

## Privacy Policy

Last updated: August 12, 2025

[NOTICE: We may sell your sensitive personal data.]<sup>1</sup>

Otovo ASA ("**Company**", "**we**", "**our**", or "**us**") respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes how we collect, process, retain, and disclose personal data about you when providing services to you through our websites, applications, products, and services that link to this policy (our "**Services**") and our practices for using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect:

- Through the Services.
- In communications, including email, text, chat, and other electronic messages, between you and the Services.
- When you interact with our advertising and applications (including mobile apps) on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries) that does not link to this policy; or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the Services.

We may provide additional or different privacy policies that are specific to certain features, services, or activities.

Please read this policy carefully to understand our policies and practices regarding your information and how we treat it. By interacting with our Services or providing us with your information, you agree to the collection, use, and sharing of your information as described in this privacy policy. This policy may change from time to time (see How We Retain Your Personal Data). Your continued use of the Services after we make changes as described here is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **Children's and Minors' Data**

Our Services are not intended for, and we do not knowingly collect any personal data from, children under the age of 18. If we learn we have collected or received personal data from a child under 18 years old without verification of parental consent, we will delete that information.

### **The Personal Data That We Collect or Process**

"**Personal data**" is information that identifies, relates to, or describes, directly or indirectly, you as an individual, such as your name, email address, telephone number, home

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<sup>1</sup> Note: delete if this is not accurate.

address, or payment information (for example, account information such as name, postal address, and email address, credit card number, or social security number or any other identifier we may use to contact you online or offline).

The types and categories of personal data we collect or process include:<sup>2</sup>

- Account and contact information, including name, address (such as home address, work address, or other address), email address, phone number, username, and other contact information you provide us.
- Payment information, including credit card or debit card information and information about the payment methods and services (such as PayPal or Venmo) you use in connection with the Services.
- Account history, including information about your subscription, account, transactions, purchases, order history, or discounts.
- Demographic information, including your age, gender, income level, education, or family or marital status.
- Location information, including general geographic location such as country, state or province, or city and precise geolocation.
- Device information, including your IP address, device identifiers, operating system and version, preferred language, hardware identifiers, browser type and settings, and other device information.
- Content and information you elect to provide as part of your profile or in any reviews you make through the Services or emails, chats, or other communications sent to us.
- Images, voice recordings, and videos collected or stored in connection with the Services.
- Identity document information, such as Social Security and driver's license numbers.

[If you are a California resident, to access our supplemental California privacy statement, visit [hyperlink URL](#)]<sup>3</sup>.

Some of the information identified above, including identification document information, and precise geolocation information may be considered sensitive data under certain laws. If required under applicable law, we will collect and process sensitive personal data only with your consent. If you choose not to provide or allow us to collect some information, we may not be able to provide you with requested features, services, or information.

We also collect:

- **Statistics or aggregated information.** Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal data. For example, we may aggregate personal data to calculate the percentage of users accessing a specific Services feature.
- **Technical information.** Technical information includes information about your internet

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<sup>2</sup> Note: intentionally broad. This can be reduced if any of these categories are not something you plan to collect.

<sup>3</sup> Note: Please let us know if you plan to operate in California and we can provide a supplemental California privacy statement.

connection and usage details about your interactions with the Services, such as clickstream information to, through, and from our Services (including date and time), products that you view or search for; page response times, download errors, length of your visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from a page.

If we combine or connect non-personal statistical or technical data with personal data so that it directly or indirectly identifies an individual, we treat the combined information as personal information.

## **How We Collect Your Personal and Other Data**

### *You Provide Information to Us*

We collect information about you when you interact with our Services, such as when you create or update an account, place an order, make a request, participate in surveys, sweepstakes, contests, or promotions, or create, upload, or post content to the Services, including reviews and media such as photos, videos, or audio recordings.

### *Automatically Through Our Services*

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect information that may include personal data. Information collected automatically may include usage details, IP addresses, operating system, and browser type, and information collected through cookies, web beacons, and other tracking technologies including details of your interactions with our Services (e.g., logs), other communication data, and the resources and Services features that you access and use.

Using automatic collection technologies helps us to improve our Services and to deliver a better and more personalized experience.

The technologies we use for this automatic data collection may include:

- **Cookies.** A cookie is a small file placed on your device when you interact with the Services. You may refuse to accept or disable cookies by activating the appropriate setting on your browser or device. However, if you select this setting, you may be unable to access certain features of the Services.
- **Web Beacons.** Some parts of the Services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those parts or opened an email and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity).

To the extent any of these automated technologies are considered a personal data sale, targeted advertising, or profiling, under applicable laws, depending on where you live, you may opt out from use of these automated technologies for such uses by {**OPT-OUT REQUEST SUBMISSION METHOD**}<sup>4</sup>. Please note that some Services features may be unavailable as a result.

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<sup>4</sup> Note: Many states (not just CA) require an opt-out method, which can be a toll-free number, email, or website.

When you interact with the Services, there are third parties that may use automatic collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your device manufacturer.
- Your internet or mobile service provider.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

#### *From Business Partners and Service Providers*

We may receive personal data about you from other sources and combine that with information we collect directly from you. For example, we may obtain information about you from service providers that we engage to perform services on our behalf, such as payment processors, analytics, security and anti-fraud services, and data brokers. We also may receive personal data from business partners that we engage to share consumer information with us, including your personal preferences and demographic information such as age, gender, and income level so that we can better provide you with a personalized experience, including personalized content, offers and services.

#### **How We Use Your Information**

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

- Provide you with the Services and any contents, features, information, products, or services that we make available through the Services.
- Fulfill and manage subscriptions, purchases, orders, deliveries, and payments.
- Provide you with notices about your account, including expiration and renewal notices.
- Promote our Services, business, and offerings by publishing advertising on our own Services and by placing ads on third parties' services. We may use your information to model, segment, target, offer, market, and advertise our Services.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when Services updates are available and about changes to any products or services we offer or provide through them.
- In any other way we may describe when you provide the information.
- Fulfill any purpose for which you provide it.
- For any other purpose with your consent.

The usage information we collect, whether connected to your personal data or not, helps us improve our Services and deliver a better and more personalized experience by enabling us to:

- Estimate our audience sizes and usage patterns.
- Store information about your preferences, allowing us to customize the Services according to your individual needs and interests.
- Speed up your searches.
- Recognize you when you return to our Services.

### **Who We Disclose Your Information To**

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

We may also disclose personal data that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our organization.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Otovo ASA's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Otovo ASA is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Mobile Application End User License Agreement [\[link\]](#)<sup>5</sup> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our organization, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Your Rights and Choices About Your Information**

This section describes mechanisms you can use to control certain uses and disclosures of your information and rights you may have under state law, depending on where you live.

**Advertising, marketing, cookies, and other tracking technologies choices:**

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<sup>5</sup> Note: add link here to the EULA

- **Cookies and Other Tracking Technologies.** You can set your browser to refuse all or some browser cookies or other tracking technology files, or to alert you when these files are being sent. You can choose whether or not to allow the Services to collect information through other tracking technologies by {OPT-OUT METHOD}<sup>6</sup>. If you disable or refuse cookies or similar tracking files, some Services features may be inaccessible or not function properly. Some browsers include a "Do Not Track" (DNT) setting that can send a signal to the online services you visit indicating you do not wish to be tracked.
- **Promotions by the Company.** If you do not wish us to use your information to promote our own or third parties' products or services, you can opt out by {OPT-OUT METHOD}. You can also opt out by logging into your account and adjusting your account settings and preferences.
- **[Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target audience preferences, you can opt out by {OPT-OUT METHOD}.]<sup>7</sup>
- **[Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal data with unaffiliated or non-agent third parties for advertising and marketing purposes, you can opt out by {OPT-OUT METHOD}. You can also opt out by logging into your account and adjusting your account settings and preferences. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.]<sup>8</sup>

#### **Location data choices:**

- **Location Data.** You can choose whether or not to allow the Services to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some Services features may become inaccessible or not function properly.

### **Your State Privacy Rights**

Depending on your state of residency, you may have certain rights related to your personal data, including:

- **Access and Data Portability.** You may confirm whether we process your personal data and access a copy of the personal data we process. To the extent feasible and required by state law, depending on your state, data will be provided in a portable format. Depending on your state, you may have the right to receive additional information and it will be included in the response to your access request.
- **Correction.** You may request that we correct inaccuracies in your personal data that we

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<sup>6</sup> Note: The method here and in the next 3 paragraphs can be the same opt-out method as referenced above under "How We Collect Your Personal and Other Data"

<sup>7</sup> Note: include only if you anticipate using personal data to provide targeted advertisements in the app. Otherwise delete.

<sup>8</sup> Note: include only if you anticipate sharing personal data with third parties for marketing / advertising purposes. Otherwise delete.

maintain, taking into account the information's nature and processing purpose.

- **Deletion.** You may request that we delete personal data about you that we maintain, subject to certain exception under applicable law.
- **Opt Out of Using Personal Data for Targeted Advertising, Profiling, and Sales.** You may request that we do not use your personal data for these purposes.

**Important:** The exact scope of these rights vary by state. There are also several exceptions where we may not have an obligation to fulfill your request.

To exercise any of these rights, please {REQUEST SUBMISSION METHOD}<sup>9</sup>. To appeal a decision regarding a consumer rights request {REQUEST SUBMISSION METHOD}.

Some browsers and browser extensions support the Global Privacy Control ("GPC") that can send a signal to process your request to opt out from certain types of data processing, including data "sales" as defined under certain laws. When we detect such a signal, we will make reasonable efforts to respect your choices indicated by a GPC setting as required by applicable law.

Nevada provides its residents with a limited right to opt out of certain personal data sales. Residents who wish to exercise their sale opt-out rights may submit a request to this designated address: {OPT OUT REQUEST SUBMISSION METHOD}. However, please know we do not currently sell data triggering that statute's opt-out requirements.

[If you are a California resident, additional information applies to you. To access our supplemental California privacy statement and learn more about California residents' privacy rights, visit {Invalid hyperlink URL}]<sup>10</sup>.

### **How We Protect Your Personal Data**

We use commercially reasonable administrative, physical, and technical measures designed to protect your personal data from accidental loss or destruction and from unauthorized access, use, alteration, and disclosure. However, no website, mobile application, system, electronic storage, or online service is completely secure, and we cannot guarantee the security of your personal data transmitted to, through, using, or in connection with the Services. In particular, email, texts, and chats sent to or from the Services may not be secure, and you should carefully decide what information you send to us via such communications channels. Any transmission of personal data is at your own risk.

The safety and security of your information also depends on you. You are responsible for taking steps to protect your personal data against unauthorized use, disclosure, and access.

### **How We Retain Your Personal Data**

We keep the categories of personal data described in this policy for as long as reasonably necessary to fulfill the purposes described or for as otherwise legally permitted or required, such as maintaining the Services, operating our organization, complying with our legal obligations, resolving disputes, and for safety, security, and fraud prevention. This means that we consider our legal and business obligations, potential risks of harm, and nature of the information when

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<sup>9</sup> Note: this can be the same as the opt-out request method above.

<sup>10</sup> Note: Please let us know if you plan to operate in California and we can provide a supplemental California privacy statement.

deciding how long to retain personal data. At the end of the retention period, personal data will be deleted, destroyed, or deidentified.

[If you are a California resident, visit {otovo.ai/faq} for more information about the retention periods that apply to the personal data categories we collect.]<sup>11</sup>

### **Changes to Our Privacy Policy**

We may update this policy from time to time, and we will provide notice of any such changes to the policy as required by law. The date the privacy policy was last updated is identified at the top of the page. We will notify you of changes to this policy by updating the "last updated" date and posting the updated policy on the Services. We may email or otherwise communicate reminders about this policy, but you should check our Services periodically to see the current policy and any changes we have made to it.

### **Contact Information**

To exercise your rights or ask questions or comment about this privacy policy or our privacy practices, contact us at:

To register a complaint or concern, please [TO FILL]<sup>12</sup>.

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<sup>11</sup> Note: Please let us know if you plan to operate in California and we can provide a supplemental California privacy statement.

<sup>12</sup> Note: The complaint or concern link may be the same or different from the opt-out request toll-free number, email, or website.