



ATTIC SALT

Privacy Policy

# Privacy Policy

This Privacy Policy is intended to inform you about how we treat Personal Information that we process about you. If you do not agree to any part of this Privacy Policy, then we cannot provide the Platform or Services to you, and you should stop accessing the Platform and deactivate your Stellar Account. You can find out more about how to deactivate your Stellar Account by emailing us at [info@atticsalt.io](mailto:info@atticsalt.io)

## What Information does Attic Salt Gather?

### 1. Information that you give us

We receive, store and process information, including Personal Information, that you make available to us when accessing or using our website, the Stellar Platform and Services. Examples include when you:

- Fill in any form on the Stellar Platform, such as when you register or update details on your account;
- Access or use the Stellar Platform, such as to search for Screen Hosts, make or accept Campaigns, pay for Campaigns, book or pay for any associated Advertising Services that may be available (potential to be changed as we adjust how advertising works);
- Communicate with Attic Salt.

### 2. Information we get from your use of Attic Salt Platforms

We also receive, store and process information, possibly including Personal Information, when you access or use our Platform and Services, including but not limited to:

#### Mobile Data

When you use certain features of the Stellar Platform, in particular our mobile applications we may receive, store and process different types of information about your location, including general information (e.g. IP address, zip code) and more specific information (e.g. GPS-based functionality on mobile devices used to access the Platform or specific features of the platform). If you access the Stellar Platform through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details.

#### Log Data

We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the Platform, regardless of whether you are registered with Stellar or logged in to your Stellar Account, such as your IP Address, the date and time you access or use the Stellar Platform, the hardware and software you are using, referring and exit pages and URLs, the number of clicks, device event information, pages viewed and the order of those pages, and the amount of time spent on particular pages.

#### Cookies and other Tracking Technologies

Attic Salt uses cookies and other similar technologies, such as mobile application and other device identifiers, on the Stellar Platform. We may also allow our business partners to use their

cookies and other tracking technologies on the Stellar Platform. As a result, when you access or use the Stellar Platform, you will provide or make available certain information to us and to our business partners.

While you may disable the usage of cookies through your browser settings, we do not change our practices in response to a “Do Not Track” signal in the HTTP header from your browser or mobile application. We track your activities if you click on advertisements for Stellar services on Third-Party platforms such as search engines and social networks, and may use analytics to track what you do in response to those advertisements.

### Third Party Solutions

We may, either directly or through Third Parties we engage to provide services to us, also continue to track your behavior on our own Platform for purposes of our own customer support, analytics, research, product development, fraud prevention, risk assessment, regulatory compliance, investigation, as well as to enable you to use and access the Platform and pay for your activities on the Platform. We may also, either directly or through Third-Parties we engage to provide services to us, track your behavior on our own Platform to market and advertise our services to you on the Platform and Third-Party websites. Third Parties that use cookies and other tracking technologies to deliver targeted advertisements on our Platform and/or Third-Party websites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as the Network Advertising Initiative and/or the Digital Advertising Alliance. You may also be able to control advertising cookies provided by publishers, for example Google’s Ad Preference Manager. Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on or about the Platform – it just will not be tailored to your interests. In addition, if you disable cookies, you may lose some of the features and functionality of using our Platform, Application and Services, as cookies are necessary to track and enhance your use and access.

Third Parties may not collect information about users’ online activities on the Platform except as described in this policy and our Cookie Policy.

## How Attic Salt Uses and Processes the Information that you provide or make available?

We use, store and process information about you for the following general purposes:

- To enable you to access and use the Stellar Platform;
- To enable you to communicate with other Users, including but not limited to by sending them messages or other information during the Campaign placement or Content Approval process (will be changed/deleted according to how we set things up for advertisers);
- To operate, protect, improve and optimize the Stellar Platform, Attic Salt’s business, and our users’ experience, such as to perform analytics, conduct research, personalize or otherwise customize your experience, and to provide customer service;
- To help create and maintain a trusted and safer environment on the Stellar Platform, such as detection and prevention of actual and potential fraud and other harmful activity, conducting investigations and risk assessments, enforcing our Terms and policies, conducting checks against databases and information sources (such as but not limited to public government

databases) for fraud detection and prevention, risk assessment and harm prevention purposes. In this regard, we may do any or all of the foregoing with or without further notifying you;

- To send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- To send you marketing, advertising, and promotional messages and other information that may be of interest to you, including information about Attic Salt, our services, or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications by contacting us at [info@atticsalt.io](mailto:info@atticsalt.io);
- To comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with Third Parties.

## What are your Data Protection Rights?

Attic Salt would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request Attic Salt for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that Attic Salt correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that Attic Salt erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that Attic Salt restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to Attic Salt's processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- If you make a request, Attic Salt has up to one (1) month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [info@atticsalt.io](mailto:info@atticsalt.io)

## When and to Whom Attic Salt Discloses or Shares your Personal Information

- A. Parts of your Screen Host Profile that contain some Personal Information may be displayed in other parts of the Platform to other users for marketing purposes or if you post content on public features on the Stellar Platform that are visible to the general public.
- B. Your public Screen System Details page will always include some minimum information such as the city where the Stellar Screen System is located, your Screen description and your calendar availability. Parts of your public Screen Details page may be displayed in other parts of the Stellar Platform to other Members and/or Third Party platforms for marketing purposes. The Stellar Platform may also display your Screen's approximate geographic location on a map, such that a user can see the general area of the Screen.

- C. When you submit an Insertion Order to book one or more spots on a Screen, your full name and your company name (if applicable) and other Personal Information will become visible to the Screen Host. We will not share your phone number and your billing and payout information will never be shared with another user.
- D. We may distribute parts of the Stellar Platform (including your Screen System Details Page) for display on sites operated by Attic Salt's business partners and affiliates, using technologies such as HTML widgets. If and when your Screen System Details are displayed on a partner's site, information from your public profile page may also be displayed.
- E. Attic Salt may provide your Personal Information to its Affiliates to use and process your Personal Information in the same way and to the same extent that we are permitted to under this Privacy Policy. These related entities comply with the same obligations that we have to protect your Personal Information under this Privacy Policy. You can unsubscribe or opt-out from receiving marketing communications by contacting us at [info@atticsalt.io](mailto:info@atticsalt.io).
- F. You acknowledge, consent and agree that Attic Salt may access, preserve and disclose your account information and Collective Content if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary (a) to respond to claims asserted against Attic Salt; (b) to comply with legal process (for example, subpoenas and warrants); (c) to enforce and administer our agreements with users, such as the Terms of Service, the Screen Host Terms of Service, the Advertiser Terms of Service, this Privacy Policy, and the Host Guarantee Terms and Conditions; (d) for fraud prevention, risk assessment, investigation, customer support, product development and de-bugging purposes; or (e) to protect the rights, property or personal safety of Attic Salt, its users or members of the public.
- G. We will use commercially reasonable efforts to notify users about law enforcement requests for their data unless:
- Providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; or
  - We believe that providing notice would (a) be futile, (b) be ineffective, or (c) would create a risk of injury or bodily harm to an individual or group, or (d) create or increase a risk of fraud upon Attic Salt's property, its Members, the Platform, Application, or Services (collectively, "Risk Scenarios").
  - In instances where Attic Salt complies with legal requests for user data without notice to the user for the reasons described above, Attic Salt will use commercially reasonable

efforts to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no Risk Scenarios apply.

- H. We may also publish, disclose and use Aggregated Information and non-personal information for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

## **Business Transfers by Attic Salt**

If Attic Salt undertakes or is involved in any merger, acquisition, reorganization, sale of assets or bankruptcy or insolvency event, then we may sell, transfer or share some or all of our assets, including your Personal Information. In this event, we will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.

## **How to Access, Change or Delete your Information**

You may review, update, correct or delete the Personal Information in your Stellar Account. If you would like to correct your information, you can do so by logging in to the Stellar Platform. To cancel your Stellar Account entirely, please email us at [info@atticsalt.io](mailto:info@atticsalt.io). Please also note that any information posted by you may continue to be publicly available on the Platform in association with your first name, even after your Stellar Account is cancelled.

## **Securing your Personal Information**

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your Personal Information against unauthorized access, destruction or alteration. However, no method of transmission over the Internet, and no method of storing electronic information, can be 100% secure. So, we cannot guarantee the security of your transmissions to us and of your Personal Information that we store.

## **Your Privacy when you Access Third-Party Websites and Resources**

The Stellar Platform will contain links to other websites not owned or controlled by Attic Salt. Attic Salt does not have any control over Third-Party websites. These other websites may place their own cookies, web beacons or other files on your device, or collect and solicit Personal Information from you. They will have their own rules about the collection, use and disclosure of Personal Information. We encourage you to read the terms of use and privacy policies of the other websites that you visit.

## **Changes to this Privacy Policy**

We may change how we collect and then use Personal Information at any time and without prior notice, at our sole discretion. We may change this Privacy Policy at any time. If we make material changes to the Privacy Policy, we will notify you either by posting the changed Privacy Policy on the Platform or by sending an email to you. We will also update the "Last Updated" date at the top of this Privacy Policy. If we let you know of changes through an email communication, then the date on which we send the email will be deemed to be the date of your receipt of that email.

It's important that you review the changed Privacy Policy. If you do not wish to agree to the changed Privacy Policy, then we will not be able to continue providing the Platform and Services to you, and your only option will be to stop accessing the Platform and Services and deactivate your Stellar Account. You can find out more about how to deactivate your Stellar Account by emailing us at [info@atticsalt.io](mailto:info@atticsalt.io).