

AD LOCAL VALUE, LLC, PRIVACY POLICY

Last Updated: 10/24/22

At Ad Local Value (“ALV”), we are committed to safeguarding your personal information. This Privacy Policy describes the ways we process and protect personal information that you provide or we collect in connection with your use of: (i) our proprietary website and related media accessible at www.adlocalvalue.com (the “**Website**”); and (ii) our software for advertising, research and data analysis, and market assessment, including any associated application program interface(s), administrative interfaces, services, information, documentation, content, and materials incorporated therein (the “**Software**”) (collectively, the Website and the Software are sometimes referred to herein as the “**Service**”). The scope of this Policy is limited to information collected or received by us through your use of the Service.

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and may provide information relating to substantive changes via email or other prominent notice. Changes to this Privacy Policy are effective as of the effective date listed above. Please periodically review this Privacy Policy for any changes.

Why We Process Your Personal Information

ALV provides physical and online platforms to advertise goods and services and capture consumer engagement through dynamic QR codes, short URLs, as well as interactive and non-interactive experiences. ALV also provides advertisement opportunities on ALV carousels, facilitates community interactions and business growth through sponsored events. Offering these services requires ALV to process your personal information. By using the Service, you hereby agree to allow ALV to process your personal information as set forth in this Privacy Policy. If you do not agree to the terms of this policy, please do not use the Service.

If you have questions or concerns about our privacy policy or practices, please contact us at info@adlocalvalue.com or by calling 509-514-0059.

Information We Process to Provide the Service

Personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. In some instances, information is collected in the aggregate that does not relate to any particular user or household (“**Aggregate Data**”), such as the number of Service users per day. In other instances, personal information can be sufficiently anonymized that it cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular user (“**Anonymous Data**”). You acknowledge and agree that ALV may process your personal information to render such information Anonymous Data and to process your personal information in combination with other information to render it Aggregate Data.

Creating an ALV account requires your basic contact information, including your phone number, email address, and confirmation that you are located within the United States. We may also require you to select a password for authentication and provide a username that will be visible to other users when you post content to certain portions of the Service. We receive and store this information and use it to create a user profile and provide you with access to the Service. We may use your email address to contact you with information relating to the Service or to provide support. We may also require your contact and payment information if you are entitled to receive payment based on your use of the Service or if you have accepted

an obligation to provide payment. When you post or upload materials to the Service, including without limitation text, audio, images, or other media (collectively “**User Content**”), those materials are personal information.

When you use the Service, ALV may collect additional personal information, including more detailed contact information you provide, your location, demographics, and your use of the Service. We may also collect and record certain information such as your unique device ID, hardware type, the version of your operating system (“**OS**”), your location and internet service provider while using the Service (based on your Internet Protocol (“**IP**”) address), what web browser is being used as reported by the browser, and your time zone and language as reported by your web browser. This information is useful to us for troubleshooting and helps us understand usage trends and for providing you with the correct version of the application. ALV may also periodically conduct surveys or request your opinion relating to your use of the Service and your interactions with other users of the Service.

Data Privacy Rights

ALV will take reasonable steps to allow you to correct, amend, delete, or limit the use of your personal information. Please contact us if you wish to learn what personal information we hold about you or would like to request deletion of your personal information. Once we have verified your identity, we will comply with all reasonable requests.

You may communicate with us regarding any privacy-related matters by telephoning us at 509-514-0059, visiting our website at www.adlocalvalue.com, or emailing us at info@adlocalvalue.com. We take all of your concerns seriously and will review any written complaints we received. We will cooperate with the appropriate regulatory authorities to resolve any complaints regarding your personal information.

Business Purposes For Processing Your Personal Information

The following list details how and why ALV uses your personal information when providing the Service:

- A. *Authentication; User Accounts.*** We use your submitted personal information to help prevent other users from accessing your user account, which includes using your personal information to authenticate user sign-in attempts to help prevent unauthorized access to your account.
- B. *Notifications.*** We may provide you with push notifications or notifications via SMS or email regarding your use of the Service. We may use a third-party authentication service to provide you with these notifications. You may adjust your notification settings within your user account options.
- C. *User Experience & Research; Support; Improvements.*** We may use your contact information to ask you about your user experience and your use of the Service. We may also use your contact information to provide support via email. Additionally, we may use your personal information to evaluate and improve the Service, monitor the popularity and manner in which users utilize various features of the Service, and otherwise .
- D. *Necessary Use.*** Due to the nature of the consumer engagement and analytics process, we may need to disclose certain personal information to other users in connection with your requests. You acknowledge we may disclose such personal information as is reasonably necessary to provide the Service.
- E. *Payment.*** If you are entitled to receive payment or if you are providing payment related to your use of the Service, your personal information may be provided to a payment processor or your account information (for instance, your PayPal account) must be submitted.

- F. *User Content.*** Materials you post or upload to the Service, along with your profile picture and account information (if you login using a separate online service) will be associated with your user account. This allows other users to view a username (and picture, if applicable) in connection with materials you post, and reciprocally, allow you to see the usernames of other users that post or upload materials to the Service. You may limit the audience for your User Content by specifying the desired audience in the Service when the User Content is shared. ALV may also collect and process personal information relating to your engagement with User Content to help it provide you with User Content that may be of interest to you.
- G. *Anonymization.*** We may further process your personal information to irreversibly render it Anonymous Data. With respect to Anonymous Data, ALV will (i) maintain technical safeguards intended to prohibit reidentification of users, (ii) maintain business processes intended to prohibit reidentification of users; (iii) maintain business processes intended to prevent inadvertent release of Anonymous Data; and (iv) refrain from attempting to reidentify users. Subject to applicable law, Anonymous Data may be processed without restriction.
- H. *Detecting and Preventing Fraud.*** We use your information to monitor for potentially fraudulent activities committed using the Service, which helps protect ALV and its users.
- I. *Legal Requirements.*** We may use or disclose your personal information where such disclosure is necessary for compliance with applicable law, including without limitation, lawful law enforcement requests and other governmental requests. To the extent we are legally required to disclose information to law enforcement, we will comply with such requests.

California Consumer Privacy Act of 2018

If you are a resident of California, then you may have additional rights under California law. To the extent possible, users will receive equal service and price regardless of whether they exercise their privacy rights under applicable law. ALV may sell or otherwise disclose Aggregate Data and Anonymous Data. ALV shall not sell or otherwise disclose your personal information without your consent.

You may contact us regarding these rights by emailing us at info@adlocalvalue.com or by phone at 509-514-0059.

Categories of Personal Information Collected By ALV Within the Preceding 12 Months

Over the past 12 months, ALV has collected information concerning users' names, addresses, email addresses, citizenship, usernames, phone numbers, User Content, use of the Service, IP addresses, browsers, devices, unique session identifiers, and operating systems.

Categories of Personal Information Disclosed for a Business Purpose Within the Preceding 12 Months

See "Exhibit A" to this Agreement which is incorporated herein.

Categories of Sources from which the Personal Information was collected

- Directly from end users of the Service

Categories of Third Parties with whom ALV shares Personal Information

- Service Providers of ALV that allow us to offer and improve the Service;
- Users of the service with whom you have authorized us to share personal information (e.g. engaging with a QR code or short-url on an advertisement);
- Email marketing and advertising providers; and
- Government agencies to the extent required by applicable law.

How long does ALV retain my Personal Information?

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Agreement unless a longer retention period is required or permitted by law, for legal, tax or regulatory reasons, or other legitimate and lawful business purposes.

Can I Limit ALV's Processing of my Personal Information? Can I Request Deletion of my Personal Information?

Yes, you may limit our processing of your data or request deletion by contacting us at info@adlocalvalue.com. However, if compliance with your request would prevent ALV from being able to provide the Service to you, then compliance with your request may require termination of your user account.

Does ALV Process the Personal Information of Children?

ALV requires that all of its users be over 16 years of age. If you have concerns or believe ALV may have received personal information relating to a person under the age of 16, please contact us at info@adlocalvalue.com.

How can I Access my Information? Can I Request a Correction?

Yes, you may obtain a copy or request a correction of your personal information by emailing info@adlocalvalue.com. You may also contact applicable regulatory authorities regarding our processing of your personal information.

California Do Not Track Disclosure

ALV does not respond to Do-Not Track (“DNT”) signals.

Usage Statistics & Tracking

Cookies. Cookies are small text files that are transferred to your computer and/or device to remember things about your visit, such as your preferences or a user session identification number. Information contained in a cookie may be linked to your personal information for purposes such as improving the quality of the Service. You can disable cookies at any time, although it may prevent you from accessing or using some or all features of the Service.

JWTs. JSON Web Tokens “JWTs” are small text files that are transferred to your computer and/or device to identify you to the Service and maintain your access to the Service once you have authenticated. Information contained in a JWT may be linked to your personal information for purposes such as improving the quality of the Service. You can disable JWTs at any time, although it may prevent you from accessing or using some or all features of the Service.

