

# Klixters Inc. ® Privacy Policy

Last modified: July 24, 2023

Thank you for using our Services. At Klixters Inc. dba Klixters Focus Group, we believe you should get to choose when your information is shared, which is one of the reasons we have created a platform where you can get paid for watching ads and sharing your information!

Klixters Inc. Inc. (“**Klixters Inc.**”) operates the Klixters Inc. Web application (“**App**”), the KlixtersFocusGroup.com website (“**Site**”), and the pay-for-views services offered through our platform (together with the App and the Sites, the “**Services**”).

Klixters Inc. respects and protects the privacy of our users. We maintain strict policies to ensure the privacy of those who use our Services. This policy (“**Privacy Policy**”) describes the types of information we may collect from you and our practices for how we collect, use, maintain, protect, and disclose such information. The way that we collect and use your information depends on the way you access the Services (whether by Site or by App). This Privacy Policy also includes a description of certain rights that you may have over information that we may collect from you.

By using the Services, you agree to this Privacy Policy. If you do not agree with our policies and practices, your choice is to not use our Services.

## **INFORMATION KLIXTERS INC. COLLECTS AND HOW WE COLLECT IT**

### Types of Information Collected

Through the Services, Klixters Inc. may collect both personal information and non-personal information about you.

### *Personal Data:*

“ Personal Data” is information by which you may be personally identified. Among other data that you may voluntarily choose to provide, Klixters Inc. may collect the following Personal Data from you:

- Name;
- Email;
- Phone Number;
- Birthdate;
- Gender (optional);
- Marital Status (optional);
- Household Income (optional);
- Profile Photos (optional); and
- Bank Account Number.

### *Non-Personal Data:*

Non-personal data includes any data that cannot be used on its own to identify, trace, or identify a person. We may collect your IP Address, device information, or location information.

When non-Personal Data you give to us is combined with Personal Data we collect about you, it will be treated as Personal Data and we will only use it in accordance with this Privacy Policy.

### Why we collect and how we use your information. (Legal Basis)

In general, we collect and use your Personal Data for the following reasons:

- when it is necessary for the general functioning of the Services, including to facilitate payments or to contact you;
- when it is necessary in connection with any contract you have entered into with us (including our terms of service) or to take steps prior to entering into a contract with us;
- when we have obtained your prior consent to the use (this legal basis is only used in relation to uses that are entirely voluntary - it is not used for information processing that is necessary or obligatory in any way);
- when we have a legitimate interest in processing your information for the purpose of providing or improving our Services;
- when have a legitimate interest in using the information for the purpose of contacting you, subject to compliance with applicable law; or
- when we have a legitimate interest in using the information for the purpose of detecting, and protecting against, breaches of our policies and applicable laws.

We may use aggregated (anonymized) information about our users, and information that does not identify any individual, without restriction.

How we collect information.

With the exception of IP addresses which may be automatically collected, we collect your Personal Data only when you affirmatively give it to us through interactions with the Services, including:

- During sign up to create an account on the Site;
- When you download and create an account through the App;
- When you enter optional preference information; and
- Through surveys, promotions, contests, and/or contact us forms;

Additionally, we may collect data via automatic means including through cookies.

Please note that if you give out personal information online such as in a forum or message board, that information is not protected, is visible to the public and other visitors of the Site and can be collected and used by third parties. Although we strive to protect our users' privacy, we cannot guarantee the security of information you voluntarily post and we have no control over how such third parties may use your information. You disclose any personal information at your own risk.

## Automated Data Collection Methods

### *Cookies*

A cookie is a small file placed on the hard drive of your computer. Cookies are used to help us manage and report on your interaction with the Site. Through cookies, we are able to collect information that we use to improve the Services, authenticate your login credentials, keep track of click-stream data, or manage multiple instances of the Site in a single browser. Cookies may also collect other data such as the date and time you visited the Site, and your current IP address.

You can learn more about cookies by visiting <http://www.allaboutcookies.org>, which includes additional useful information on cookies and how to block cookies on different types of browsers and mobile devices. Please note, however, that by blocking or deleting cookies used in the Services, you may not be able to take full advantage of the Services.

### *Log Files*

We use means to collect IP addresses, physical location, and to report access times. We use this information to ensure compliance with various state laws. Occasionally, we use the information to improve our Services.

### *Do Not Track Settings*

We not do track our Users over time and across third party websites to provide targeted advertising and do not specifically respond to Do Not Track (“DNT”) signals.

## **WHO WE SHARE DATA WITH**

We may use aggregated (anonymized) information about our users, and information that does not identify any individual, without restriction.

We may share your Personal Data with the following parties under the following circumstances:

Advertisers	After you watch an ad, you will have the opportunity to request that we share your information with the applicable advertiser. We will only share your data if you affirmatively instruct us to via the platform.
Affiliates	We may, for our legitimate interests, share your information with entities under common ownership or control with us who will process your information in a manner consistent with this Privacy Policy and subject to appropriate safeguards
Successors in Interest	We may, for our legitimate interests, share your information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which Personal Data about our users is among the assets transferred. You will be notified of any such change by a prominent notice displayed on our Services or by e-mail. Any successor in interest to this Privacy Policy will be bound to the Privacy Policy at the time of transfer.
Law enforcement and other governmental agencies.	We may share your information when we believe in good faith that such sharing is reasonably necessary to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations.
Service providers and partners	We may, for our legitimate interests, share your information with contractors, service providers, third party authenticators, and other third parties we use to support our

	<p>business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. Some of the functions that our service providers provide are as follows:</p> <ul style="list-style-type: none"> <li>- Host server infrastructure and storage;</li> <li>- Business analytics services;</li> <li>- In-App user management;</li> <li>- Identity verification management;</li> <li>- Payment processing;</li> <li>- Site log analytics service for activity, performance, and troubleshooting;</li> <li>- App log analytics service for activity, performance, and troubleshooting;</li> <li>- Infrastructure monitoring for app performance; and</li> <li>- Email management services.</li> </ul>
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**HOW KLIXTERS INC. PROTECTS YOUR INFORMATION**

Klixters Inc. stores user data on our servers including name, email, phone number, address, and username. Personal Data about users is stored within the United States. If you are using the Services from other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your Personal Data to the United States. The United States may have laws which are different, and potentially not as protective, as the laws of your own country. By providing your Personal Data, you consent to any transfer and processing in accordance with this Privacy Policy. For the avoidance of doubt, our platform is not intended for any users outside of the United States.

Klixters Inc. employs physical, electronic and managerial control procedures to safeguard and help prevent unauthorized access to your information. We choose these safeguards based on the sensitivity of the information that we collect, process and store and the current state of technology. Our outsourced service providers who support our operations are also vetted to ensure that they too have the appropriate organizational and technical measures in place to protect your information

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your information

transmitted to the Services. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services. In the event that there is breach in the information that we hold, we shall notify of such breach via email or via notice on the Services.

How Long do we Store Personal Data?

We will only retain your Personal Data for as long as is necessary to fulfil the purposes for which it is collected. This length of time may vary according to the nature of your relationship with us. Personal Data will be purged after two years of nonuse of an account.

## ACCESSING AND CONTROLLING YOUR INFORMATION

If you would like to prevent us from collecting your information completely, you should cease use of our Services. You can also control certain data via these other methods:

Opt-out of non-essential electronic communications: You may opt out of receiving newsletters and other non-essential messages by using the “unsubscribe” function included in all such messages. However, you will continue to receive notices and essential transactional emails. If you have already opted-in, you can later choose to stop receiving such information or opt out of a feature. You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will make reasonable efforts to do so upon your request.

Optional information: You can always choose not to fill in non-mandatory fields when you submit any form linked to our services. communications.

Amend information: You may amend your information through your account page on the platform.

If you are a California resident, you also have the rights disclosed below.

## SPECIFIC RIGHTS AND DISCLOSURES FOR CALIFORNIA RESIDENTS

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 using the contact information provided below.

### CCPA Privacy Notice

If you are a California resident, you have the following rights with respect to information that we hold about you. We attempt to provide you the same rights no matter where you choose to live.

- **Right to access:** You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information source, purpose and period of processing, and the persons to whom the information is shared.
- **Right to rectification:** You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.
- **Right to erasure:** You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.
- **Right to restriction of processing:** You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to data portability:** You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.
- **Right to object:** You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

CCPA Data Collection Summary			
This chart is a summary of data we do collect and have collected over the past 12 months.			
Categories of Personal Information	Do we Collect?	Do we Disclose for a business purpose?	Do we sell?
Identifiers: (Contact details, such as real name, alias, address, telephone number, unique personal identifiers, online identifiers, IP address, email address, and account name)	YES	YES	With Consent
Categories of Information described in the California Customer Records statute: (including name, email, phone number, mailing address, SSN, driver’s license number, and bank account number)	YES	YES	NO

Geolocation Data: (device location)	YES	YES	NO
Inferences Drawn from other Personal Information to Create a Profile About a Consumer: (Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics)	YES	YES	NO
Internet or other Electronic Network Activity Information:  (Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements)	YES	YES	NO
Commercial Information: (Transaction information, purchase history, financial details, and payment information)	yes	NO	NO
Characteristics of Protected Classifications under California or Federal Law (gender and date of birth)	YES	YES	NO
Biometric Information: (Fingerprints and voiceprints)	NO	NO	NO
Audio, Visual, or Similar Information: (Images and audio, video, or call recordings created in connection with our business activities)	NO	NO	NO
Professional or Employment Related Information: (Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications)	NO	NO	NO
Non-Public Education Information (per the Family Educational Rights and Privacy Act) (Student records and directory information)	NO	NO	NO

## THIRD-PARTY SERVICES AND WEBSITES

Klixters Inc. is not responsible for the privacy policies or other practices employed by websites linked to, or from, our Services, including advertisers you may connect with via the Services, nor the information or content contained therein, and we encourage you to read the privacy statements of any linked third party.

We may allow third-party service providers to deliver content and advertisements in connection with our Services and to provide anonymous site metrics and other analytics services. These third parties may use cookies, web beacons, and other technologies to collect information, such as your IP



address, identifiers associated with your device, other applications on your device, the browsers you use to access our Services, webpages viewed, time spent on webpages, links clicked, and conversion information (e.g., transactions entered into). This information may be used by Klixters Inc. and third-party service providers on behalf of Klixters Inc. to analyze and track usage of our Services, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand how you use our Services. For more information about targeted advertising specifically, please visit <http://www.aboutads.info/choices>.

## **USERS UNDER THE AGE OF 16**

Our Services are not intended for children under 16 years of age and we do not knowingly collect Personal Data from children under 16. If you are under 16, do not use or register on the Services, make any purchases, use any of the interactive or public comment features, or provide any information about yourself to us. If we learn we have collected or received Personal Data from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the email address listed below.

## **USERS FROM THE EUROPEAN ECONOMIC AREA**

For the purposes of data collection under the GDPR, Klixters Inc shall be the data controller. If you are an individual resident in EEA, you have the following data protection rights regarding personal data:

- You have the right to access, correct, update or request deletion of your personal data. You can do so at any time by contacting us.
- You have the right to object to processing of your personal data, to ask us to restrict processing of your personal data, or to request portability of your personal data. Again, you can exercise these rights by contacting us.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us.
- You have that right to revoke consent that was previously given. If we have collected and process your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your Personal Data.

For more information, please contact your local data protection authority. If you would like to exercise any of the above rights, please contact us at [info@klixtersfocusgroup.com](mailto:info@klixtersfocusgroup.com)

## **CHANGES TO OUR PRIVACY POLICY**

We keep our privacy policy under regular review and we will place any updates on this webpage. If we make material changes to the policy, we will notify you by email to the email address specified in your account and/or through a notice on the Site or the App. Your continued use of our Services following the posting of any modification to this Privacy Policy shall constitute your acceptance of the amendments to this Privacy Policy. You can choose to discontinue use of the Service if you do not accept any modified version of this Privacy Policy. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting this Privacy Policy to check for any changes.

## **CONTACT**

Klixters Inc. Inc. is a Delaware corporation. Please contact our Privacy Department with any questions or concerns regarding this Privacy Policy.

Klixters Inc.

922 SE 14<sup>th</sup> Place

Cape coral, Fl. 33990

[info@klixtersfocusgroup.com](mailto:info@klixtersfocusgroup.com)

If you have any questions or concerns regarding our policy, or if you believe our policy or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with our Privacy Department listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We will keep records of your request and any resolution.