

GENERAL DATA PROTECTION AND PRIVACY POLICY

This Privacy Policy explains how TECHPRIO LTD. ("Techprio", "our", "us", and "we") collects, uses, and discloses information about you. This Privacy Policy applies to information we collect when you use our website located at <https://fundprio.ai> ("Site") and related services (collectively, the "Platform Services") or when you otherwise interact with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review this Privacy Policy before you use or submit any information on or through the Platform Services to stay informed about our information practices and the ways you can help protect your privacy. By using the Platform Services, you consent to the collection, use, disclosure and sharing of your information as further outlined below in this Privacy Policy. This Privacy Policy is provided as a part of our Terms of Services and applies to all users of the Platform Services. You must agree to both this Privacy Policy and our Terms of Service in order to use the Platform Services.

Key terms:

Anonymisation : The process of either encrypting or removing personal data from a database, so that the individuals whom the data describe remain anonymous. This is done for the purpose of protecting individuals' private activities while maintaining the integrity of the data gathered and shared.

Behavioural Advertising : The act of tracking users' online activities and then delivering ads or recommendations based upon the tracked activities.

Biometric Data : Personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial/body images, videos or dactyloscopy data.

Chief Privacy Officer : The individual appointed by Techprio Ltd. globally to carry out certain responsibilities and functions in respect of privacy and data protection.

Consent : Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Cookies : A small text file stored on a user machine that may later be retrieved by a web server from the machine. Cookies allow web servers to keep track of the end user's browser activities, and connect individual web requests into a session.

Data Enrichment : A process used to enhance, refine or otherwise improve existing data.

Data Processing : Any operation or set of operations which is performed on personal data, such as collecting, recording, organizing, storing, adapting or altering, retrieving, consulting, using, disclosing by transmission, dissemination or otherwise making the data available, aligning or combining data, or blocking, erasing or destroying data. Not limited to automatic means.

Data Protection Officer : The individual appointed by Techprio. Ltd locally to carry out certain responsibilities and functions in respect of privacy and data protection.

Data Retention : The policies and processes used within <https://fundprio.ai/legal/privacy-policy> for determining the time period for archiving and storing of personal data.

Data Subject : The natural person that the personal data refers to.

Direct Marketing : A form of advertising in which companies provide physical marketing materials to consumers to communicate information about a product or service.

Encryption : The method by which plaintext or any other type of data is converted from a readable form to an encoded version that can only be decoded by another entity if they have access to a decryption key.

GDPR : General Data Protection Regulation.

Genetic Data : Personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.

Health Data : Personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status

International Organisation : An organization and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

IP Address : A unique address that identifies a device on the Internet or a local network and which allows a system to be recognized by other systems connected via the Internet protocol.

Online Behavioural Advertising : Websites or online advertising services that engage in the tracking or analysis of, e.g., search terms, browser or user profiles, preferences, demographics, online activity, offline activity, location data, and offer advertising based on that tracking.

Personal Data : Any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Personal Data Breach : A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Privacy and Data Protection : The collection of laws and regulation that applies to the collection, usage, storage, protection and other processing of personal data. This includes data protection, privacy, banking secrecy, electronic communications and confidentiality laws and

regulations, and any other applicable laws or regulations to the extent they relate to privacy of personal data.

Processor : A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Profiling : Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Pseudonymization : The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Recipient : A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third-party or not. However, public authorities which may receive personal data in the framework of an inquiry in accordance with regulations shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Restriction of Processing : The marking of stored personal data with the aim of limiting their processing in the future.

Special Categories of Personal Data : Special categories of personal data, include: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data (for uniquely identifying an individual) and of data concerning health, sex life or sexual orientation.

Third-Party : A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Collection of Information:

We may collect the following kinds of information about you through your use of the Site or Platform Services:

Information You Provide Directly To Us.

We collect information you provide directly to us in the course of using the Platform Services, including personally identifiable information. For example, we collect information when you create an account on the Site, provide payment and billing information, participate in any interactive features of the Platform Services, fill out a form, perform project and topic searches, watching/showing/archieving reports, analysis, chats, post bids for projects, request customer support or otherwise communicate with us. The types of information we may collect include your name, email address, credit card or other billing information, profile photo and any other

information you choose to provide. We may combine such information with information we already have about you. We will use your billing information linked to your application account for campaigns. The processing of campaigns will be subject to the terms, conditions, and privacy policies of the campaign processor in addition to this Privacy Policy and our Terms of Service.

Information We Collect Automatically

When you access or use the Platform Services, we automatically collect information about you, including:

- **Log Information:** We collect log information about your use of the Platform Services, including the type of browser you use, access times, pages viewed, your IP address, the page you visited before navigating to the Platform Services, and Project bids.
- **Device Information:** We collect information about the computer or mobile device you use to access the Platform Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve the Platform Services and your experience, see which areas and features of the Platform Services are popular and count visits. Web beacons are electronic images that may be used in the Platform Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see "Cookies" below.

Information We Collect From Other Sources

We may also obtain information from other sources and combine that with information we collect through the Platform Services. For example, we may collect information about you from third parties, including but not limited to Exchange user and account information with assets, user balances, user transaction history, publicly available sources.

How We Use Your Information

We may use information about you for various purposes, including to:

- Provide, maintain, and improve the Platform Services;
- Provide our services, process transactions, and send you related information, including confirmations and invoices;
- Send you technical notices, updates, security alerts, and support and administrative messages;
- Ensure compliance with our Terms of Service, including but not limited to identifying and preventing misuse, inappropriate behavior, fraud, or any criminal activity;
- Respond to your comments, questions and requests and provide customer service;
- Communicate with you about products, services, offers, promotions, rewards offered by Techprio Ltd. and others, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities in connection with the Platform Services;

- Personalize and improve the Platform Services and provide advertisements, content or features that match user account profiles or interests;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose described to you at the time the information was collected.

How We Share Your Information

We may share information about you as follows or as otherwise described in this Privacy Policy

- With vendors, consultants, third party payment processors and other service providers who need access to such information to carry out work on our behalf;
- With third parties for their own services and marketing purposes, unless you opt out of this type of sharing by logging into your fundprio account and updating your account settings;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of Fundprio account;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among Techprio Ltd. and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Advertising and Analytics Services

We may allow others to provide analytics services and serve advertisements on our behalf across the Internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Platform Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by Techprio and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Platform Services and other websites and better understand your online activity. You may also opt-out of having your information used for advertising purposes by logging into your fundprio account and updating your account settings.

Modifying and Reviewing your Data:

You have the right to review, change and delete information about you at any time. You can do so by editing your profiles on the Site or emailing us at support@fundprio.ai Deleting all your information may result in account deactivation. You can choose to have your account deleted from the system by emailing support@fundprio.ai, but note that we may retain certain

information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

Data Security:

We take the protection of your information seriously and use reasonable measures designed to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be secure. Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information. Additionally, we are not responsible for the confidentiality of any information and content created and shared between users of the Site when they agree to share any such information. Users who choose to share any information with other users of the Site are responsible for maintaining the privacy and security of that data in accordance with our Terms of Service.

Cookies:

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Removing or rejecting browser cookies does not necessarily affect third party flash cookies used in connection with the Platform Services. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Platform Services.

Links to Other Websites and Applications:

There may be links to other websites and applications on the Site, but the inclusion of these links does not represent our endorsement, authorization or affiliation with the other websites or applications. This Privacy Policy and our Terms of Service do not cover any third party applications or websites. Users should consult the terms and conditions of third party websites or applications to understand their privacy policies and how they collect and use your information.

Do-Not-Track Signals and Similar Mechanisms

Some web browsers transmit "Do-Not-Track" signals to websites. The Site does not currently respond to browser "Do-Not-Track" requests.

Marketing E-Mails:

We may send you periodic promotional or informational e-mails. You may opt-out of such communications by following the opt-out instructions contained in the website on notifications settings. Please note that it may take up to 5 business days for us to process opt-out requests. If you opt-out of receiving e-mails about recommendations or other information we think may interest you, we may still send you e-mails about your account on the Site or the Platform Services.

Data Retention:

The time periods for which we retain your personal information will depend on the purposes for which we use it. We will retain your personal information for so long as is necessary to provide the Platform Services, unless applicable law requires we either dispose of it or keep it longer. We may also continue to store your personal information to allow us to resolve disputes, enforce our agreements, comply with legal obligations and/or for other legally permissible purposes consistent with this Privacy Policy and our Terms of Service

Children's Privacy:

No part of the Platform Services or Site is directed to persons under 18 years of age. We do not knowingly allow individuals under the age of 18 to create accounts that allow access to the Platform Services.

Contact Us:

If you have any questions about this Privacy Policy, please contact us at: support@fundprio.ai

COOKIE NOTICE

We respect your concerns about privacy and value the relationship that we have with you.

Like many companies, we use technology on our website to collect information that helps us enhance your experience and our products and services. The cookies that we use allow our website to work and help us to understand what information and advertising is most useful to visitors.

Please take a moment to familiarise yourself with our cookie practices and let us know if you have any questions by sending us an e-mail or submitting a request through the “Contact Us” form on our websites and application platform services (both websites).

Who is collecting it?

Any personal data provided to or collected by .TechPrio via cookies and other tracking technologies is controlled by Ekon Yazılım ve Teknoloji A.Ş.

By using our websites, you are consenting to our use of cookies in accordance with this Cookie Notice and our Data Protection Policies.

This Cookie Notice applies to any websites, apps, branded pages on third-party platforms (such as Facebook or YouTube), and applications accessed or used through such websites or third-party platforms (hereinafter, “our websites”) which are operated by or on behalf of Techprio will only collect, use or disclose your personal data where it is fair and lawful to do so.

What does cookie mean?

Cookies, pixel tags and similar technologies (collectively ‘cookies’) are files containing small amounts of information which are downloaded to any internet enabled device – such as your computer, smartphone or tablet – when you visit a website.

Cookies, pixel tags and similar technologies (collectively ‘cookies’) are files containing small amounts of information which are downloaded to any internet enabled device – such as your

computer, smartphone or tablet – when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies do lots of different and useful jobs, such as remembering your preferences, generally improving your online experience, and helping us to offer you the best product and services.

There are many types of cookies. They all work in the same way, but have minor differences. For a detailed list of cookies used on our websites, please refer to the below relevant section.

What purpose do we use cookies for?

We use cookies to make TechPrio easier to use, to deliver a personalised experience on our websites, and to better tailor our products, services and websites to your interests and needs. Cookies are used to help speed up your future activities and your experience on Techprio.

The cookies you consent to, are also used to collect your personal data which we then profile into audiences so that we can deliver targeted advertising tailored to your interests and limit the number of times you see an advertisement.

We also insert cookies in emails and newsletters to improve our content and advertising.

Lastly, we use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our websites and to help us improve their structure and content and also help us measure the effectiveness of advertising campaigns on Techprio.

How can I control or delete cookies?

There are many ways to manage your cookies:

- You can refuse your consent;
- You can disable Techprio or third-party cookies by use of your browser settings; or
- You can use our cookie management tool to disable Techprio or third-party.

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Control via your browser settings

Most internet browsers are initially set up to automatically accept cookies. If you do not want our websites to store cookies on your device, you can change your browser settings so that you receive a warning before certain cookies are stored. You can also adjust your settings so that your browser refuses most of our cookies or only certain cookies from third parties. You can also withdraw your consent to cookies by deleting the cookies that have already been stored.

If you disable the cookies that we use, this may impact your experience while on the fundprio website, for example you may not be able to visit certain areas of a website or you may not receive personalized information when you visit a website.

If you use different devices to view and access the fundprio website (e.g., your computer, smartphone, tablet) you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

The procedures for changing your settings and cookies differ from browser to browser. If necessary, use the help function on your browser or click on one of the links below to go directly to the user manual for your browser.

- [Internet Explorer](#)

- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Safari](#)
- [Opera](#)

There are also software products available that can manage cookies for you.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

Control via our cookie management tool

You can disable Techprio. or third-party cookies by use of our cookie consent tool.

Switching off tracking cookies, for example, ensures that TechPrio will no longer track your online behaviour. However please note that opting-out from tracking cookies does not necessarily mean that you will receive less Techprio advertising. It just means that the advertising you receive will not be tailored to your interests.

What cookies do we use?

The cookies used on Techprio may be generally categorised as follow:

- **Necessary Cookies.** These cookies are essential to make TechPrio work correctly, they enable you to move around our websites and use our features. Without these cookies, services like shopping baskets cannot be provided. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session.
 - Do these cookies collect personal data/identify me? These cookies do not identify you as an individual. If you do not accept these cookies, it may affect the performance of the website, or parts of it.
- **Performance Cookies.** These cookies collect information about how you use our websites, for instance which pages you go to most often, the time spent on our websites, and any issues encountered, such as error messages. These cookies are also used to let affiliates know if you came to one of our websites from an affiliate and if your visit resulted in the use or purchase of a product or service from us, including details of the product or service purchased. This helps us improve the performance of our websites.
 - Do these cookies collect personal data/identify me? These cookies do not identify you as an individual. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.
- **Functionality Cookies.** These cookies allow our websites to remember the choices you make (such as your user name, language or the region you are in) to provide a more personalised online experience. These cookies may also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. Similarly, they may be used to keep track of what featured products or videos have been viewed to avoid repetition, and to enable you to play games and engage with social tools, such as blogs, chatrooms and forums.
 - Do these cookies collect personal data/identify me? The information these cookies collect may include personal data that you have disclosed. If you do not accept these cookies, it may affect the performance and functionality of the website and may restrict access to content on the website.
- **Targeting or Advertising Cookies.** These cookies are used to deliver content that is more relevant to you and your interests. They are also used to deliver targeted advertising or limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns on Techprio. They remember that you have visited one of our websites

and this information is shared with other parties, including advertisers and our agencies. These cookies may also be linked to site functionality provided by third-parties.

- Do these cookies collect personal data/identify me? Most types of these cookies track consumers via their Device ID or IP address therefore they may collect personal data.
- **Third-Party Cookies.** We use a number of partners that may also set cookies on your device on our behalf when you visit our websites to allow them to deliver tailored Techprio advertising within their domains, for example Facebook and Google Double Click. We endeavour to identify these cookies before they are used so that you can decide whether you wish to accept them or not. We also use a number of partners to provide digital experiences and functionalities on our websites. For example, while browsing Techprio you may be served cookies from third-parties who provide some of its features on our websites (e.g., a YouTube video), although you have withdrawn or declined your consent to our cookies. This happens because you have directly given your consent to the use of their cookies. In such cases, you should directly withdraw your consent on the relevant third-party website.
 - Do these cookies collect personal data/identify me? Based on the type of cookies used by the relevant third-party, the information these cookies collect may include personal data.

Duration of the cookie we use

In terms of duration, we may use two different types of cookies on our websites:

- **Session Cookies.** These cookies are temporary cookies that remain on your device until you leave our websites; or
- **Persistent Cookies.** These cookies remain on your device for much longer or until you manually delete them (how long the cookie remains on your device will depend on the duration or “lifetime” of the specific cookie, as well as your browser settings, as stated below).