

PRIVACY POLICY

Last updated: 1 May 2022

1. Introductory provisions

1.1. This Privacy Policy describes how **ROKETO LABS LTD** (“Company”, “We”, “Us”, “Our”), a limited company incorporated under the laws of Republic of the British Virgin Islands with registered address: Intershore Chambers, Road Town, Tortola, British Virgin Islands, processes your Personal Data when you access and use the services (hereinafter “Services”) offered on the website (including all tools and plugin(s) available therein) www.roke.to (hereinafter “Website”).

1.2. This Privacy Policy complies with applicable privacy laws, including, without limitation, the European Union General Data Protection Regulation (GDPR). All capitalized words not specifically defined in this Privacy Policy have the same meaning as in Our Terms of Use and/or GDPR.

1.3. When processing Personal Data, We act either as a Data Controller or a Data Processor. When We determine the purpose and the manner of processing of your Personal Data, We are deemed to be a Data Controller. We will apply similar approach to protecting your data whether acting as a Data Processor or a Data Controller.

1.4. Please read this Privacy Policy carefully before accessing and/or using the Services. By using the Services, you confirm that you accept this Privacy Policy and agree to comply with it. If you do not agree to this Privacy Policy, you must immediately stop using the Services. In addition, by accepting this Privacy Policy, you expressly represent that you have reached the age of majority in your jurisdiction or are at least 16 (sixteen) years of age.

1.5. Please note, that We do not provide Services to minors and do not knowingly collect Personal Data of children or persons under 18 years of age. In the event that We discover that We have collected Personal Data of persons under 18 years of age, We will delete such data as soon, as practically possible. If you believe that a person under 18 years of age have provided Us personal Data, please contact Us at info@roke.to.

1.6. We reserve the right to amend this Privacy Policy; therefore, it is recommended that you check this Privacy Policy on a regular basis. All the changes to this Privacy Policy are effective as of the “Last updated” date. In the event that you continue to use the Services after the Last updated date, you are deemed to accept the changes made to this Privacy Policy.

2. What data We collect

2.1. We collect data (including Personal Data) about you:

a) *When you access and/or use the Services:* Our systems gather data that is automatically transmitted from the device(s) you use to access the Services, such as your IP address, language settings, location information, information on Internet Service Provider (ISP), date and time stamp, unique device identifier, browser information and system information (e.g., operating system), user data (URL clickstreams, page response times, errors);

b) *When you open an Account, initiate Transaction(s) and use Our Services:* When opening an Account, initiating Transaction(s) and/or otherwise using the Services, you will be prompted to enter certain information about yourself, including, but not limited to first name, last name, email address, phone number, wallet number, country, day of birth, a copy of your government-issued ID (passport etc.), proof of residence (g. utility bill); bank card information (card number, CVC or CVV, card expire date, card holder Name and Surname) amounts sent and received, amounts paid for services, the type of virtual financial assets involved, the order volume, price, value; virtual currency exchanging records, receiver address, streaming transaction duration; transaction history on the Platform, including withdrawals and virtual and fiat currency exchanging; amounts credited to your account and your account balances, Tax ID number, Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp, a contract with you in the interests of your company or with your company, or your request before entering into a contractual relationship; information contained in relevant documents.

c) *When data is provided to Us by third parties in connection with your use of the Services:*

Merchants whom We process payments for, may send Us any required data that you have provided them, including your Personal Data (e.g., first name, last name, email address, phone number, wallet number, country, day of birth, a copy of your government-issued ID (passport etc.), proof of residence (g. utility bill); bank card information (card number, CVC or CVV, card expire date, card holder Name and Surname) amounts sent and received, amounts paid for services, the type of virtual financial assets involved, the order volume, price, value; virtual currency exchanging records, receiver address, streaming transaction duration; transaction history on the Platform, including withdrawals and virtual and fiat currency exchanging; amounts credited to your account and your account balances, Tax ID number, Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp, a contract with you in the interests of your company or with your company, or your request before entering into a contractual relationship;) and details regarding your past and current purchases and activity on their site(s) and/or services to the extent that such data is necessary to process your Transaction.

When required for compliance with applicable laws (including, but not limited to anti-money laundering and counter-terrorism financing laws and regulations, hereinafter “KYC/AML”), We may verify your information and collect information from publicly

available sources, credit reference or fraud prevention agencies or check data against government sanction lists, either directly, or by using identity verification providers or due diligence and screening information providers.

d) When you communicate with Our customer support team: If you initiate communication with Our customer support team, you may be prompted to provide additional information about yourself and/or relevant Transaction(s). Additionally, Our customer support team may contact you to request further proof of identity, and other document(s) in order to ensure that your Transaction is valid or to the extent it otherwise may be necessary to comply with our legal obligations.

2.2. We never collect sensitive data. We do not use automated decision making or any kind of automated profiling.

3. Purposes and legal bases for processing

3.1. When processing your Personal Data, We rely on the following legal bases:

- a) your consent;
- b) Our performance under a contract between you and Us;
- c) Our legal obligation(s);
- d) Our (or third party's) legitimate interest(s); where your interests and fundamental rights do not override such interests.

3.2. We process your Personal Data with the following purposes:

- a) To manage Our relationship with you, including:
 - provision of Services to you;
 - notifying you about changes to the Services, Terms of Use and/or this Privacy policy;
 - responding to your inquiries, sending service notices, provision of customer support.

Legal bases:

- your consent (e.g., when receiving your Personal Data as part of your inquiry);
- performance under a contract between you and Us.

b) To register your Account with the Services, including:

- evaluation of your application and relevant verification procedures.

Legal bases:

- performance under a contract between you and Us;
- Our legal obligation(s) (including Our obligation(s) under anti-money laundering legislation);

- legitimate interests (prevention of fraud).
- c) To process and execute your Transaction(s), and other payment - related activities, including:
- managing payments, Fees and Charges;
 - communicate with Financial Services Provider(s) regarding a payment.

Legal bases:

- performance under a contract between you and Us;
- Our legal obligation(s) (including Our obligation(s) under anti-money laundering legislation);
- legitimate interests (prevention of fraud).

d) To improve the Services and to ensure that content on the Services (including Company's Materials) is presented in the most effective manner, including:

- testing of new features;
- traffic optimization;
- improvement of user experience;
- data analysis and research.

Legal basis:

- Our legitimate interests.

e) To administer and protect the Services and interests of the Company, including:

- troubleshooting, system maintenance;
- risk management, prevention of fraud, illegal activities on the Services, or any violation of Our Terms or Privacy Policy by way of monitoring, detecting and preventing above activities;
- enforcement of Our Terms or Privacy Policy;
- compliance with applicable laws and regulations;

Legal basis:

- Our legal obligation(s);
- legitimate interests.

f) To send marketing communications, provide you with newsletters and offers which may be interesting to you.

Legal basis:

- your consent.

4. How We share your data

4.1. We may share your data (including Personal Data) in the following circumstances:

4.1.1. with Our service providers:

- with Our affiliates or subsidiaries when such affiliates and/or subsidiaries require respective data to help Us to provide the Services to you.
- with Financial Services Providers and payment card network(s);
- with the merchants that use the Services when respective data is needed in connection with a Transaction that you initiated with the Services; such data will never include your “Sensitive Authentication Data”, as defined by the PCI Standards;
- KYC/AML service providers and providers of fraud-preventing services;
- providers of analytics;
- advertising services.

4.1.2. in connection with, or during negotiations of or any reorganization, acquisition, merger, sale, transfer or other disposition of all or portion of Company’s business, assets or stock;

4.1.3. with law enforcement or regulatory agencies under a subpoena, warrant, or other judicial or administrative order, or as may be otherwise required by applicable law; the necessity of disclosure under this Clause 4.1.3 will be determined in Our sole discretion;

4.1.4. with other third parties, upon reception of your explicit consent or direction to do so.

4.2. Your privacy is important to Us, so We have taken measures to ensure that all of the entities that We share your data with under Clause 4.1.1., have implemented strong data protection practices. While sharing your data with above third parties, We control use of your data by third parties via written contracts which conform to this Privacy Policy and/or applicable privacy laws. We do not above third-parties to use your personal data for their own purposes.

5. Third-party links and resources

The Services may contain links to third-party websites, applications or resources. This Privacy Policy does not cover privacy practices of such third-party websites, applications or resources. You are responsible for reviewing, understanding and accepting privacy policies associated with such websites, applications or resources and we do not accept any responsibility or liability for above websites, applications or resources, their features or policies.

6. Retention of Personal Data and transfers of Personal Data

6.1. We store Personal Data for as long as We need it; retention practice depends on the type of data collected, regulatory requirements, and Our use of specific data. We will only

retain your Personal Data for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

6.2. Our retention period is based on criteria that include legally mandated retention periods, pending or potential litigation, tax and accounting laws, intellectual property or ownership rights or contract requirements.

6.3. In some circumstances, we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

6.4. For the purposes of the KYC/AML, we will store and process your personal data for 5 (five) years.

6.5. Personal Data collected by the Company is stored and processed in Company's premises and on the servers located in the Republic of Cyprus. Personal Data that We collect from you may be transferred outside of EU/EEA, for instance when shared with our service providers in accordance with section 4 of this Privacy Policy. Generally, We strive to restrict the transfer of your Personal Data to countries [that have been deemed](#) to provide an adequate level of data protection by the European Commission. Subject to sections 1, 2 (c) of article 46 of GDPR, We rely on [standard contract clauses](#) approved by the European Commission when carrying out international transfers of data of EU/EEA residents to jurisdictions outside of EU/EEA which are not deemed to provide an adequate level of data protection by the European Commission.

7. Your rights as a Data Subject

7.1. You can exercise the following rights by contacting Us:

7.1.1. You have the right to access Personal Data that We have collected about you, specifically: categories of data; purposes of data processing; third parties to whom your data was disclosed; how long the data will be retained, and the criteria used to determine that period; your other rights regarding the use of your Personal Data. The right to access your Personal Data may be performed only by you or your legal representative. In case if you request the right to access information via a legal representative, you have to provide proof of whether such person has a right represent you.

7.1.2. If you have given consent to the processing of your Personal Data, you can freely withdraw such consent at any time by contacting Us.

7.1.3. You have the right to make Us correct any inaccurate Personal Data about you.

7.1.4. You have the right to be "forgotten". You may ask Us to erase any Personal Data about you.

7.1.5. You have the right to introduce restriction regime on processing of your Personal Data, so that in each case relevant data may be processed only upon your separate consent, with exceptions provided in applicable law.

7.1.6. You can object to using your Personal Data in case when respective processing is performed on the basis of Our legitimate interests

7.1.7. You have the right to data portability. We will give you a copy of your Personal Data in a readable format so that you can provide it to another service. If you ask us and it is technically possible, We will directly transfer the data to the other service for you.

7.1.8. You have the right to lodge a complaint regarding the use of your data by us. You can address a complaint to your national regulator (the list of the regulators are accessible via https://edpb.europa.eu/about-edpb/board/members_en).

7.2. The abovementioned rights are not absolute. In order to exercise some of the rights, you should meet certain conditions and requirements, specified in applicable law.

7.3. Once we receive any of your requests We will consider and decide on it within one month unless there is a justified requirement to provide such information faster. This term may be extended according to the applicable law.

7.4. We may request specific information from you to confirm your identity when necessary and reasonable. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. You do not need to pay a fee to access information or other rights, but We may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or refuse to comply with your request in these circumstances.

8. Security

8.1. We have implemented different technical and organizational solutions to comply with applicable privacy laws.

8.2. We have implemented security and organizational measures and procedures to secure the data collected and stored and to prevent it from being accidentally lost, used, altered, disclosed, or accessed without authorization. We allow disclosure of your personal data only to those employees and companies who have a business need to know such data. They will process Personal Data on Our instructions, and they are obliged to do it confidentially.

8.3. You acknowledge that no data transmission is guaranteed to be 100% secure and we cannot guarantee that your data will not be intercepted or accessed by unauthorised third parties.

8.4. In that you suspect privacy breach, please contact Us immediately. We have procedures in place to handle any potential data breach and we will inform a regulator of a breach if we are legally required to do so.

9. Cookie Policy

9.1. In order to guarantee an optimal level of usability and performance, We use Cookies and similar technologies (SDK) in order to track your interaction(s) with the Services. This section explains different types of Cookies that may be set when you use the Services, helping to understand and manage them as you wish.

9.2. A Cookie is a small file that is stored locally on your device as soon as the Services are being used. Cookies function by saving sets of data, such as, for example, language selection. Cookies do not store personal information like your name or address. You can find more information about Cookies at www.allaboutcookies.org.

9.3. We use Cookies in a range of ways to make your experience on the Services more enjoyable, including but not limited to:

- a. to keep you signed in;
- b. to record your habits and preferences when using the Services;
- c. to record performance of the Services and to collect statistics.

9.4. We use following types of Cookies:

9.4.1. Persistent Cookies. We use persistent Cookies to improve your experience of using the Services (e.g., by way of recording your privacy preferences).

9.4.2. Session Cookies. Session Cookies are temporary and are deleted from your device when at the end of each session. We use session Cookies to track your usage of the Services as described above.

9.4.3. First-party and third-party Cookies. First-party Cookies are the Cookies are placed on your device directly by Us. Third-party cookies are placed on your device by Our partners and service providers.

9.4.4. Strictly Necessary Cookies. These Cookies are necessary for the Services to function and cannot be switched off. They are set in response to actions which amount to a request for the Services, such as setting your privacy preferences, logging in, or filling forms available on the Services. In addition to above, these Cookies are used to identify irregular behavior on the Services, prevent fraudulent activity and improve security.

9.4.5. Performance/Analytics Cookies. These Cookies allow Us to count visits and traffic sources so We can measure and improve the performance of the Services. They help Us to know which part of the Services are the most and least popular and guide development of other improvements to the Services.

9.5. How to manage cookies:

9.5.1. You may change your Cookie settings through preference options on the Services, where applicable.

9.5.2. You can adjust and your browser settings to disable Cookies on the Website (see further instructions for [Chrome](#), [Internet Explorer](#), [Mozilla Firefox](#), [Safari on Mac](#), [Safari on mobile devices](#), [Opera](#); for other browsers, please check the information provided by your browser's developer).

9.5.3. You can adjust your device's settings to disable Cookies.

9.6. Below is information about how We use Cookies:

Name	Purpose	Is it a 1st or 3rd party Cookie?
Necessary cookies	These cookies are strictly necessary to provide you with the Services.	1st party Cookie
Local storage	Analytics	1st party Cookie

10. Contact Information

If you still have any question or need clarification regarding Our privacy practices, please contact Us at: info@roke.to, or send Us an email to: info@roke.to.

11. Duration of Processing

11.1. The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility of objection on your part.

12. International Transfer

12.1. We operate internationally, this means that personal data that we collect will be processed by Us in states where data protection and privacy regulations will not offer the same level of protection as in other parts of the world, such as the European Union.

12.2. When we transfer your Information to our entities outside the European Economic Area (EEA), we make use of standard contractual clauses which have been approved by the

European Commission. We also use these clauses when we transfer your personal data to third parties outside the EEA. You may obtain a copy of the documents we use to protect your personal data when it is transferred outside the EEA by contacting us via email at info@roke.to.

13. Notice to the merchants using the Services

13.1. We may collect, use and disclose certain Personal Data about your customers when acting as your service provider. You are responsible for making sure that your customer's privacy rights are respected, including ensuring appropriate disclosures about third party data collection and use. You must comply with applicable privacy laws, in particular when processing and sending Personal Data to Us in the context of using the Services and submitting Transactions.

13.2. To the extent that We are acting as your Data Processor, We will process Personal Data in accordance with the terms of Our Agreement with you and your lawful instructions.

Privacy Notice for California Residents

1. Effective date: 22 April 2022.

This Privacy Notice for California Residents (this "Privacy Notice") supplements the information contained in Roketo Labs Ltd. ("Company", "us" or "our", or "we") Privacy Policy ("Site Privacy Policy") and applies solely to all visitors, Users and others who reside in the State of California ("consumers", "you" or "your"). We adopt this Privacy Notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Privacy Notice. All capitalized terms not herein defined will have the meaning set forth in Company's Privacy Policy. In case on any inconsistencies with Company's Privacy Policy, this Privacy Notice shall prevail.

INFORMATION WE COLLECT

- 1.1. We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information").
- 1.2. In particular, we have collected the following categories of personal information from our consumers within the last twelve (12) months:

A. Identifiers.

Examples: first name, last name, email address, phone number, wallet number, country, day of birth, a copy of your government-issued ID (passport etc.), proof of residence (g. utility bill); bank card information (card number, CVC or CVV, card expire date, card holder Name and Surname) amounts sent and received, amounts paid for services, the type of virtual financial assets involved, the order volume, price, value; virtual currency exchanging records, receiver address, streaming transaction duration; transaction history on the Platform, including withdrawals and virtual and fiat currency exchanging; amounts credited to your account and your account balances, Tax ID number, Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp, a contract with you in the interests of your company or with your company, or your request before entering into a contractual relationship.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)).

Examples: A name, signature, physical characteristics or description, address, telephone number. Some personal information included in this category may overlap with other categories.

C. Protected classification characteristics under California or federal law.

Examples: Age, citizenship.

D. Commercial information.

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

E. Internet or other similar network activity.

Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

F. Geolocation data.

Examples: Physical location or movements.

1.3. Personal information does not include:

- (i) Publicly available information from government records;

- (ii) De-identified or aggregated consumer information;
- (iii) Information excluded from the CCPA's scope, like:
 - i. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - ii. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

1.4. We obtain the categories of personal information listed above from the following categories of sources:

- (i) Directly from our consumers or their agents. For example, from information consumers provide to Us related to the Services for which they engage Us.
- (ii) Directly from you when you provide it to Us. For example, if you share your name and contact information to ask a question about Our website or app.
- (iii) Indirectly from you. For example, from observing your actions on Our websites.
- (iv) From third parties, for example, Our service providers.

2. USE OF PERSONAL INFORMATION

2.1. We may use or disclose the personal information we collect for one or more of the following purposes:

- (i) To fulfill or meet the reason for which you provided the information. For example, if you share your name and contact information to ask a question about Our website, app or product we will use that personal information to respond to your inquiry.
- (ii) To provide, support, personalize and develop our websites and products.
- (iii) To process your requests and respond to your inquiries, including to investigate and address your concerns and monitor and improve Our responses.

- (iv) To notify you about changes to Our websites or any products or services we offer or provide through Our websites.
- (v) To notify you about changes to our policies and/or terms of use.
- (vi) To maintain a record of Our dealings with you.
- (vii) To understand and analyze the usage trends and preferences of Our Users, to improve Our websites and other products and to develop new features, and functionality.
- (viii) To contact you for administrative and information purposes - this may include providing customer service or sending communications, including changes to our terms of use.
- (ix) To engage features of third party social networks.
- (x) For testing, research, analysis and product development.
- (xi) To help maintain the safety, security, and integrity of Our websites and our databases, other technology assets and business.
- (xii) To diagnose or fix technological problems in relation to Our websites and products.
- (xiii) To carry out Our obligations and enforce Our rights arising from any contracts entered into between you and Us.
- (xiv) To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- (xv) To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Us is among the assets transferred.
- (xvi) As described to you when collecting your personal information or as otherwise set forth in the CCPA.

3. SHARING PERSONAL INFORMATION

3.1. We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

3.2. We disclose your personal information for a business purpose to the following categories of third parties:

- (i) Our affiliates.
- (ii) Service providers.
- (iii) Third parties to whom you or your agents authorize Us to disclose your personal information in connection with products or services We provide to you.
- (iv) Law enforcement bodies and courts.

3.3. We share your personal information for the following general purposes:

- (i) Service Providers: We may disclose personal information to third-party service providers that assist us with our operations. For example, analytics, log management, payment processing and data storage and processing services.
- (ii) Protecting our Rights: We may disclose personal information to third parties if We believe that doing so is legally required or is in Our interest to protect Our property or other legal rights (including, but not limited to, enforcement of Our agreements), or the rights or property of others.
- (iii) Corporate Transaction: Personal information may be disclosed as part of a corporate transaction, such as a merger, acquisition, debt financing, sale of Company's assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information could be transferred to third parties as one of Our business assets.

3.5. In the preceding twelve (12) months, we have not sold any personal information.

4. YOUR RIGHTS AND CHOICES

4.1. The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

4.2. Access to Specific Information and Data Portability Rights.

You have the right to request that We disclose certain information to you about Our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see "Exercising Access, Data Portability, and Deletion Rights" section), we will disclose to you:

- (i) The categories of personal information We collected about you.

- (ii) The categories of sources for the personal information We collected about you.
- (iii) Our business or commercial purpose for collecting and selling that personal information.
- (iv) The categories of third parties with whom We share that personal information.
- (v) The specific pieces of personal information We collected about you (also called a data portability request).
- (vi) If we disclosed your personal information for a business purpose, a list with disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

4.3. Deletion Request Rights.

You have the right to request that We delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once We receive and confirm your verifiable consumer request (see "Exercising Access, Data Portability, and Deletion Rights" section), We will delete (and direct our service providers to delete) your personal information from Our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for Us or Our service provider(s) to:

- (i) Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you or otherwise perform our contract with you.
- (ii) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- (iii) Debug products to identify and repair errors that impair existing intended functionality.
- (iv) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- (v) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- (vi) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

(vii) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

(viii) Comply with a legal obligation.

(ix) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

4.4. Exercising Access, Data Portability, and Deletion Rights.

4.4.1. To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to Us by either:

Emailing Us at: info@roke.to

4.4.2. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

4.4.3. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

(i) Provide sufficient information that allows Us to reasonably verify that you are the person about whom We collected personal information or an authorized representative of such person; and

(ii) Describe your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it.

4.4.4. 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 the personal information relates to you.

4.4.5. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

4.5. Response Timing and Format

4.5.1 We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If We require more time (up to 90 days), We will inform you of the reason and extension period in writing.

4.5.2. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response We provide will also explain the reasons

We cannot comply with a request, if applicable. For data portability requests, We will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

4.5.3. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If We determine that the request warrants a fee, We will tell you why We made that decision and provide you with a cost estimate before completing your request.

4.6. Personal Information Sales Opt-Out and Opt-In Rights.

4.6.1. If you are a California resident and 16 years of age or older, you have the right to direct Us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers We actually know are less than 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

4.6.2. To exercise the right to opt-out, you (or your authorized representative) shall submit a variable notice to info@roke.to.

4.6.3. Once you make an opt-out request, We will wait at least twelve (12) months before asking you to reauthorize personal information sales.

5. NON-DISCRIMINATION

5.1. We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, We will not:

(i) Deny you goods or services.

(ii) Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.

(iii) Provide you a different level or quality of goods or services.

(iv) Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

6. CHANGES TO OUR PRIVACY NOTICE

6.1. We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated Privacy Notice on

the Site and update the Privacy Notice's effective date. Your continued use of our websites and Services following the posting of changes constitutes your acceptance of such changes.

7. CONTACT INFORMATION

7.1. If you have any questions or comments about this Privacy Notice, the ways in which the Company collects and uses your information described here and in Our Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact our representative responsible for personal information as follows:

e-mail info@roke.to

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