



# Privacy Policy

*Effective Date: January 9, 2023*

Metaintro, Inc. (“**Metaintro**,” “**we**,” “**our**,” or “**us**”), respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy describes the types of information we may collect from or about you or that you may provide when you visit our website or use our services, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

## Which Services are Covered?

This Privacy Policy applies to data we collect through the following mechanisms, which are collectively referred to as the “**Services**”:

- On the Metaintro.com website (our “**Website**”) or through a Metaintro mobile application.
- Through email, SMS, chat or other online communications between you and Metaintro.
- user interactions with a banner and/or link located on a third-party website, which links the user to Website.

Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in our [Terms of Use](#), which terms are incorporated herein by this reference.

## 1. KEY TERMS

We use certain defined terms that appear in this specific Privacy Policy:

**Non-Personal Data:** Data that is not considered Personal Data under applicable law. We reserve the right to treat data as Personal Data or Non-Personal Data based on the law applicable to the data and the data subject.

**Personal Data:** Any information or pieces of information that identifies you or could reasonably be used to identify you or your personal device either directly (e.g., your name) or, where required by applicable law indirectly (e.g., through pseudonymised data, such as a unique ID number). This means that Personal Data includes things like email/home addresses, usernames, user generated content, financial information, and health information. It could also include certain Technical Data (defined below) such as unique numerical identifiers like your computer’s IP address or your mobile device’s MAC address, as well as cookies (“Device IDs”), where required by applicable law

**Special Categories of Personal Data:** Sensitive Personal Data that reveals racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; genetic and biometric data; and data concerning health, sex life or sexual orientation.

## 2. DATA WE COLLECT ABOUT YOU

### A. Personal Data

As permitted by applicable law in the country from which you access our Website and use our Services, we may collect, use, store and transfer different kinds of Personal Data about you. We have grouped these into the following categories of Personal Data:

- **“Identity Data”** such as first name, maiden name, last name, resume/CV, Social Media profile, username or similar identifier.
- **“Contact Data”** such as physical address, email address, social media address, telephone number, and any other contact information you provide to us.
- **“Financial Data”** such as payment card details. However, please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers.
- **“Transaction Data”** such as details about payments to and from you, and details regarding the services that you have subscribed to or purchased through the Website.
- **“Technical Data”** such as Device IDs, your login data, access dates and times, browser type and version, device information, cookie data, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.
- **“Profile Data”** such as your username and password, orders made by you, preferences, user-generated content, searches, prior submission information, feedback and survey responses.
- **“Usage Data”** such as information about how you use our Website, products and services.
- **“Marketing and Communications Data”** such as your preferences in receiving marketing from us and our third-parties and your communication preferences.

### B. Non-Personal Data

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data since it does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

## 3. HOW DATA IS COLLECTED

We use different methods to collect Personal Data from and about you including, for example:

### **A. Direct Interaction with Us**

You may give us your Identity Data, Contact Data, Financial Data, Profile Data, and other information by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes Personal Data you provide when you:

- sign-up for our Services
- create an account on our Website
- request information to be sent to you
- give us feedback
- sign up for email or SMS job alerts
- authorize Metaintro to connect your account or wallet to another site (e.g., Google, LinkedIn, etc.)

### **B. Automated Technologies or Interactions**

As you interact with our Website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Data and Non-Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data and Usage Data about you if you visit other websites employing our cookies and other Tracking Technologies (defined below).

### **C. Third Parties**

We may receive Personal Data in the form of Technical Data and Usage Data about you from various third-parties such as analytics providers or advertising networks.

## **4. HOW WE USE YOUR DATA**

### **A. Use of Non-Personal Data**

Where permitted by applicable law, we may use your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection.

### **B. Use of Personal Data**

We will only use your Personal Data to provide the Services directly to you, except as otherwise described in this Privacy Policy or with your consent. We process your personal information to pursue our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We use the information that we collect from you to verify your identity, for account creation and login, to post testimonials, to request feedback on our Services, to enable user-to-user communication, to manage user accounts, to protect our Services, to enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements and prevent harm, to fulfill and manage your orders, to administer promotions, to deliver and facilitate delivery of our Services to the user, to respond to inquiries and offer support to our users, to send marketing and promotional communications, and to deliver targeted advertising.

## 5. WHO WE SHARE YOUR DATA WITH

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions and this Privacy Policy.

### **A. Personal Data**

We may share Personal Data with the following parties:

#### **Internal Parties**

- Access to your Personal Data will be controlled and only granted where necessary to provide our services to you and/or to allow us to perform any necessary or legitimate functions.

#### **External Third-Parties**

- Service providers that we use to support our business and/or help provide our services to you, including, but not limited to, third-parties that host our Website, assist us to verify your identity, perform website and platform maintenance, risk assessments, and security, perform data and web analytics, provide databases, IT services, customer service, payment platforms and credit card processing, communication services, and email services. These service providers may be located in the United States.
- Professional advisers, such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial, auditing, and accounting services to us so we can operate our business.
- Taxing authorities, such as the Internal Revenue Service and other authorities acting as processors, who require reporting of processing activities in certain circumstances.
- Fraud prevention and identity verification services where we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of Metaintro, our customers or others. This includes exchanging information with third-parties for the purposes of fraud detection and prevention and credit risk reduction.
- In connection with or during negotiations of any proposed or actual financing, merger, purchase, sale, sale or transfer of some or all of our assets or stock, joint venture, or any other type of financing, acquisition or business combination of our company(ies), or all or any portion of our assets, or transfer of all or a portion of our business to another company, including without limitation in the event of a divestiture, restructuring, reorganization, dissolution or other event, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding. If a change happens to our business, the new owners may only use your Personal Data in accordance with this Privacy Policy.
- Third parties, where you have expressly consented to the disclosure of your Personal Data.
- Law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third-parties, to the extent that we are permitted or required to do so by law, or in order to

comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity.

- To enforce our [Terms of Use](#) and other agreements with you, to respond to, and defend ourselves against, claims asserted against us, to protect the rights, property, or safety of Metaintro, our services, customers or others, or to investigate, prevent, or take action regarding suspected or actual illegal activities or for debt collection.
- or any other purpose disclosed by us when you provide the information or with your consent.

#### **B. Non-Personal Data**

Where permitted by applicable law, we may share your Non-Personal Data for any purpose not prohibited by applicable law or inconsistent with this Privacy Policy or any written representation we have made to you at the point and time of the data collection.

## **6. HOW LONG YOUR DATA WILL BE KEPT**

Different retention periods apply for different types of Personal Data and in determining the appropriate retention period, we consider several criteria, including, but not limited to, the purpose for which we hold your Personal Data, our legal, accounting, reporting and/or regulatory obligations in relation to that Personal Data, (e.g., financial or tax reporting obligations), whether our relationship with you is ongoing (e.g., where you use more than one of our products and/or services), any specific request you may have made in relation to the deletion of your Personal Data, or where we have a legitimate interest in relation to the management of our own rights (e.g., the defense of any claims). In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you no longer have a relationship with us, we will retain or securely delete or destroy your Personal Data subject to the foregoing and in accordance with applicable laws and regulations. If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

## **7. YOUR DATA SUBJECT ACCESS RIGHTS**

We respect your privacy rights and provide you with reasonable access and rights to the Personal Data that you may have provided through your use of the Services, in accordance with applicable law.

#### **A. Data Subject Rights**

Depending on applicable law, you may have the following rights with respect to your Personal Data:

**Right to Information:** The right to know whether we process Personal Data about you and, if so, what Personal Data we hold about you and how we use it.

**Right of Access:** The right to be provided with a copy of your Personal Data (subject to certain restrictions under applicable law).

**Right to Delete:** The right to request that we delete your Personal Data (subject to certain restrictions under applicable law).

**Right of Rectification:** The right to require us to correct any incomplete or inaccurate Personal Data we hold about you, though we may need to verify the accuracy of the new data you provide to us. If you have a user account with us, you also have the option of correcting your information directly in your account.

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

**Right to opt out of sale/targeted advertising:** You have the right to opt-out of the sales of your Personal Data or the processing of your Personal Data for purposes of targeted advertising.

If you would like to exercise any of the data subject access rights in the above (each, an “**Access Request**”) please send an email to with your specific request and identify the specific website to which your request relates. We will respond to your request within a reasonable timeframe.

Once we receive your request, we may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

If we are not clear as to what you are requesting, we may also need to contact you for clarification so we can more fully respond to your request.

If we cannot locate any records about you, we may also ask you for additional information to assist us in locating records, if they exist.

We try to respond to all legitimate requests within the timeframes required under applicable law. Occasionally it may take us longer than the time period required under applicable law if your request is particularly complex or you have made a number of requests. In this case, we will notify you as to the reason for the delay.

## **B. Deleting Your Account**

If you would like to delete your account, you can send an email to [████████@Metaintro.com](mailto:████████@Metaintro.com) asking for your account to be deleted. If you close or delete your account, we may still retain certain information for analytical purposes and recordkeeping integrity, as well as to prevent fraud, resolve disputes, enforce our Terms of Use or other policies, take actions we deem necessary due to technical and legal requirements, and as dictated by constraints related to the security, integrity and operation of our Services.

## **8. JURISDICTION SPECIFIC PRIVACY RIGHTS**

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right to: (1) request access and obtain a copy of your personal information; (2) request rectification or erasure; (3) restrict the processing of your personal information;

and (4) if applicable, the right to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please contact [\\_\\_\\_\\_\\_@Metaintro.com](mailto:_____@Metaintro.com). We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you have questions or comments about your privacy rights, you may email us at [\\_\\_\\_\\_\\_@Metaintro.com](mailto:_____@Metaintro.com).

If you are a California resident, you are granted specific rights regarding access to your personal information. California Civil Code Section 1798.83 permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to [\\_\\_\\_\\_\\_@Metaintro.com](mailto:_____@Metaintro.com).

You have rights with respect to your personal data, including: (1) the right to request deletion of your data (you may request the deletion of your personal data); (2) the right to be informed (depending on the circumstances, you have the right to whether we collect and use your personal information, the categories of personal information we collect, the purposes for which it was collected and how it was used, and where we sell your information to third parties); and (3) the right to non-discrimination for the exercise of a consumer's privacy rights (we will not discriminate against you if you exercise your privacy rights).

## 9. MARKETING

We may use your Personal Data to send you information about the services provided by the Metaintro Group; provided, however that we will obtain consent to do so where required by applicable law. You may unsubscribe from our marketing e-mails by clicking "Unsubscribe" in any promotional e-mail communications we send you. As permitted by applicable law, you cannot opt-out of non-marketing, services-related notices.

## 10. COOKIES AND TRACKING TECHNOLOGIES

Metaintro and third parties may use cookies or similar tracking technologies (**e.g., pixels, beacons, scripts, etc.**) ("**Tracking Technologies**") to analyze trends, administer the Website, track users' movements around the Website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

We partner with a third party to either display advertising on our websites or to manage our advertising on other sites. Our third party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of any interest-based advertising please email [\\_\\_\\_\\_\\_@Metaintro.com](mailto:_____@Metaintro.com). Please note that you will continue to receive generic ads.

We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data and the website from which the application was downloaded.

To the extent permitted by applicable law, we may send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

## **11. DATA SECURITY**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

We may use vendors to deliver the Services, and in some cases, they may have access to your personal information and retain copies of it for their records. We can make no guarantees that such vendor sites won't be subject to hackers, cybercriminals, or that other unauthorized third parties.. If you believe that your access credentials or Personal Data have been compromised, please contact us immediately.

## **12. LINKS TO THIRD-PARTY WEBSITES AND SOCIAL MEDIA FEATURES**

Our Website may from time to time, contain links to third-party services such as websites, locations, platforms, applications or services operated by third parties. If you follow a link to or otherwise access any of these third-party services, these third-party services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Data from you. Please note that these third-party services have their own privacy policies and we do not accept any responsibility or liability for these parties' policies or practices. Please check these policies before you share any Personal Data with these third-party services.

We may offer you the opportunity to use your social media login when interacting with our Website. If you do so, please be aware that you may be sharing your profile information with us. The Personal Data that is shared will depend on your social media platform settings. Please visit the relevant social media platform and review its privacy policy to understand how your Personal Data is shared and used in this context.

Social media features may also collect your IP address, which page you are visiting on our Website, and may set a cookie or other Tracking Technologies to enable the applicable social media feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing such features.



The Website may include tools provided by us or third-party services that enable you to send a message to another person. If you use any such tools, please ensure that you only send messages to persons to whom you have permission to send messages. Absent the recipient's consent, we will only use their Personal Data that you provide us to facilitate such messages.

### **13. QUESTIONS OR COMPLAINTS**

If you have a complaint, or if you have any questions or requests regarding your Personal Data, please email us at [\\_\\_\\_\\_\\_@Metaintro.com](mailto:_____@Metaintro.com)

### **14. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time. If we propose to make any material changes, we will notify you by posting a notice on the Website or by issuing an email to the email address listed by registered users prior to the changes becoming effective. You acknowledge that it is your responsibility to maintain a valid email address as a registered user, and to review the Website and this Privacy Policy periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Policy, you can stop using our services and close your account with us. However, if you continue to use our services (including the Website) after we publish a new or updated Privacy Policy, you acknowledge that such continued use means that the treatment of your Personal Data will be subject to the new or updated Privacy Policy.

### **15. MINORS AND CHILDREN**

Our Services and the Websites are not intended for use by persons under the age of 18 years. Metaintro does not knowingly collect or solicit Personal Data from anyone under the age of 13 or knowingly allow such persons to register to use our Website. In the event that we learn that we have collected Personal Data of a child under the age of 13, we will delete that data to the extent required by applicable law as quickly as possible. If you believe that we might have any Personal Data from or about a child under 18, please contact us at [\\_\\_\\_\\_\\_@Metaintro.com](mailto:_____@Metaintro.com).