

## **Privacy Policy**

### **WALL ONE Privacy Policy**

Last updated on 21 January, 2021

This privacy policy (the “Privacy Policy”) explains the privacy rules applicable to all information collected or submitted when You access, install, or use (“You” or “Your” as applicable) the mobile application entitled “WALL PRIVACY” (herein “WALL PRIVACY”) owned and developed by WALL ONE LTD, limited company registered in England and Wales under company number 11842561 (“We”/”Us”/”Our/WALL ONE”).

#### **1. Presentation**

All definitions and capitalized words used in this Privacy Policy are defined here or in Our Terms of Use.

By visiting WALL PRIVACY, by submitting Your personal data to us, and by accessing, installing and/or using WALL PRIVACY, You confirm that You have read this Privacy Policy and agree to be bound by this Privacy Policy. If You disagree with the rules of this Privacy Policy, please do not use WALL PRIVACY or any of Our Services.

We are the data controller regarding the Personal Data processed within the framework of this Privacy Policy.

WALL ONE is committed to protecting and respecting Your privacy and ensures the security when using WALL PRIVACY. This Privacy Policy is intended to help You to understand what data and for which purposes WALL PRIVACY collects, how collected data is processed and protected.

WALL ONE reserves the right to amend this Privacy Policy; therefore, it is recommended that You to check Privacy Policy on a regular basis. WALL PRIVACY will send a notice or an email regarding such changes to You.

All the changes to this Privacy Policy are effective as of the “Last updated” date. If You continue to use WALL PRIVACY after the Last updated date are deemed to accept the changes made to it.

## **2. Processing of Your data**

2.1 When using WALL PRIVACY, You agree to the processing of the following Personal Data:

2.1.1. Personal Data that You provide to WALL PRIVACY:

- a. When creating an account, You provide WALL PRIVACY with basic details necessary for WALL PRIVACY to work, such as Your e-mail.
- b. When contacting Support Service: the information that You provide during the interaction. WALL PRIVACY reserves the right to monitor or record interactions between You and the Support Service for training purposes and to ensure high quality of service.
- c. When participating in surveys or focus groups: insights and evaluation of WALL ONE’s services, responses to the questions from WALL PRIVACY.

d. Payment data (if using paid WALL PRIVACY plan). This information is necessary to collect payments for Our Services. We also process some of the same payment information ourselves (e. g., card owner's full name, last few digits of Your credit card) in cases of recurring payments.

2.1.2. Personal Data collected through the use of the Service:

When You are using WALL PRIVACY, it may collect:

- a. Data regarding the device(s) You use to access WALL PRIVACY (such as his/her IP address,

device identifier (including unique advertising device identifiers, for example Google Advertiser ID and IDFA), technical and statistical data (including data about the Internet connection, cellular service provider and application usage data), data about Your device's type and location data (upon a separate consent).

b. Statistical server load information. We monitor server performance (cpu, ram, servers net usage) to recommend the most suitable servers to Our customers.

c. Username and a timestamp of the last session status. This information is used to limit the amount of concurrent active user sessions and is automatically deleted within 15 minutes after a session is terminated.

d. Connectivity information. To prevent abuse and to be able to dispute unfair chargebacks, We register whether the user has used WALL PRIVACY in the last 30 days. No personally identifiable information is collected in this case, apart from the fact that WALL PRIVACY was or was not used during the mentioned period.

e. Application diagnostics. This aggregated and anonymized data helps Us to identify problems related to Our app performance and updates. The collected information includes crash error reports. You can opt-out of collection of application diagnostics data at any time by navigating app settings.

f. Anonymized telemetry data. We collect statistical information about the activity on Your account: search, item rating and content viewed events, opened push notifications, etc. (in-app events). This analytical information provides knowledge of how Our application is being used so We can improve the user experience and the app itself. You can opt-out of collection of anonymized app usage statistics at any time by navigating app settings.

2.2. By providing Personal Data to WALL PRIVACY, You warrant Us that such data is true, accurate and up to date.

### **3. Use of Your Personal Data**

3.1. WALL ONE collects, process and uses Your Personal Data based on the following grounds:

- a. when such processing is performed in order to fulfil the contract between WALL ONE and You;
- b. based on legitimate interest of WALL PRIVACY;
- c. upon Your explicit prior consent.

3.2. WALL ONE collects and processes Personal Data of WALL PRIVACY's clients in order to maintain the functionality of WALL PRIVACY and to ensure compliance with legal and business-related requirements.

Your Personal Data is processed for the following purposes:

3.2.1. When processing of personal data is related to fulfilment of the contract between WALL PRIVACY and You:

- a. to set up, operate and manage Your account and, if necessary, to contact You through the means provided by You upon registration, in connection with the operation and management of Your account;
- b. to proceed and respond to your requests and enquiries;
- c. for administrative purposes, such as password reminders, service messages (including but not limited to WALL PRIVACY's maintenance messages, updates to the WALL PRIVACY's Privacy Policy and Terms of Use);

3.2.2. Under legitimate interests of WALL PRIVACY:

- a. for Your verification purposes, conducted in relation to an ongoing or alleged misbehavior, performed by You, in order to block accounts as part of the Services anti-spam procedures, to investigate possible fraud;
- b. to evaluate the effectiveness of marketing and to perform market research and training.

3.2.3. Under an explicit consent from You:

- a. to process Personal Data from Your account in a third-party social network, connected to Your account with WALL PRIVACY;
- b. to prepare statistics regarding Your usage of WALL PRIVACY;
- c. to identify possible technical malfunctions in the work of WALL PRIVACY, to assist internal research and development and to make improvements to WALL PRIVACY.

#### **4. Disclosure of Personal Data**

4.1. WALL PRIVACY may share Your Personal Data with third parties in the following cases:

- a. Third-party advertising services. WALL PRIVACY uses the following services (list of services is provided alongside with privacy policies of the relevant services):

Facebook – privacy policy is available at: <https://www.facebook.com/policy.php>

Apple Search Ads - privacy policy is available at: <https://searchads.apple.com/privacy/#:~:text=Apple%20Search%20Ads%20doesn't,device%20data%20with%20data%20brokers.,> information collected by Apple is treated at all times in accordance with Apple's Privacy policy, available at: <https://www.apple.com/legal/privacy/>

Google ads - privacy policy is available at: <https://policies.google.com/technologies/ads?hl=en-US>, for general Google's privacy policy please refer to: <https://policies.google.com/privacy>

- b. Third-party analytics and technical services. WALL PRIVACY uses the following services (list of services is provided alongside with privacy policies of the relevant services):

AppsFlyer - privacy policy is available at: <https://www.appsflyer.com/services-privacy-policy/>

Amplitude - privacy policy is available at: <https://amplitude.com/amplitude-security-and-privacy/privacy>

- c. Cloud services providers:

Vultr - privacy policy is available at: <https://www.vultr.com/legal/privacy/>

- d. Client support services. All Your requests from are processed by a third-party Client support service Intercom.

Intercom - privacy policy is available at: <https://www.intercom.com/legal/privacy>

- e. Providing Your data by law:

WALL PRIVACY may disclose Your Personal Data when such disclosure is required by law and is reasonably necessary:

- in order to establish, exercise, defend or enforce legal rights of WALL PRIVACY or/and WALL ONE;
- to comply with a legal process such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements;
- to assist in the prevention or detection of crime (subject in each case to applicable law);
- to protect the safety or vital interests of an individual.

4.2. WALL PRIVACY ensures appropriate contractual control over third parties assisting WALL PRIVACY in processing Your Personal Data, securing that Your rights are upheld, Your Personal Data is secure, appropriate security and privacy arrangements are in place.

4.3. In the event of change in the corporate structure of WALL PRIVACY, resulting in transfer of Your Personal Data to a third party, You will be notified of such changes via email and through a notice posted on WALL PRIVACY. Respective notice would explain the identity of the new data controller and Your options regarding disposal of Your Personal Data.

4.4. Any request for user data should follow an appropriate legal process to be recognized by the laws of United Kingdom.

## **5. Rights related to Your Personal Data**

5.1. You are a data subject and thus has ultimate rights over Your Personal Data.

5.2. The rights of data subject over his/her Personal Data are as follows:

Your right	Description
Access	A right to know whether Personal Data is being processed by WALL PRIVACY, right to get information regarding processing of Personal data, right to request a copy of Personal Data being processed.
Rectification	A right to ask WALL PRIVACY to correct Your Personal Data in a situation when such data available to WALL PRIVACY or disclosed to third parties is inaccurate or incomplete.
Erase	A right to request 'to be forgotten', meaning deletion Your Personal Data from the database of WALL PRIVACY so that WALL PRIVACY is not able to continue processing and storing of such data, with exceptions, provided by applicable law.
Restrict processing	Right to introduce the restriction regime on the processing Your Personal Data, so that in each case the data may be processed only upon separate consent from You.

Data portability	Right to request for the Personal Data provided to WALL PRIVACY to be given in a machine-readable format so that it could be transferred to another service provider or transfer directly to a third party designated by You.
Object	Right to object to processing his/her Personal Data in a case when the corresponding processing is not performed on the basis of Your consent.
Withdraw consent	Right to withdraw consent to processing Your Personal Data by WALL PRIVACY and/or third-party processors of Personal Data You should note that withdrawal of consent to the processing of his/her will result in the deletion of Your account with WALL PRIVACY and the termination of Your use of WALL PRIVACY.

The abovementioned rights are not absolute. In order to exercise some of the rights, You should meet certain conditions and requirements, specified by the law.

5.3. If You'd like to edit Your profile information, delete Your account or data, or request to provide You with a copy of Your personal information, please contact Our support team. Please note that You may need to pass through a couple of account verification steps so that We can verify You are the owner of the account.

5.4. Some browsers have incorporated a "do-not-track" feature that can send a signal to the websites You visit, indicating You do not wish to be tracked. Currently, Our systems do not recognize browser "do-not-track" requests.

5.5. If You disagree with the processing of Your data by WALL ONE, please do not use Our Services. You can request Us to discontinue processing Your personal data, in which case Your data will be processed only as much as it is necessary to effect the discontinuation of Your use of WALL PRIVACYs (e.g., final settlement, or deleting all personal data based on Your email



address), or finalizing other legal relationship with You (e.g., record keeping, accounting, processing refunds).

If You wish to use WALL PRIVACYs again, You will have to accept and agree to this Privacy Policy anew.

5.6. For more information regarding his/her rights over Personal Data, You should contact [privacy@wall.one](mailto:privacy@wall.one). In order to exercise Your rights, You should submit a request to [privacy@wall.one](mailto:privacy@wall.one).

5.7. You should also be acknowledged of Your right to complain to a data protection regulator in Your jurisdiction.

## **6. Protection measures**

6.1. WALL PRIVACY works hard to protect You from unauthorized access to or alteration, disclosure or destruction of their Personal Data. Yet, as any other technology companies, although WALL PRIVACY takes steps to secure Your information, it could not be promised or guaranteed, that unauthorized access, hacking, data loss, or other breaches will never occur.

WALL PRIVACY reserves the right to suspend Your account without notice if there is a reasonable suspicion of breach of security or unauthorized access to such an account. If You believe that Your account or information is no longer secure, please notify WALL PRIVACY immediately by sending a message to [privacy@wall.one](mailto:privacy@wall.one).

6.2. You should take reasonable steps in order to keep Your Personal Data (including the account's password) safe. It is recommended that You do not share account's password with anyone.

6.3. We take data security very seriously and take all steps reasonably necessary to secure Your data (whether technical, physical, or administrative). However, no company can guarantee the absolute security of internet communications. By using WALL PRIVACYs, You expressly

acknowledge that We cannot guarantee the security of any data provided to or received by Us through WALL PRIVACYs and that any information received from You through the website or Our Services is provided at Your own responsibility.

## **7. Cookies**

7.1. In order to guarantee an optimal level of usability and performance and to ensure relevance of promoted services, WALL PRIVACY uses cookies or/and similar technologies (as SDK) (hereinafter collectively referred to as “cookies to track Your interaction with WALL PRIVACY. This section explains the different types of cookies that may be set when You use WALL PRIVACY, helping to understand and manage them as You wish.

7.2. A cookie is a small file that is stored locally at Your technical device as soon as WALL PRIVACY is being visited. Cookies function by saving particular sets of data, such as, for example, Your language selection. Should You open WALL PRIVACY again later, a cookie will transmit this data back to WALL PRIVACY. WALL PRIVACY's cookies don't store personal information like Your name or address.

### **7.3. Types of Cookies**

WALL PRIVACY uses different types of cookies:

- Session cookies only last only while You are visiting WALL PRIVACY and help WALL PRIVACY to be maintained more efficiently.
- Persistent cookies are primarily used to help You to sign-in into WALL PRIVACY again quickly, for security and analytical purposes.
- WALL PRIVACY uses first-party cookies that is when the cookies are placed on Your device directly by WALL PRIVACY.

- Third-party cookies are placed on the Your device by WALL PRIVACY partners and service providers.

7.4. You can at any time reset device identifiers by activating the appropriate setting on Your mobile device. The procedure for managing device identifiers is slightly different for each device.

7.5. Below is information about how WALL PRIVACY uses Your cookies:

#### **Necessary cookies**

These cookies are strictly necessary to provide the WALL PRIVACY services.

#### **Authentication cookies**

These persistent cookies help WALL PRIVACY to identify You so that You could log into WALL PRIVACY automatically.

#### **Analytics cookies**

These cookies help WALL PRIVACY to understand how WALL PRIVACY is being used.

Cookie provider	Link to the provider's privacy policy
AppsFlyer	<a href="https://www.appsflyer.com/services-privacy-policy">https://www.appsflyer.com/services-privacy-policy</a>
Amplitude	<a href="https://amplitude.com/amplitude-security-and-privacy/privacy">https://amplitude.com/amplitude-security-and-privacy/privacy</a>

#### **Advertising cookies**

These cookies are used to make advertising messages more relevant to You. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, selecting advertisements that are based on Your interests and measuring the number of ads displayed and their performance, such as how many people clicked on a given ad.

## **8. Term for storing personal data**

8.1. WALL PRIVACY keeps Your personal data for as long as reasonably necessary for the purposes set out in this Privacy Policy. The data might be kept longer if required for tax, accounting, payment processing purposes, to ensure We would be able to defend or raise a claim, or where We have a specific need - though We will generally not keep personal data for longer than 2 years following the last date of communication with You, unless the data is necessary in order to provide WALL PRIVACY.

8.2. Personal Data, that You have communicated to WALL PRIVACY upon registration and subsequently through the use of WALL PRIVACY, will be retained by Us as long as You remain Our client.

8.3. To protect the safety and security of WALL PRIVACY, We implement a safety retention window of 30 days following Your account deletion.

## **9. International transfers**

WALL Privacy is based outside the EEA and has service providers established in various countries. These locations may not guarantee the same level of protection of personal data as the one in which You live. We assess the circumstances involving all cross-border data transfers and have suitable safeguards in place to require that Your personal data will remain protected in

accordance with this Privacy Policy. We use standard contractual clauses approved by the European Commission to transfer Your personal information from the EEA to other countries.

## **10. Other Terms**

10.1. The Privacy Policy is governed by and shall be construed in accordance with the laws provided in Our TERMS OF USE.

10.2. To ensure the security of personal data, WALL ONE employs various administrative, technical and physical security measures; however, it is Your responsibility to exercise caution and reason when using WALL PRIVACY. You will be personally responsible if such action violates any third party's privacy or any other rights, or any applicable law. Under no circumstances is WALL ONE liable for the consequences of Your unlawful activities, Your willful and negligent activities that violate applicable laws or third-party rights, and any circumstances that may not have been reasonably controlled or foreseen.

10.3. WALL PRIVACY may include links to other websites whose privacy practices may be different from ours. If You submit personal information to any of those sites, Your information is governed by their privacy policies. We encourage You to carefully read the privacy policy of any website You visit.

10.4. This Privacy Policy may be modified and updated at any time, at Our sole discretion, for any or no reason, and without liability, as indicated below. The date of the most current wording of the Privacy Policy is indicated at the top of the text. We ask all users to ensure that they are familiar with the most current wording of the Privacy Policy. The amendment of the Privacy Policy may be communicated to You by sending an email and/or by publishing the updated Privacy Policy on this website. Updates of the Privacy Policy come into force as of the moment when they are published.

10.5. You may not assign or transfer Your rights or obligations under this Privacy Policy to any third party.

## **11. Additional Rights for Brazilian residents.**

11.1 If You are a Brazilian resident, You have the following additional rights:

- a. Right of erasure: If You would exercise this right, We will respond to You immediately, or if that is not possible, We will send a reply to You to indicate the reasons of fact or law that prevents the immediate adoption of the measure.
- b. Right to be informed: You have the right to obtain information about what types of processing do We carry out on Your personal information.
- c. Right of access: If You request the providing of Your personal data processed by us, We will grant You access to such data in 15 days of Your request, if the data requested is more than the simplified request version.
- d. Nondiscrimination: We do not process Your data for unlawful or abusive discriminatory purposes.
- e. Data portability: Your data might be transferred to another service or product supplier in accordance with the regulations of the ANPD.

## **12. Questions**

If You have any questions concerning this Privacy Policy or WALL PRIVACY, please contact Us at [privacy@wall.one](mailto:privacy@wall.one).

For EEA and Republic of Brazil residents:

If You have any questions or comments about this Privacy Policy, the ways in which We collect and use Your information described here, Your choices and rights regarding such use, or wish to exercise Your rights under GDPR or LGPD (applicable to EEA or Brazilian residents

respectively), please do not hesitate to contact Our representative responsible for personal information as follows: [privacy@wall.one](mailto:privacy@wall.one).

## **Privacy Notice for California residents**

This Privacy Notice for California Residents (this “Privacy Notice”) supplements the information contained in WALL ONE Limited (“Company”, “us” or “our”, or “we”) Privacy Policy (“Site Privacy Policy”) and applies solely to all visitors, users and others who reside in the State of California (“consumers”, “You” or “Your”). We adopt this Privacy Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Privacy Notice. All capitalized terms not herein defined will have the meaning set forth in Company’s Privacy Policy. In case on any inconsistencies with Company’s Privacy Policy, this Privacy Notice shall prevail.

### **1. INFORMATION WE COLLECT**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”).

1.1. In particular, We have collected the following categories of personal information from Our consumers within the last twelve (12) months:

#### **A. Identifiers.**

Examples: email address

1.2. Personal information does not include:

- (i) Publicly available information from government records,
- (ii) De-identified or aggregated consumer information,
- (iii) Information excluded from the CCPA's scope, like:

- i. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- ii. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

1.3. We obtain the categories of personal information listed above from the following categories of sources:

- (i) Directly from Our clients or their agents. For example, from information Our clients provide to Us related to WALL PRIVACYs for which they engage us.
- (ii) Directly from You when You provide it to us. For example, if You share Your name and contact information to ask a question about Our site or app.
- (iii) Indirectly from You. For example, from observing Your actions on Our Site.
- (iv) From third parties, for example, Our service providers.

## 2. USE OF PERSONAL INFORMATION

We may use or disclose the personal information We collect for one or more of the following purposes:

- (i) To fulfill or meet the reason You provided the information. For example, if You share Your name and contact information to ask a question about Our site, app or product We will use that personal information to respond to Your inquiry.
- (ii) To provide, support, personalize and develop Our apps and products.
- (iii) To process Your requests and respond to Your inquiries, including to investigate and address Your concerns and monitor and improve Our responses.
- (iv) To notify You about changes to Our site, app or any products or services We offer or provide through it.



- (v) To notify You about changes to Our policies and/or user agreements.
- (vi) To maintain a record of Our dealings with You.
- (vii) To understand and analyze the usage trends and preferences of Our users, to improve the site, the app and other products and to develop new features, and functionality.
- (viii) To contact You for administrative and information purposes - this may include providing customer service or sending communications, including changes to Our terms of use.
- (ix) To engage features of third-party social networks.
- (x) For testing, research, analytics and product development.
- (xi) To help maintain the safety, security, and integrity of Our site and app, and Our databases, other technology assets and business.
- (xii) To diagnose or fix technological problems in relation to Our site, app and products.
- (xiii) To carry out Our obligations and enforce Our rights arising from any contracts entered into between You and us.
- (xiv) To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- (xv) To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Us is among the assets transferred.
- (xvi) As described to You when collecting Your personal information or as otherwise set forth in the CCPA.

### 3. SHARING PERSONAL INFORMATION

3.1. We may disclose Your personal information to a third party for a business purpose. When We disclose personal information for a business purpose, We enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

3.2. In the preceding twelve (12) months, We have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

3.3. We disclose Your personal information for a business purpose to the following categories of third parties:

- (i) Our affiliates;
- (ii) Service providers;
- (iii) Third parties to whom You or Your agents authorize Us to disclose Your personal information in connection with products or services We provide to You;
- (iv) Law enforcement bodies and courts.

3.4. We share Your personal information for the following general purposes:

- (i) Service Providers: We may disclose personal information to third-party technical service providers.
- (ii) Protecting Our Rights: We may disclose personal information to third parties in order to protect Our legal rights, or the rights stipulated to Us by law.
- (iii) Corporate Transaction: Personal information may be disclosed as part of a corporate transaction.

In the preceding twelve (12) months, We have not sold any personal information.

## 4. YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes Your CCPA rights and explains how to exercise those rights.

### 4.1. Access to Specific Information and Data Portability Rights

You have the right to request that We disclose certain information to You about Our collection and use of Your personal information over the past 12 months. Once We receive and confirm Your verifiable consumer request, We will disclose to You:

- (i) The categories of personal information We collected about You;
- (ii) The categories of sources for the personal information We collected about You;
- (iii) Our business or commercial purpose for collecting and selling that personal information;
- (iv) The categories of third parties with whom We share that personal information;
- (v) The specific pieces of personal information We collected about You;
- (vi) If We disclosed Your personal information for a business purpose, a list with disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

#### 4.2. Deletion Request Rights

You have the right to request that We delete any of Your personal information that We collected from You and retained, subject to certain exceptions. Once We receive and confirm Your verifiable consumer request, We will delete Your personal information from Our records, unless an exception applies.

We may deny Your deletion request if retaining the information is necessary for Us or Our service provider(s) to:

- (i) Complete the transaction for which We collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of Our ongoing business relationship with You or otherwise perform Our contract with You.
- (ii) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- (iii) Debug products to identify and repair errors that impair existing intended functionality.
- (iv) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- (v) Comply with the California Electronic Communications Privacy Act.

- (vi) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
- (vii) Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with us.
- (viii) Comply with a legal obligation.
- (ix) Make other internal and lawful uses of that information that are compatible with the context in which You provided it.

#### 4.3. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to Us by emailing Us at [privacy@wall.one](mailto:privacy@wall.one).

Only You, or someone legally authorized to act on Your behalf, may make a verifiable consumer request related to Your personal information. You may also make a verifiable consumer request on behalf of Your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- (i) Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative; and
- (ii) Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it.

We cannot respond to Your request or provide You with personal information if We cannot verify Your identity or authority to make the request and confirm the personal information relates to You.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### 4.3.1. Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five days of its receipt. If We require more time (up to 90 days), We will inform You of the reason and extension period in writing.

Any disclosures We provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response We provide will also explain the reasons We cannot comply with a request, if applicable. For data portability requests, We will select a format to provide Your personal information that is readily useable and should allow You to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to Your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If We determine that the request warrants a fee, We will tell You why We made that decision and provide You with a cost estimate before completing Your request.

#### 4.4. Personal Information Sales Opt-Out and Opt-In Rights

If You are a California resident and 16 years of age or older, You have the right to direct Us to not sell Your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers We actually know are less than 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, You (or Your authorized representative) may submit a variable notice to [privacy@wall.one](mailto:privacy@wall.one).

Once You make an opt-out request, We will wait at least twelve (12) months before asking You to reauthorize personal information sales.

## 5. NON-DISCRIMINATION

We will not discriminate against You for exercising any of Your CCPA rights. Unless permitted by the CCPA, We will not:

- (i) Deny You goods or services.
- (ii) Charge You different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- (iii) Provide You a different level or quality of goods or services.
- (iv) Suggest that You may receive a different price or rate for goods or services or a different level or quality of goods or services.

## 6. CHANGES TO Our PRIVACY NOTICE

We reserve the right to amend this Privacy Notice at Our discretion and at any time. When We make changes to this Privacy Notice, We will post the updated Privacy Notice on Our Site and update the Privacy Notice's effective date. Your continued use of Our Site following the posting of changes constitutes Your acceptance of such changes.

## 7. CONTACT INFORMATION

If You have any questions or comments about this Privacy Notice, the ways in which the Company collects and uses Your information described here and in Our Site Privacy Policy, Your choices and rights regarding such use, or wish to exercise Your rights under California law, please do not hesitate to contact Our representative responsible for personal information as follows: [privacy@wall.one](mailto:privacy@wall.one).