Colu Privacy Policy

Last Updated June 4, 2020

This Privacy Policy (the "Privacy Policy") is provided by Colu Technologies (US) Inc. and parent company Colu Technologies Ltd. (Israel), which are referred within the policy collectively as "Colu", "we", "us" and/or "our". It explains how we may collect, store, use, and disclose information when you access or use (1) our website located at www.Colu.com (the "Website"); (2) our mobile applications to which this Privacy Policy is posted (collectively, the "Application" or the "App"); and (3) any services, content, and features made available by us through the Website or the Application (together with the Website and the Application, the "Services").

By accessing or using the Services, you consent to our collection, storage, use, and disclosure of your information as described in this Privacy Policy. If you do not agree to every provision of this Privacy Policy, you may not access, sign up to or use the Services.

1. Introduction

Colu is providing municipalities in the United States with services that are intended to increase civic engagement, promote city goals, encourage local spending, and support local businesses. This is done through Colu's technological platform, which includes the Application. The Application is localized to each of the municipalities that are engaging Colu (each of them will be referred to as "City"); City is providing you with its own services through the Application, including, e.g., a municipal reward program (the "Reward Program").

In the course of providing our services to Municipalities, we collect, store, use and disclose certain types of information about users of the Application ("Users"). This information includes information that identifies you ("Personal Information"). Colu is committed to treating your Personal Information with respect and sensitivity. If you have any queries about this privacy policy or in relation to how we use your personal data, please contact us at Privacy@Colu.com.

Please note that we may also collect, use and share/license aggregated data and other types of anonymized data such as statistical or demographic data for any purpose.

Aggregated/anonymized data could be derived from your Personal Information but is not considered Personal Information as it may not identify you personally. For example, we may aggregate your data of usage of the App to calculate the percentage of users accessing a specific App feature. As another example, we may aggregate your data of purchases qualifying for rewards with that of other users and share it (anonymized) with City (or third-party sponsors), in order to analyze the results of a reward offering campaign under the Rewards Program. However, if we combine or connect Aggregated Data with your personal data so that it can

identify you, we will treat the combined data as Personal Information which will be used in accordance with this Privacy Policy.

We keep our Privacy Policy under regular review and may change it from time to time by posting a revised version and updating the 'Effective Date' above. The revised version will be effective on the "Effective Date" listed. We will provide you with reasonable prior notice of substantial changes in how we use your information, by email or other means, at our choice by email. We may provide notice of changes in other circumstances as well. If you are unhappy with these changes, you can stop your use of the Application.

The Application contains links to and from websites and platforms of third parties, such as merchants, social platforms and others. Please note that these websites, platforms, and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites, platforms or services, such as contact and location data. Please check these policies before you submit any personal data to these websites and platforms or use these services.

2. Types of Private Information We Collect and How We Collect It

Information you provide to us. This is information, including Personal Information, that you agree to give us about you by filling in forms in the Application or the Website, or otherwise submitting such information, *e.g.,* by corresponding with us (for example, by email or chat) or by phone. It includes information you provide when you register to use the Application (such as your name and email address), share data via the Application social media functions, if available, enter a competition, promotion or survey, and when you communicate with us for customer service or technical support for the Services. If you contact us, we may keep a record of that correspondence.

In signing up to the Application, you expressly consent to receive mobile phone text messages, push notifications and emails from us or from City to the mobile phone number and email address you provided us, including marketing and promotional communications. You can opt-out from receiving marketing and promotional emails and text messages by adjusting the relevant settings in the App or by contacting us at CS@colu.com. You may also follow the unsubscribe instructions in any promotional email you receive. Please note that certain Services-related messages that we send (including emails we may send on behalf of City) are necessary for the proper functioning and use of the Services and you may not have the ability to

opt-out of those messages. You may opt-out from receiving phone notifications by adjusting the preferences in your mobile phone.

Information Collected from Devices. When you access or use the Services via a computer or mobile device, including, without limitation, a desktop computer, laptop, mobile phone, tablet, or other electronic device (each, a "Device"), we may collect information from your Device, such as your Device type and manufacturer, your Device operating system and version, your mobile carrier, your Device identifiers, your mobile phone number, your IP address, your browser type, your network connection type, information about the webpage that referred you to the Website or that you visited prior to the Website, and your behavior and activity on the Website and the Application. This includes, for example, details of your usage of the App, such as details of your participation in reward offers in the App, your reward balance and information on rewards awarded to you and redeemed by you through the Application at any of the Redeeming Merchants' stores (each, a "Redemption Purchase").

In addition, if you download the Application to your mobile Device, we may collect information from your mobile Device about your location. We may use this information to provide targeted offers to you and notify you of nearby third-party locations where you may use the Services. You may opt out of the collection of location data at any time by changing your settings on your mobile Device or your preferences in the App settings. However, if you do so, certain features of the Services may not be available to you or the performance of certain features of the Services may be limited or not work at all.

Information Collected by Cookies and Similar Tracking Technologies. When you access or use the Services, we may place small data files on your Device that assign random, unique numbers to your Device to enable us to recognize your Device when you use the Services. These data files may be cookies, pixel tags, other local shared objects, or similar technologies provided by your browser or associated applications (collectively, "Cookies"). We may use Cookies to recognize your device, manage and store your settings and preferences for the Services, improve the Services, offer targeted products and services to you, and collect and analyze information about your access and use of the Services. The Cookies we use in connection with the Services may include the following:

- *Session Cookies*: Session Cookies are temporary Cookies that expire and are automatically erased when you close your browser window. We may use session Cookies to grant you access to content and to enable actions that require you to be logged into your Account to perform.

- *Persistent Cookies*: Persistent Cookies are Cookies that usually have an expiration date in the distant future and remain in your browser until they expire or you manually delete them. We may use persistent Cookies to better understand usage patterns so we can improve the Services. For example, we may use a persistent Cookie to associate you with your Account or to remember your choices for the Services.
- *Third-Party Cookies*: We permit certain third parties to place Cookies through the Services to provide us with insight about the use of the Services and user demographics. These third parties may use Cookies to collect information about your online activities over time and across different websites when you access or use the Services. For example, we may use Google Analytics to analyze usage patterns for the Website and the Application. Google Analytics may generate a Cookie to capture information about your access and use of the Website and the Application that Google may use to compile reports on activity for us and to provide other related services. Your web browser may automatically send certain information to Google, such as the web address of the page that you are visiting and your IP address. To opt out of Google Analytics in connection with the Services, visit the Google Analytics opt-out page and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser. We do not control third parties' use of Cookies or similar tracking technologies. Such use is subject to the respective third parties' privacy policies.

By accessing or using the Services, you consent to the placement of Cookies on your Devices as described in this Privacy Policy. If you prefer not to receive Cookies through the Services, you may control how your browser responds to Cookies by adjusting the privacy and security settings of your web browser. Unless you set your browser settings to refuse all Cookies, our systems may issue Cookies when you access or use the Services. If you set your browser settings to refuse all Cookies, the performance of certain features of the Services may be limited or not work at all.

In addition, in our email messages to you (including emails that Colu may be sending on behalf of the City operating the App you are using), we and third-party providers we may be using, may use Cookies to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded. Some of our email messages might include "click-through URLs" linked to content on the Website or the Application. We track click-through data to help us understand and analyze interest in topics and use of the Services.

Information Collected from Third-Party Payment Card Information Vendor:

The Reward Program provided by City through the App may allow you to get reward points for qualifying purchases at certain local merchants, as defined in the App's User Terms of Use [Link]. In order to be able to receive such reward points for qualifying purchases, you will be required to link a payment card or cards to your App account by providing our third-party vendor with the linked financial account identifiers and login information, and/or similar information (collectively, the "Account Login Information"). Such Financial Account Login Information is collected by our payment information vendor Plaid Technologies, Inc. ("Plaid"), pursuant to the terms and conditions of its privacy policy (found here: https://plaid.com/legal/#privacy-policy), and we are provided only with an encrypted token by Plaid in connection therewith. **We do not obtain access to your Financial Account Login Information itself.**

Once you have linked a payment card (or cards) to the App, Colu would receive from Plaid information from the financial account relating to that payment card, such as Information about transactions *e.g.,* amount, date, payee, type, quantity, price, location, and a description of the transaction ("Transaction Information") as well as general information on the financial account and any account associated with it, such as the financial account's financial institution name, account name, account type, account ownership and the last 2-4 alphanumeric characters of an account's official account number.

By linking your payment card, you:

(1) Acknowledge and agree that if and to the extent your Financial Account Login Information, Personal Information, Transaction Information, or any other information is collected by or transferred to Plaid Technologies, Inc. ("Plaid"), the terms and conditions of Plaid's privacy policy (found here: https://plaid.com/legal/#privacy-policy) will govern Plaid's use of such information, and that you expressly agree to the terms and conditions of Plaid's privacy policy. You hereby expressly grant Plaid the right, power, and authority to access and transmit your information as reasonably necessary for Plaid to provide its services to you.

(2) Authorize Colu to receive, process and store the information provided by Plaid as described above and to monitor the Transactional Information on your linked payment card financial account in connection with identifying potentially qualifying purchases under the City's Reward Program.

Please note that you are not obligated to link a payment card to the App, and you may opt-out of the information collection, processing and transaction monitoring on the payment card(s) you

have linked by de-linking them through the Application. However, if you do not link a payment card, you will not be able to take advantage of reward offers that are based on completing qualifying purchases at local merchants, should City initiate such reward offers.

Information from Other Third Parties and Publicly Available Sources

We may receive personal data about you from third parties and public sources, such as data from analytics providers, and name, contact information, profile photo and other account/profile information from social networks such as Facebook and providers such as Apple if you choose to register to the App through these services (should such an option be available).

3. How We Use Private Information

We may use Personal Information for the purposes described elsewhere in this Privacy Policy and internally for our general commercial purposes, including, among other things, to:

- offer and improve the Services and City's services, including advising City on creating and personalizing content and reward offers;
- analyze usage of the Services and City's services;
- alert you to software compatibility issues;
- deliver any notices or alerts and communications relevant to your use of the Services or City's services, including on behalf of City;
- for marketing and advertising purposes including on behalf of City, including sending you promotional material or special offers on our behalf or on behalf of City or other third parties, provided that you have not already opted-out of receiving such communications;
- to fulfill contracts we have with you, our contract with City, and to assist City in fulfilling its contracts with you;
- offer you other products, programs, or services that we or City believe may be of interest;
- perform market research, project planning, product development, troubleshooting problems, and analysis of user behavior;
- detect, prevent and investigate actual or suspected fraud, hacking, infringement, or other misconduct involving the Services;
- comply with any applicable laws and regulations and respond to lawful requests;

- Investigate and resolve complaints, defend against legal claims and potential litigation, including on behalf of City

4. How We Share Information

We may share Anonymous/Aggregated Information with third parties as described elsewhere in this Privacy Policy and for our commercial purposes.

We do not share Personal Information with our affiliates or third-party service providers, except as described elsewhere in this Privacy Policy and as follows:

- With City: As noted, Colu is a service provider to City; the information collected, processed and transmitted by Colu through or in connection with the Services, including your Personal Information, may be collected and processed on behalf of City or otherwise in relation to City's provision of services through the Application and in accordance with the User Terms of Use. Therefore, Colu may share with City all categories of information, including your Personal Information, except for Transaction Data and any other financial account Personal Information provided to Colu by Plaid, which will not be shared with City. Notwithstanding this exclusion, Colu may share with City anonymized and/or aggregated information, including in regard to potentially qualifying transactions based on information received from Plaid.
- With Merchants: On behalf of City, we may share your Personal Information with merchants with whom you made a potentially qualifying purchase under the terms of the Reward Program, to inform them where a transaction occurred as needed for the merchant to confirm a specific transaction occurred; for example, we may share the date and amount of your purchase so the merchant can verify your purchase with its records or confirm if there is a missing or disputed transaction. We may share with Redeeming Merchants similar information, on behalf of City, to verify a Redemption Purchase and its details. In addition, we share with Redeeming Merchants your full name (as you have registered it in the App).
- We may also share some or all of your Personal Information –
    - with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us;
    - you request or authorize it, or to provide a service requested by you;
    - with Third-Party Service Providers that provide services to support the Services, such as data analysis, email delivery, hosting, infrastructure, network storage,

customer service, technical support, and promotional services who are bound by contractual obligations to keep the information we provide them confidential.

- to comply with applicable laws, rules, and regulations, and to comply with governmental and regulatory requests, court orders, and subpoenas;
- to protect our rights, property, and safety and the rights, property, and safety of City and of others
- to enforce our rights arising from any contracts entered into between you and us, including the Terms of Service, to enforce City's rights arising from any contracts entered between you and City, including the User Terms of Use;
- In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Private Information may be shared and may be part of the transferred assets.

5. Security

We take the security of your Personal Information seriously. We use technical, physical and administrative safeguards, such as, but not limited to, firewalls, encryption techniques and authentication procedures to maintain the security of your Information. Unfortunately, no collection or transmission of information over the Internet or other publicly accessible communications networks can be guaranteed to be 100% secure, and therefore, we cannot warrant the security of any such information. We are not responsible for the circumvention of any privacy settings or security features. You agree that we will not have any liability for misuse, access, acquisition, deletion, or disclosure of your Information.

We may provide you with the option to protect the access to the App with a code/password you select. We strongly recommend that you do not disclose your password to anyone. We will never ask you for your password in any unsolicited communication (such as letters, phone calls or email messages).

6. Children's Information

The Services are not intended for children, and we do not knowingly attempt to solicit or receive information from children on the Services. If we learn we have collected or received personal information from a child under the age of 13 without verification of parental consent, we will take steps to comply with any applicable legal requirement to remove such Information. Please contact us if you believe that we have mistakenly or unintentionally collected Information from a child under the age of 13.

7. Contact Information

If you have any questions regarding this Privacy Policy or the Services, please contact us at Privacy@colu.com.