptop or computer with internet access and an email account.

### Other important privacy information

Third-party service providers

The following third parties may have access to your Personal Information but only to perform the following tasks on our behalf, and they are obligated not to disclose or use it for any other purpose.

- Google Analytics is a service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on our website available to Google Analytics by installing the Google Analytics opt-out browser add-on. This add-on prevents the Google Analytics JavaScript (e.g., ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about web activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a>
- Facebook Conversion Tracking Pixel is a tool that allows us to follow your actions after you are redirected to our Platforms by clicking on a Facebook advertisement. We are thus able to record the effectiveness of our advertisements. The data collected is not personally identifiable. Facebook cannot see your Personal Information; however, the collected data is saved and processed by Facebook. Facebook is able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with their own privacy policy at: <a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>. Facebook Conversion Tracking also allows Facebook and its partners to show you advertisements on and outside Facebook. A cookie will be saved onto your computer for these purposes. By using our Platforms, you agree to the data processing associated with the integration of Facebook Pixel. You can revoke your permission at: <a href="https://www.facebook.com/ads/settings">https://www.facebook.com/ads/settings</a>.
- Apple Store In-App Payments is a feature that allows you to purchase some of our services, products, or licenses through our products sold on Apple's App Store. Their Privacy Policy can be viewed at <a href="https://www.apple.com/legal/privacy/en-ww/">https://www.apple.com/legal/privacy/en-ww/</a>.
- Authorize.net is the third-party service provider we use for payment processing on our Platforms. Their Privacy Policy can be viewed at <a href="https://www.authorize.net/company/privacy/">https://www.authorize.net/company/privacy/</a>.
- Intercom is a third-party service provider we use to assist us with customer support. When you use support on our Platforms by clicking "Support" at the top of our Platforms, you are redirected into their system. Their system may write cookies, and they may retain your personal information. You can view their privacy policy at https://www.intercom.com/legal/privacy
- Hubspot is a third-party service provider for email campaigns, marketing automation, marketing analytics, and serves as our Customer Relationship Manager (CRM). You can view their privacy policy at <a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/privacy-policy</a>
- EBANX is a third-party service provider we use for payment processing on our Platforms. Their Privacy Policy can be viewed at <a href="https://business.ebanx.com/en/legal-terms/for-customers/privacy-policy">https://business.ebanx.com/en/legal-terms/for-customers/privacy-policy</a>
- Anrok is a third-party service provider we use to assist us with calculating, collecting, and remitting US state sales tax. Their Privacy Policy can be viewed at <a href="https://www.anrok.com/privacy-terms">https://www.anrok.com/privacy-terms</a>

• Microsoft is a third-party provider we use for various purposes such as data processing and website and app performance analytics across all products. Their Privacy Policy can be viewed at <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>

## EEA data subject protection rights under the GDPR

If you are a resident of the EEA, you have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information.

If you wish to be informed about what Personal Information we hold about you, have a copy of it, correct or otherwise rectify it, and/or if you want it to be removed from our systems, please contact us using the contact information set out below or fill-out and submit this form.

using the contact information set out below or fill-out and submit this form.
In certain circumstances, you have the following data protection rights:
□ Request access to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Information we hold about you where we are the data controller and to check that we are lawfully processing it.
□ Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
□ Request erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your Personal Information 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 Information to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons, which will be explained to you, if applicable, at the time of your request.
□ <b>Object to processing of your Personal Information</b> 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 to where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.
Right to Restrict Processing. You have the right to request that we restrict the processing of your Personal Information. This enables you to ask us to temporarily stop the processing of your Personal Information in the following scenarios: (a) if you have concerns about the accuracy of your information and want to have it rectified; (b) where you believe our use of your information may be unlawful but you do not want us to erase it; (c) where you need us to hold the information for the purposes of defending or exercising your rights with respect to a legal claim even though we may no longer need it; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to keep it.
☐ Right to Data Portability. You have the right to request the transfer of your Personal Information to you or to a third party. We will provide you, or a third party you have chosen, with

your Personal Information in a structured, commonly used, machine-readable format. Note that this right

only applies to automated information which you initially provided with your consent for us to use or where we used the information to perform a contract with you.

□ Right to Withdraw Consent. You have the right to withdraw consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any process carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority in the EEA.

If you wish to exercise any of the rights set out above, please contact us using the contact details below.

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, provided that such fee does not exceed our actual costs of responding to the request. Alternatively, we may refuse to comply with your request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure designed to ensure that Personal Information 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 to speed up our response.

For users in the EEA, the United Kingdom, or Switzerland, any material changes or modifications will be effective upon your express consent. You will be notified of any material changes by email and by virtue of a prominent pop-up, banner, or other notification mechanism when you seek to access the Site or Services after we issue a change or modification. Non-material changes will be effective upon posting. Upon consent, the revisions on the Site or Services shall apply to all uses of the Site or Services and all acts or omissions occurring after the effective date of the revised Privacy Policy.

#### Notice to California, Nevada, and Utah residents

We do not disclose a user's personal data to any third party for such third-party's direct marketing purposes. Nevada S.B. 220 allows Nevada residents to opt-out of the sale of their personal information in the event we change our Privacy Policy in the future to permit such sales. If you are a Nevada resident we want you to know that, in the event we sell your Personal Information, you will have choices and can opt-out and can affect them by contacting us at <a href="mailto:privacy@multitracks.com">privacy@multitracks.com</a> or via mail at Privacy Officer, MultiTracks.com LLC, 1500 Arrow Point Dr. Building VII Ste 701, Cedar Park, TX 78613. This may prevent or restrict your use of the Services in the future.

#### California Data Subject Rights

Shine the Light Law

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal Information that we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request

to <u>privacy@multitracks.com</u> or via mail at Privacy Officer, MultiTracks.com LLC, 1500 Arrow Point Dr. Building VII Ste 701, Cedar Park, TX 78613. We will respond to one request per California customer each year, and we do not respond to requests made by means other than as set forth above.

The California Consumer Protection Act (CCPA) and the California Privacy Rights Act (CPRA)

If you are a California resident, you have the following rights under applicable California law in relation to your personal information, subject to certain exceptions:

- Right to Know. You have the right to, up to twice in a 12-month period, request what categories and specific pieces of Personal Information we collect, use, disclose, share and/or sell, as applicable. You may make a request for this information twice within a 12-month period. You may request any or all of the following: The categories of your personal information we have collected about you in the preceding 12 months; the categories of sources from which the personal information has been collected about you in the preceding 12 months; the business or commercial purpose for collecting or selling your personal information in the preceding 12 months; the categories of third parties with whom we have shared your personal information in the preceding 12 months; the categories of your personal information that we sold and the categories of third parties to whom the personal information was sold in the preceding 12 months, listed by category or categories of personal information for each third party to whom your personal information was sold; the categories of your personal information that we disclosed for a business purpose in the preceding 12 months; and/or the specific pieces of personal information we have collected about you.
- **Right to Delete**. You have the right to request the deletion of your Personal Information that is collected by us.
- **Right to Opt-Out of Sale or Sharing**. You have the right to opt out of the sale and sharing of your Personal Information by a business. However, as noted above, we do not currently share or sell any Personal Information. Please note that, for the purposes of this Privacy Policy "sharing" means to share your Personal Information with third parties for the purpose of cross-context behavioral marketing/targeting only.
- **Right to Non-Discrimination**. You have the right not to receive discriminatory treatment for the exercise of the privacy rights described above.
- **Right to Data Portability**. You have the right to request a copy of your Personal Information we have collected and maintained about you in the past 12 months.

Please note that if you request deletion of your Personal Information, we may deny your request or may retain certain elements of your Personal Information if it is necessary for us or our service providers to:

- Complete the transaction for which the Personal Information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between our business and you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the deletion of the

- information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use the personal data, internally, in a lawful manner that is compatible with the context in which you provided the information.

Any request you submit to us is subject to an identification and residency verification process ("Verifiable Consumer Request") as permitted by the CCPA. We will not fulfill your request unless you have provided sufficient information that enables us to reasonably verify that you are the consumer about whom we collected the personal information on. To process requests about categories of information about you, we require that you provide at least two pieces of personal information that match the personal information we maintain about you. For example, if we collect your name, email and address, we may request you provide us with your name, email, zip code or other pieces of information that we can verify. These rights are also subject to various exclusions and exceptions under applicable laws.

In your request for deletion, specify what information you are requesting to be deleted or state that you are requesting deletion of all information we have collected or maintain about you, subject to applicable legal exceptions. Please provide us with an email address to contact you at. If you do not have an email address, please provide either a telephone number and/or postal mailing address to contact you.

You may designate an authorized agent to make a request under the California Consumer Privacy Act by providing the authorized agent with written permission to do so or when you have provided the authorized agent power of attorney pursuant to California Probate Code sections 4000 to 4465.

We will require the authorized agent to submit proof that they have been authorized by you to act on their behalf, and, except in cases where you have provided the authorized agent power of attorney, we may require that you verify your identity with us. The authorized agent may submit a request to exercise these rights by emailing the letter of authorization or power of attorney to <a href="mailto:privacy@multitracks.com">privacy@multitracks.com</a>.

We have not sold any personal information to third parties for a business or commercial purpose in the preceding 12 months. We do not knowingly collect, sell or share the Personal Information of minors under 18 years of age.

We do not provide a mechanism for opting out of the sale or sharing of your Personal Information because do not sell or share the personal information we collect. If we decide to sell or share Personal Information in the future, we will provide a notice of the right to opt-out in this Privacy Policy. We do not sell or share Personal Information collected during the time period during which a notice of opt-out is not posted.

We currently do not collect household data. If we receive a Right to Know or Right to Delete request submitted by all members of a household, we will individually respond to each request. We will not be able to comply with any request by a member of a household under the age of 13 as we do not collect personal information from any person under the age of 13.

We will respond to your request within 45 days after receipt of a Verifiable Consumer Request. You may submit such requests for information covering the preceding 12 months, and no more than twice in a twelve-month period. We reserve the right to extend the response time by an additional 45 days when

reasonably necessary and provided consumer notification of the extension is made within the first 45 days.

You may exercise any of the rights described in this section by filling out and submitting this form yourself, by having your agent fill out and submit this form on your behalf or sending an email to: privacy@multitracks.com with "California Privacy Rights" as the subject line or mail us a letter to: Privacy Officer, MultiTracks.com LLC, 1500 Arrow Point Dr. Building VII Ste 701, Cedar Park, TX 78613.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We do not provide a mechanism for opting out of the sale of your personal information because we do not, and will not, sell the personal information we collect. If we decide to sell personal information in the future, we will provide a notice of the right to opt-out in this privacy policy. We do not, and will not, sell personal information collected during the time period during which a notice of opt-out is not posted.

We do not currently offer financial incentives or price or service differences online to consumers in exchange for the retention and/or sale of their information.

We may aggregate and/or de-identify your information so that the information no longer relates to you individually. Our use and disclosure of such aggregated or de-identified information is not subject to this Privacy Policy and may be disclosed to others without limitation and for any purpose.

We may now or in the future elect to share information about you with third parties for those third parties' direct marketing purposes. California Civil Code § 1798.83 permits California residents who have supplied personal information (as defined in the law) to us to, under certain circumstances, request and obtain certain information regarding our disclosure, if any, of Personal Information to third parties for their direct marketing purposes. If this law applies to you, you may obtain the categories of Personal Information shared by us and the names and addresses of all third parties that received Personal Information for their direct marketing purposes from us during the immediately prior calendar year (e.g., requests made in 2021 will receive information about 2020 sharing activities). To make such a request, please provide sufficient information for us to determine if this applies to you, attest to the fact that you are a California resident and provide a current California address for our response. To make such a request (limit one request per year), please send an email to <a href="mailto:privacy@multitracks.com">privacy@multitracks.com</a>, with "California Privacy Rights" as the subject line or mail us a letter to our attention at Privacy Officer, MultiTracks.com LLC, 1500 Arrow Point Dr. Building VII Ste 701, Cedar Park, TX 78613. You must include your full name, email address with which you registered on our Platforms or to use our Services, and postal address in your request.

California consumers with disabilities may contact us by phone at (512) 535-1172 or email us at <a href="mailto:privacy@multitracks.com">privacy@multitracks.com</a> for information on how to access this notice in an alternative format.

# Colorado Data Subject Rights

Colorado residents have the same rights as set forth in the <u>California Consumer Privacy Act (CCPA)</u> and the <u>California Privacy Rights Act (CPRA) Section</u> directly above, except that, to exercise your rights, email us at privacy@multitracks.com subject matter "Colorado Data Subject Right Request". If we deny your request to exercise your rights in whole or in part, you have the right to appeal our decision within

45 days from the date you receive our decision. In such circumstances, you may contact us at privacy@multitracks.com with the subject "Colorado Data Privacy Request Appeal" to provide us with information about details about why you are appealing the decision. In the event you are not satisfied with our response, you may contact the Colorado Attorney General.

In addition, If you are a Colorado resident as of July 1, 2023, you have the right to access, delete, correct, transfer, and opt-out of the sale of your Personal Information for the purposes of targeted advertising, sale to a third party for monetary gain, and/or for profiling in furtherance of decisions that produce legal or similarly significant effects concerning you or any other consumer.

You may authorize another person acting on your behalf to opt out of the processing of your Personal Information for any of the reasons set forth above, via this web link, by indicating such preference through a browser setting, browser extension, universal opt-out mechanism that meets the technical specifications established by the Colorado Attorney General as of July 1, 2024, or global device setting.

# **Nevada Data Subject Rights**

Nevada residents have a right to submit a verified request directing a website operator to not make any "sale" of covered information collected about the consumer for monetary consideration to a person for such person to license or sell the information to additional persons, subject to certain exceptions. If you are a Nevada resident and you would like to opt-out of a future sale of your covered information, you can contact us at privacy@multitracks.com.

# **Canadian Anti-Spam Legislation ("CASL")**

This Section provides additional information regarding the use of Personal Information about Canadian residents and the process to be followed in order to send unsolicited electronic communications to them, and our responsibilities under CASL.

For the purposes of this section:

- Commercial activity: Any transaction of commercial character, regardless of whether there is an expectation of profit or not.
- Commercial electronic message ("CEM"): CEMs are commercial electronic messages that encourage participation in commercial activity. Even if a commercial message is not sent with an expectation of garnering profit, it still qualifies as a CEM.
- Electronic address: An address used in connection with the transmission of an electronic message to an electronic mail account, and instant messaging account, a telephone account or similar account
- Electronic message: A message sent by any means of telecommunication, including text, sound, voice or image.
- Express consent: Permission obtained when a recipient "opts in" to receive CEMs. Consent can be oral or written and could be an unedited audio recording, paper or electronic checkbox on a website. Express consent never expires unless the recipient chooses to unsubscribe. We will maintain records of all contacts for whom express consent exists.
- Unsubscribe: A withdrawal of consent to receive CEMs

By submitting forms to us that provide your electronic address, you are granting us express consent to send you CEMs. You may unsubscribe via the link found at the bottom of every electronic message.

All partners, employees, contractors, vendors and any other person sending CEMs on behalf of us will ensure that all such CEMs contain:

- Full contact information. This includes the sender's first name, last name, title, company name, company mailing address, direct telephone number, electronic address and company web address.
- Information enabling you to contact us and, if the CEM is sent on behalf of another party, the name of this party and the sender, in addition to the information listed above.
- An unsubscribe link that is clearly visible and that is valid for at least 60 days. The unsubscribe mechanism that will be provided to users via this link will be simple, quick and easy for the user to perform.

Unsubscribe Requests: All unsubscribe requests will be managed within 10 days of receipt. Partners, employees, contractors, vendors and any other person sending CEMs on behalf of us will not send an unsubscribed party any further communications by electronic means.

When we plan to introduce significant changes to its privacy practices, it will notify Canadian-resident users and obtain their consent prior to the changes coming into effect. Significant changes include using Personal Information for a new purpose not anticipated originally or a new disclosure of personal information to a third party for a purpose other than processing that is integral to the delivery of a service.

#### Links to other sites

Our Services may contain links to other sites that are not operated by us. If you click on a third-party link, you will be redirected to that third-party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## Children's privacy

We do not knowingly collect personally identifiable information from anyone under the age of 13 (16 in the EEA). If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us at <a href="mailto:privacy@multitracks.com">privacy@multitracks.com</a>. If we become aware that we have collected personal information from anyone under the age of 13 (16 in the EEA) without verification of parental consent, then we will take steps to remove that information from our servers.

#### What about security

We implement commercially reasonable safeguards designed to protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that while we strive to protect your Personal Information, we cannot guarantee absolute security of any information you transmit to us. By using our Services, you acknowledge and accept the inherent security risks of Internet transmission.

#### **Data Retention Policy**

We retain Personal Information for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulations. Usage data is generally retained for 12 months, unless a longer retention period is required or permitted by law.

### **Automated Decision-Making and Profiling Disclosure**

We may use automated decision-making to personalize your experience. You have the right to request human intervention, express your point of view, and contest any decision made by automated means.

### **Cross-Border Data Transfer Safeguards**

When we transfer personal data outside the EEA, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses approved by the European Commission.

# **Privacy by Design Statement**

We are committed to Privacy by Design principles, integrating privacy considerations into all stages of our product development and service delivery.

## **Data Protection Impact Assessment Policy**

We conduct Data Protection Impact Assessments for new projects or significant changes that involve processing personal data, to identify and minimize privacy risks.

## **Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. We will email you about the changes and when they will go into effect. Modifications to this Privacy Policy are effective when they are posted on this page and within the Mobile Apps. In the event material changes are made to this Privacy Policy you will be asked to renew your acceptance of this policy the next time you login to your account on our Platforms. If required, we will obtain your consent before the changes go into effect.

#### Severability and Enforceability

To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

#### **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

Notice by mail to Service Provider:

ATTENTION: Privacy Officer

MultiTracks.com LLC

1500 Arrow Point Dr. Building VII Ste 701

Cedar Park, TX 78613

By email: <u>privacy@multitracks.com</u>

All notices must be sent via certified mail, return receipt requested, or via reputable overnight courier service, and shall be deemed delivered upon receipt (for courier) or three (3) business days after mailing (for certified mail). Email notices shall be deemed delivered upon confirmation of receipt.