Eurasia Group Privacy Policy

Privacy Policy

Updated: January 4, 2024

This privacy policy (the "Privacy Policy") of Eurasia Group Ltd and those of each of its subsidiaries and controlled affiliates (collectively, the “Company” or “we” or “us”), applies to the websites including www.eurasiagroup.net, www.gzeromedia.com, www.gzerosummit.com (collectively, the “Web Site”) and internal client portals and any content, and any other mobile or other applications on which a link to this Privacy Policy appears (collectively with the Web Site, the “Services”). The Company understands and appreciates that you, a website visitor or consumer of the Services, are concerned about your privacy and about the confidentiality and security of personally identifiable information from or about an individual (“Personal Information”) that we may obtain about you online or through your interactions with us. We want you to understand the steps we have taken to safeguard the information we receive from visitors who access or interact with us and the Services.

Please read the Privacy Policy to understand how your Personal Information will be treated as you make full use of the Services. Your use of the Services is subject to your acceptance of this Privacy Policy and the Terms of Use. If you do not agree with this Privacy Policy, please do not use the Web Site or Services.

Scope of this Privacy Policy

This Privacy Policy describes the types of Personal Information the Company, as a data controller, may collect from you or about you or that you may provide. It also describes our practices for collecting, using, maintaining, protecting, and disclosing that information, including the following:

- Personal data we collect or process, including from the Web Site;
- Cookie policy;
- How we use data;
- Legal grounds for the processing of your data;
- With whom we may share the personal data;
- Your worldwide privacy rights, choices and disclosures;
- Retention periods and protection of your personal data;
- Children's privacy;
- Information about international transfers;
- Links to other sites;
- Privacy Policy updates;
- How you can contact us and
- Thought Leadership Privacy Policy Rider

Residents of the European Union and California may have additional rights. Please see our GDPR Privacy Rights section and California Disclosures following the main Privacy Policy.

Residents of certain other US states may have additional rights. Please see our US State Privacy Notice for each of these states following the main Privacy Policy.

Residents of Brazil may also have additional rights. Please see our LGPD Privacy Notice following the main Privacy Policy.

Consent

By using the Services, you unambiguously consent to the Company's collection, processing, use, and disclosure of your Personal Information in the United States and other jurisdictions within or outside your country of residence, consistent with the terms of this Privacy Policy and applicable law.

What personal data do we collect or process?

The Company collects information in several ways from different parts of the Services:

Information you provide:

Some personal information is gathered from corporate clients of the Company (“Clients”) when they sign up for our Services and make the Services available to employees and other individuals within their organizations.

During Client registration, the Company asks for the name, email address, business title and other optional information on the preferences of the Client. The more information volunteered (and the more accurate it is), the better we are able to customize the Client experience and the experience of the Client's employees who are provided with access to the Services.

Some personal information is gathered directly from you, as an individual user of the Services, when you register directly to use the Web Site and Services. This information may include your name, email address and business title and other information relevant to the Services which you are requesting.

The Company may at other times ask for a user's personal information for reasons specified at the time, which you may choose to provide at or in your sole discretion. It is always your choice whether or not to provide information but if you do not, you may not be able to access any, some or all of the Services.

If you contact the Company or the Company contacts you, we may keep a record of that correspondence. The Company also occasionally asks users of the Services to complete surveys that we use for research purposes that you may choose to complete at or in your sole discretion. Wherever the Company collects personal information, we will make an effort to include a link to this Privacy Policy.

The Company may also collect information from you through third party mailing lists and service emails and links. Please be aware that the Company are not responsible for the privacy practices of other sites to which you may have linked to or through the Web Site.

We operate social media pages on third party networks and have social media icons on our Web Site. When you visit or link to our social media pages, your Personal Information is processed both by us and the applicable social media provider. Social media providers are unaffiliated with us, and we are not responsible for the content or privacy practices of social media providers. Social media providers have their own terms of use and privacy policies, and we encourage you to review those policies whenever you visit their websites or interact with their platforms. These third parties may retain any information

used or provided in any such communications or activities and these third parties' practices are not subject to our Privacy Policy. Further, when you use third-party sites or services, you are using their services and not our services and they, not we, are responsible for their practices.

Information collected automatically when you visit our Web Site

In addition to information that you choose to submit to us, we and/or our service providers may automatically collect and/or store certain information when you visit or interact with the Web Site ("Usage Information").

This Usage Information may be stored and/or accessed from your personal computer, laptop, tablet, mobile phone or other device (a "Device") whenever you visit or interact with our Web Site. Usage Information may include:

- Your IP address, IDFA, Android/Google Advertising ID, IMEI, or another unique identifier.
- Your Device functionality (including browser, browser language, time zone, operating system, hardware, mobile network information).
- Referring and exit web pages and URLs;
- The areas within our Website that you visit and your activities there, including remembering you and your preferences;
- Your Device location or other geolocation information, including the zip code, state or country from which you accessed the Services;
- Your Device characteristics; and
- Certain other Device data, including the time of day you visit our Website.

Cookies Policy

As is true of most websites, Eurasia Group and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking mechanisms (web beacons, device identifiers and similar technologies) to recognize you across websites and provide certain functionality. We use cookies and similar technologies to administer our websites, to improve our content and Services, and protect the security of our Services. Please refer to our Cookie Policy for further information on the types of cookies collected from visitors to the Services.

Generally, we use cookies to remind us who you are and to access your account information (stored on our computers) to deliver to you a better and more personalized service. This cookie is set when you "Log In" and is modified when you "Log Out" of the Client portal. In addition (even if you have not registered with the Web Site), we use cookies to help us measure certain traffic patterns, which areas of the Web Site you have visited, and your visiting patterns in the aggregate. We use this research to understand how our users' habits are similar or different from one another so that we can make each new experience on the Web Site a better one. For example, we may use this information to better personalize the content and Services that you and other users will see and use on the Web Site.

How your information is used

The Company's primary goal in collecting personal information is to provide you, the user, with a customized experience on the Web Site and Services. By knowing a little about you, the Company is able to deliver more relevant Services and content and hence a better experience to you.

The Company uses the personal data we collect to (i) respond to your inquiries, (ii) provide or enhance our Services, (iii) perform our contractual obligations, (iv) inform you of new Services or changes in Services, (v) administer the Web Site, (vi) to enter into contracts with others to help us fulfill the Services, such as payment processors, (vii) to fulfill legal obligations we have to governmental authorities or other third parties, and (viii) for other legitimate business purposes.

You may also receive updates from the Company by email regarding your transactions with the Company and promotional material about the Company's Services and features if you have indicated in your preferences that you would like to receive them. You can change your account preferences at any time. However, if you choose not to receive marketing and promotional materials, you may still receive emails of a transactional nature. (Please see “Your privacy rights, choices and disclosures” and “Thought Leadership Rider” for more information.)

You may be invited from time to time to participate in events sponsored by third parties with whom the Company has relationships, to receive sponsored content, or to participate in third party-sponsored promotions, in which case your registration information may be provided to those third parties.

The Company does research on Web Site users' demographics, interests, and behavior based on the information provided to us at registration, from our server log files, or from surveys or third-party analytics tools. We do this to better understand and serve our users. This research is compiled and analyzed on an aggregated basis. The Company may share this aggregated data with advertisers or business partners. (Please see “With whom does the Company share my information?” for more information on how the Company discloses aggregate data.)

We use your IP address to help diagnose problems with our server and to administer the Web Site. We also use your IP Address to identify you when reentering the Web Site, as described above with respect to our use of cookies. Your IP address is also used to gather broad demographic information.

Legal grounds for processing your personal data

We rely on the following legal grounds to process your personal information:

- **Consent.** We may use your Personal Information as described in this Privacy Policy subject to your consent. To withdraw your consent, please contact us at privacy@eurasiagroup.net.
- **Performance of a contract.** We may need to collect and use your Personal Information to enter into an agreement with you or to perform under an agreement that you have with us. When we process personal data on behalf of third parties, we do so in performance of agreements with such third parties.
- **Legitimate interests.** We may use your personal information for our legitimate interests to provide our Services and to improve our Services and the content on the Web Site. We may use technical information as described in this Privacy Policy and use Personal Information for our marketing purposes consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law.
- **Compliance with Legal Obligations.** We may use your personal information as necessary to comply with our legal obligations.

With whom your information may be shared

The Company is a global provider of Services headquartered in the United States, and as such may need to share information with internal personnel located in different geographic locations in order to fulfill our contractual and legal obligations. We may also share, as controller or as processor performing at the direction of our clients, your Personal Information with third parties (within or outside your country of residence) who perform services on our behalf, including without limitation our technology providers, payment processors, administrative and support personnel, and providers and professional advisers.

The Company may disclose within or outside your country of residence aggregated user statistics to describe our Services to current and prospective partners, advertisers, and other third parties, and for other lawful purposes. As set forth in our privacy policy, some of our third-party advertising partners may, with your consent, distribute cookies to you in advertisements that are provided to the Company. The Company has no access or control over these cookies.

We reserve the right to release current or past Personal Information: (i) in the event that we believe that the Services are being or have been used to commit unlawful acts; or (ii) if the information is subpoenaed or requested pursuant to any court order or lawful request by public authorities, including to meet national security or law enforcement requirements; provided, however, that, where permitted by applicable law, we shall provide you with e-mail notice, and opportunity to challenge the subpoena/court order, prior to disclosure of any personal information pursuant to a subpoena.

We may also disclose within or outside your country of residence account information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be violating the Company's Terms of Use or may be causing injury to or interference with (either intentionally or unintentionally) the Company's rights or property, other users of the Web Site, or anyone else who could be harmed by such activities. The Company may disclose information within or outside your country of residence or access this information when we believe in good faith that the law requires it, or for administrative and other purposes that we deem necessary to maintain, service, and improve our products and Services.

The Company may disclose and transfer the Company's database of user and account information to third parties in connection with a merger, acquisition, or sale of all or substantially all of its assets.

We use analytics tools and other third-party technologies, such as Google Analytics, to collect information in the form of various usage and user metrics when you use our site. These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage and demographics, and other similar information. You can deactivate Google Analytics using a browser add-on if you do not wish the website analysis to take place. You can download the add-on here: https://tools.google.com/dlpage/gaoptout. Please note the Google Analytics is disabled for EU residents.

The Company may obtain your written consent from time to time in electronic form by using online agreements or other acknowledgments on the Web Site, including for any other contemplated uses of your personal data not addressed in this Privacy Policy. Please read all online agreements carefully before accepting them.

Your privacy rights, choices and disclosures

General. We are committed to facilitate the exercise of your rights granted by the laws of your jurisdiction, which may include the right to request the correction, modification or deletion of your personal information and the right to opt out of the sale of your personal information (as applicable). We will do our best to honor your requests subject to any legal and contractual obligations. If you would like to make a request, cancel your account or request we delete or no longer use your account information to provide you Services, contact us at privacy@eurasiagroup.net or make changes to any user profile information connected to your account.

You may also opt out of receiving electronic marketing communications from us by clicking on the "unsubscribe" link on the communication. Some non-marketing communications may not be subject to a general opt-out, such as communications about transactions, disclosures to comply with legal requirements, software updates and other support-related information. If you do not wish to receive any service-related emails from us, you have the option to deactivate your account.

Subject to local law, you may have additional rights under the laws of your jurisdiction regarding your personal data, such as the right to complain to your local data protection authority.

You may edit your Web Site preferences by contacting us by email at privacy@eurasiagroup.net. We may not be able to honor all preferences with respect to some information you provide to the Company, such as survey responses and clickstream data.

Your Web Site profile can be deleted or deactivated but doing so will result in not being able to access any Services of the Web Site that are for registered or client users only. Please contact us by email at privacy@eurasiagroup.net for further instructions about deleting or deactivating your account. Residual information will remain within our archive records and may be used by the Company in accordance with this Privacy Policy.

Retention Periods

We retain the Personal Information we collect for as long as reasonably necessary to fulfill the purposes for which the data was collected; to perform our contractual, legal, and ethical obligations; and for any applicable statute of limitations periods.

As for cookies, "session" cookies last until you close your browser, and "persistent" cookies last until you or your browser delete them

Protection of your Personal Information

We take reasonable administrative, physical, and technical precautions to protect your personal data and communications with us. This includes, when required or as we deem appropriate and feasible under the circumstances, obtaining written commitments from third parties that may have access to your data that they will protect the data with safeguards that are substantially equivalent to those used by the Company.

A client's Web Site preferences are password-protected. You are responsible for maintaining the confidentiality of your account and are fully responsible for all activities that occur under your account. You agree to (a) immediately notify the Company of any unauthorized use of your account or any other

breach of security, and (b) ensure that you exit from your account at the end of each session. The Company cannot and will not be liable for any loss or damage arising from your failure to comply with these provisions. Remember to sign out of your Web Site account and close your browser window when you have finished your work. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, though we strive to protect your Personal Information, the Company cannot ensure or warrant the security of any information you transmit to us or from our Web Site or Services, and you do so at your own risk.

Once we receive your transmission, we endeavor to maintain its security on our systems. By using the Web Site and the Internet in general, you may be subject to various risks, including among others eavesdropping, sniffing, spoofing, forgery, spamming, "imposturing," tampering, breaking passwords, harassment, fraud, electronic trespassing, hacking. You may be subject to system contamination including without limitation, viruses, worms, and Trojan horses, causing unauthorized, damaging, or harmful access and/or retrieval of information and data on your computer and other forms of activity that may be considered unlawful. Information (including registration information, passwords and content) received or delivered or intended to be made available on and through the Web Site may be subject to these and other security or privacy hazards; or it may not reach its destination or reach an erroneous address or recipient. The Web Site is not different than other applications in this respect. Without limitation of the foregoing, although we take seriously the security of all client accounts and other personal and non-personal information associated with our visitors and participants, because of the open communication nature of the Internet, we cannot guarantee that your account will be free from unauthorized access by third parties.

Children's privacy

Our Services are **NOT** directed at persons under 18 and we do not knowingly collect Personal Information from children under 18. If you become aware that your child has provided us with Personal Information, without your consent, then please contact us using the details below so that we can take steps to remove such information and terminate any account your child has created with us. We encourage you to monitor the online activities of your children.

Information about international transfers

Eurasia Group, Ltd is a corporation organized and headquartered in New York, New York. If you are visiting the Web Site from outside the United States, please be aware that your information will be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By visiting the Web Site or using the Company's Services, you understand that your information will be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

Links and affiliates

The Web Site may include links to third party sites. The inclusion of any link does not imply that we endorse the products and services offered at such linked site. We cannot control or be responsible for

the actions of such other web site operators and the existence of an affiliation with, or a link from, the Web Site does not mean the affiliated or linked website has a privacy policy similar to this Privacy Policy. You should read the privacy policy of any website linked to or from the Web Site.

Do Not Track Disclosures

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our websites for third-party purposes, and that is why we provide the variety of opt-out mechanisms listed above, and in our Cookies Notice. Some web browsers offer users a "Do Not Track" privacy preference setting in the web browser. We do not currently recognize or respond to browser-initiated Do Not Track signals. Learn more about Do Not Track.

Global Privacy Control

We recognize and honor Global Privacy Control ("GPC") for U.S.- based users; if GPC is enabled, we recognize this as an "opt out of the sale or sharing of personal information" or as an "opt out of targeted advertising and the sale of personal data" request (non-California U.S. residents). For further details, see the US State Privacy Notice below.

Privacy Policy updates

We may update this Privacy Policy from time to time at our sole discretion to reflect changes in our information practices. If we modify or update this Privacy Policy, we will post changes and updates on the Web Site so that you will always be aware of what information we collect, use, and disclose. Your continued use of the Web Site after any changes to our Privacy Policy indicates your agreement with the terms of the revised Privacy Policy. Please review this Privacy Policy periodically and especially before you provide personal data to us. The date of the last update of the Privacy Policy is indicated at the top of this Privacy Policy.

How to contact us

To make a request, ask us a question about our data practices, or if you believe that we have not adhered to the terms of this Privacy Policy, please notify us by email at privacy@eurasiagroup.net, and we will do our best to address your concerns and promptly confirm and correct any problems. Please use the words Privacy Policy in the subject line of the email.

In addition, you may contact us at:

21 W 26th Street
New York, NY 10010
Attention: Cassandra Spratt

Thought Leadership Privacy Policy Rider

Thought Leadership Privacy Policy Rider ("Rider") applies solely to any Thought Leadership Download Page. Except as specifically provided in this Rider, the Eurasia Group Privacy Policy (the "General Policy") shall apply.

The third paragraph in the General Policy section titled "How your information is used" is nonapplicable for Thought Leadership downloads; there is no account set-up and no option to indicate preferences regarding receipt of promotional materials. The provision of Personal Information in order to receive the download remains at your sole discretion, but the download is available only to those that provide the information indicated as mandatory.

With respect to the section "Legal grounds for processing your personal data," Eurasia Group's legal basis for processing your personal data for Thought Leadership Downloads is the pursuit of marketing opportunities consistent with its legitimate business interests.

To the extent of any conflict with this Rider and the Privacy Policy, this Rider shall control.

Your European Rights and Choices

If you reside or otherwise find yourself in the territory of the EU, EEA, UK or Switzerland, we are committed to facilitate the exercise of your rights granted by the EU General Data Protection Regulation and the UK Data Protection Act 2018 or the revised Swiss Federal Act on Data Protection (collectively "GDPR").

Generally your Privacy rights under GDPR include:

- **Transparency and the right to information.** Through this policy we explain how we use and share your information. However, if you have questions or need additional information you can contact us at any time.
- **Right of access, restriction of processing, erasure.** You may contact us to request information about the personal data we have collected from you and to request the correction, modification, or deletion of such personal information, requests we will do our best to honor subject to any legal and contractual obligations. To make a request or ask us a question about our data practices, please contact us by email to privacy@eurasiagroup.net.
- **Right to withdraw your consent at any time.** When we process your personal data based on your consent, you have the right to withdraw it at any time.
- **Right to object at any time.** You have the right to object at any time to receiving marketing or promotional materials from us by either following the opt-out instructions in commercial emails or by contacting us, as well as the right to object to any processing of your personal data based on your specific situation. In the latter case, we will assess your request and provide a reply in a timely manner, according to our legal and contractual obligations. Some non-marketing communications are not subject to a general opt out, such as communications about transactions and disclosures to comply with legal requirements.
- **Right to data portability.** In certain circumstances, you have the right to data portability of your own personal data by contacting us.
- **Right not to be subject to an automated decision, including profiling.** We do not make automated decisions using your personal data that may negatively affect you.
- **Right to lodge a complaint with a supervisory authority.** If you consider that the processing of your personal data infringes on your privacy rights according to GDPR, although we would hope that you would contact us first to try to resolve any issues, you have the right to lodge a complaint with a supervisory authority, in the member state of your habitual residence, place of work, or place of the alleged infringement.

Your requests to access, correct, restrict or delete Personal Information may be restricted in certain situations, for example, if fulfilling the request would compromise Personal Information about another individual, or if you ask to delete information which Eurasia Group, Eurasia Group business partners, or Eurasia Group account owners are permitted by law or have compelling legitimate interests to keep the information.

California Disclosures

California Information-Sharing Disclosure: California residents may request a list of all third parties to which we have disclosed any information about you for direct marketing purposes, as well as the categories of information disclosed. If you are a California resident and want such a list, please send us a written request by email to privacy@eurasiagroup.net with "California Privacy Rights" in the subject line.

California Do Not Track Disclosure: Depending on the browser you are using, you may be able to choose to block third party cookies or browse in a private browsing mode, although some features of the Web Site may not function properly. The information we collect is governed by this Privacy Policy.

California Consumer Privacy Act ("CCPA") Disclosures. The California Consumer Privacy Act, effective on January 1, 2020 as amended by the California Privacy Rights Act (CPRA), gives California residents the right to request:

The categories of personal information we have collected about you;

The categories of sources from which the personal information is collected;

The business or commercial purpose of collecting or selling personal information;

The categories of third parties with whom we share or sell personal information;

The categories of personal information about you that we have sold; and

The specific pieces of personal information we have collected about you.

Additionally, you have the right to request deletion of your personal information, the right to opt out of the sale of your information (if applicable), and the right not to be discriminated against for exercising any of your CCPA rights.

In the twelve (12) months preceding the Effective Date of this Privacy Policy, the Company may have collected or received information about California consumers in the following categories and disclosed the information to our service providers for business purposes and to third parties under Section 1798.140(t)(2)(A) of the CCPA:

(1) Identifiers such as name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address.

(2) Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

(3) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.

(4) Geolocation data if you voluntarily share your location.

(5) Professional or employment-related information.

(6) Inferences drawn from any of the foregoing information.

The Company does not sell Personal Information for monetary consideration. If the use of Google Analytics is deemed a “sale” under the CCPA, then you may opt out of Google Analytics Cookies by downloading the browser add-on here: www.tools.google.com/dlpage/gaoptout.

We comply with Global Privacy Controls.

Our contact information is listed at the bottom of this policy. If your name and email address are insufficient to verify your identity and assess your request, we may need to ask for additional information. You may also designate an authorized agent to make a CCPA data subject request.

US States Privacy Notice

Applicability

This U.S. State Privacy Notice applies to "Consumers" as defined under privacy laws in Colorado, Connecticut and Virginia, the Colorado Privacy Act (Colorado Revised Statute Title 6 Article 1 Part 13 § 6-1-1301 et seq.) (“CPA”); Connecticut’s Act Concerning Personal Data Privacy and Online Monitoring (Public Act No. 22-15); and the Virginia Consumer Data Privacy Act (collectively, “U.S. State Privacy Laws"). This U.S. State Privacy Notice is a supplement to our other privacy policies or notices for the Services, including our Privacy Policy. In the event of a conflict between any other Eurasia Group policy, statement, or notice and this U.S. State Privacy Notice, this U.S. State Privacy Notice will prevail as to Consumers and their rights under the applicable state privacy law. Capitalized terms used but not defined herein will have the meanings given to them in the Privacy Policy.

This U.S. State Privacy Notice is designed to provide you with notice of our data practices on the Eurasia Group Services and anywhere this U.S. State Privacy Notice is posted over the prior 12 months (from the Effective Date listed at the top of this U.S. State Privacy Notice), as required under some U.S. State Privacy Laws. Additionally, this U.S. State Privacy Notice also applies to our current data practices such that it is also meant to provide you with “notice at collection,” which is notice of personal information we collect, and the purposes for which we process personal information, among other things as required by the U.S. State Privacy Laws. For any new or substantially different processing activities that are not described in this U.S. State Privacy Notice, we will notify you as legally required, such as at the point of collection. We reserve the right to amend this U.S. State Privacy Notice at our discretion and at any time. When we make changes to this U.S. State Privacy Notice, we will update the Effective Date (which will be the date that this U.S. State Privacy Notice was last updated). Residents of certain states in the United States may have additional rights in the future and Eurasia Group will update this policy as and when such laws become applicable to it.

Your Rights to Your Personal Information

Generally, the rights available to residents of the United States under various privacy laws can be categorized as follows:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects

Processing of Sensitive Information: We must obtain your express consent prior to collecting and processing certain categories of sensitive personal data such as precise geolocation data, data about protected characteristics and genetic or biometric data.

Non-Discrimination: Eurasia Group will not discriminate against customers who exercise their rights under state privacy laws.

Personal Information of Minors

Our Services are not intended for children or minors under the age of 16. Accordingly, we do not knowingly store information from minors under the age of 16 except as required pursuant to applicable law.

Financial Incentives for Consumers

We do not have any programs which provide financial incentives for consumers.

Exercising Access, Data Portability, and Deletion Rights

To exercise any of these rights, you can submit your request by contacting us at or We will respond to your privacy requests within 30 days' and notify you of the action(s) we have taken or required steps to fulfill the request.

Only you or a person registered with the appropriate state authority that you authorize 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.

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

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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. Making a

verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

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.

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.

General Privacy Controls.

Some of the U.S. State Privacy Laws require businesses to process GPC signals, which are referred to in some states as opt-out preference signals ("OOPS"). GPC signals are signals sent by a platform, technology, or mechanism, enabled by individuals on their devices or browsers, that communicate the individual's choice to opt-out of Sale, Sharing and/or Targeted Advertising, such that the GPC signal effectively automatically communicates such requests. To use an OOPS/GPC, you can download an internet browser or a plugin to use on your current internet browser and follow the settings to enable the OOPS/GPC. To our knowledge, we have configured our websites to receive and honor GPC signals pursuant to the specification and implementation instructions at https://globalprivacycontrol.org. We will apply GPC signals as a Do Not Sell/Share/Target requests as to cookie PI. Due to technical limitations, we are unable to apply GPC signals to non-cookie PI; however, you can make a Do Not Sell/Share/Target request as to non-cookie PI at our webform as just described above. Notably, when you are visiting our website on a particular device and browser, we will apply the GPC signal and corresponding Do Not Sell/Share/Target as to cookie-PI only to that specific device and browser. You must re-enable GPC if you visit our website on a different device and/or browser.

We are required by certain U.S. State Privacy Laws to state that we do not: (1) charge a fee for use of our websites if you have enabled GPC; (2) change your experience with our websites if you use GPC; or (3) display a notification, pop-up, text, graphic, animation, sound, video, or any interstitial in response to the OOPS/GPC (except that we may from time-to-time display on our website or consent management platform that you have enabled GPC).

YOUR LGPD PRIVACY RIGHTS

If you are resident in Brazil, you may be able to exercise the following rights with respect to your personal information that we have collected, subject to certain limitations:

- The right to confirmation of the existence of the processing. You have the right to ask that we confirm whether we process your personal data.

- The right to access the data. You have the right to access the personal data we hold about you and certain information about how we use it and who we share it with, including information about any public and private entities we have shared your personal data with.

- The right to correct incomplete, inaccurate or out-of-date data

- The right to anonymize, block, or delete unnecessary or excessive data or data that is not being processed in compliance with the LGPD. Please note that, depending on the request, this may result in a suspension or discontinuation of certain services and is also governed by legal and/or contractual retention guidelines.

- The right to the portability of data to another service or product provider, by means of an express request.

- The right to delete personal data processed with the consent of the data subject. You have a right to request the permanent deletion of your data, subject to certain exceptions. However, please note that exercising this right may result in a suspension or discontinuation of services and is also governed by legal and/or contractual retention guidelines.

- The right to information about the possibility of not giving consent and about the consequences of the refusal. You have the right to ask us to provide information about the possibility of not giving consent for the processing of your personal data and the consequences of such refusal.

- The right to revoke consent.

Please note that not all of these rights listed above are absolute, and limitations/exceptions apply in some cases. For example, we may not be able to fully comply with your request if we are bound by certain legal restrictions or contractual requirements, but in those circumstances, we will still respond to notify you of such a decision.

Exercising Data Portability and Deletion Rights

To exercise the data portability and deletion rights described above, please submit a verifiable consumer request to us by:

Emailing us at privacy@eurasiagroup.net

We will need to verify your identity before processing your request. The verifiable consumer request must:

o Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or a legal representative.

o Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

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. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 15 days of its receipt but no more than 30 days. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. 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.

We do not charge a fee to process or respond to your verifiable consumer request.

You shall immediately inform us, through the Data Protection Officer listed in the following paragraph, when our cooperation is necessary to alter, update, supplement, correct or exclude personal data that has been made available by you to us (e.g. personal data of third parties). You shall provide all the relevant information so that we may take the necessary provisions within a reasonable time.

Our Data Protection Officer can assist and guide you related to this Privacy Policy or the processing of personal data carried out by us, as well as act as a communication channel between you, us and the local data protection authority.

Name: Cassandra Spratt

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