BLACK WOMEN TALK TECH, INC. PRIVACY POLICY

Last modified: August 10th, 2021

Introduction

Black Women Talk Tech, Inc. ("**Company**," "we," "our," or "us") respects your privacy and are committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you use the Company's Scalegrow.ai software, including any content, functionality, and services offered on or through the platform software (the "**Platform**").

This Privacy Policy applies to information we collect:

- Through your use of our Platform.
- In email, text, and other electronic messages between you and the Platform.

It does not apply to information collected by:

- us offline or through any other means, including, without limitation, on any other website or software operated by Company or any third party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content that may link to or be accessible from or on the Platform.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Platform. By accessing or using our Platform, you agree to this Privacy Policy. This Privacy Policy may change from time to time.

What information do we collect about you and how do we collect it?

We collect several types of information from and about users of our Platform, including, without limitation, information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, social security number, bank account information, and any other identifier by which you may be contacted online or offline ("**personal information**");
- About your internet connection, the equipment you use to access our Platform, and usage details.

We collect this information:

- Directly from you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases, submit information to, or otherwise provide personal information to us.
- Automatically as you navigate through the Platform.
- From third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Platform may include:

- Information that you provide by completing forms on our Platform. We may also ask you for information when you report a problem with our Platform.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your search queries on the Platform.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Platform, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including, without limitation:

- Details of your use of our Platform including traffic data, location data, logs, and other communication data and the resources that you access and use on the Platform.
- Information about your computer, phone, tablet, or any other device you may use to access the Platform, and information about your internet connection, including your IP address, Uniform Resource Locator, operating system, and browser type.
- Information collected through cookies, web beacons, and other tracking technologies.

How do we use your information?

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Platform and its contents to you.
- To verify accounts and activity.
- To monitor suspicious or fraudulent activity and to identify violations of our policies.
- To provide you with information or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Platform or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Platform.
- To follow up with you after correspondence (live chat, email or phone inquiries) or to provide claim support.
- To offer you services from our third-party partners
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

How do we disclose your information?

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To connect you with our third-party partners, including, without limitation, You Exec LLC, who offer services we desire to share with you.
- To contractors, service providers, hosting partners, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To 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 the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Platform users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- To protect our legal rights and to complying with applicable laws, regulations, legal claims, audit functions, etc.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce or apply our <u>Terms of Use</u> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

How do we protect your information?

If you do not wish to have your email address/contact information used by us to promote our own parties' products opt-out by or third or services, you can contact us at hello@blackwomentalktech.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as needed for you to continue to access the Platform and use the Platform for its intended purpose.

How long do we keep your information?

Account Information

We retain your account information until you delete your account. We also retain some of your information as necessary to comply with our legal obligations (which may be for a period of time after you delete your account), to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our Platform. Where we retain information for Platform improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Platform, not to specifically analyze personal characteristics about you.

Information You Share On the Platform

If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your employer and/or team members or other users to make full use of the Platform. For example, we continue to display activities and content you generated.

Marketing Information

If you have elected to receive marketing emails from us, we retain information about your marketing preferences unless you specifically ask us to delete such information. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

Do we use "cookies"?

Yes. Cookies are small files that a site or its service provider transfers to your computer or mobile device hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart.

We use cookies to:

- Keep track of advertisements.
- Understand your preferences based on previous or current activity, which enables us to provide you with improved services.
- Compile and aggregate data about Platform traffic and interactions in order to offer better experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is different, please review your browser's help menu to learn the correct way to modify your cookies. If you turn cookies off, some of the features that make your experience more efficient may not function properly. It won't affect the user's experience that make your experience more efficient and may not function properly.

Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. https://support.google.com/adwordspolicy/answer/1316548?hl=en

We use Google AdSense Advertising.

Google, as a third-party vendor, uses cookies to serve ads on our Platform. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our Platform and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We have implemented the following:

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party

identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Platform.

Opting out:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

California Online Privacy Protection Act (CalOPPA)

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information.

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. – See more at: http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Platform that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at hello@blackwomentalktech.com.

How does our Platform handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our Platform allow third-party behavioral tracking?

It's also important to note that we allow third-party behavioral tracking.

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

Our Platform is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Platform. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Platform or on or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at hello@blackwomentalktech.com. California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information.

Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to comply with Fair Information Practices, we agree to the following:

Should a data breach occur, we will notify the users via in-Platform notification within seven (7) business days.

We also agree to the "Individual Redress Principle", which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

• Send information, respond to inquiries, and/or other requests or questions.

To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.

European Union Data Subjects Rights Under General Data Protection Regulation 2016/679 (GDPR)

European Union data subjects have legal rights under the GDPR in relation to your personal information. To learn more about each right you may have or to exercise any of your rights please contact us by sending an email to <u>hello@blackwomentalktech.com</u>.

You may request that we:

- Confirm whether or not we have and are using your personal information.
- Correct any information about you which is incorrect.
- Ask us to restrict our use of your information in certain circumstances.

- Stop using your data for direct marketing purposes.
- Erase your information if you think we no longer need to use it for the purpose we collected it from you or if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal information.

We can continue to use your information following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

Changes to our Privacy Policy

We may revise and update this Privacy Policy from time to time in our sole discretion. All changes are effective immediately when we post them and apply to all access to and use of the Platform thereafter.

Your continued use of the Platform following the posting of revised Privacy Policy means that you accept and agree to the changes. You are expected to check this page from time to time so you are aware of any changes, as they are binding on you.

Contacting Us

If there are any questions regarding this Privacy Policy, you may contact us at <u>hello@blackwomentalktech.com</u>.