

## EUROPEAN UNION, EUROPEAN ECONOMIC AREA AND UNITED KINGDOM PRIVACY POLICY ADDENDUM

Updated: May 24, 2023

This European Union, European Economic Area, and United Kingdom Privacy Policy Addendum (“Privacy Policy Addendum”) is provided in addition to the Awespira Global Privacy Policy and applies only to information collected about consumers (“consumer(s)”, “you”, “your”), residing in the European Union (“EU”), the European Economic Area (“EEA”), or the United Kingdom (UK). This Privacy Policy Addendum describes the practices of AveNew Solutions LLC (“we”, “us”, “our”)

If you reside in the European Union (“EU”) or the European Economic Area (“EEA”), the European Union General Data Protection Regulation (“GDPR”) will apply to how we collect and process your personal information. If you reside in the United Kingdom (UK), the United Kingdom General Data Protection Regulation (“UK GDPR”) will apply to how we collect and process your personal information. Under the GDPR and UK GDPR, EU, EEA, and UK residents have certain rights with respect to their personal information. You can make the following choices regarding your personal information:

### **CHANGES TO THIS PRIVACY POLICY ADDENDUM**

The Effective Date of this Privacy Policy Addendum is set forth at the top of this webpage. As business needs change, we will review our practices regarding the collection and use of your Personal Information, and we may amend this Privacy Policy Addendum as appropriate. The amended Privacy Policy Addendum supersedes all previous versions. We will alert you about any changes by updating the “Updated” date to this Privacy Policy Addendum, and you waive any right to receive specific notice of each such change. It is your responsibility to periodically review this Privacy Policy Addendum to stay informed of updates. You will be subject to and will be deemed to have been made aware of and to have accepted the changes in any revised Privacy Policy Addendum by your continued use of this website after the date such revised Privacy Policy Addendum is posted. Your continued use of the Services after the posted “Updated” date constitutes your acceptance of the revised or amended Privacy Policy Addendum. If you do not agree with the Privacy Policy Addendum on this website or any revisions to the Privacy Policy Addendum, you agree to immediately stop accessing and using this website.

### **AVENEW SOLUTIONS, LLC AS DATA CONTROLLER**

This Privacy Policy Addendum is provided on behalf of AveNew Solutions, LLC the data controller with regard to Personal Data collected under this Privacy Policy Addendum.

### **PERSONAL DATA WE PROCESS**

“Personal Data” refers to any information that relates to you directly or indirectly or any other “personal data” as defined in Article 4 point 1 of Regulation (EU) 2016/679 (General Data Protection Regulation) (“GDPR”). We process the following categories of Personal Data:

- **Contact information**, such as your name, home or business address, email address, and phone number, social media handles, and business contact information;
- **Customer information**, which includes information provided or made available to us by or on behalf of our customers and information generated by us in the course of providing services to our customers;
- **Technical information**, such as data collected about your interaction with our websites, mobile applications, and email communications;
- **Financial information**, such as payment card, debit card and personal information for customer onboarding, account processing, and when providing any of our Services;
- **Identification or background information** provided by you or collected by us or third parties as part of our customer engagements, business analysis, customer onboarding, regulatory compliance checks, and related processes; and
- Any other information that you provide us that can be used to identify you.

#### **PERSONAL DATA WE COLLECT**

- **Direct interactions**, such as when you inquire about our Services, provide us your contact details, register for an event with us, provide us with information in connection with our Services, participate in surveys or questionnaires, subscribe to newsletter and blog updates, post comments on our blogs, or in any way engage with us or our personnel;
- **Cookies and automated technologies**, such as when you interact with our website, mobile applications or click on links on our emails;
- **Mobile applications**, such as when you use mobile applications that we may offer as part of our Services;
- **Private third party sources**, such as when third parties provide information to us;
- **Through social media**, such as if you link to social media platforms or use social media plug-ins, we may (depending on your user privacy settings on that social media platform) automatically receive information about you from that social media platform;
- **Public sources**, such as Personal Data from publicly available sources including, government and law enforcement agencies, companies, and land registries; and
- **Security systems**, such as when you visit our offices, we may obtain closed circuit television (“CCTV”) footage and other information through electronic means such as security/swipe card records.

#### **HOW WE USE YOUR PERSONAL DATA**

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We do NOT sell user personal information.

We use the information we collect or receive:

**To facilitate account creation and logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed "SOCIAL MEDIA LOGINS" for further information.

**To post testimonials.** We post testimonials on our Services that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the consent of the testimonial. If you wish to update, or delete your testimonial, please contact us at [Awespira@AveNew.org](mailto:Awespira@AveNew.org) and be sure to include your name, testimonial location, and contact information.

**Request feedback.** We may use your personal information to request feedback and to contact you about your use of our Services.

**To enable user-to-user communications.** We may use your personal information in order to enable user-to-user communications with each user's consent.

**To manage user accounts.** We may use your personal information for the purposes of managing your account and keeping it in working order.

**To send administrative information to you.** We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.

**To protect our Services.** We may use your personal information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).

**To enforce our terms, conditions, and policies for business purposes.** We may use your personal information to comply with legal and regulatory requirements or in connection with our contract.

**To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

**Fulfill and manage your orders.** We may use your personal information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.

**Administer prize draws, and rewards programs.** We may use your personal information to administer prize draws, and rewards programs when you elect to participate.

**To deliver and facilitate delivery of services to the user.** We may use your personal information to provide you with the requested service.

**To respond to user inquiries/offer support to users.** We may use your personal information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

**To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Services, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see "YOUR PRIVACY RIGHTS" below).

**Deliver targeted advertising to you.** We may use your personal information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

#### **SOCIAL MEDIA LOGINS.**

We may offer you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on such social media platform.

We will use the information we receive only for the purposes that are described in this Supplemental Policy or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policy to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

#### **SPECIAL CATEGORIES**

Special Categories of Personal Data includes information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning health, sex life, and sexual orientation.

We only process **Special Categories** of Personal Data if you give us your explicit consent, the processing is necessary to meet a legal or regulatory obligation, the processing is in connection with the establishment, exercise, or defense of our or our customer's legal claims or is otherwise expressly permitted by the GDPR.

#### **OTHER USES**

Any other purposes for which we wish to use your Personal Data that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you by

amending this Privacy Policy Addendum in accordance with the Section titled “Changes to this Privacy Policy Addendum.”

If we need to collect Personal Data by law or under the terms of an engagement or contract we have with you and you fail to provide us with the information when requested, subject to our regulatory ethics, we may not be able to continue the engagement or perform the contract we have, or are trying to enter into, with you. We will inform you of any mandatory Personal Data we require from you and the consequences if you fail to provide it.

### **HOW WE SHARE YOUR PERSONAL DATA**

We will share your Personal Data within our company or affiliates, with data processors, employees, distributors, licensees, and other staff members for accounting, tax, and other administrative purposes. We may disclose your Personal Information to such professional consultants as accountants, lawyers, and financial advisors.

### **DATA PROCESSORS**

We engage other AveNew Solutions LLC Entities as well as third-party service providers for the provision of services that help us in processing Personal Data and providing services to our customers. These will process your personal data as data processors (Article 28 GDPR) solely on our behalf. The categories of such recipients include:

- service providers for information technology and telecommunications (such as data centers, hosting providers, email service providers);
- marketing service providers;
- accounting service providers;
- forensic service providers;
- corporate services and litigation support providers;
- trustee and nominee service providers;
- expert witnesses;
- incorporation service providers;
- cyber security providers; and
- business process outsourcing providers.

### **OTHER CONTROLLERS**

In addition, we may share your Personal Data with:

- Any party for whom your consent has been provided or other legal basis obtained, including companies we introduce you to or companies with whom you ask us to share your Personal Data;
- Third parties that provide services necessary to accomplish the processing activities set forth above;
- Third parties, if necessary, in relation to a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other change of ownership or control (whether in whole or in part); and

- Third parties, if we determine that the disclosure is necessary: (i) to comply with any law applicable to us, a request from law enforcement, a regulatory agency, or other legal process; (ii) to satisfy our Services to our customers; (iii) to protect the legitimate rights, privacy, property, interests or safety of AveNew Solutions LLC, our customers, business partners, personnel, or the general public; (iv) to pursue available remedies or limit damages; (v) to enforce our Terms of Use; or (vi) to respond to an emergency.

### **INTERNATIONAL TRANSFER OF PERSONAL DATA**

We are committed to complying with this Privacy Policy Addendum and European and UK data protection laws with regard to information transferred from the EEA or UK. The laws in the United States and other countries outside the EEA or UK may not be as protective as the laws in Europe or the UK. Because of this, we have taken steps to protect your privacy and fundamental rights when your Personal Data is transferred to the United States (or to other countries where no adequacy decision of the European Commission or UK, as applicable, exists). For transfers to third parties, we make sure that the recipient is subject to a jurisdiction for which there is an adequacy decision of the European Commission or UK, as applicable.

### **COOKIES AND OTHER DATA COLLECTION TECHNOLOGY**

A “**Cookie**” is a small text file that is sent to or accessed from your web browser or your computer’s hard drive. A Cookie typically contains the name of the domain (internet location) from which the Cookie originated, the “lifetime” of the Cookie (when it expires), and a randomly generated unique number or other similar identifier. A Cookie may also contain information about your computer, such as user settings, browsing history and activities conducted while using our online Services.

A “**Web Beacon**” (also called a “pixel tag” or “clear GIF”) is a piece of computer code that enables us to monitor user activity and website traffic.

We refer to Cookies, web beacons (also known as pixel tags and clear GIFs) and other similar technology as “**Data Collection Technology.**” To learn more about cookies and web beacons, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Data Collection Technology helps us improve your experience on our online Services. For example, we use Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the website is used to help us to improve it. Google Analytics does this by placing Cookies on your device. The information that the Cookies collect, such as the number of visitors to the website, the pages visited and the length of time spent on the website, is aggregated. We also may use Data Collection Technology to collect information from the computer or device that you use to access our online Services, such as your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone in which your computer or device is located.

## **YOUR CONTROL OF COOKIES**

Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject Cookies or alert you when a Cookies is placed on your device. You may also be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept Cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through our online Services.

Although you are not required to accept cookies, web trackers or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Services. If you change computers, devices, or browsers; use multiple computers, devices, or browsers; or delete your cookies, you may need to repeat this process for each computer, device, or browser. Your ability to limit browser-based tracking technologies is subject to your browser settings and limitations.

- You may disable the use of advertising cookies and other tracking technologies. Please click here for [Cookie and Privacy Settings](#). You must complete this step on each of our websites from each browser and on each device that you use. These steps are necessary so that we can place a first-party cookie signaling that you have opted out on each browser and each device you use. Please note:
  - If you block cookies, we will be unable to comply with your request to opt out with respect to device data that we automatically collect and disclose to third parties online using cookies, pixels, and other tracking technologies.
  - If you clear cookies, you will need to disable the use of all advertising cookies and tracking technologies in the preference center again on each browser on each device where you have cleared cookies.

Regular cookies generally may be disabled or removed using tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. The choices available, and the mechanism used, will vary from browser to browser. Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or alert you when a cookie is placed on your computer or device.

You may also be able to reject mobile device identifiers by adjusting the appropriate setting on your mobile device. Such browser settings are typically found in the “options,” “tools” or “preferences” menu of your browser. You may also consult your browser’s “help” menu.

## **OUR POLICY ON DO NOT TRACK SIGNALS**

Some web browsers incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser’s user. We follow the DNT signals we receive from your browsers.

## **LINKS TO THIRD PARTY WEBSITES AND SERVICES**

Our Services may include links or references to third party websites and services that we do not operate or control. If you provide your Personal Data to that third party through its websites or services, you will be subject to that third party's privacy practices and policies. This Privacy Policy does not apply to any Personal Data that you provide to a third party website or service. We recommend that you read the Privacy Policy that applies to that third party website or service. A link or reference to a third party website or service does not mean that we endorse that third party or the quality or accuracy of the information presented on its website or service.

## **DATA SECURITY**

We implement appropriate technical and organizational measures designed to ensure your Personal Data is protected from unauthorized access, use, disclosure, alteration, or destruction, in accordance with applicable laws and regulations. For example:

- Limiting access of your Personal Data to authorized parties;
- Limiting our collection and use of your Personal Data to the extent necessary to provide you with our Services;
- If we outsource processing of Personal Data to third parties, basing our selection on said third parties having adequate safeguards in place that meet our data protection and security standards.
- Having systems in place designed to ensure that we can restore the availability and access to Personal Data in the event of a physical or technical incident;
- Periodically inspecting, assessing, and evaluating the effectiveness of our technical and organizational measures designed to ensure the security of our processing; and
- Regularly training our personnel on data protection and cybersecurity.

Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## **RETENTION OF PERSONAL DATA**

We will keep your Personal Data for as long as necessary to fulfill the purposes we collected it for, including any legal, accounting or reporting requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data, whether we can achieve those purposes through other means, and all applicable legal requirements.

## **CHILDREN'S PRIVACY**

Our online content and Services are not directed to or intended for use by minors. Consistent with the requirements of the US Children's Online Privacy Protection Act, the GDPR, and all other applicable laws and regulations, if we learn that we have received information directly from a child under age 16 without his or her parent or legal guardian's verified consent, we will

use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use our Services. Subsequently, we will delete such information.

### **OUR SERVICES NOT INTENDED FOR MINORS UNDER 18 YEARS OF AGE**

Our Services are not directed to, nor are they intended for minors under 18 years of age. We do not knowingly solicit data from or market to minors under 18 years of age. By using the Services, you represent that you are at least 18. If we learn that personal information from a minor less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from minors under age 18, please contact us at [Awespira@AveNew.org](mailto:Awespira@AveNew.org).

### **MARKETING**

If you do not wish to receive marketing-related emails from us, please click the unsubscribe link at the bottom of a marketing email, or email us using the information in the Section “Contact Us” of this Privacy Policy Addendum. You may unsubscribe from certain marketing topics while staying subscribed to other marketing topics. Please note that even if we stop all marketing communications, you may still receive administrative, legal, and other important communications from us.

### **YOUR PRIVACY RIGHTS**

- **Access to your personal information.** You may request access to your personal information by contacting us using the information in the Section “Contact Us” of this Privacy Policy Addendum. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. We will provide this information in a portable format if required.
- **Changes to your personal information.** We rely on you to update and correct your personal information. Our website(s) allow you to modify or delete your account profile. If our Website or App does not permit you to update or correct certain information, you may contact us using the information in the Section “Contact Us” of this Privacy Policy Addendum in order to request that your information be modified. Note that we may keep historical information in our backup files as permitted by law.
- **Objections/Restriction to your personal information.** You have the right to object to how personal data is processed in relation to public interest/official authority and our legitimate interests as well as direct marketing purposes – including profiling under both. You also have the right to request that processing of your personal information be restricted where its accuracy or lawfulness is contested, you need it in response to legal claims or in relation to verification as to whether legitimate interests for processing exist.
- **Deletion of your personal information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy Addendum, unless a longer retention period is required or permitted by law. Where certain grounds apply, the law authorizes you to make a request that your personal information be deleted and triggers our corresponding obligation to comply, unless exceptions apply.

- **Move, copy, or export personal data.** This is known as the Right of Portability. You have the right to request that your personal data be forwarded to a third party.
- **Provision/Revocation of Consent.** You have the right to provide or decline consent to the processing of personal information. If you've already provided consent, you also have the right to revoke it. This will not impact the legality of processing prior to revocation. If you revoke your consent for the processing of personal information, then we may no longer be able to provide you with services. In some cases, we may deny your request to revoke consent if the law permits or requires us to do so – such as when we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us using the information in the Section “Contact Us” of this Privacy Policy Addendum.

If you wish to exercise any of your rights above, please contact us using the information in the Section “Contact Us” of this Privacy Policy Addendum. We may charge you a reasonable fee in case you request additional copies of your Personal Data or make other requests that are manifestly unfounded or excessive. If we are unable to honor your request, or before we charge a fee, we will let you know why. In so far as practicable and required under law, we will notify third parties with whom we have shared your Personal Data of any request for correction, deletion, and/or restriction to the processing of your Personal Data. Please note that we cannot guarantee third parties will comply with your requests and we encourage you to contact those third parties directly.

Please note that if you decide to exercise some of your rights, we may be unable to perform the actions necessary to achieve the purposes set out above or you may not be able to use or take full advantage of the services and products we offer.

We must ensure that your Personal Data is accurate and up to date. Therefore, please advise us by using the information in the Section “Contact Us” of this Privacy Policy Addendum.

## **COMPLAINTS**

We are committed to resolving valid complaints about your privacy and our collection or use of your personal information. For questions or complaints regarding our data use practices or this Privacy Policy Addendum, please contact us using the information in the “Contact Us” Section below.

## **CONTACT US**

We welcome your questions and comments about this Privacy Policy Addendum. You may contact us by email at [Awespira@AveNew.org](mailto:Awespira@AveNew.org), by phone at 213-387-0780, or by mail to:

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