

FLOWFY PRIVACY POLICY

Last Updated: May 2022

INTRODUCTION AND ACCEPTANCE OF POLICIES

Flowfy respects the privacy rights of our users. When you use our Site (as defined below), we receive information that may directly or indirectly identify you (“personal information” or “personal data”).

This privacy policy (this “Privacy Policy”) governs and describes how [Flowfy Commerce Service, LLC] and its subsidiaries and affiliates (“Flowfy”, “we,” “us” or “our”) may collect, use, and disclose personal information that we obtain through or from:

- [Flowfy.com] and all websites and platforms within that domain (the “Site”) and mobile applications;
- information that may be collected from our service providers and from other third-party sources as detailed below; and
- offline methods such as telephone correspondence or other interactions.

The purpose of this policy is to inform you of how we handle your personal data. This Privacy Policy also explains your rights with respect to such information.

Your access to and use of the Site is subject to Flowfy’s Terms and Conditions of Use (the “Terms”). Any capitalized terms used but not defined in this Privacy Policy have the meanings provided in the Terms.

BY USING, REGISTERING TO, OR OTHERWISE ACCESSING THE SITE, YOU AGREE TO THIS PRIVACY POLICY AND GIVE AN EXPLICIT AND INFORMED CONSENT TO THE COLLECTION, USE AND PROCESSING OF YOUR PERSONAL DATA IN ACCORDANCE WITH THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT VISIT, INSTALL, USE, REGISTER TO, OR OTHERWISE ACCESS OUR SITE OR ANY OF OUR SERVICES.

HOW TO CONTACT US

If you have any questions or comments about this Privacy Policy, the Site, or our privacy practices, including the processing of your personal information, if you would like to exercise your data rights under applicable laws, or if you believe your privacy rights have been violated, please visit our website www.flowfy.com and leave your inquiry.

If you are a California resident please see the contact options in “California Residents’ Exercising Access, Data Portability and Deletion Rights” below.

PERSONAL INFORMATION WE COLLECT ABOUT YOU

The types of personal information we collect depend on the nature of your interaction with us. For example, when you register to create an account we will need certain information to open your account.

Certain features of the Site may require different types of personal information. You can opt out of providing personal information by not entering it or not using that aspect of the Site, although not providing certain requested personal information may hinder your ability to use features or aspects of the Site. Information that we collect from you may include the following categories however not all, if any, of the examples shown may be collected by us in a particular category:

Category	Examples	Collected; Sources	Business Purpose for Collection	How it is Shared
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, or other similar identifiers.	YES Sources: You; our service providers	Site security, debugging/repair; performing services on behalf of Flowfy; responding to inquiries; quality, safety maintenance and verification of a service or device; enabling or effecting a commercial transaction	With our service providers and affiliated businesses, including those to whom you instruct us to send this information
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, insurance policy number, education, bank account number, credit card number, debit card number, or any other financial information, tax ID, email address, date of birth, Dun & Bradstreet No. Some personal information included in this category may overlap with other categories.	YES Sources: You; our service providers	Site security, debugging/repair; performing services on behalf of Flowfy; responding to inquiries; quality, safety maintenance and verification of a service or device; enabling or effecting a commercial transaction	With our service providers and affiliated businesses, including those to whom you instruct us to send this information
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical	NO		

	conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).			
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, tax ID, business type, annual income, Dun & Branstreet No.	YES Sources: You; our service providers	performing services on behalf of Flowfy; responding to inquiries; quality, safety maintenance and verification of a service or device; enabling or effecting a commercial transaction	With our service providers and affiliated businesses, including those to whom you instruct us to send this information
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO		
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES Sources: You; our service providers	performing services on behalf of Flowfy; responding to inquiries; quality, safety maintenance and verification of a service or device; enabling or effecting a commercial transaction	With our service providers and affiliated businesses, including those to whom you instruct us to send this information
G. Geolocation data.	Physical location or movements.	YES Sources: You; our	Logistics service requires pickup location, delivery	

		service providers	location info	
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO		
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO		
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO		
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES Sources: You; our service providers	Site security, debugging/repair; performing services on behalf of Flowfy; responding to inquiries; quality, safety maintenance and verification of a service or device; enabling or effecting a commercial transaction	With our service providers and affiliated businesses, including those to whom you instruct us to send this information

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

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

- Directly from you. For example, you may give us your personal information by filling in forms, products you purchase, or by corresponding with us by mail, phone, fax, email or in-person.
- Indirectly from you. For example, from observing your actions on our Site.
- From third parties that interact with us in connection with the services we perform.

OUR PURPOSE FOR COLLECTING INFORMATION

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to troubleshoot a product, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment, facilitate delivery and/or provide credit services. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure any of your accounts with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our websites, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our websites, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- As described to you when collecting your personal information or as otherwise set forth under applicable law.
- 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.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Subject to applicable law, we may retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements. We may not remove your Personal Information when there is a legal storage requirement,

such as accounting rules or when there are other legal grounds to keep the data, such as an ongoing contractual relationship.

SHARING PERSONAL INFORMATION

We do not sell your personal information to third parties; however, we do share personal information with third parties for other purposes. 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 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.

Certain personal information you share with us, including but not limited to your company name and email address, may be viewable by and shared with other users in connection with your and other users use of the Site.

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

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial Information
- Category K: Inferences drawn from other personal information.

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

- Service providers.
- Third parties in connection with products or services we provide to you or that you request.

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

Corporate Reorganization. We may disclose or transfer your personal information and other data to a third party in the event of any reorganization, merger, acquisition, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Flowfy's business, assets or stock (including any bankruptcy or similar proceedings).

YOUR RIGHTS AND CHOICES REGARDING YOUR PERSONAL INFORMATION

Right to Opt-Out

Flowfy offers Site users a means to choose how we use the information provided. If you receive a marketing communication or promotion from us, you may opt-out of these communications at any time (i) by following the unsubscribe instructions included in the promotion (if sent by e-mail), or (ii) sending

us an e-mail at the address noted in the Contact Information section above. If you are a California resident please see the contact options in “California Residents’ Exercising Access, Data Portability and Deletion Rights” below.

Right to Access or Correct Personal Information

You have the right to access and correct your personal information. If you want to review or correct your personal information, you can login to the Site and visit your account profile page, or you may send us an e-mail at the address noted in the Contact Information section above.

CALIFORNIA RESIDENTS’ EXERCISING ACCESS, DATA PORTABILITY AND DELETION RIGHTS

California residents have the right to request that Flowfy 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:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- A list disclosing all disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that Flowfy 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 (and direct our service providers to 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 providers to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et seq.*).
- 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.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If you are a California resident to exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by visiting our website www.flowfy.com and leave your inquiry.

Only you, or a person registered with the California Secretary of State that you authorize 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:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- 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. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

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.

Non-Discrimination

We will not discriminate against you for exercising any of your Personal Information rights. Unless permitted by applicable law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value based on several factors including: (a) the average value of the collection and use of such information; (b) revenue generated by the collection and use of such information; (c) profit generated from collection and retention of such information; and/or (d) any other practical and reasonably reliable method of calculation used in good faith. When you are invited to participate in a financial incentive program, the offer will contain written terms that describe the program's material aspects.

Our Policy on "Do Not Track" Signals and Third-Party Website Tracking under the California Online Protection Act (CalOPPA)

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

We do not engage in the collection of Personal Information over time across third-party websites, and we do not permit third parties to gather information passively on our website for behavioral advertising purposes.

Your California Privacy Rights

Under California law, a California resident with whom Flowfy has an established relationship has the right to request certain information with respect to the types of personal information Flowfy has shared with third parties for their direct marketing purposes (if any), and the identities of those third parties, within the immediately preceding calendar year, subject to certain exceptions. In response to a written request, Flowfy is allowed to provide a cost-free means to opt-out of such sharing.

Since Flowfy does not provide your Personal Information to third parties for their direct marketing purposes, it is not necessary for us to establish this procedure.

Nevada residents may opt out of the sale of their covered information, as those terms are defined in Nevada law. Please submit such request on our website www.flowfy.com. However, please note that we do not sell your covered information as defined by Nevada law.

CHILDREN'S PRIVACY

Our Site and services are not intended for children under the age of 13. No one under age 13 years old may provide any personal information to or on the Site. We do not knowingly collect, maintain, or use personal information from children under the age of 13. If you are under 13 years old, do not use or provide any information on our Site, make any purchases through the Site, or provide any information about yourself to us, including your name, address, telephone number, or e-mail address. If we learn we have collected or received personal information from a child under 13 years old, we will promptly delete that information from our records.

INFORMATION SECURITY

Flowfy will maintain appropriate technical and organizational security measures designed to protect your personal information from accidental loss, unauthorized use, alteration, or disclosure. Although we implement and maintain security measures that are appropriate for our business activities, please be aware that no security measures are perfect or impenetrable and any transmission of personal information is at your own risk. If you have questions regarding the security of your personal information, you can visit our website www.flowfy.com and leave your inquiry.

COOKIES AND TRACKING TECHNOLOGIES

Like most website operators, Flowfy and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our websites. Additionally, some Internet browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, so we are currently not set up to respond to such signals.

We use session Cookies that expire at the end of a browser session (from when a user opens the browser window to when they exit the browser) and persistent Cookies which remain on your hard drive until you erase them or they expire. How long a persistent Cookie remains on your browser depends on how long the visited website has programmed the Cookie to last or they can be stored for longer.

We use Cookies for different purposes, including tracking your consent for various services, personalizing content, and targeting advertisements.

THIRD PARTY LINKS

The Site may contain content that is supplied by a third party, and those third parties may collect web site usage information and your device identifier when webpages from any online or mobile service are

connected to your browser. In addition, when you are using the Site, you may be directed to other sites or applications that are operated and controlled by third parties that we do not control. We are not responsible for the privacy practices employed by any of these third parties. For example, if you click on an advertisement, you may be redirected from our Site to a third party website. These other websites may send their own cookies to you, independently collect data or solicit personal information and may or may not have their own published privacy policies. We encourage you to note when you leave the Site and to read the privacy statements of all third party websites or applications before submitting any personal information to such services.

USER GENERATED CONTENT

The Site may offer publicly accessible blogs or forums or other ways to permit you to post content, including personal information. We or others may reproduce, publish, distribute or otherwise such content on the Site. Others may have access to this content and may have the ability to share it with third parties across the Internet. You should be aware that any content you provide in these areas may be read, collected, and use by others who access them. Please note that we do not control who will have access to the information that you choose to make public, and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. We are not responsible for the accuracy, use or misuse of any content or information that you disclose or receive through the Site and we may not have the ability to delete all instances of information and content you post to the Site.

CHANGES TO THIS POLICY

Flowfy reserves the right to modify this Privacy Policy at any time. It is our policy to post any changes we make to this Privacy Policy on this page and the changes will be effective upon Flowfy's publication of the updated Privacy Policy except as described below. If Flowfy makes material changes to how we treat your personal information, we will notify you by e-mail (sent to the e-mail address specified in your account) or by means of a notice on our Site thirty (30) days prior to the change becoming effective. However, changes made to comply with applicable laws will be effective immediately. You are responsible for ensuring we have an up-to-date e-mail address for you and periodically visiting this page to check for any changes to our Privacy Policy. Your continued use of the Site and the services expressly indicates your acceptance of Flowfy's then-current Privacy Policy and your consent to Flowfy's collection of personal information in accordance with the then-current Privacy Policy.

If you have questions or concerns about this Privacy Policy, please contact Flowfy using the information in the Contact Information section above. The date this Privacy Policy was last revised is identified at the top of the page.

WEBSITE LOCATION, TRANSFER AND PROCESSING

THE SITE IS OPERATED BY FLOWFY IN THE UNITED STATES, AND PERSONAL INFORMATION WILL BE PRIMARILY STORED IN THE UNITED STATES. BY PROVIDING PERSONAL INFORMATION TO US, TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, YOU ACKNOWLEDGE THAT WE COLLECT, MAINTAIN, PROCESS AND TRANSFER SUCH INFORMATION IN AND TO THE UNITED STATES AND OTHER COUNTRIES AND TERRITORIES, PURSUANT TO THE LAWS OF THE UNITED STATES OR SUCH OTHER JURISDICTIONS, WHICH MAY PROVIDE LESSER PRIVACY PROTECTIONS THAN EUROPEAN ECONOMIC

AREA COUNTRIES, AND TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, YOU ACKNOWLEDGE THAT YOUR INFORMATION MAY THUS BE SUBJECT TO U.S. FEDERAL AND [TEXAS] STATE LAW AND OTHER FOREIGN LAWS AND ACCESSIBLE TO U.S. AND FOREIGN GOVERNMENTS, COURTS, LAW ENFORCEMENT AND REGULATORY AGENCIES. BECAUSE FLOWFY IS LOCATED IN THE UNITED STATES, THESE DATA TRANSFERS TO THE UNITED STATES ARE NECESSARY TO PROVIDE THE SITE AND SERVICES TO YOU AS SET FORTH IN OUR TERMS OF SERVICE AND TO OPERATE OUR WEBSITE. WHEN APPLICABLE, WE WILL OBTAIN YOUR CONSENT FOR THESE DATA TRANSFERS TO THE UNITED STATES.

DISPUTE RESOLUTION

If you have an unresolved privacy or data use concern that Flowfy has not addressed satisfactorily, please visit our website www.flowfy.com and leave your inquiry.