SUBSHARE BY BREXVA PRIVACY POLICY

Last updated December 20, 2024

This Privacy Notice for SubShare by Brexva ('**we**', '**us**', or '**our**'), describes how and why we might access, collect, store, use, and/or share ('**process**') your personal information when you use our services ('**Services**'), including when you:

- Visit our website at https://subshare.brexva.com, or any website of ours that links to this Privacy Notice
- We facilitate shared access to subscription services, manage group memberships, and provide other digital account-related solutions. We do not claim ownership or control over the third-party services you access through our platform.
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns?Â Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at support@subshare.brexva.com.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using ourÂ table of contentsÂ below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more aboutÂ personal information you disclose to us.

Do we process any sensitive personal information?Â Some of the information may be considered 'special' or 'sensitive' in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

Do we collect any information from third parties? We may collect information from public databases, marketing partners, social media platforms, and other outside sources. Learn more aboutÂ information collected from other sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more aboutÂ how we process your information.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties. Learn more aboutÂ when and with whom we share your personal information.

How do we keep your information safe? We have adequate organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more aboutÂ how we keep your information safe.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more aboutÂ your privacy rights.

How do you exercise your rights? The easiest way to exercise your rights is by visiting support@subshare.brexva.com, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect?Â Review the Privacy Notice in full.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE PROCESS YOUR INFORMATION?
3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?
4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?
5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?
6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
7. HOW LONG DO WE KEEP YOUR INFORMATION?
8. HOW DO WE KEEP YOUR INFORMATION SAFE?
9. DO WE COLLECT INFORMATION FROM MINORS?
10. WHAT ARE YOUR PRIVACY RIGHTS?
11. CONTROLS FOR DO-NOT-TRACK FEATURES
12. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?
13. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?
14. DO WE MAKE UPDATES TO THIS NOTICE?
15. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?
16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short:Â *We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Services,Â express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- mailing addresses
- contact preferences
- contact or authentication data

- billing addresses
- debit/credit card numbers
- social media profile(s)

Sensitive Information. We do not process sensitive information.

Payment Data. We may collect data necessary to process your payment if you choose to make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is handled and stored by Stripe, Inc., PayPal, Inc. and Zoho Corporation. You may find their privacy notice links here: https://stripe.com/privacy, https://www.paypal.com/us/legalhub/paypal/privacy-full and https://www.zoho.com/privacy.html.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Google API

Our use of information received from Google APIs will adhere toÂ Google API Services User Data Policy, including theÂ Limited Use requirements.

Information collected from other sources

***In Short:Â** We may collect limited data from public databases, marketing partners, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers,Â and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion.

2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:Â** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.Â** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.Â** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.Â** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.Â** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- **To request feedback.Â** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individualâ€™s vital interest, such as to prevent harm.
- **Administrative & billing purposes. _____**

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

***In Short:Â** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.Â** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more aboutÂ withdrawing your consent.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
  - Diagnose problems and/or prevent fraudulent activities
  - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e. express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e. implied consent). You canÂ withdraw your consentÂ at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse

- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short:*Â We may share information in specific situations described in this section and/or with the following categories of third parties.*

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ('**third parties**') who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

The categories of third parties we may share personal information with are as follows:

- Data Storage Service Providers
- Payment Processors
- User Account Registration & Authentication Services
- Website Hosting Service Providers
- Communication & Collaboration Tools
- Finance & Accounting Tools
- Order Fulfilment Service Providers
- Third-Party Service Providers
- Billing Service Providers
- Business Administration Service Providers

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

In Short:*Â We are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Services, but are not affiliated with, our Services.*

The Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third-party websites. Any data collected by third parties is not covered by this Privacy Notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short:*Â We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our Services or on other websites.

To the extent these online tracking technologies are deemed to be a 'sale'/'sharing' (which includes targeted advertising, as defined under the applicable laws) under applicable US state laws, you can opt out of these online tracking technologies by submitting a request as described below under section 'DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?'

Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

Google Analytics

We may share your information with Google Analytics to track and analyse the use of the Services. The Google Analytics Advertising Features that we may use include: Google Analytics Demographics and Interests Reporting. To opt out of being tracked by Google Analytics across the Services, visit https://tools.google.com/dlpage/gaoptout. You can opt out of Google Analytics Advertising Features through Ads Settings and Ad Settings for mobile apps. Other opt out means include http://optout.networkadvertising.org/ and http://www.networkadvertising.org/mobile-choice. For more information on the privacy practices of Google, please visit the Google Privacy & Terms page.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short:Â *We keep your information for as long as necessary to fulfil the purposes outlined in this Privacy Notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than one thousand five hundred (1500) months past the start of the idle period of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short:Â *We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

9. DO WE COLLECT INFORMATION FROM MINORS?

In Short:*Â We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependentâ€™s use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at support@subshare.brexva.com.

10. WHAT ARE YOUR PRIVACY RIGHTS?

In Short:*Â Depending on your state of residence in the US or in some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information.Â You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

We will consider and act upon any request in accordance with applicable data protection laws.
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If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority orÂ UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at support@subshare.brexva.com.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognising or honouring DNT signals, we do not respond to them at this time.

12. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short:*Â If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.*

Categories of Personal Information We Collect

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behaviour, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO

G. Geolocation data	Device location	NO
H. Audio, electronic, sensory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individualâ€™s preferences and characteristics	YES
L. Sensitive personal Information		NO

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A - Indefinitely
- Category B - Until customer requests CCPA deletion
- Category K - Indefinitely

Sources of Personal Information

Learn more about the sources of personal information we collect in 'WHAT INFORMATION DO WE COLLECT?'

How We Use and Share Personal Information

Learn more about how we use your personal information in the section, 'HOW DO WE PROCESS YOUR INFORMATION?'

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information to in the section, 'WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?'

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be 'selling' of your personal information.

We have not sold or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months.Â We have disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

- Category A. Identifiers
- Category K. Inferences drawn from collected personal information

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under 'WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?'

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- **Right to know** whether or not we are processing your personal data
- **Right to accessÂ** your personal data
- **Right to correctÂ** inaccuracies in your personal data
- **Right to request** the deletion of your personal data
- **Right to obtain a copyÂ** of the personal data you previously shared with us
- **Right to non-discrimination** for exercising your rights
- **Right to opt out** of the processing of your personal data if it is used for targeted advertising (or sharing as defined under Californiaâ€™s privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ('profiling')

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including Minnesotaâ€™s privacy law)
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California's and Delaware's privacy law)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Minnesota's and Oregon's privacy law)
- Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including Minnesotaâ€™s privacy law)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including Californiaâ€™s privacy law)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Floridaâ€™s privacy law)

How to Exercise Your Rights

To exercise these rights, you can contact us by visiting support@subshare.brexva.com, by emailing us at support@subshare.brexva.com, by visiting https://subshare.brexva.com/support, or by referring to the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorised agent to make a request on your behalf. We may deny a request from an authorised agent that does not submit proof that they have been validly authorised to act on your behalf in accordance with applicable laws.

Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorised agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at support@subshare.brexva.com. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

California 'Shine The Light' Law

California Civil Code Section 1798.83, also known as the 'Shine The Light' law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?'

13. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?

In Short:*Â You may have additional rights based on the country you reside in.*

Australia and New Zealand

We collect and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).

This Privacy Notice satisfies the notice requirements defined in both Privacy Acts, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfil their applicable purpose, it may affect our ability to provide our services, in particular:

- offer you the products or services that you want
- respond to or help with your requests
- manage your account with us
- confirm your identity and protect your account

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?'

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner and a breach of New Zealand's Privacy Principles to the Office of New Zealand Privacy Commissioner.

14. DO WE MAKE UPDATES TO THIS NOTICE?

In Short:Â *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated 'Revised' date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

15. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at support@subshare.brexva.comÂ

SubShare by Brexva

16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please visit: support@subshare.brexva.com.