

PRIVACY POLICY

Last Modified: Sept 28, 2023

Honorarium Inc. (“Honorarium,” “we,” “us,” or “our”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy (this “Privacy Policy”).

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit our website (<https://honoraccess.com/>) (the “Website”) or through our mobile application (the “Application”) and the use of any of our other services, data, or software (collectively “Services”) and our policies and procedures for collecting, using, maintaining, protecting and disclosing that information.

This Privacy Policy applies to information we collect on our Website, on or through our Application, and in any e-mail, text, and other electronic messages between you and the Website or Application. Your use of our Services and any information you may provide through your use and/or access of the Website or Application is subject to the terms of this Privacy Policy, as may be updated from time to time. Please read this Privacy Policy carefully before using the Website and/or Application. This Privacy Policy does not apply to any third-party websites, services, or applications, even if such are available or accessible through the Website or Application. This Privacy Policy is incorporated by reference into Honorarium’s Terms and Conditions (the “Terms”) ([Link to terms and conditions](#)), which govern your use of and access to the Website, Application and the Services made available by Honorarium.

By using the Website, the Application and/or Services, you acknowledge that you have read, understood, and agreed to be bound by the terms contained in this Privacy Policy. If you do not agree with our policies and practices, your choice is not to use our Website, Application or Services. Your continued use of this Website, Application or Services after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

INFORMATION WE COLLECT

The types of information we may collect and our privacy practices are dependent on your interaction with the Website and Application and requirements of applicable law. Through your use of the Website and Application, we may collect the following information:

- **User Provided Information** – Honorarium may collect certain information by which you may be personally identified, including, without limitation, (i) full name; (ii) mailing address; (iii) phone number; (iv) email address; (v) geolocation data; (vi) photo provided by you; and/or (vi) images of driver’s license or other identification (“Personal Information”). This information is collected directly from

you when you provide it to us by completing forms on our Website or Application, including information provided at the time of registering for use of our Services.

Additionally, when you send a communication via the Website and/or Application (i.e. campaigns / customer service inquiries / comments), Honorarium may also collect that communication and any information you choose to provide therein, and you agree Honorarium is free to use the content of any communications submitted by you for any purpose.

- **Non-Personal Information** – Honorarium may collect certain non-personal information via your use of our Services. This may include information automatically collected when you access or interact with the Services. This may include information about your computer or device such as (i) your internet connection; (ii) IP address; (iii) operating system; (iv) browser type; and/or (v) the equipment you use to access our Website and Application. We may also collect details about your visit to our Website or Application, including: (i) traffic data; (ii) location data; and (iii) other communication data and the resources that you access and use on the Website or Application.

Further, when you download, access, and use the Application, it may use technology to automatically collect usage data such as traffic data, location data, logs, and other communication data and resources that you access and use on or through the Application. We may also collect certain device information including, but not limited to: (i) the type of mobile device you are using; (ii) your mobile device unique identifier (IMEI); (iii) the IP address of your mobile device; (iv) your mobile device operating system; (v) the type of mobile internet browser you are using; (vi) mobile network information; (vii) the device's telephone number; and/or (viii) unique device information and other diagnostic data.

- **Aggregate Data** – Honorarium may collect data that is about you but individually does not identify you, such as statistical information and analytic data relating to Website and Application usage.

TECHNOLOGIES USED FOR AUTOMATIC DATA COLLECTION

- **Cookies and Other Tracking Technologies** – Honorarium may place cookies and/or other tracking technology on your computer, mobile device or any other device used to access the Website, Application and Services. Cookies do not tell us or collect your personal information unless you choose to provide such information by using the Website and Application. We may use cookies to monitor aggregate usage and web traffic routing on our Website and to customize Services and improve our Website. You may elect to delete cookies and/or turn off cookie acceptance altogether in your browser or in the appropriate settings on your smartphone or other mobile device. However, some functions and features of the Website and Application may not function properly if you have elected to disable cookies or similar tracking technologies. We will not, and have

no obligation to continue to, remind you that cookies are used while you access the Website or Application.

Our Website, Application, and other Services may also use Web Beacons, which are small electronic files (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Honorarium, for example, to count users who have visited those pages or opened an email and for other related Website or Application statistics (for example, recording the popularity of certain Application content and verifying system and server integrity).

- **Google Analytics** - Google Analytics is a web analytics website offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google Websites. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visit activity. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page.

INFORMATION WE COLLECT FROM OTHER SOURCES

We and our business partners may collect and/or receive information about you, including personal information, from third parties, including our affiliates, any of our services providers or your selected providers, and may combine this information with the information we maintain about you. If do we so, this Privacy Policy governs any combined information that we maintain in personally identifiable format.

THIRD PARTY USE OF COOKIES AND TRACKING TECHNOLOGIES

Third-party services providers that we engage may also place their own cookies on your device. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you. The information that they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. We do not control these third parties' tracking technologies or how they may be used. Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by any third parties.

SOCIAL MEDIA, WIDGETS AND OPEN FORUMS

Our Website and Application may allow you to engage with social media services, such as Facebook, Twitter, and Instagram ("Social Networks"), and widgets such as the

“Share this” button, connection to your profile or interactive features that run on our Website or Application or which link from Social Networks to our Website (“Social Functions”). These Social Functions may access, collect and integrate with your Social Network accounts and information. For example, these Social Functions may collect your IP address, identify which page you are visiting on our Website, or set a cookie. We do not control those Social Networks or your profiles on those services. We do not modify your privacy settings on those services or establish rules about how your personal information on those services will be used. Social Functions are either hosted by a third party or hosted directly on our Website or Application. Your interactions with them are governed by the privacy policy of the company providing them. Please refer to the privacy settings in your Social Network account to manage the data that is shared with us through your account.

Further, information you include and transmit online in a publicly accessible blog, chat room or Social Network, may be viewed and used by others without any restrictions. As noted above, we do not control such uses of your personal information. By using such services, you assume the risk and acknowledge that the personal information provided by you may be viewed and used by us and/or third parties for any number of purposes, and that the usage restrictions set forth in this Privacy Policy do not apply to such services.

HOW WE MAY USE YOUR INFORMATION

Honorarium uses the information received from you in connection with the Website and Application in order to improve and develop the Website and Application and provide the Services, create and maintain a secure environment, provide a personalized experience, and comply with our various legal obligations. Such uses include:

- Providing you with the Website and the Application and its contents, any other information, and products or Services you request from us.
- Providing customer service / responding to customer inquiries;
- Offering you a personalized experience regarding use of the Website, Application and Services;
- Enforcing the Terms;
- Contacting customers for administrative purposes, including, without limitation, notifying you of changes to the Privacy Policy and when Application updates are available;
- Fraud prevention / verifying or authenticating information;
- Providing information about our Services; and
- Monitoring and tracking total number of users of the Website and Application for statistical purposes.

We may also use personal information provided by you for reasons for which we have a legitimate interest at the time you provide such personal information or with your consent. Otherwise, unless consent is given, we will not use or disclose your personal information for any reason other than the purposes for which it was collected.

HOW WE SECURE AND MAY SHARE YOUR INFORMATION

We may share your information received in connection with your use of the Website, Application and Services to: (i) our staff and/or data person(s) in charge of maintaining and recording the information; and/or (ii) to our service providers involved in providing the Services or other services who shall only have access to such information for the purpose of performing such services. Any such service provider shall be prohibited from collecting, sharing or using your personal information except as necessary to perform the Services or to comply with applicable legal requirements. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them if required to provide the Services. For these providers, we recommend that you read their privacy policies so you can understand the manner in which these providers will handle your personal information.

Honorarium may also make anonymous and/or aggregate personal information for commercial, marketing, and/or legitimate business purposes, such as reporting and conducting research and development in order to enhance the Website, Application and/or the Services. Anonymous or aggregated information does not identify you, and we may use or disclose such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information internally and/or with third parties for our or their purposes in an anonymous or aggregated form that is designed to prevent anyone from identifying you.

In the event that ownership of all or a part of Honorarium or its business were to change via merger, acquisition, divestiture, dissolution, or sale of all or substantially all of Honorarium's assets, your information pertinent to that business' operations may be assigned or transferred to, or licensed for use by, the new owner, without any prior notice to or consent from you.

We may also disclose your personal information to comply with any court order, law, or legal process, including to respond to any government or regulatory request, to enforce or apply our Terms and any other agreements, or if we believe disclosure is necessary or appropriate to protect the rights and/or safety of Honorarium, its customers or others.

We take reasonable administrative, physical and electronic measures designed to protect the information that we collect from or about you (including your personal information) from unauthorized access, use, destruction, or disclosure. All payment transactions are processed through third parties and are subject to the security, terms and conditions, and policies of that third-party provider. Notwithstanding, Honorarium cannot assure or guarantee the security of any information that you transmit to us or that any third party with whom Honorarium shares information will comply with its obligations regarding such information. Furthermore, even though appropriate measures are used to prevent unauthorized disclosures of information, we cannot assure you that any personal information collected or received by us will never be

disclosed in a manner that is inconsistent with this Privacy Policy, and do not accept liability for any unintentional disclosure or for circumvention of any privacy settings or security measures. Any and all information you share for use of the Website and/or its Services is done at your own risk.

By using the Website, Application or Services, or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Website, Application, or Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Website and/or Application or sending you an email at the email provided to us.

THIRD PARTY WEBSITES

Honorarium may include links to other websites and applications (collectively, "Third Party Websites") via the Website and/or Application. This Privacy Policy does not cover any collection or use of information that Third Party Websites may collect from you, or the practices used by third parties to collect such information, and Third Party Websites should have separate and independent privacy policies and terms of use for the purpose of collecting personal information about you. Honorarium has and assumes absolutely no responsibility or liability whatsoever for the content and/or activities of Third Party Websites. If you decide to use, click on, access, or provide any personal information to Third Party Websites, you acknowledge that you are doing so at your own risk.

RETAINING YOUR INFORMATION

Honorarium will retain your personal information received as described in this Privacy Policy while you are an active user of the Website, Application and/or the Services, and thereafter so long as needed for purposes that are not prohibited by applicable law. Before we use any of your personal information for any new purpose not originally authorized by you, we will use best efforts to provide details regarding the new purpose and give you the opportunity to opt-out. Subject to our requirements for continued retention of your information, we will make every reasonable effort to honor your request.

OPT-OUT

When you provide us with personal information, we imply that you consent to our collecting it and using it for the reasons set forth in this Privacy Policy. We may also use your contact information to periodically send you e-mails regarding the Website, Application, and Services. When you receive such promotional communications from us, you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or mailing us at: support@honoraccess.com

Even if you opt-out from receiving promotional communications, we may still collect and use non-personal information regarding your use of the Website, Application and Services, and/or contact you in connection with your relationship, activities, transactions and communications with us and/or the Services you may have requested.

MODIFYING, ACCESSING, CORRECTING, OR DESTROYING INFORMATION

It is your sole responsibility to ensure that any and all information you provide when using the Website, Application or requesting Services is complete and accurate. Where permitted by applicable law, you may request and access your personal information, and can review and/or make necessary changes to your information at any time by contacting us at support@honoraccess.com. If you want us to delete your personal information, please contact us at support@honoraccess.com with your request. We'll take steps to delete your information as soon we can, but some information may remain in archived/backup copies for our records or as otherwise required by law. The abovementioned requests will be processed in accordance with applicable laws.

Honorarium shall use best efforts to provide you with access to your personal information and delete personal information upon your request. However, there may be circumstances in which we are unable to provide access or deletion, including but not limited to: (i) where the information contains legal privilege, (ii) would compromise others' privacy or legitimate rights, (iii) where the burden or expense would be disproportionate to the risks to your privacy in the case in question, or (iv) where it is commercially proprietary. If we determine that access or deletion should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access to or making any changes to your personal information.

PRIVACY RIGHTS OF CHILDREN

Neither the Website nor the Application are intended for use by or directed to children, and we do not knowingly collect personal information from children under 18. If we learn that we have collected personal information from a child under the age of 18, we will take steps to delete such information from our files as soon as possible. If you believe we have collected personal information of a minor, please contact us as support@honoraccess.com.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Website and Application. If we make material changes to this Privacy Policy, we will notify you. Your continued use of the Website, Application and/or the Services constitutes your agreement to this Privacy Policy and any future revisions, updates, or modifications.

INTERNATIONAL USERS AND TRANSFER OF INFORMATION

Honorarium is located in and the Website and Application are hosted in the United States, our Services are directed towards the United States market, and our Privacy Policy is in place to comply with applicable United States law. If you are located outside the United States and choose to provide personal information to us via the Website, Application and/or request for Services, please be advised providing such information serves as your consent to: (i) the transfer of your personal information from regions outside the United States to the United States, where the privacy laws may not be as protective as those in your jurisdiction / country you reside, and (ii) the use of your personal information in accordance with this Privacy Policy. For avoidance of doubt, by using the Website, Application and/or its Services, you authorize us to transfer, store, and use your information in the United States, and agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed and adjudicated in accordance with terms provided herein and/or set forth in the Terms ([link to terms and conditions](#)).

If you are a resident of the European Union (EU), you have certain data protection rights under the European General Data Protection Regulation (GDPR).

To process your Personal Information, Honorarium must have a legal basis for doing so. We may process your Personal Information under the following conditions:

- Consent: You have given consent for processing personal information for one or more specific purposes.
- Performance of a Contract: The personal information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- Legal Obligations: Processing personal information is necessary for compliance with a legal obligation to which Honorarium is subject.
- Vital Interests: Processing personal information is necessary in order to protect your vital interests or of another natural person.
- Public Interests: Processing personal information is related to a task that is carried out in the public interest or in the exercise of official authority vested in Honorarium.
- Legitimate Interests: Processing personal information is necessary for the purposes of the legitimate interests pursued by Honorarium.

As required by the GDPR, we require that all processors and sub-processors of the data we collect fully comply with the obligations of the GDPR and do not infringe on your

privacy rights in any way. In particular, in certain circumstances, you have the following rights with respect to the personal information that we collect and process:

- Right to Access. You have the right to see any Personal Information we have collected about you as well as the purpose of our collection and processing of it and whether we plan on sharing such Personal Information with anyone.
- Right to Correct. You have the right to correct any inaccurate Personal Information in our possession. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a statement to us at support@honoraccess.com.
- Right to Erase. You have the right to have your Personal Information erased from our data stores without undue delay. Additionally, we will erase Personal Information without undue delay if:

the Personal Information is no longer necessary in relation to the purposes for which it was collected;

you withdraw consent and there is no other legitimate basis for the processing;

you object to the processing and there are no overriding legitimate grounds for the processing;

the Personal Information has been unlawfully processed; or

the Personal Information must be erased for compliance with a legal obligation.

- Right to Restrict. You have the right to restrict processing of your Personal Information.
- Right to Port Data. You have the right to request your Personal Information be ported over to another controller. However, because we don't store much Personal Information, we likely will not have the technical means to port the information automatically. If this is the case, we will recommend simply deleting the Personal Information instead. If you really want it transferred to another party, we'll email data fields directly to the new controller and let you know via email when it is complete.
- Right to Object. You have the right to object to the collection or processing of Personal Information at any time if you believe data was collected or processed unlawfully. Our team will work with you to investigate the claim and take appropriate action. While the claims are under investigation, your data will be deleted from our stores. If you'd like, you may re-submit your data at any time.

You may exercise any of the rights enumerated above by contacting us at support@honoraccess.com. Please note that we may ask you to verify your identity

before responding to such requests. Where your request is repetitive, excessive, or unfounded, we reserve the right to charge you a reasonable fee for costs associated with complying with your request.

You also have the right to complain to a Data Protection Authority about our collection and use of your personal information. For more information, please contact your local data protection authority in the European Economic Area.

CALIFORNIA ONLINE PRIVACY PROTECTION ACT

If you are a California resident, you have certain data protection rights. This section supplements the information contained in the Privacy Policy above and applies solely to all users and others who reside in the State of California. Under the California Consumer Privacy Act of 2018 (CCPA) and California Civil Code § 1798.83, you have the right to exercise the following rights:

- **Right to Know.** California customers have the right to request information about the categories and sources of Personal Information we collect, our business or commercial purposes for collecting the information, the types of third parties that receive that information, and the specific pieces of Personal Information we have collected about you. Details about our data collection, use and third-party disclosures can be found in this Privacy Policy. In addition, you have the right to request a copy of your Personal Information. You may exercise this right once per 12-month period by submitting a request to us at support@honoraccess.com.
- **Right to Delete.** California customers have the right to request that we delete some or all of the Personal Information that we have about you, subject to certain exceptions (i.e. complete transactions, honor opt-outs, prevent fraud, spam, and other abuse, comply with our legal obligations, cooperate with law enforcement, and to exercise and defend our rights). You may exercise your right to delete by contacting us at support@honoraccess.com.
- **Right to Opt Out of Sale of Personal Information.** California customers have the right to opt out of the sale of your personal information, and to request information about whether we have sold your personal information in the past 12 months. We do not sell personal information as defined under CCPA, and we do not plan to do so. Should such change, we will notify you and provide an ability to opt out as required.
- **Non-Discrimination.** We won't discriminate against you because you exercise any rights herein. This means we cannot deny goods or services to you or provide a different level or quality of goods or services to you.

Exercising Your Rights:

To exercise your rights to know and delete, we must be able to verify your identity as the owner of the Personal Information you are inquiring about. We will not be able to fulfill

your request until we can do so. In general, we verify identity by confirming that you are the owner of the email address associated with the Personal Information. An authorized agent submitting a request on your behalf must also have access to the email address associated with the Personal Information, along with sufficient evidence that you have authorized that person to submit the request on your behalf.

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact support@honoraccess.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), 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 our receipt of your request. 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 Data 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.

Honorarium has collected the following types of personal information about California Residents in the last 12 months:

Category	Examples
Identifiers.	Real name, postal address, driver's license number, IP address, email address, phone number, photograph
California Customer Records Personal Data categories.	Name, address, telephone number, driver's license or other identification number, education, financial information
Protected classification characteristics under California or federal law.	N/A (collect age or gender?)

Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Geolocation Data	Physical locations or movements

Disclosures for a Business or Commercial Purpose:

Personal Data Category	Category of Third-Party Data	
	Business Purposes Disclosures	Sales
A: Identifiers.	Advertising networks, data analytic providers, operating systems and platforms, services providers, internet cookie data recipients, affiliates, suppliers	None
B: California Customer Records Personal Data categories.	Advertising networks, data analytic providers, operating systems and platforms, services providers, affiliates, suppliers	None
C: Protected classification characteristics under California or federal law.	None	None
D: Commercial Information	None	None
E: Biometric Information	None	None
F: Internet or other similar network activity	Advertising networks, data analytic providers, operating systems and platforms, services providers, internet cookie data recipients, affiliates, suppliers	None
G: Geolocation Data	Advertising networks, data analytic providers, operating systems and platforms, services providers, affiliates, suppliers	None

H: Sensory Data	None	None
I: Professional or employment-related information	None	None
J: Non-public education information	None	None
K: Inferences drawn from other Personal Data	None	None

Additional Information:

In addition to CCPA, California's Shine Your Light Law (Civil Code § 1798.83) permits users that are residents of California to request the following information regarding our disclosure of your Personal Data to third parties for those third parties' direct marketing purposes: (i) a list of certain categories of personal information that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year; (ii) the identity of certain third parties that received personal information from us for their direct marketing purposes during that calendar year; and (iii) where the nature of the third parties' business is not reasonably determinable, examples of the products or services marketed (if we have that information) . If you are a California resident and would like to make such a request, please email us at support@honoraccess.com.

Concerning the California Online Privacy Protection Act (CalOPPA) "Do Not Track" Policy, neither the Website nor Application respond to or support Do Not Track ("DNT") signals.

Do Not Track is a preference you can set in your web browser to inform websites you do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of your web browser.

CONTACT INFORMATION:

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at: support@honoraccess.com