

Privacy Policy

Effective date: 10 July, 2025

At Civic Marketplace, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Website in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and disclose your information as described in this Privacy Policy.**

You may print a copy of this Privacy Policy by clicking [here](#).

As we continually work to improve our Website, we may need to change this Privacy Policy from time to time. We will alert you of material changes by placing a notice on the Civic Marketplace Website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Website, and you are still responsible for reading and understanding them. If you use the Website after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

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What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Website. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

Category of Personal Data (and Examples)	Business or Commercial Purpose(s) for Collection	Categories of Third Parties With Whom We Disclose this Personal Data

Contact Data such as first and last name, email address, postal address, phone number	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Website • Marketing our products and services • Corresponding with You 	Service Providers
Device/IP Data such as IP address and type of device/operating system/browser	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Website • Marketing our products and services • Corresponding with You 	Service Providers
Web Analytics such as web page interactions, referring web page/source through which you accessed the Website, statistics associated with the interaction between device or browser and the Website	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Website • Marketing our products and services • Corresponding with You 	Service Providers

Social Network Data such as email, phone number or social media account used to log into the Website	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Website • Marketing our products and services • Corresponding with You 	Service Providers
Professional or Employment-Related Data such as job title, employer, and other professional information	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Website • Marketing our products and services • Corresponding with You 	Service Providers

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Website**

- Providing you with the products, Website or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Website.
- Improving the Website, including testing, research, internal analytics and product development.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the Texas Data Privacy and Security Act (“TDPSA”).
- **Marketing the Website**
 - Marketing and selling the Website.
- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Civic Marketplace or the Website.
 - Sending emails and other communications according to your preferences.

Other Permitted Purposes for Processing Personal Data

In addition, each of the above referenced categories of Personal Data may be collected, used, and disclosed with the government, including law enforcement, or other parties to meet certain legal requirements and enforcing legal terms including: fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities; protecting the

rights, property or safety of you, Civic Marketplace or another party; enforcing any agreements with you; responding to claims that any posting or other content violates third-party rights; and resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice or obtaining your consent.

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
 - When you provide such information directly to us.
 - When you create an account or use our interactive tools and Website.
 - When you voluntarily provide information in free-form text boxes through the Website or through responses to surveys or questionnaires.
 - When you send us an email or otherwise contact us.
 - When you use the Website and such information is collected automatically.
 - Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).

How We Disclose Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Website or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Analytics providers for web traffic or usage of the site.

Legal Obligations

We may disclose any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Other Permitted Purposes for Processing Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and disclose it with third parties for our lawful business purposes, including to analyze, build and improve the Website and promote our business, provided that we will not disclose such data in a manner that could identify you.

Tracking Tools and Opt-Out

The Website use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Website, analyze trends, learn about our user base and operate and improve our Website. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Website. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s).

Please note that because of our use of Cookies, the Website do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or Website that you have requested. For example, certain Cookies enable you to log into secure areas of our Website. Disabling these Cookies may make certain features and Website unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Website, maintain your preferences over time and recognize you when you return to our Website. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Website. They do this by collecting information about the number of visitors to the Website, what pages visitors view on our Website and how long visitors are viewing pages on the Website. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Website' content for those who engage with our advertising. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and disclose information collected by Google Analytics about your visits to the Website is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust

some preferences every time you visit our Website and some of the services and functionalities may not work.

To explore what Cookie settings are available to you or to modify your preferences with respect to Cookies, you can access your Cookie management settings by clicking below. To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

Cookie Settings

Session Replay Technology

We may use session replay technology in order to identify and resolve customer issues, to monitor and analyze how you use our Website, to better understand user behavior, and to improve our Website. By continuing to use the Website, you consent to the use of session replay technology. If you would like to change your settings with respect to session replay technology, you can access your Cookie management settings by clicking [LINK].

Data Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account

and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

Data Retention

We retain Personal Data about you for as long as necessary to provide you with our Website or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

For example:

- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data from children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Website or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as quickly as possible. If you believe that a

child under 13 years of age may have provided Personal Data to us, please contact us at support@civicmarketplace.com.

Texas Resident Rights

If you are a Texas resident, you have the rights set forth under the Texas Data Privacy and Security Act (“TDPSA”). Please see the “Exercising Your Rights under the State Privacy Laws” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a Texas resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at support@civicmarketplace.com.

Access and Portability

You have the right to request confirmation of whether or not we are processing your Personal Data and to access your Personal Data and request a copy of your Personal Data in a machine-readable format, to the extent technically feasible, twice within a calendar year.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Deletion

You have the right to delete Personal Data you have provided to us or we have obtained about you.

Personal Data Sales and Targeted Advertising Opt-Out

We do not currently sell or process for the purposes of targeted advertising your Personal Data as defined under the TDPSA.

Profiling Opt-Out

We do not process your Personal Data for “Profiling” as defined under the TDPSA. “Profiling” means any form of solely automated processing performed on personal data to evaluate, analyze, or predict personal aspects related to an identified or identifiable individual’s economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

We Will Not Discriminate Against You for Exercising Your Rights Under the TDPSA

We will not discriminate against you for exercising your rights under the TDPSA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the TDPSA. However, we may offer different tiers of our Website as allowed by applicable data privacy laws (including the TDPSA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Exercising Your Rights under the TDPSA

If you are a Texas resident, to exercise the rights described in this Privacy Policy, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Data

provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the time period required by applicable law. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

Request to Access, Delete, or Correct

You may submit a Valid Request for any other rights afforded to you in this Privacy Policy by using the following methods:

- Email us at: support@civicmarketplace.com

If you are a Texas resident, you may authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Appealing a Denial

If you are a Texas resident and we refuse to take action on your request within a reasonable period of time after receiving your request in accordance with this section, you may appeal our decision. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the

original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the State Privacy Laws (as applicable). We will respond to your appeal within the time period required under the applicable law. You can submit a Verified Request to appeal by the following methods:

- Email us at: support@civicmarketplace.com (title must include “Texas Appeal”)

If we deny your appeal, you have the right to contact the Attorney General of your State, including by the following links: [Texas](#).

Other State Law Privacy Rights

California Resident Rights

Under California Civil Code Sections 1798.83–1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at support@civicmarketplace.com.

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across

different websites. Our Website does not support Do Not Track requests at this time. To find out more about “Do Not Track,” you can visit www.allaboutdnt.com.

Nevada Resident Rights

Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at support@civicmarketplace.com.