Last updated: August 29, 2024

NOTICE: We collect and use sensitive and personal data strictly to enhance our products, personalize user experiences, and facilitate effective communication.

Introduction

ATLANTIX PORTAL L.L.C (**"Company"** or **"We"**) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit https://www.platform.atlantix.cc/ (our "**Site**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to the information we collect:

- On this Site;
- In email, text, and other electronic messages between you and this Site;
- Through mobile and desktop applications you download, which provide dedicated non-browser-based interaction between you and this Site;
- When you interact with our advertising and applications on third-party websites, applications, and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the Site.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using this Site, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 18

Our Site is not intended for children under 18 years of age. No one under the age of 18 may provide any information to or on the Site. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Site or through any of its features, register on the Site, make any purchases through the Site, use any of the interactive or public comment features of this Site, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we

learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at privacy@atlantix.cc.

Residents of certain states under 13, 16, or 18 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your State Privacy Rights for more information.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Site, including information:

- By which you may be personally identified, such as name, postal address, email address, or telephone number ("**personal information**");
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Site, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies;
- From third parties, for example, our business partners.

Information You Provide to Us****

The information we collect on or through our Site may include:

- Information that you provide by filling in forms on our Site, or through your behavior on our Site;
- Records and copies of your correspondence (including email addresses), if you contact us;
- Your responses to surveys that we might ask you to complete for research purposes;
- Details of transactions you carry out through our Site and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Site;
- Your search queries on the Site.

You also may provide information to be published or displayed (hereinafter, **"posted"**) on public areas of the Site, or transmitted to other users of the Site or third parties (collectively, **"User Contributions"**). Your User Contributions are posted on and transmitted to others at your own risk. Additionally, we cannot control the actions of other users of the Site with whom you may choose to share your User Contributions.

Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies****

As you navigate through and interact with our Site, we may use automatic data collection technologies including artificial intelligence and machine learning (except as prohibited by law) to collect certain information about your equipment, browsing actions, patterns, and our services generally, including:

- Details of your visits to our Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site;
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party Sites or other online services (behavioral tracking). Check Choices About How We Use and Disclose Your Information for information on how you can opt out of behavioral tracking on this Site and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically may include personal information, and we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Site and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Site according to your individual interests;
- Speed up your searches;
- Recognize you when you return to our Site.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate settings on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site. For information about managing your privacy and security settings for cookies, see <u>Choices About How We Use and Disclose Your Information</u>;
- Web Beacons. Pages of our Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other

related Site statistics (for example, recording the popularity of certain Site content and verifying system and server integrity).

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Site may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Site. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different Sites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Choices About How We Use and Disclose Your Information.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Site and its contents to you;
- To provide you with information, products, or services that you request from us;
- To fulfill any other purpose for which you provide it;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- To notify you about changes to our Site or any products or services we offer or provide through it;
- To allow you to participate in interactive features on our Site;
- In any other way, we may describe when you provide the information;
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please email us at privacy@atlantix.cc. For more information, see Choices About How We Use and Disclose Your Information.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Site users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them. For more information, see Choices About How We Use and Disclose Your Information.
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information;
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce or apply our <u>Terms of Use</u> and other agreements, including for billing and collection purposes;
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

• Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly;

- Disclosure of Your Information for Third-Party Advertising. If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to privacy@atlantix.cc;
- Promotional Offers from the Company. If you do not wish to have your email address or contact information used by the Company to promote our own or third-party products or services, you can opt-out by sending us an email stating your request to privacy@atlantix.cc. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt-out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience, or other transactions;
- Targeted Advertising. If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target audience preferences, you can opt-out by sending us an email stating your request to privacy@atlantix.cc. For this opt-out to function, you must have your browser set to accept all browser cookies.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's Site.

Residents of certain states may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

Accessing and Correcting Your Information

You can review and change your personal information by logging into the Site and visiting your account profile page.

You may also send us an email at privacy@atlantix.cc to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Site, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Site users. Proper access and use of information provided on the Site, including User Contributions, is governed by our <u>Terms of Use</u>.

Residents of certain states may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information;
- Access and delete certain personal information;
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding lowa and Utah);
- Data portability;
- Opt-out of personal data processing for:
 - o targeted advertising (excluding lowa);
 - o sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding lowa and Utah);
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. To exercise any of these rights please contact us at privacy@atlantix.cc. To appeal a decision regarding a consumer rights request, please contact us at privacy@atlantix.cc.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: privacy@atlantix.ccHowever, please know we do not currently sell data triggering that statute's opt-out requirements.

Your European Union Privacy Rights

Legal Basis for Processing Information

If you are located in the EEA or Switzerland, we rely on several legal bases to process your Personal Information. These legal bases include where:

- The processing is necessary to perform our contractual obligations, such as to provide you with our services;
- You have given your prior consent, which you may withdraw at any time (such as for marketing purposes or other purposes we obtain your consent for from time to time);
- The processing is necessary to comply with a legal obligation, a court order or to exercise or defend legal claims;
- The processing is necessary for the purposes of our legitimate interests, such as in improving, personalizing, and developing our services, marketing new features or products that may be of interest, and promoting safety and security as described above.

If you have any questions about this or would like further information concerning the legal basis on which we collect and use your Personal Information, please contact us by emailing privacy@atlantix.cc.

Data Retention

If you are our customer, we will retain your Personal Information as long as we are providing the services to you. We retain Personal Information after we cease providing services to you, to the extent necessary to comply with our legal and regulatory obligations, and for the purpose of fraud monitoring, detection, and prevention. We also retain Personal Information to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

Rights Under the General Data Protection Regulation (GDPR)

If you are located in the EEA or Switzerland, you have the following rights in respect of your Personal Information that we hold:

- Right of access. The right to obtain access to your Personal Information;
- Right to rectification. The right to obtain rectification of your Personal Information without undue delay where that Personal Information is inaccurate or incomplete;
- Right to erasure. The right to obtain the erasure of your Personal Information without undue delay in certain circumstances, such as where the Personal Information is no longer necessary in relation to the purposes for which it was collected or processed;
- Right to restriction. The right to obtain the restriction of the processing undertaken by us on your Personal Information in certain circumstances, such as where the accuracy of the Personal Information is contested by you, for a period enabling us to verify the accuracy of that Personal Information;
- Right to portability. The right to portability allows you to move, copy, or transfer Personal Information easily from one organization to another;
- Right to object. You have a right to object to processing based on legitimate interests and direct marketing;
- Withdrawing consent. If our processing of your Personal Information is based on your consent, you have the right to withdraw your consent at any time. Please note that if you withdraw your consent, this will not affect the lawfulness of our processing of your information on the basis of your consent before the point in time when you withdraw your consent.

If you wish to exercise one of these rights, please email us at privacy@atlantix.cc. Please note, that some rights may be limited, and we may need to retain certain Personal Information, as required or permitted by applicable law. You also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at https://ec.europa.eu/newsroom/article29/items/612080.

Transfer of Personal Information Outside of Europe

We take steps to ensure that we handle your Personal Information subject to appropriate safeguards. As a U.S. company, our operations are conducted in the United States and in order to provide the Site, Personal Information will be processed in the United States, where laws regarding processing of Personal Information may be less stringent than the laws in your country. We provide appropriate protections for cross-border transfers as required by applicable law for international data transfers. With respect to transfers originating from the European Economic Area, we implement the standard contractual clauses approved by the European Commission. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

Automated Decision-Making

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or that otherwise significantly affects you.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on secure servers behind firewalls and is governed by the terms and conditions of our servers service provider. We are not responsible, and disclaim all responsibility whatsoever, for all acts and omissions by or on behalf of these servers service provider.

All payments are also governed by Stripe's terms and conditions, which can be found at https://stripe.com/legal/ssa. We are not responsible, and disclaim all responsibility whatsoever, for all acts and omissions by or on behalf of Stripe.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Site like message boards. The information you share in public areas may be viewed by any user of the Site.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Site. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Site home page. If we make material changes to how we treat our users' personal information, we will notify you

through a notice on the Site home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, or to register a complaint or concern, please contact us at privacy@atlantix.cc.