

Pledge Your Share Privacy Policy

Last updated: March 15, 2023

OUR APPROACH TO PRIVACY

Tulipshare Limited ("**Tulipshare**", "**we**", "**our**" or "**us**") is committed to protecting and respecting your privacy. This Privacy Policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you ("**personal information**") when you sign up for our Pledge Your Share initiative (the "Initiative").

Please ensure that you have read and understood this Privacy Policy before you provide any information to us, and let us know if you have any questions about our use of your data.

HOW WE USE YOUR PERSONAL INFORMATION

Tulipshare is registered as a data controller with the Information Commissioner's Office and we are the controller of the personal information we hold about you in connection with the Initiative. This means that we determine and are responsible for how your personal information is used.

When you sign up to the Initiative, we will ask you to provide us with the following information, which we will collect, store and use:

- Your full name;
- Your email address;
- Your country of origin;
- The name of the company whose shares you own;
- The number of shares you own;
- The broker-dealer you use; and

- Whether you would like to help us enhance our product by taking part in surveys or other types of marketing.

You provide us with this data so we can contact you in relation to the purposes of the Initiative, increase the investor support we have in the Initiative, and provide information to you on the voting of your shares. If you choose not to provide us with this personal information, you may not be able to participate in our Initiative.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the purpose of our Initiative. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so unless there is another lawful basis on which we can process the data in question.

We will only use your personal information when we are allowed to by law. We will use your personal information in the following ways:

- Where we need to perform the contractual obligations under the contract we have with you;
- Where we need to comply with any legal obligation;
- Where it is necessary for our legitimate interests, and your rights do not override our interests.

Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

We also automatically collect technical information about how you access and use our website. We use this information to provide you with the features and functionality of

our website, and we also use it to monitor and improve our services as well as to develop new services. We typically collect this information through a variety of tracking technologies, including cookies.

We may share this technical information with certain third-party service providers. These third-party providers will need to use your personal information for their own purposes, such as providing third party services to us.

The tables at **Annex 1 and 2** set out in detail the technical information we collect about you and how we use that information when you use our services, as well as the legal basis which we rely on to process this information and who may receive this information.

HOW LONG WE STORE YOUR PERSONAL INFORMATION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of our legitimate business interests and satisfying any legal or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and the applicable legal requirements.

In any event, we will not retain your personal information for longer than 6 months from the date we end our Initiative.

WHEN WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with the following :

Service providers and advisors: we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, as described above.

Law enforcement, regulators and other parties for legal reasons: we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements, including our Terms of Service; and/or (iii) exercise or protect the rights, property, or personal safety of Tulipshare, its users or others.

MARKETING AND ADVERTISING

From time to time we may contact you with information about our products and services, including sending you marketing messages and asking for your feedback on our products and services.

Most marketing messages we send will be by email. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you.

We will only send you marketing messages if you have given us your consent to do so. You can withdraw your consent at a later date by clicking on the unsubscribe link at the bottom of our marketing emails or by updating your preferences via your account.

Please note that, if you do not agree to receive marketing messages or later unsubscribe from such messages, we may still send you service-related communications (e.g., account verification, transactional communications, proxy

voting and related authorizations, changes/updates to our services, technical and security notices).

HOW WE STORE AND TRANSFER YOUR PERSONAL INFORMATION

Security. We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect is stored by our cloud hosting provider on secure servers. We will never send you unsolicited emails or contact you by phone requesting your account ID, password, credit or debit card information or national identification numbers.

International Transfers of your Personal Information. The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third-party service providers have operations. If you are accessing our services from the European Economic Area ("**EEA**") or the UK, your personal information will be processed outside of the EEA / UK including in the United States.

In the event of such a transfer, we ensure that: (i) the personal information is transferred to countries recognised as offering an equivalent level of protection; or (ii) the transfer is made pursuant to appropriate safeguards, such as standard data protection clauses adopted by the European Commission. If you wish to enquire further about these safeguards used, please contact us using the details set out at the end of this Privacy Policy.

RIGHTS FOR EEA AND UK USERS

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 along with certain related information.

Right of portability. You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.

Right to rectification. You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.

Right to erasure. You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.

Right to restriction. You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.

Right to withdraw consent. If you have provided consent for the processing of your personal information, you have the right to withdraw your consent. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information before your withdrawal.

You also have the right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this Privacy Policy.

You also have the right to lodge a complaint to your local data protection authority. If you are based in the European Union, information about how to contact your local data protection authority is available [here](#). If you are based in the UK, information about how to contact your local data protection authority is available [here](#).

You can update your profile information, such as your contact information, and may change some of your data sharing preferences on your Tulipshare Account page/by emailing us at support@tulipshare.com.

LINKS TO THIRD PARTY SITES

The Service may, from time to time, contain links to and from third party websites, including those of other users, our partner networks, advertisers, partner merchants, news publications, retailers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

OUR POLICY TOWARDS CHILDREN

Our Initiative is not available to persons under 18. We do not knowingly collect or solicit personal information from any persons under the age of 13. In the event that we learn that we have inadvertently collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 13, please contact us at support@tulipshare.com.

CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time and so you should review this page periodically. When we change this Privacy Policy in a material way, we will notify you by email and update the "last modified" date at the end of this Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

NOTICE TO YOU

If we need to provide you with information about something, whether for legal, marketing or other business-related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by placing a notice on our website or mobile application. The fact that we may send notices to you will not stop you from being able to opt out of certain types of contact as described in this Privacy Policy.

CONTACTING US

Please contact support@tulipshare.com if you have any complaints, questions, comments and requests regarding this Privacy Policy.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address is: Information Commissioner's Office, Wycliffe House, Water

Lane, Wilmslow, Cheshire SK9 5AF. Their helpline number is 0303 123 1113 and their website is available at <https://www.ico.org.uk>.

This Privacy Policy was last modified on March 15, 2023.

ANNEX 1 – Personal information collected automatically

Category of personal information	How we may use it	Legal basis for the processing	Recipients of Personal Data
Your IP address.	We may use this information to detect fraud or suspicious activity in relation to your account.	The processing is necessary for our legitimate interests, namely to protect our business and your account from fraud and other illegal activities.	We may share this information with: Amplitude (USA); and

	<p>We may use this information to localise features of the Service.</p>	<p>We will only process your personal information in this way to the extent you have given us your consent to do so.</p>	<p>Google Ireland Limited;</p> <p>Mailchimp (USA); and</p> <p>AppsFlyer Ltd.</p>
	<p>Where you have given us your consent to send you marketing communications, we will use this information during the e-mail marketing process.</p>	<p>We will only process your personal information in this way to the extent you have given us your consent to do so.</p>	

<p>Information about how you access and use our services. For example, how frequently you access our website and mobile application, the time you access it and how long you use it for, the approximate location that you access it from, the site from which you came and the site to which you are going when you leave our Website, the Website pages you visit, the links you click, whether you open</p>	<p>We may use this information about how you use and connect to determine the way our services are presented to you on your device.</p>	<p>The processing is necessary for the performance of a contract with you.</p>	
	<p>We may use this information to determine products and services that may be of interest to you for marketing purposes.</p>	<p>We will only process your personal information in this way to the extent you have given us your consent to do so.</p>	

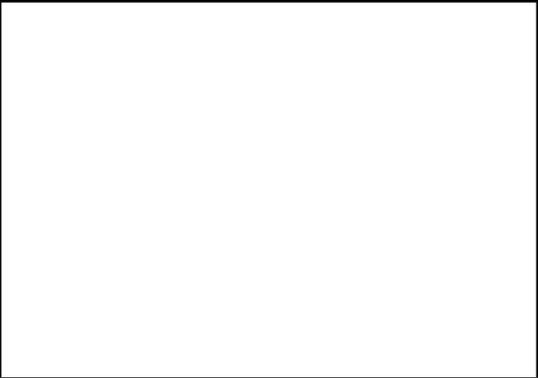
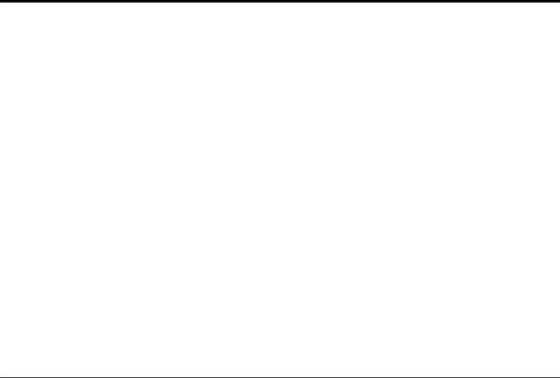
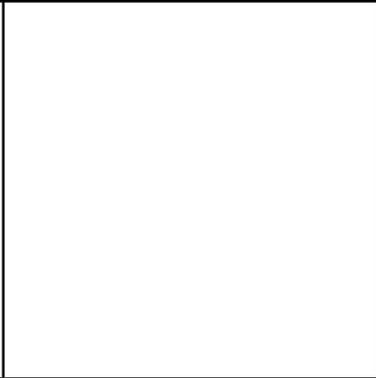
<p>emails or click the links contained in emails, whether you access our services from multiple devices, and other actions you take on our website and mobile application.</p>	<p>We may use this information to monitor and improve our services and business, resolve issues and to inform the development of new products and services.</p>	<p>We will only process your personal information in this way to the extent you have given us your consent to do so.</p>	
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<p>Log files and information about your device. We also collect information about the computer, tablet, smartphone or other electronic device you use to connect to the Service. This information can include details about the type of device, Internet service provider, platform type, device type, date and time stamp, a unique ID (that allows us to uniquely identify your</p>	<p>We may use information about how you use and connect to our services to determine how to present the service to you on your device.</p>	<p>The processing is necessary for the performance of a contract with you.</p>	
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<p>browser, mobile device, or your account), operating systems, browsers and applications connected to the Service through the device, your mobile network, your IP address and your device's telephone number (if it has one). When you access our Service from a mobile device, we may collect unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for</p>	<p>We may use this information to determine products and services that may be of interest to you for marketing purposes.</p>	<p>We will only process your personal information in this way to the extent you have given us your consent to do so</p>	
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<p>Advertisers (“IDFA”), Google AdID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g., latitude and/or longitude) or similar information regarding the location of your mobile device, or we may be able to</p>	<p>We may use this information to monitor and improve our service and business, resolve issues and to inform the development of new products and services.</p>	<p>We will only process your personal information in this way to the extent you have given us your consent to do so</p>	
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approximate a device's location by analyzing other information, like an IP address.



ANNEX 2 – Cookies and similar tracking technologies

Third party	Product	Persistent / session	Type of cookie	Purposes / Additional information
Facebook	Facebook	Persistent	Third party – advertising	Enables Facebook Ads / remarketing
Google	Google, Google Ads & DoubleClick	Persistent	Third party – analytics / advertising / marketing	For analytics, marketing and advertising purposes. Note you may control your advertising preferences or opt-out of certain Google advertising products by

				<p>visiting the Google Ads Preferences Manager, currently available at https://google.com/ads/preferences or by visiting NAI's online resources at http://www.networkadvertising.org/choices. You can learn more about Google's practices at http://www.google.com/policies/privacy/partners and view its currently available opt-out options at https://tools.google.com/dlpage/gaoptout</p>
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Amplitude	Amplitude	Persistent	Third party - analytics	Enables Amplitude user behaviour tracking. These cookies are used by Amplitude for session tracking for analytics purposes.
Intercom	Intercom	Persistent	Third party - authorization	Enables us to offer a live chat on our website. The cookies attempt to remember a user such that they may continue their conversation between different pages of the site and resume the conversation on repeat visits to the site.

AppsFlyer	AppsFlyer	Persistent	Third party - analytics	Enables ads attribution and related analytics.
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