EXORDI PRIVACY POLICY

EXORDI Limited, (Company Number 145403) is committed to respecting the privacy of your personal information and data.

This Privacy Policy explains our policy for dealing with personal information and data that we collect through the following channels

- our online properties (here and after, each a "Website"), including:
 - the EXORDI Platform and
 - our websites, including, but not limited to, exordi.io and any of our related websites, social media pages, internal websites and other mobile applications;
- any other means through which an individual provides personal information to EXORDI, including either physically or electronically; and
- any other means through which we lawfully collect personal information about you.

You may contact us with any queries you may have in respect of this Privacy Policy or your personal information by contacting us via tamsin@exordi.io

Relevant Law

The way in which we process personal data is governed by data protection law, which includes the Data Protection (Jersey) Law 2018 (the 'DPJL 2018'), the

Data Protection Authority (Jersey) Law 2018 (the 'Authority Law') [and, where relevant, the General Data Protection Regulation (EU) 2016/679 ('GDPR')]. Data protection principles We will comply with the data protection principles when gathering and using personal information

1. WHAT IS PERSONAL DATA (PERSONAL DETAILS)?

Personal data is all details and information relating to a particular or determinable person. In connection with internet presence, this includes, without being limited to, e-mail addresses, but also the IP address.

2. OWNER OF THE DATA COLLECTION

In connection with the services offered on the websites of Exordi, Exordi Limited collects data from the user/customer. Exordi Limited is the owner of this data collection..

3. PERSONAL INFORMATION IS IMPORTANT TO US

- 1. We are committed to safeguarding personal privacy. We recognise that you have a right to control how your personal information is collected and used. Providing personal information is an act of trust and it is taken seriously. Unless given consent to do otherwise, we will only collect and use personal information as set out below.
- 2. Throughout this Privacy Policy, we refer to your 'personal information', which means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not, and whether the information or opinion is recorded in a

material form or not. Your full name, gender, date of birth, home address, home telephone number, mobile telephone number, email address and workplace contact details are examples of information which may constitute personal information. Personal information may also include information we may collect about your individual preferences.

3. In order to keep up with changing legislation and best practice, we may revise this Privacy Policy at any time without notice. We will post any changes to this Privacy Policy on our Websites, so we encourage you to check this Privacy Policy from time to time.

4. THE PURPOSE OF WHICH WE PROCESS YOUR PERSONAL DATA

We collect and process your personal data for the purpose of providing you with our services and their advanced features, continuously improving and developing them, ensuring their technical functionality and ensuring the security of our services.

Personal information collected will be used for the following primary purposes:

- 1. To allow you to respond to opportunities, briefs or campaigns created by clients of EXORDI.
- To maintain the functionality of a Website, including the provision of information to you relating to the content available on the Website job opportunities translated via the Website.
- 3. To send you any technical, administrative or legal notices important to our Websites.

- 4. To allow you to create an account, sign in and use the functionality of our matching platform.
- 5. To maintain our relationship with you.
- 6. Enable creators to search for and connect with other creators
- 7. Recommend you to prospect clients and recommend other clients to you

5. WHAT PERSONAL DETAILS ARE GATHERED BY EXORDI LIMITED?

4.1. Data you submit to us and how we use it:

a) When you register as a photographer/videographer (creator)

You are a "creator" if you want to share your content with us within the community or to businesses using exordi.io

Personal information that may be requested includes, but is not limited to:

- contact information such as your full name, date of birth, telephone number, mobile telephone number, current and valid email address, residential address and postcode;
- your social media handles and login details including usernames and passwords;
- 3. location information;
- 4. more detailed contact preferences;
- sensitive information about you;
- photographs of you;

- your occupation and information regarding your professional history and professional interests;
- information regarding your personal interests and interesting and relevant information about you;
- 9. financial details including your bank account details and PayPal details;
- 10. your online behaviour and interests based on your online browsing activity;
- information about your preferences, interests, and experiences with our products or services. This information is collected in order to tailor our communications to you and continuously improve our products and services;

Providing the above information about you is required. Otherwise, we cannot create the respective user account for you and cannot process any transactions for you.

We use this data:

- 1. To create your user account as a creator.
- 2. To inform you about any job matches (e.g. via e-mail).
- 3. According to your account settings, you can receive notifications via email. If you do not want to receive such notifications, you can unsubscribe from them at any time by deleting your profile.
- 4. To send our newsletter or community updates, if you have given your consent (see below).

Storage time: In principle, we only store this data until the deletion of your user account. If you have sold a licence to your content, your data will also be archived for the duration of the statutory retention periods.

c) When you provide additional, voluntary information in your profile

If you have a Creator Profile, you can voluntarily provide additional profile information in your profile to make it more meaningful. For example, you can:

- Upload a picture of you as profile picture.
- Upload examples of work in photo and video format.
- Provide further information about you in your profile.

We use this data to make it visible in your profile to other users.

Storage time: As a rule, we only save this data until your user account has been deleted and pending transactions have been completed.

d) When you upload content

When you have registered as a Creator, you can upload content to exordi.io via our desktop website.

When you upload content, we also process the information contained in the metadata of such content (so- called exif data), such as the date, time and location of the shot, camera type, shutter speed, etc., as well as any additional information you provide about the content (e.g. tags, captions).

Storage time: We usually store any metadata only until your user account is deleted and pending transactions are completed.

e) When you register for our newsletters or email updates, we will save:

The email address you provided

We use your email address to first verify your subscription (double opt-in) and then to send you the respective newsletter or community updates via email. Community updates may include community newsletters, relevant job opportunities, information regarding creator meet up events, competitions and brand partnerships, announcements on specific community events and feature updates.

Storage time: Your email address will be deleted as soon as you unsubscribe from the respective newsletter or community update.

6. HOW CAN I DELETE MY PERSONAL DATA

Every user has the option to delete their account and thus, their personal data, through the profile settings tab in the profile menu of Exordi user dashboard (click the profile icon on the top right, then scroll to the bottom, and then "Delete Exordi account"). Once a personal account is deleted, all user information, including profile information, payment information and credentials and more is deleted and cannot be restored by Exordi Limited at a later point in time.

7. WHAT TECHNICAL AIDS DOES EXORDI LIMITED USE?

When you use a Website, we may also collect personal information about you in the following general categories:

- usage and preference information: we collect information about how you interact with a Website, including the pages you visit, your preferences and settings that you choose. We may do this through the use of cookies and other similar technologies that uniquely identify you;
- device information: we may collect information about your mobile device such as the hardware model, operating system, preferred language, unique device identifier and mobile network; and

other information: we may also collect and log information such as your IP address, access dates and times, browser type and pages visited when you interact with a Website.

Exordi Limited analyses the use of its internet presence by means of the web analysis tools below. These tools are installed on the respective web servers of the provider. An exception to this is a cookie that is used by Exordi Limited for the authentication of the user.

Facebook remarketing / retargeting: Remarketing tags of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA are integrated on our website. When you visit our website, remarketing tags establish a direct link between your browser and the Facebook server. This informs Facebook that you have visited our website with your IP address. Facebook is therefore able to assign our website to your user account.

We use the information thereby gathered to display Facebook ads. Please note that as the website provider we do not receive any information about the content of the transmitted data or utilisation thereof by Facebook. Further relevant information is set out in Facebook's data protection declaration under https://www.facebook.com/about/privacy. If you do not want data to be recorded via Custom Audience, you can deactivate Custom Audience there.

Cookies: Cookies are files which are sent to the user's server when a particular website is called and which is sent back again when the site is accessed again. They typically contain data about visited websites, which the web browser saves during surfing on the internet. They can mean, for example, that the user/customer does not have to log in again when repeatedly visiting an encrypted page and can save information about complex internet behaviour of the user and convey this to the server. You can prevent the saving of cookies by

making the appropriate adjustment to your browser software; we point out, however, that in this case you may possibly not be able to use all functions of this website in their full extent.

Facebook, Instagram and Twitter Re-Auth Application: For registration, Exordi Limited uses Re-Auth technology and apps of Instagram. By registering and authorising the respective application, the user/customer grants Exordi Limited access rights to the data of the selected social media accounts. The Exordi Limited Instagram application retrieves the user name of the Instagram account. This information is processed and saved for the purpose of registration.

Google Analytics: Google Analytics is a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies. The information, generated by the cookie, about the use of this website by the user/customer is normally transferred to a server of Google in the USA and saved there. On behalf of the operator of this website, Google will use this information to analyse the use of the website by the user/customer, in order to compile reports about website activities and to render further services relating to website use and internet use to the website operator. The user/customer can, according to the statements of Google Inc., prevent the gathering of the data generated by the cookie and relating to the use of the website (incl. the IP address of the user/customer) at Google and the processing of this data by Google, by downloading and installing the browser plugin available under the following link (http://tools.google.com/dlpage/gaoptout?hl=de). The user/customer can find more detailed information about the terms and conditions of use and about data protection at http://www.google.com/analytics/terms/de.html and/or at https://www.google.de/intl/de/policies/. Exordi Limited also uses Google Analytics to analyse data from AdWords and the DoubleClick cookie for statistical

purposes. If the user/customer does not want this, they can, according to

statements of Google Inc., deactivate this using the Ads Preferences Manager (http://www.google.com/settings/ads/onweb/?hl=de).

Social Media Plugins: Facebook plugins (like button): plugins of the social network Facebook (1601 South California Avenue, Palo Alto, CA 94304, USA) are incorporated into this website. The Facebook plugins can be recognised by the user/customer by the Facebook logo, the "like button" on this website. The user/customer can find an overview of the Facebook plugins here:http://developers.Facebook.com/docs/plugins/. If the user/customer visits this website, a direct connection is established between their browser and the Facebook server via the plugin. Facebook thereby receives the information that the user/customer with their IP address has visited this website. If the user/customer clicks on the Facebook "like button" while being logged on in their Facebook account, they can link the contents of this website on their Facebook profile. Due to this, Facebook can assign the visit of the pages of Exordi Limited to the user account of the user/customer. Exordi Limited points out that it, as the provider of the pages, receives no knowledge of the transferred data or its use by Facebook. The user/customer can find more information on this in the data privacy statement of Facebook at: http://de.Facebook.com/policy.php. If the user/customer does not want Facebook to be able to assign the visit of the pages of Exordi Limited to their Facebook user account, they can use an incognito window, use a different machine or temporarily log out of their Facebook user account.

8. HOW EXORDI COLLECTS AND HOLDS PERSONAL INFORMATION

We will only collect or monitor any personal information about you with your consent including as provided in this Privacy Policy or if it is otherwise lawful to do so. The only personal information collected by us is what has been provided

to or collected by us in accordance with this Privacy Policy or has been provided to us lawfully by third parties including social media platforms such as Instagram and Facebook and any other third parties or categories of third parties from whom personal information is collected.

Information may be held at our offices, and third party agencies, service providers, representatives and agents as described above.

Personal information is stored on secure systems provided by our third party service provider (Amazon RDS & Amazon S3) within the EU.

All data stored on Amazon RDS is encrypted both at rest and in transit using industry-standard encryption protocols. The encryption keys are securely managed and protected by Amazon Web Services (AWS) to ensure that unauthorised access to the data is prevented. Access to the data is restricted to authorised personnel only, and all access is monitored and logged. Amazon RDS is committed to maintaining the privacy of all data stored on its service. Data stored on Amazon RDS is only accessed by authorised personnel for the purpose of providing support, maintenance, or troubleshooting services. Amazon RDS does not sell or share data with third parties, except where required by law.

All data stored on Amazon S3 is encrypted both at rest and in transit using industry-standard encryption protocols. The encryption keys are securely managed and protected by Amazon Web Services (AWS) to ensure that

unauthorised access to the data is prevented. Access to the data is restricted to authorised personnel only, and all access is monitored and logged.

9. HOW EXORDI SHARES YOUR PERSONAL INFORMATION

With other users and Site visitors. Once you register, your username, country, and additional information regarding your activity is made public and is visible to all users of the Site. This information includes photos you upload, your published portfolio, job information, ratings, and additional information you may choose to add to your profile.

We also offer you the opportunity to participate and post content publicly in forums, blogs and on other similar features. Please be aware that certain information, such as your user name and profile, together with the content uploaded by you, will be publicly displayed when you use such features. Your information will also be shared with other users when you message or otherwise communicate with such users. Please be careful with your information, and make sure that the content you share are things you're comfortable with being visible.

10. HOW TO COMPLAIN

You can also complain to the Jersey Office of the Information Commissioner (JOIC) if you are unhappy with how we have used your personal data.

JOIC's address: 2nd Floor 5 Castle Street St. Helier Jersey JE2 3BT enquiries@jerseyoic.org +44 (0) 1534 716530

Changes to this Notice We reserve the right to modify this notice at any time.

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