

PRIVACY POLICY

Company "RICHADS LTD", with an address: Pavlov Nirvana & Aipeias, 4 ALPHA TOWER, 1 st Floor, Flat / Office 11, 3021 Limassol Cyprus is a company providing advertising and other services ("Services"). List of our services is at our official web-site <https://richoffers.co/> (Website). Publishers, developers and advertisers, as well as advertising networks and other connecting publishers and advertisers, which We provide Services to, are collectively named "Clients".

A. INFORMATION CONCERNING END-USERS

1. What information may We collect? We collect only information that our Clients have instructed Us to collect, prior to such collection, and subject to your permissions inside Clients' sites and mobile applications and/or your device.

As an example, Our software that may be installed on the Clients' sites and mobile applications you are using will not collect your location data unless you affirmatively allowed/enabled the Client to collect it. Other information may be received by embedding tags on websites you visit.

We avoid collecting information that identifies you personally, such as your name, address, or email address, but the information We collect does enable us to recognize your device over time and your user experience. When you interact with any website or app of our Client that uses our Services, We may automatically collect/receive the following information:

- information about your device, such as device type and model, network provider, browser type, language;
- log information, including the app or website visited, session start/stop time, time zone, referrer URL, network connection type and cookie information;
- information about Clients' sites and mobile applications, such as ad placement data, key words, version;
- information about your mobile advertising identifiers, such as your Advertising ID (Apple IDFA or Google Advertising ID);
- information provided by your device (computer, mobile phone, etc.), such as device IP address, network connection type and device geo-location information (country, region, city, DMA, GPS location: latitude, longitude), user-agent strings;
- other information that our Clients and other third parties have collected and share with Us, such as information about activity in their services. This may include the content you view or searches you made, the language you prefer, or other non-personally identifying demographic or interest information, to help make the ads served to you more relevant.

2. How do We use information We collect? We collect information from you in order to provide Services and for other specific purposes, as described in this Privacy Policy. Please

note that you are not required by law to provide Us with any personal information.

We use the information We collect and receive:

- to provide Services;
- to help Us personalize and improve your user experience;
- to enable and optimize Services' tools and features;
- to study and analyze the functionality of Services, end-users' activities;
- to provide support;
- to measure Services' activity for pricing purposes;
- to maintain Services;
- to improve Services and to continue developing Services;
- contact you by email messaging.

We may also create an interest profile about you in order to help our Clients improve your user experience and serve more relevant ads to you.

We will not combine the non-personally identifiable information with your personally-identifying information without your express consent.

3. How may We share information We collect?

We may share the information collected from you for the following purposes:

i. share it with Clients:

- for the purpose of serving you with contextual and/or targeted ads that are relevant to you and may interest you;
- for ad reporting purposes and to have information about the performance of their ad campaigns and improve their ads performance over time;
- to help them understand how end-users are engaging with ads, what kind of end-users are most engaging with certain types of ads on Clients' sites and apps, and what kind of ads are published on Clients' sites and apps;

ii. share it with third parties:

- to receive additional data on you from sources other than Clients' sites and apps in order to help analyze and enrich the information collected on you, as well as serve you with more relevant and targeted ads on Clients' sites and apps and elsewhere;

- to receive third party's services, such as fraud protection, bot detection, rating, analytics, viewability, geo location services, ad security and verification services;
- to share it with Our corporate affiliates in order to provide Services;
- to share it in any other circumstances where We receive your written consent.

4. Your choice. You can opt out from collection of information We collect if you prefer us not to deliver personalized advertising. If you opt out, We won't use the information collected to serve ads based on your interests.

5. Controllers. Please note, unless otherwise provided below, that under the GDPR We process information collected in connection with Services as a processor and not as a controller. Under the GDPR controllers are our Clients. As a processor, We are committed to assist our Clients (controllers) to fulfill the GDPR requirements and data subjects' GDPR rights.

We require our Clients to comply with all applicable laws and regulations and to provide end-users with notice of the collection of personal information for advertising purposes as outlined in this Privacy Policy, to obtain from end-users the consent on processing of the relevant personal data for the relevant purposes.

6. Children. We do not permit Services to be used to collect information from sites and apps directed to children aged 16 or under for purposes of creating interest-based profiles or serving ads based on users' inferred interests. We may collect information from sites and apps directed to children aged 16 or under for other purposes, such as serving advertisements based on contextual information, like the content or type of the site or app (for example, serving an ad for a video game to a gaming app).

7. Information retention. We store information collected for as long as you use the Clients' sites and apps and for a 365 days thereafter, for the purpose of internal reporting, analysis, invoicing, reporting, discrepancy reasons and to prevent fraud, or until We delete information collected from you pursuant to your written request. Please note that We may be required to retain certain information by law.

B. INFORMATION CONCERNING OUR CLIENTS

8. What information may We collect? In order to be able to use of and access the Website, its services and tools and to become our Client, you may be requested to provide the following personal information:

i. information you provide to Us if you open a personal account on the Website:

- contact information: name, company name, physical address, phone number, email;
- financial information: full bank account numbers and/or credit card numbers;
- detailed personal information: date of birth, national ID number, country of company registration;

ii. when you contact Us, by filling a form on the Website, contacting Our customer support team for technical and other issues or when We contact you regarding any of the above, We may receive and process any personal information that you provide Us.

9. How do We use information We collect? We use information We collect in order to provide you with a secure, smooth, efficient, and customized Services. We may use information to:

- provide Services, other products and Client support;
- process transactions and send notices about your transactions;
- collect fees for Services;
- resolve disputes and troubleshoot problems;
- prevent potentially prohibited or illegal activities;
- customize, measure, and improve Our Website, its content, products, applications, services, etc.;
- contact you by email messaging.

10. How may We share information We collect? We may disclose information about Clients:

- to service providers under contract who help with Our business operations, such as fraud prevention, bill collection, marketing, and technology services;
- to trusted advertisers for the purposes of account inquiries or verification, or to enable participation in certain features of our mobile advertising exchange;
- within Our corporate affiliates to provide, understand, or improve their or our services.

11. Information retention. We store information collected for as long as you are our Client or representative of our Client and for a 365 days thereafter, for the purpose of internal reporting, analysis, invoicing, reporting, discrepancy reasons and to prevent fraud, or until We delete information collected from you pursuant to your written request. Please note that We may be required to retain certain information by law.

C. GENERAL PROVISIONS

12. Transfer of information outside your territory. If you visit Website and/or use Services from outside the Cyprus, please be aware that you are sending information (including personal data) to the United States or other country where our servers are located (if you need more information about location of our servers, please contact us at Website or via e-mail hello@richoffers.co). Information We have collected then may be

transferred within the United States or other country where the services located or back out of this country to other countries outside of your country of residence, depending on the type of information and in what purposes it shall be used.

We may share and transfer the information We collect only subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that your information is used only on our behalf and pursuant to our instructions.

13. Cookies. When you visit Website and/or use Services, We may place small data files on your computer or other device. These data files may be cookies, beacons, pixel tags (collectively "Cookies"). We use these technologies to:

- recognize you as a Client or Client's end-user;
- customize our Services, content, and advertising; measure promotional effectiveness;
- help ensure that your account security is not compromised;
- mitigate risk and prevent fraud;
- and to promote trust and safety across Website.

We may use Cookies in advertising services to help Clients serve and manage ads across the web.

You are free to decline Cookies if your browser or browser add-on permits, unless Cookies are required to prevent fraud or ensure the security of Website. However, declining Cookies may interfere with your use of Website and/or Services.

14. Information security. We are concerned about safeguarding the confidentiality of your personal information. We and Our hosting services implement systems, applications and procedures to secure your personal information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information.

For example, We limit access to your personal information to employees who We believe reasonably need to come into contact with that information to provide Services to you or in order to fulfill their official duties. These employees are bound by confidentiality obligations and may be subject to liability, if they fail to meet these obligations.

We will take all other steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy.

We protect your personal information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration.

We will make efforts to guarantee that your personal information is kept for no longer than is necessary for the purposes for which the personal information is processed.

15. Accessing Your Personal Information. At any time, you may contact Us at Website or

via e-mail hello@richoffers.co and request to access the personal information that We keep on you. We may need to ask you to provide certain credentials to make sure that you are who you claim to be. If you find that the information on your personal account is not accurate, complete or updated, then please provide Us the necessary information to correct it.

At any time, you may contact Us at Website or via e-mail hello@richoffers.co to receive a copy of the personal information that We keep about you, and to verify the accuracy of the information.

16. Your Data Subject Rights under the GDPR. In operating Website, unless otherwise provided below, We process your personal information as a controller (as such terms are defined in the GDPR). As a controller, We are committed to fulfill data subjects' GDPR rights.

As an EU resident, you may:

- contact Us if you want to withdraw your consent to the processing of your personal information. Exercising this right will not affect the lawfulness of processing based on consent before its withdrawal;
- request to delete or restrict access to your personal information. We may postpone or deny your request if your personal information is in current use for providing Services or due to other legitimate purposes, such as compliance with regulatory requirements associated with Us;
- if you exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, you may request to be informed that third parties that hold your personal information, in accordance with this Privacy Policy, will act accordingly;
- you may ask to transfer your personal information in accordance with your right to data portability;
- you may object to the processing of your personal information for direct marketing purposes;
- you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you;
- you have a right to lodge a complaint with a data protection supervisory authority.

17. Changes in Corporate Structure. We may share information you provided to Us if We are involved in a merger, acquisition, or sale of all or a portion of its assets, as part of such transaction. You will be notified via a prominent notice on Website of any change in ownership or uses of this information. In any event, your information will remain protected under this Privacy Policy.

18. Changes to this Privacy Policy. From time to time, We may update this Privacy Policy. Updates take effect 7 days after We post a notice on Website.

Until the new privacy policy takes effect, you can choose not to accept it and terminate your use of Website and/or Services. Continuing using Services after the new privacy policy takes effect means that you agree to the new privacy policy.

Note that if We need to adapt the privacy policy to legal requirements, the new privacy policy will become effective immediately or as required.

19. Contact Us If you have any requests concerning your personal information or any queries with.

D. INFORMATION FOR RESIDENTS OF CALIFORNIA: YOUR CALIFORNIA PRIVACY RIGHTS

20. If you are a California resident, the California Consumer Privacy Act ("CCPA") may provide you with rights that are in addition to those set forth elsewhere in this Privacy Policy regarding our use of your personal information. The CCPA Notice applies to "Consumers" as defined by the law. This section describes your CCPA rights as a California Consumer and explains how to exercise those rights. See Section 1-10 above to learn what information we collect from you and how it is collected, used and shared.

21. Access to Information and Data Portability Rights. You have the right to send us a request, no more than twice in a twelve-month period, for any of the following for the period that is twelve months prior to the request date:

- the categories of personal information we have collected about you;
- the categories of sources from which we collected your personal information;
- the business or commercial purposes for our collecting or selling your personal information;
- the categories of third parties to whom we have shared your personal information;
- the specific pieces of personal information we have collected about you.

A list of the categories of personal information disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.

A list of the categories of personal information sold about you in the prior 12 months, or that no sale occurred. If we sold your personal information, we will explain:

- the categories of your personal information we have sold;
the categories of third parties to which we sold personal information, by categories of personal information sold for each third party.

You have the right to make or obtain a transportable copy, no more than twice in a twelve-month period, of your personal information that we have collected in the period that is 12 months prior to the request date and are maintaining.

22. Data Deletion Rights. Except to the extent we have a basis for retention under CCPA, you may request that we delete your personal information that we have collected directly from you and are maintaining. Note also that we are not required to delete your personal information that we did not collect directly from you.

23. Exercising Your Rights. To make a request for access, portability or deletion according to your rights under CCPA, contact Us at Website or via e-mail hello@richoffers.co. California Consumers may exercise these rights via an authorized agent who meets the agency requirements of the CCPA. 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 that the personal information relates to you. Any request you submit to us is subject to an identification and residency verification process ("Verifiable Consumer Request").

24. 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;
- and Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Some personal information we maintain about Consumers is not sufficiently associated with enough personal information about the Consumer for us to be able to verify that it is a particular Consumer's personal information (e.g., clickstream data tied only to a pseudonymous browser ID). As required by the CCPA, we do not include that personal information in response to Verifiable Consumer Requests. If we cannot comply with a request, we will explain the reasons in our response.

We will make commercially reasonable efforts to identify Consumer personal information that we collect, process, store, disclose, and otherwise use and to respond to your California Consumer privacy rights requests. We will typically not charge a fee to fully respond to your requests, but we may charge a reasonable fee, or refuse to act upon a request, if your request is excessive, repetitive, unfounded, or overly burdensome.

25. Opt-Out

There is not yet a consensus as to whether third party cookies and tracking devices associated with our Website and mobile apps may constitute a "sale" of your PI as defined by the CCPA. To make a request to opt-out of sale under CCPA, contact Us at Website or via e-mail hello@richoffers.co.

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights. However, we may charge a different price or rate, or offer a different level or quality of Service, to the extent that doing so is reasonably related to the value of the applicable data. In addition, we may offer you financial incentives for the collection, sale and retention and use of your personal information as permitted by the CCPA that can, without limitation, result in reasonably different prices, rates, or quality levels. The material aspects of any financial incentive will be explained and described in its program terms. We may add or change incentive programs and/or their terms by posting notice on the program descriptions and terms linked to above so check them regularly.

California's "Shine the Light" law, Civil Code section 1798.83, requires certain businesses to respond to requests from California customers asking about the businesses' practices related to disclosing personal information to third parties for the third parties' direct marketing purposes. Alternately, such businesses may have in place a policy not to disclose personal information of customers to third parties for the third parties' direct marketing purposes if the customer has exercised an option to opt-out of such information-sharing. As discussed above, if we share Personal Information with third parties for their marketing purposes you will be able to elect for us not to do so by submitting your request at Website or via e-mail hello@richoffers.co (please include your name, mailing address, and email address).

E. INFORMATION FOR INDIVIDUALS IN THE EUROPEAN ECONOMIC AREA (EEA).

26. Your Choices and Rights.

As a resident of the EEA, you may have some or all of the following rights in relation to how we use your personal information:

- Access: you may request access to your personal information and receive copies of it;
- Correction: you may have inaccurate/incomplete personal information corrected and updated;
- Object to, or Limit or Restrict, Use of Data: you can ask us to stop using all or some of your personal information or to limit our use of it;
- Deletion: in certain circumstances, you can request a right "to be forgotten" (this is a right to have your information deleted or our use of your data restricted). We will honor such requests unless we have to retain this information to comply with a legal obligation or unless we have an overriding interest to retain it;
- Portability: in certain circumstances, exercise the right to data portability (this is a right to obtain a transferable version of your personal information to transfer to another provider); and
- Consent Management: where we rely on consent to process your personal data, you may withdraw consent at any time. You do not have to provide a reason for your withdrawal where processing is based on consent.

If you are a resident of the EEA and you wish to access, change or delete personal information we hold about you, you may contact Us at Website or via e-mail hello@richoffers.co. If we change or delete your personal information or if you decline to actively share certain personal information with us, we may not be able to provide you with our Services some of the features and functionality of our Services. In addition, you may contact Us at Website or via e-mail hello@richoffers.co to request that we not disclose your personal information to third parties (other than those that are acting as our agent to perform tasks on our behalf, such as data processors). Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on the rights and freedoms of another person. For example, we may not be able to accommodate certain requests to object to the processing of personal information, notably where such requests would not allow us to provide our service to you anymore.

For your protection, we may require proof of identity and verification before we can answer the above requests.

27. Legal basis for processing data. In this section, we identify the legal grounds on which we rely to process personal information.

In some cases, we have a legitimate interest to process the personal information that we collect, such as to develop, administer and support our products and services; to operate, evaluate and improve our business; to facilitate and manage engagement programs; to promote research; to support our recruitment activities; or to facilitate a Corporate Transaction (including a sale of assets or merger or acquisition).

In other cases, we process personal information to fulfill our contracts with business partners, such as third parties that distribute our products.

It may also be necessary for us to process personal information to establish, exercise or defend against fraud, illegal activity, and claims and other liabilities, including by enforcing the terms and conditions that govern the services we provide.

Our processing of certain information may be necessary to comply with our legal obligations, and for reasons of public interest, such as with respect to adverse event and product safety reporting.

We may also process personal information as specifically permitted by applicable legal requirements.

If we rely on consent for the processing of your personal information, we will seek such consent at the time we collect your personal information.

28. International data transfers. We may transfer your personal information to countries other than the country in which the data was originally collected for the purposes described in this Privacy Notice. The countries to which we transfer personal information may not have the same data protection laws as the country in which you initially provided the information. When we transfer personal information across borders, we consider a variety of requirements that may apply to such transfers.

Specifically, we may transfer personal information from the European Economic Area to:

- Countries that the European Commissions has deemed to adequately safeguard personal information;
- Pursuant to the recipient's compliance with standard contractual clauses (also known as Model Clauses), or Binding Corporate Rules;
- Pursuant to the consent of the individual to whom the personal information pertains, or
- As otherwise permitted by applicable EEA requirements.