

## UNIKA PRIVACY POLICY

Effective date: December 27, 2022

Last updated: January 02, 2023

UNIKA LABS LTD. ENCOURAGE YOU TO READ THE PRIVACY POLICY CAREFULLY AND USE IT TO MAKE INFORMED DECISIONS. BY USING UNIKA, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND YOUR CONTINUED USE OF THE SERVICES CONSTITUTES YOUR ONGOING AGREEMENT TO THE PRIVACY POLICY.

Unika Labs Ltd. (hereinafter in the text – the Company, we, our) has prepared this Privacy Policy to outline its practices with respect to collecting, using and disclosing Users' information when in process of using Unika.

### DEFINITIONS FOR THE PURPOSES OF THIS PRIVACY POLICY

“Personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“Controller” is a legal entity of Unika Labs Ltd., with Registered Office of the Company at the offices of QUIJANO & ASSOCIATES (BVI) LIMITED, Quijano Chambers, P.O. Box 3159, Road Town, Tortola, British Virgin Islands, which independently determines the purposes and means of processing personal data when using Unika via website.

We use the terms “personal data” and “processing” as they are defined in the GDPR, but “personal data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage, and disclosure.

### SCOPE OF THE PRIVACY POLICY

The Policy is applicable only in relations to the use of Unika (via website), and does not apply to data that comes from companies or other organizations. This Policy (together with our other documents) sets out the basis on which we process any personal data that we receive from you or that you provide to us.

We ask for your personal data that is (i) adequate, (ii) appropriate and (iii) necessary for processing (data minimization principle).

Your data is processed in a lawful, fair and transparent manner.

Unika Labs Ltd. is not intended for children under the age of 18. If you are under 18 years old, you should not use Unika or provide any personal Information to us. In the event that we become aware that an individual under the age of 18 has shared any of their information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [info@unika.network](mailto:info@unika.network).

YOU ACKNOWLEDGE THAT WE ARE NOT RESPONSIBLE FOR THE PRODUCTS, SERVICES, OR DESCRIPTIONS OF PRODUCTS OR SERVICES THAT YOU RECEIVE FROM THIRD-PARTY SITES OR TO THE CONTENT OR PRIVACY PRACTICES OF THOSE SITES AND THAT THIS PRIVACY POLICY DOES NOT APPLY TO ANY SUCH THIRD-PARTY PRODUCTS AND SERVICES. YOU ARE KNOWINGLY AND VOLUNTARILY ASSUMING ALL RISKS OF USING THIRD-PARTY SITES TO PURCHASE PRODUCTS AND SERVICES. YOU AGREE THAT WE SHALL HAVE NO LIABILITY WHATSOEVER WITH RESPECT TO SUCH THIRD-PARTY SITES AND YOUR USAGE OF THEM.

We may share information, including Personal Information, in the event of a corporate transaction (e.g., the sale of a substantial part of our business, a merger, consolidation of assets, the sale of an asset, or transfer in the operation thereof) of the Company. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

## WHAT DATA WE PROCESS AND FOR WHAT PURPOSE

By submitting your personal information, you consent to its processing in order for the Company to fulfill its obligations to you to enable you to use Unika, to keep it secure. We also use your personal information to support our services and business functions, such as fraud prevention, marketing (in terms of number of users and country of download) and legal functions. Anyway, our goal is to limit the information we collect to the information we need to support our business.

We process two types of information:

- 1) information we receive directly from you;
- 2) information we receive from others, including services and automated programs.

The information we **receive from you** includes the information you share with us when you send a feedback/inquiries about Unika, testing performance of Unika, using our website.

When you take these actions, you may give us different types of personal information, such as:

- your name;
- your email address;

- mathematically represented facial image information (that means we do not collect your facial image, because of the Unika's nature);
- other information you deem necessary to provide.

We process **technical information** when you use our website. We use third party tools to automatically record and collect analytics information about your use This may include information such as:

- data about the device;
- browser, unique user IDs;
- location data;
- IP-address, time, date, referral link.

## HOW WE USE THE PERSONAL INFORMATION

The information we collect, which may include your Personal Information, is used for the following purposes:

To provide the services (testing performance of Unika);

To respond you and to keep you informed of our latest updates and news;

To market our website and the services;

To perform research or to conduct analytics in order to improve and Unika;

To respond to your queries;

To investigate and resolve disputes in connection with your use of Unika;

To detect and prevent fraudulent and illegal activity or any other type of activity that may negatively affect the integrity of Unika;

To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

## COOKIES

When you visit Unika website, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be related you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalized web experience. However, blocking some types of cookies may impact your experience of the site and the services we are able to offer.

We use cookies to personalize content, to provide features and to analyze our traffic, to operate and administer Unika website, conduct analytics. You have the right to decide whether to accept cookies. You can see which cookies we use and exercise your acceptance preferences of cookies served on Unika website.

Unika Labs Ltd. is a company that uses Google Analytics. Google will use the information obtained on our behalf as the processor of this website to evaluate your use of the website, to compile reports on website activity and to provide us with other services related to website activity and internet usage. The following information, among others, can be collected: IP address, date and time of the page view, click path, information about the browser you are using and the device you are using (device), pages visited, referrer URL (website from which you accessed our website), location data. The IP address of your browser transmitted by Google Analytics is not linked to any other Google data.

#### FOR HOW LONG WE RETAIN THE INFORMATION

We retain the information we collect for as long as needed to provide the services (including aspects of risk management) and to comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

We may rectify, replenish, or remove incomplete or inaccurate information at any time and at our own discretion.

#### THE RIGHT OF THE DATA SUBJECT TO REFUSE TO PROVIDE DATA

If you contact us by e-mail or mail, be sure to include your full name and related contact information. For example, if you wish to opt out of mail, please provide your mailing address. It may take up to ten days to process your email requests and up to 30 calendar days to process your requests for telephone calls, text messages, and communications with your consent.

You may request and receive information about the applicable processing methods, personal data, the amount, timing of processing and storage and other data required by the legislative acts referred to above that apply to you based on your citizenship or location, or if you are stateless. In order to do this, you need to make a correct request and send it to e-mail: [info@unika.network](mailto:info@unika.network).

#### OBTAINING YOUR PERSONAL INFORMATION, UPDATING IT AND REQUESTING TO DELETE IT

You have the option of obtaining a summary of the data that We have processed about You, as well as the data that We keep about You. We may also delete or anonymize personal information and all or part of your information at your request, so that you will not be able to use the App. All of this is available by sending an email to: [info@unika.network](mailto:info@unika.network).

Contact us in one of the ways listed in the Contact Us section. Please describe the information you wish to access and the changes you are requesting in your request. We will provide you with the requested personal information if it is reasonably available, unless it violates the privacy of others and is subject to reasonable restrictions imposed

by law and internal procedures. Otherwise, we will describe the types of information we typically collect. We will grant access and make the changes you request, or provide an explanation of what action we can take with respect to the request.

## EU RIGHTS

If you reside in the European Union, you have the following rights according to the article 8 of GDPR:

**The right to be informed.** This right provides the data subject with the ability to ask a company for information about what personal data (about him or her) is being processed and the rationale for such processing. For example, a user may ask us for the list of personal information we process during the period of testing performance of Unika.

**The Right to be Forgotten / Right of Erasure.** Article 17 of the GDPR details that a user can request to have their personal data removed from a controller's and processor's system.

A user has the Right of Erasure without delay if they meet one of the following criteria:

- The controller no longer needs the data.
- The user exercises their right to object to the data processing
- The user withdraws consent to processing
- The data must be erased for legal reasons
- The user was a child at the time of data collection
- The controller or processor is processing the data unlawfully

**The right of access.** This right provides the data subject (user) with the ability to get access to his or her personal data that is being processed. This request provides the right for data subjects to see or view their own personal data, as well as to request copies of the personal data.

**The right to rectification.** This right provides the data subject (user) with the ability to ask for modifications to his or her personal data in case the data subject believes that this personal data is not up to date or accurate.

**The right to withdraw consent.** This right provides the data subject (user) with the ability to withdraw a previously given consent for processing of their personal data for a purpose. The request would then require the company to stop the processing of the personal data that was based on the consent provided earlier.

**The right to object.** This right provides the data subject (user) with the ability to object to the processing of their personal data. Normally, this would be the same as the right to withdraw consent, if consent was appropriately requested and no processing other than legitimate purposes is being conducted. However, a specific scenario would be when a user asks that his or her personal data should not be processed for certain purposes while a legal dispute is ongoing in court.

**The right to data portability.** This right allows a user to obtain a copy of their personal data safely and in a machine-readable format free of charge, so it can be copied or securely transfer to another controller. It is important to note that this right is subject to several conditions: only data provided by and concerning the individual is eligible; processing must be performed using automated procedures; and it must not infringe upon the rights and/or freedoms of others.

**Rights related to automated decision making and profiling.** This right provides the data subject (user) with the ability to object to a decision based on automated processing. Using this right, a user may ask for his or her request to be reviewed manually, because he or she believes that automated processing may not consider the unique situation of the user.

## HOW WE PROTECT YOUR PERSONAL INFORMATION

We recognize the importance of keeping our users' personal information secure. We have employees who are responsible for ensuring the security of your information. We use reasonable security measures, including physical, administrative and technical security measures. These measures may include access controls or other physical security measures, information security technology and policies, and procedures to help ensure that information is properly deleted.

## RELATIONSHIPS RELATING TO THE TRANSFER OF PERSONAL INFORMATION

We will not sell or rent your personal information. We may transfer your personal information in limited circumstances, such as the conduct of our business, when required by law, or with your consent.

We will not transfer your personal information outside of our Company, except as follows:

- 1) If the maintenance and technical support of the Unika website will be performed by another organization that is committed to comply with this Policy just as We would.
- 2) When necessary to comply with legal requirements and to protect the Company and others.

We may share your personal information in other special circumstances, which include situations where sharing is required by law or We believe that sharing will help protect the safety, property or rights of Unika Labs Ltd., our customers, our employees or others. For example:

- Protecting the health or safety of users;
- Combating crimes committed against Company property or the organization that provides maintenance and technical support for the Application;
- Detecting and eliminating fraud or financial risks;
- Providing personal information to law enforcement agencies upon their written request;
- In response to a search warrant or other valid legal request;
- Responding to actions, requests, acts of investigative authorities in cases of breach of agreement or violation of law.

### 3) Business Transfers.

In the event of a merger, sale or reorganization of all or part of our business (including transfers made in bankruptcy proceedings), personal information about you may be transferred to the successor business. We will use reasonable and necessary measures to ensure that any successor business treats your information in accordance with this Policy.

### 4) With your consent.

At your request, we may transfer the information we process about you to the address you provide within a period of up to calendar 30 days. The exception is a static assignable key, as this information is secret and provides security against fraud or other misconduct against you and the Company. Under any circumstances other than those described above, we will ask for your consent before we transfer your personal information outside of our Company.

## MARKETING

Your Personal Information, such as your full name, email address, may be used by us, or by our third-party subcontractors to provide you with promotional materials, concerning our services.

Out of respect to your right to privacy, within such marketing materials, we provide you with means to decline receiving further marketing offers from us. In addition, at any time, you may request to unsubscribe and discontinue receiving marketing offers by sending us a blank message with the word "remove" to [info@unika.network](mailto:info@unika.network)

Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

## HOW WILL YOU KNOW IF THIS POLICY CHANGES?

This Policy is available to any subject of personal data.

Please check our Privacy Policy periodically for changes. We will provide additional notice of significant updates via the email address used when you registered your backup or otherwise. We will post the date our Policy was last updated at the top of the Privacy Policy.

We may also send you informational materials, posters, announcements in one of these ways, and you can unsubscribe from them at the service through which you will receive them.