FLYER ONE VENTURES

IMPORTANT PRIVACY INFORMATION

When you access our website we automatically collect from your device language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID. We need this data to provide our services, analyze how our customers use the website and to measure ads.

For operating and improving the website and serving ads, we use third party solutions. As a result, we may process data using solutions developed by **Facebook, Google, and Wix.com**. Therefore, some of the data is stored and processed on the servers of such third parties.

Please read our Privacy Policy below to know more about what we do with data (Section 3), what data privacy rights are available to you (Section 6) and who will be the data controller (Section 1). If any questions will remain unanswered, please contact us at go@flyerone.vc.

PRIVACY POLICY

This Privacy Policy explains what personal data is collected when you use the website located at: https://www.flyerone.vc/ (the "**Website**"), the services and products provided through it (together with the Website, the "**Service**"), how such personal data will be processed.

BY USING THE SERVICE, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, AND (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU). If you do not agree, or are unable to make this promise, you must not use the Service. In such case, you must (a) contact us and request deletion of your data; and (b) leave the Website and not access or use it.

"**GDPR**" means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

"**EEA**" includes all current member states to the European Union and the European Free Trade Association. For the purpose of this policy EEA shall include the United Kingdom of Great Britain and Northern Ireland.

"**Process**", in respect of personal data, includes to collect, store, and disclose to others.

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1. PERSONAL DATA CONTROLLER

GIVC Tech III Limited, a company registered under the laws of British Virgin Islands, having its registered office at Quijano Chambers, P.O. Box 3159, Road Town, Tortola, British Virgin Islands, will be the controller of your personal data.

2. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect data you give us voluntarily (for example, email address). We also collect data automatically (for example, your IP address).

2.1. Data you give us

If you decide to contact us about your use of the Website or information, products or services provided through the Website, you will have to provide email address, which will be used to enable further communication with you.

2.2. Data we collect automatically:

2.2.1. Data about how you found us

We collect data about your referring app or URL (that is, the app or place on the Web where you were when you tapped/clicked on our ad).

2.2.2. Device and Location data

We collect data from your mobile device. Examples of such data include: language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID.

2.2.3. Usage data

We record how you interact with our Service. For example, we log what pages you have viewed, the features and content you interact with, how often you use the Website, how long you are on the Website.

2.2.4. Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our Service. A persistent cookie remains on your hard drive for an extended period of time. We also use tracking pixels that set cookies to assist with delivering online advertising.

Cookies are used, in particular, to automatically recognize you the next time you visit our website. As a result, the information, which you have earlier entered in certain fields on the website may automatically appear the next time when you use our Service. Cookie data will be stored on your device and most of the times only for a limited time period.

3. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

3.1. To provide our Service

This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues. As a result of such processing, we will use your email, for example, for sending you the personalized style guide.

We use **Wix.com** as a platform for websites and mobile apps creation, which provides technical solutions for operation of the Website. To learn more, please visit Wix.com's Privacy Policy.

3.2. To provide you with customer support

We process your personal data to respond to your requests for technical support, Service information or to any other communication you initiate. For this purpose, we may send you, for example, notifications or emails about, the performance of our Website, security, notices regarding our Terms and Conditions of Use or this Privacy Policy.

3.3. To communicate with you regarding your use of our Service

We communicate with you, for example, by emails once you contact us about information, products or services provided through the Website. These may include for example, emails with information about Flyer One Ventures, its portfolio companies and other relevant information. To opt out of receiving emails, you need to follow the instructions in the footer of the emails.

3.4. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop Flyer One Ventures and the Website. We also use such data for statistical analysis purposes. This enables us to better understand what categories of users are interested in Flyer One Ventures and its activities. As a consequence, we often decide how to improve Flyer One Ventures based on the results obtained from this processing.

We use **Wix Analytics** as an analytics service provided by Wix.com. The service enables us to get aggregated statistics on the Website's traffic and customer behaviour in the form of summary reports. To learn more, please visit Wix.com's Privacy Policy.

We also use **Facebook Analytics**, which is a service provided by Facebook that allows us to use different analytical tools. On Facebook Analytics we get, in particular, aggregated demographics and insights on how many people visit our Website, how often users make purchases, and other interactions. Lean more about Facebook's approach to data from its Privacy Policy.

3.5. To personalize our ads

We and our partners use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you visited our Website, you might see ads of our products in your Facebook's feed.

How to opt out or influence personalized advertising
iOS: On your iPhone or iPad, go to Settings > Privacy > Apple Advertising and deselect Personalized Ads.

Android: To opt-out of ads on an Android device, go to Settings > Privacy > Ads and enable Opt out of Ads personalization. In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads). To learn even more about how to affect advertising choices on various devices, please look at the information available here.

macOS: On your MacBook, you can disable personalized ads: go to System Preferences > Security & Privacy > Privacy, select Apple Advertising, and deselect Personalized Ads.

Windows: On your laptop running Windows 10, you shall select Start > Settings > Privacy and then turn off the setting for Let apps use advertising ID to make ads more interesting to you based on your app activity. If you have other Windows version, please follow the steps here

To learn even more about how to affect advertising choices on various devices, please look at the information available here.

In addition, you may get useful information and opt out of some interest-based advertising, by visiting the following links:

- Network Advertising Initiative – http://optout.networkadvertising.org/
- Digital Advertising Alliance – http://optout.aboutads.info/
- Digital Advertising Alliance (Canada) – http://youradchoices.ca/choices
- Digital Advertising Alliance (EU) – http://www.youronlinechoices.com/
- DAA AppChoices page – http://www.aboutads.info/appchoices

Browsers: It is also may be possible to stop your browser from accepting cookies altogether by changing your browser's cookie settings. You can usually find these settings in the "options" or "preferences" menu of your browser. The following links may be helpful, or you can use the "Help" option in your browser.

- Cookie settings in Internet Explorer
- Cookie settings in Firefox
- Cookie settings in Chrome
- Cookie settings in Safari web and iOS

Google allows its users to opt out of Google's personalized ads and to prevent their data from being used by Google Analytics.

We use **Facebook Ads Manager** together with **Facebook Custom Audience**, which allows us to choose audiences that will see our ads on Facebook or other Facebook's products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, such as an IDFA, choose users that have completed certain actions in the Service (for example, visited certain sections of the Website). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook's products (for example, Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience here.

Facebook also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go here or adjust your ads settings on Facebook.

Google Ads is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows us to tailor the ads in a way that they will appear, for example, only to users that have conducted certain actions with our Website (for example, show our ads to users who have made a purchase). Some other examples of events that may be used for tailoring ads include, in particular, visiting our Website. Google allows its users to opt out of Google's personalized ads and to prevent their data from being used by Google Analytics.

3.6. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms and Conditions of Use).

3.7. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

4. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to Section 3. This section applies only to EEA-based users.

We process your personal data under the following legal bases:

4.1. your consent

Under this legal basis we:

- Store or access information on your devices via cookies and other tracking technologies

4.2. to perform our contract with you;

Under this legal basis we:

- Provide our Service (in accordance with our Terms and Conditions of Use)
- Provide you with customer support
- Communicate with you regarding your use of our Service

4.3. for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;

We rely on legitimate interests:

- to research and analyze your use of the Service

  Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of the Website easier and more enjoyable, or to introduce and test new features).

- to personalize our ads

  The legitimate interest we rely on for this processing is our interest to promote our Service in a reasonably targeted way.

- to enforce our Terms and Conditions of Use and to prevent and combat fraud

  Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorised use of the Service, non-compliance with our Terms and Conditions of Use.

4.4. to comply with legal obligations.

5. WITH WHOM WE SHARE YOUR PERSONAL DATA

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes and with parties indicated in Section 3 of this Privacy Policy. The types of third parties we share information with include, in particular:

5.1. Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We may share your personal information with data analytics providers, such as Facebook, Google, and Wix.com.

5.2. Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

5.3. Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

6. HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS

To be in control of your personal data, you have the following rights:

Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided on the Website.

Deleting your personal data. You can request erasure of your personal data as permitted by law.

When you request deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some of the data for a certain time; in such event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data. You can ask us to stop using all or some of your personal data or limit our use thereof.

Additional information for EEA-based users:

If you are based in the EEA, you have the following rights in addition to the above:

The right to lodge a complaint with supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or where the alleged infringement has taken place.

The right to data portability. If you wish to receive your personal data in a machine-readable format, you can send respective request to us as described below.

To exercise any of your privacy rights, please send a request to go@flyerone.vc.

7. AGE LIMITATION

We do not knowingly process personal data from persons under 16 years of age. If you learn that anyone younger than 16 has provided us with personal data, please contact us.

8. INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in the Terms and Conditions of Use and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available here), or (ii) the European Commission adequacy decisions about certain countries (details available here).

9. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified by available means such as email and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

10. CALIFORNIA PRIVACY RIGHTS

California's Shine the Light law gives California residents the right to ask companies once a year what personal information they share with third parties for those third parties' direct marketing purposes. Learn more about what is considered to be personal information under the statute.

To obtain this information from us, please send an email message to go@flyerone.vc which includes "Request for California Privacy Information" on the subject line and your state of residence and email address in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

11. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you). We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

12. HOW "DO NOT TRACK" REQUESTS ARE HANDLED

Except as otherwise stipulated in this Privacy Policy, this Website does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

13. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at go@flyerone.vc.

Effective as of: 25 May 2020