

Ravacan, Inc. Privacy Policy

Effective Date: May 18, 2020

This Privacy Policy (this “Policy”) applies to personal information collected by Ravacan, Inc., a Delaware corporation (“Ravacan”, “we”, “us”, “our”) from your use of the Ravacan website located at www.ravacan.com (the “Website”), the Purchasing & Procurement platform service, any other products and services available through the Website that is made available on that Website, and any other user interfaces, applications or services made available through the Website, and other websites, pages, applications, or services that Ravacan operates or offers that link to this Policy (the Website and all services are collectively referred to herein as the “Services,” and each as a “Service”). This Policy governs the personal information collection and disclosure practices for the Services. This Policy does not apply to any website, application, or service that does not display or link to this Policy.

BY ACCESSING, BROWSING, OR USING THE SERVICES, INCLUDING REGISTERING AN ACCOUNT WITH OUR SERVICES, YOU EXPRESSLY CONSENT TO THE COLLECTION, TRANSFER, USE, PROCESSING, AND STORAGE OF YOUR INFORMATION (INCLUDING PERSONAL INFORMATION), AS DESCRIBED IN THIS POLICY. IF YOU DO NOT AGREE WITH THIS POLICY OR THE INFORMATION COLLECTION, USE, AND DISCLOSURE PRACTICES DESCRIBED IN THIS POLICY, DO NOT USE THE SERVICES.

This Privacy Policy is incorporated into and made a part of Ravacan’s Terms of Use. If you have not done so already, please also review the Terms of Use. Our agreements with certain partners, suppliers or affiliated entities (“Partners”) may contain provisions about the collection, use, storage and disposal of personal information collected through the Services and offline. If a provision of a Partner agreement conflicts or otherwise is inconsistent with a provision of this Privacy Policy, then the provision of the Partner agreement will prevail as to such Partner, but solely to the extent of the conflict or inconsistency.

1. INFORMATION COLLECTION PRACTICES

- 1.1. General.** If you register for an account or otherwise use a Service, we will collect some personal information from you, including your full name, email address, phone number, geographic location, occupation, employer, addresses, phone, and a password that you select. When you request a paid subscription to the Service, Ravacan may collect the following additional information: billing address, telephone number, and credit card or other payment information.

When you interact with the Services, we also receive and store certain additional types of Internet or network information. For example, we automatically receive and record information on our server logs from your browser or device including your IP address, browser type and language, referring/exit pages and URLs, other browser history, device type, wi-fi network information, crash reports, platform type, number of clicks, landing pages, cookie information, the pages you requested and viewed, the amount of time spent on particular pages, and the date and time.

1.2. Information that You Provide.

- (a) Registration and Login.** Certain Services may require you to register for an individual account or an associated with the entity on whose behalf you use the Services (“Account”). When you register for an Account you will be asked to provide some personal information, including your full name, email address, phone number, occupation, employer, and a password that you select. When you register an Account and log in to a Service you must provide your current, complete, and accurate information. It is your responsibility to keep

your information up to date. We are not responsible for any problems, interruptions in access, or liability that may arise if you do not give us complete and accurate information or if you fail to update your personal information so that it is current.

- (b) **Uploads.** If you upload, submit, or otherwise provide materials to the Services (including within your Account profile), we may collect personal information about you or other individuals that you submit and we may save the information in a profile specific to you or the entity on whose behalf you use the Services.
- (c) **Correspondence.** If you send us personal correspondence, such as emails or letters, or if other users or third parties send us information about your use of the Services, we may save the information in a profile specific to you.
- (d) **Support.** If you speak or correspond with our sales associates or support associates, we may collect information from you and may save that information in a profile specific to you.

1.3. Information We Receive from Others.

We also obtain personal information from third parties or use third parties to assist us with data collection. For example, we may supplement or confirm the accuracy of the personal information we collect as described in this Policy by collecting personal information from third parties.

- **Our Partners.** We may receive personal information about you from our Partners or their affiliates, in connection with requests, quotations, or bids made or received by you on the Service.
- **Our Service Providers.** As provided in Section 4, we may provide information to Third Party Providers in connection with the Services.

1.4. Automatically Collected Information. Ravacan collects information about the Services that you use and how you use them automatically, using a variety of technologies. This Section provides examples of personal information that Ravacan collects about you automatically. For example, Ravacan may collect and store the IP address of your computer or other networking device, which may be needed to operate various features of the Service or to determine any misuse of content. Ravacan may collect operational information relating to the date on which your profile was last updated, whether your email address has been verified, whether your account has been deactivated, what browser you are using, and other similar types of information. Ravacan may also collect personal information pertaining to your online transactions, communications with Partners, application usage patterns, and website usage patterns by use of a tracking pixel, agent or any other visitor identification technology that collects anonymous data about end users of Ravacan Services.

Ravacan and its service providers may use cookies, web beacons, and other technologies to automatically collect certain types of information when you use the Services, as well as through emails that we may exchange. This collection may include, but is not limited to: your IP address, browser type and language, device type, referring/exit pages and URLs, other browser history, platform type, number of clicks, landing pages, cookie information, the pages you requested and viewed, the amount of time spent on particular pages, and the date and time of each request you make. In general, automatically collected information about use of the Services does not directly identify you. We collect this information for the purposes described in this Policy, including to better understand our customer base and to improve the quality of our Services.

- (a) **Cookies.** A cookie is a small text file that is stored on a user's computer. If you are accessing the Services through a web browser, we use cookies to record information about your

activities on the Services to “remember” you when you return to the Services. Some cookies remain on your computer or device until you delete them. Others, like session ID cookies, expire when you close your browser. You may set your browser setting to attempt to reject cookies and you may still use the Services. See the Section “Online Tracking and Your Choices” below for more information on how the Services may respond to your browser settings. We do not control the use of cookies by third parties. See Section 4 (Third Party Providers) for more information and review the privacy policies of all third party providers for more information on third party cookies.

Types of Cookies

We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them). To make it easier for you to understand why we need them, the cookies we use on our Services can be grouped into the following categories:

- *Strictly Necessary:* These cookies are necessary for the Services to work properly. They include any essential authentication and authorization cookies for our Services.
- *Functionality:* These cookies enable technical performance and allow us to “remember” the choices you make while browsing our Website, including any preferences you set. They also include sign-in and authentication cookies and IDs that enable you to return without additional sign-in.
- *Performance/Analytical:* These cookies allow us to collect certain information about how you use the Services running on your device. They help us understand which areas you use and what we can do to improve them.
- *Targeting:* These cookies are used to deliver relevant information related to our Services to an identified machine or other device (not a named or otherwise identifiable person) which has previously been used to visit our Website. Some of these types of cookies on our Website are operated by third parties with our permission and are used to identify advertising sources that are effectively driving customers to our Website.

Here is a representative list of cookies that we use:

Cookie Provider	Cookie Name	Category	Purpose/Duration
CloudFlare	__cfduid	Strictly Necessary	Speed up page load times and identify trusted web traffic; duration of 5 years
HubSpot	__hssrc	Targeting/Advertising	Tracking restart of browsers; expires at end of session
HubSpot	__hstc	Targeting/Advertising	Tracking visitors; expires in 13 months
Google Analytics	_ga	Performance/Analytical	Used to distinguish users; expires in 2 years

Google Analytics	_gid	Performance/Analytical	Used to distinguish users; expires in 24 hours
HubSpot	hubspotutk	Targeting/Advertising	Used to track a visitor's identity; expires in 13 months
HubSpot	messagesUtk	Targeting/Advertising	Recognize visitors who use the chat/messages tool; expires in 13 months

(b) Pixels (aka web beacons/web bugs/javascript). Pixels are tiny graphics with a unique identifier that are used to track the online movements of web users. Unlike cookies, which are stored on a user's computer hard drive, pixels are small graphics that are about the size of the period at the end of the sentence that are embedded invisibly on web pages or in HTML-based emails. If you are accessing the Services through a web browser, our third-party analytics provider may place pixels on our Services that track what other websites you visit (both before and after visiting the Services). Our third-party analytics provider uses information obtained from pixels to help us improve our business and the Services. We do not control the use of pixels by third parties. See Section 4 (Third Party Providers) for more information and review the privacy policies of each of the third party providers for more information on third party pixels.

2. USE OF INFORMATION

2.1. General. How we use personal information depends on how you use the Services. We use personal information:

(a) To administer your Account and provide the Services to you

- Create and manage your Account.
- Provide you with customer support and respond to your requests.
- Complete your transactions.
- Communicate with you about our products and services, including order management and billing.

(b) To improve the Services and develop new ones

- Administer focus groups and surveys.
- Conduct research and analysis of users' behavior to improve the Services and content (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behavior).
- Develop new products and services.

(c) To prevent, detect and fight fraud

- Analyze data to better understand and design countermeasures against fraudulent activities.

(d) To ensure legal compliance

- Comply with legal requirements.
- Assist law enforcement.
- Enforce or exercise our legal rights.
- Resolve disputes.

(e) **Any other purpose described in this Policy or that we describe to you at the time of collection**

2.2. Email Communications. We may use your personal information to send you emails, notifications, or other communications related to your Account or the Services, or in response to your inquiries or requests. You may not opt-out of receiving service-related messages that are not promotional in nature. We may also send you marketing emails, surveys, or newsletters to notify you about products or services that may be of interest to you. If you would like to stop receiving marketing emails from us, please click on the unsubscribe link at the bottom of any marketing email you receive. If you opt-out, you will continue to receive Service-related emails.

2.3. Non-identifying Information. We may use non-identifying information for any lawful purpose, including analyzing trends, research, Services administration, tracking users' movements around the Services, and to improve our business and the Services.

2.4. Retaining Your Information. In general, we will retain your information indefinitely, or as long as legally required or allowed. If you cancel your Account or your Account is otherwise terminated, we may, but are not obligated to, delete information we have collected or obtained from third parties and we may continue to use and disclose it in accordance with this Policy.

2.5. Basis of Processing. To process your information as described above, we rely on the following legal bases:

(a) **Legitimate interests.** We may use your personal information where we have legitimate interests to do so. For example, we use your personal information to provide the products and services that you request and to market similar products and services.

(b) **Consent.** From time to time, we may ask for your consent to use your personal information for certain specific reasons. You may withdraw your consent at any time by contacting us at the address provided at the end of this Policy.

3. INFORMATION SHARING

3.1. Generally. We may disclose your information: (a) to any affiliated entity or organization and to agents, (b) service providers (including internal and external app developers), (c) payment processors as necessary to facilitate your requested transaction; and (d) Partners with which you interact on the Website. We may share non-identifying information with third parties for any lawful purpose, including analyzing trends, research, Services administration, tracking users' movements around the Services, and to improve our business, products, services, and the Services. Use of personal information by affiliated entities and organizations will be subject to this Policy or an agreement that is at least as restrictive as this Policy. For information on use of personal information by agents and service providers see Section 4 (Third Party Providers).

3.2. Legal Requirements. In some cases, we may disclose your personal information as required by law; if we believe that disclosure is needed to protect our rights; to government regulators; to law enforcement authorities; in connection with any judicial proceeding, court order, subpoena, or legal process served on us or the Services; and to respond to a physical threat to you or another person.

3.3. Insolvency and Business Transitions. If we ever file for bankruptcy or engage in a business transition such as a merger with another company or if purchase, sell, or reorganize all or a part of the Services

or our business or assets, we may disclose your personal information, including to prospective or actual purchasers in connection with one of these transactions.

- 3.4. Disclaimer.** We cannot ensure that all of your personal information will never be disclosed in ways not otherwise described in this Policy. For example, we may be required to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your personal information that they collect from the Services. No transmission of data over the internet can be 100% secure.

4. THIRD-PARTY PROVIDERS

- 4.1. General.** We use third parties to help us operate and improve the Services. We may provide these third parties information we collect and they may collect information from you and about your use of the Services. We may provide information we collect to third parties and it will, unless specifically noted otherwise in this Policy, be governed by this Policy and may only be used by those third parties to help us operate or improve our business or the Services, and provide services to us. We do not control information collected by third parties and are not responsible for their use of that information. Please review their privacy policies for more information on their information collection, use, and sharing practices.
- 4.2. Google Analytics.** We use Google, a third-party analytics provider, to collect information about Services usage and the users of the Services, including demographic and interest-level information. Google uses cookies and pixels in order to collect demographic and interest-level information and usage information from users that visit the Services, including information about the pages where users enter and exit the Services and what pages users view on the Services, time spent, browser, operating system, and IP address. Cookies and pixels allow Google to recognize a user when a user visits the Services and when the user visits other websites. Google uses the information it collects from the Services and other websites to share with us and other website operators information about users including age range, gender, geographic regions, general interests, and details about devices used to visit websites and purchase items. We do not link information we receive from Google with any of your personal information. For more information regarding Google's use of cookies, pixels, and collection and use of information, see the [Google Privacy Policy](#). If you would like to opt out of Google Analytics tracking, please visit the following link: [Google Analytics Opt-out Browser Add-on](#).
- 4.3. HubSpot.** We use HubSpot, a third party customer relationship management tool, to manage the personal information we collect and to help us understand how you engage with content. If you use the Services, the Services will share your personal information with HubSpot. Additionally, Hubspot uses cookies or similar technologies that allow us to track the actions of users of our Website and analyze your use of the Services. Hubspot may aggregate this information and provide it to us in reports. We use Hubspot to manage information collected via forms on our Website, some personal information, such as email addresses, may be stored with them. We do not control and are not responsible for HubSpot, or HubSpots's collection or use of your personal information. You may find out more about how HubSpot stores and uses your personal information by accessing its privacy policy at https://legal.hubspot.com/privacy-policy?_ga=2.229895450.78454272.1565882895-886908056.1565882895 and information regarding cookie usage at https://knowledge.hubspot.com/articles/kcs_article/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser.
- 4.4. Stripe.** We use Stripe, Inc., a third party payment processor ("Payment Processor"), to assist in

securely processing your payment information. If you pay with a credit or debit card the payment information, the Services will redirect you to websites or applications operated by the Payment Processor to provide your payment information directly to the Payment Processor. We do not store your payment information and do not control and are not responsible for the Payment Processor or its collection or use of your personal information. You may find out more about how the Payment Processor stores and uses your payment information by accessing its privacy policy at <https://stripe.com/privacy>.

5. ONLINE TRACKING AND YOUR CHOICES

As discussed above, because we and our third party service providers automatically collect Services usage information through the use of cookies, pixels, and other tracking technologies (including as described in the “Automatically Collected Information” Section above, and otherwise in this Policy), your selection of the “Do Not Track” option provided by your browser does not have any effect on our collection of automatically collected information. One way to attempt to “opt out” of the collection of any information through cookies and some (but not all) other tracking technology is to actively manage the settings on your browser to delete and disable cookies and other tracking/recording tools. However, getting a “Do Not Track” signal to work as you might want is difficult and may not be possible. Using browsers as an example, not all tracking technologies can be controlled by browsers; unique aspects of your browser might be recognizable even if you disable a tracking technology; not all settings will necessarily last or be effective; even if a setting is effective for one purpose data still may be collected for another; and even if one website observes a “Do Not Track” signal, that website usually will not be able to control other websites.

6. INFORMATION SECURITY MEASURES

Keeping secure personal information that we collect is of great concern to us. While we have mechanisms in place to reasonably safeguard your personal information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. When you provide personal information to the Services, you do so at your own risk. In the event that we are required by applicable law to inform you of any unauthorized access or acquisition of your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by applicable law.

7. CHILDREN

7.1. The Services are not for or Directed Toward Children. Our primary audience is adults. We do not intend to and will not knowingly collect any personal information from children under the age of 13; children under the age of 13 are prohibited from using the Services without parent/guardian supervision. If we learn that we have collected information from a child under the age of 13, we will remove that information immediately and delete it from our servers (subject to applicable law and this Policy). If you believe personal information from a child under the age of 13 has been posted to the Services, please contact us using the contact information in the Privacy Questions section at the bottom of this Policy. We also recommend that children over the age of 13 ask their parents for permission before sending any information about themselves to anyone over the internet.

7.2. California Minors. If you are a California resident who is under age 18 and you are unable to remove publicly-available personal information that you have submitted to us, you may request

removal by contacting us using the contact information in the Privacy Questions section at the bottom of this Policy. When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information is located, so that we can find it. We are not required to remove any personal information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the personal information. REMOVAL OF YOUR PERSONAL INFORMATION FROM THE SERVICES DOES NOT ENSURE COMPLETE OR COMPREHENSIVE REMOVAL OF THAT PERSONAL INFORMATION FROM OUR SYSTEMS OR THE SYSTEMS OF OUR SERVICE PROVIDERS. We are not required to delete the personal information posted by you; our obligations under California law are satisfied so long as we anonymize the personal information or render it invisible to other users and the public.

8. CALIFORNIA SHINE THE LIGHT LAW

California Civil Code Section 1798.83 permits California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed personal information (as defined under that statute) of that California resident, for direct marketing purposes in the preceding calendar year and the categories of that kind of personal information that was disclosed to them. If you are a California resident and you wish to make such a request you may contact us by using the contact information in the Privacy Questions section at the bottom of this Policy.

9. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

9.1. Access to personal information: In some jurisdictions, you have the right to request access to your personal information. In these cases, we will comply, subject to any relevant legal requirements and exemptions, including identity verification procedures. Before providing personal information to you, we will ask for proof of identity and sufficient information about your interaction with us so that we can locate any relevant personal information. We may also charge you a fee for providing you with a copy of your data (except where this is not permissible under applicable law). If you are accessing the Services on behalf of your employer, please first request access to your personal information with your employer. Your employer will then be in touch with us with respect to your request.

9.2. Correction and deletion: In some jurisdictions, you have the right to correct or amend your personal information if it is inaccurate or requires updating. You may also have the right to request deletion of your personal information. Please note that such a request could be refused because your personal information is required to provide you with the products or services you requested, e.g. to deliver a product or send an invoice to your email address, or that it is required by applicable law.

9.3. Portability: If you reside within the European Union, you have the right to ask for a copy of your personal information or ask for it to be ported to another provider of your choice. Please note that such a request could be limited to the only personal information you provided us with or that we hold at that given time and subject to any relevant legal requirements and exemptions, including identity verification procedures. If you are accessing the Services on behalf of your employer, please first request access to your personal information with your employer. Your

employer will then be in touch with us with respect to your request.

10. THE GENERAL DATA PROTECTION REGULATION (“GDPR”)

If you reside within the European Union you may be entitled to other rights under the GDPR. These rights are summarized below. We may require you to verify your identity before we respond to your requests to exercise your rights. If you are entitled to these rights, you may exercise these rights with respect to your personal information that we collect and store:

- the right to withdraw your consent to personal information processing at any time (please note that this might prevent you from using certain aspects of the Website, the Services, or the Website or Services altogether);
- the right of access your personal information;
- the right to request a copy of your personal information;
- the right to correct any inaccuracies in your personal information;
- the right to erase your personal information;
- the right to data portability, meaning to request a transfer of your personal information from us to any other person or entity as chosen by you;
- the right to request restriction of the processing of your personal information; and
- the right to object to processing of your personal information.

You may exercise these rights free of charge. These rights will be exercisable subject to limitations as provided for by the GDPR. Any requests to exercise the above listed rights may be made to: sophie@ravacan.com.

If you reside within the European Union, you have the right to lodge a complaint with a Data Protection Authority about how we process your personal information at the following website: https://edpb.europa.eu/about-edpb/board/members_en.

If you live in the European Union, the data controller for the information you provide or that we collect is: Ravacan, Inc., 33 Miguel Street, #4, San Francisco, CA 94131

11. INTERNATIONAL TRANSFERS

Personal information collected by us may be stored and processed in your region, in the United States or in any other country where we, our affiliates, clients, or contractors maintain facilities, including outside the European Union. Please be aware that any personal information you provide to us maybe transferred to, processed, maintained, and used outside your jurisdiction of residence where the privacy and data protection laws may not be as protective as those in your jurisdiction.

12. LINKS TO OTHER WEBSITES AND SERVICES

The Services may include links to third-party websites and services that are not operated by us. When you click on these links, you will be directed away from the Services. A link to a third-party website or service does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a third-party website or service, you are subject to its privacy practices and policies, not ours. This Policy does not apply to any personal information that you provide to those other websites and services.

13. MODIFICATION OF THIS POLICY

The Effective Date of this Policy is set forth at the top of this webpage. We reserve the right to change this Policy as business needs require. If we make material changes to the way we use personal information, we will provide advance notice to you by email or by posting a message on the Services. Your continued use of the Services after the Effective Date constitutes your acceptance of the amended Policy. The amended Policy supersedes all previous versions.

14. PRIVACY QUESTIONS

If you have any concerns or questions about these policies, please contact us at: sophie@ravacan.com.