

FREEZE INC.

Privacy Policy

Last modified: July 1st, 2022

1. Introduction

Freeze Inc. (“**Company**” or “**We**”) respects your privacy and is committed to protecting it through our compliance with this privacy policy (this “**Privacy Policy**”). This Privacy Policy describes the types of information that we may collect from you or that you may provide to us when you use or access our website located at freeze.com (the “**Website**”) and any other services provided by us (collectively, the “**Services**”) and our practices for collecting, using, maintaining, protecting and disclosing that information. This Privacy Policy applies to information that we collect: (i) on the Website or through any other product offerings, including mobile applications developed by us and (ii) in e-mail, text and other electronic messages between the Company and you. This Privacy Policy does not apply to information that is collected by third-party websites, applications, and services that are integrated with or linked to our Website and Services (the “**Third-Party Services**”).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, please do not use the Services. By using the Services, you agree to this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of the Services after we make any changes to this Privacy Policy is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

2. Types of Information and Data Collected.

The following is a summary of the various types of data and information that we collect from you when you access our Website and/or use the Services:

- a. **Personal Data.** When you use our Services, we may ask you to provide us with certain personally identifiable information (“**Personal Data**”) that can be used to contact or identify you or any other individual that you add to your account (each, an “**Identity Profile**”). The information identified as “optional” below is used to disambiguate you from others who may have the same or a similar name as you when we deliver our Services. Personal Data may include, but is not limited to:
 - i. Email address(es) (required)
 - ii. First name and last name (required), as well as middle name and other names or spellings of your name (optional)
 - iii. Phone number(s) (optional)
 - iv. City and State (optional), as well as Address and ZIP/Postal code (optional)

- v. Cookies and Usage Data (only first party cookies for logins)
- vi. Birth year (required), birth month and birth day (optional)
- vii. Gender (optional)
- viii. Government issued identification details
- ix. The names of family members, roommates, or significant others with whom you have shared an address (optional)
- x. Any other information that we request that is optional

We may use the Personal Data (i) to contact you with certain information regarding your account, including the status of our data broker removal efforts on your behalf and on behalf of any other Identity Profiles in your account, (ii) to send you required account updates such as billing and account activity confirmations, and (iii) to contact any other individual in your account to confirm their acceptance of the terms of this Privacy Policy, our Terms of Service, and our Cookie Policy.

- b. **Usage Data.** We may also collect information that your web browser sends whenever you visit our Website or when you access the Services by or through a mobile device (“**Usage Data**”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When you access our Services with a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.
- c. **Tracking Cookies Data.** We use cookies and similar tracking technologies to track the activity on our Services and we retain such information for our internal business purposes (the “**Tracking Cookies Data**,” and collectively with the Personal Data, Usage Data, and Location Data, the “**Data**”). Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Services. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Services.

The following is a list of the types of cookies that we use:

- i. *Session Cookies:* We use Session Cookies to operate our Service.

- ii. *Preference Cookies:* We use Preference Cookies to remember your preferences and various settings.
- iii. *Security Cookies:* We use Security Cookies for security purposes.

3. **How We Use Your Data.**

We use the Data that we collect from you for various purposes, including:

- a. To provide and to maintain the Website and the Services
- b. To provide you with the Services
- c. To ensure that the Website and the Services are working properly and to prevent attempts to break in our systems or use your Data improperly
- d. To notify you about changes to the Website and the Services
- e. To allow you to participate in interactive features of our Services when you choose to do so
- f. To provide customer support
- g. To gather analysis or valuable information so that we can improve our Services
- h. To monitor the usage of our Services
- i. To detect, prevent and address technical issues
- j. To fulfill any other purpose for which you provide it
- k. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection
- l. To provide you with notices about your account and/or subscription, including expiration and renewal notices, email instructions, etc.
- m. To provide you with news and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- n. To comply with our legal obligations, for example, under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities
- o. In any other way we may describe when you provide the information.
- p. For any other purpose with your consent

4. Retention of Your Data.

We will retain the Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use the Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Services or we are legally obligated to retain this data for longer time periods.

5. Disclosure of Data.

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

We may disclose Data that we collect or that you provide to us as described in this Privacy Policy:

- a. To our subsidiaries and affiliates;
- b. To contractors, service providers and other third parties we use to support our business;
- c. 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 the Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about our Website users is among the assets transferred;
- d. To third parties to market their products or services to you if you have not opted out of these disclosures;
- e. To fulfill the purpose for which you provide it;
- f. For any other purpose disclosed by us when you provide the information; and
- g. With your consent.

We may also disclose the Data:

- h. To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- i. To enforce or apply our Terms of Service, which can be found here https://freeze.com/en/Freeze_Inc_Terms_of_Service_Updated_2022-07-01.pdf and other agreements, including for billing and collection purposes.

- j. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6. Data Security.

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website or our other product offerings, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. While we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security.

7. Data Collected by Third-Party Services.

Any Third-Party Services integrated with or linked to our Website and Services may collect certain data from you when you use those services. Your use of such Third-Party Services will be subject to the terms applicable to each such Third-Party Services, including without limitation the terms of service, privacy policy, and cookie policy related thereto. We have no control over, we do not warrant, and we do not assume any responsibility for, the content, terms of service, privacy policies or practices of any such Third-Party Services. You agree that the Company provides links to and integrations with such Third-Party Services solely as a convenience and has no responsibility for the content or availability of such Third-Party Services, and that the Company does not endorse such Third-Party Services (or any products or other services associated therewith). You agree and acknowledge that such Third-Party Services, such as payment processors, may collect certain personal information and data from you in connection with your use of such Third-Party Services. You agree that your access to any Third-Party Services linked to the Service is at your own risk.

8. Your Data Protection Rights Under General Data Protection Regulation (GDPR).

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights, covered by GDPR. For more information, please see <https://eur-lex.europa.eu/eli/reg/2016/679/oj>. We enable you to correct, amend, delete, or limit the use of your Personal Data. If you wish to be informed of the Personal Data that we hold about you or any other individual for whom an Identity Profile has been added to your account, please view the Manage Profile page in your account or email us at <https://account.freeze.com/en/c1f8ecf2a2cb7a4a/>. If you want any Personal Data to be removed from our systems, you should delete your account from the Login & Security section of your Account page.

In certain circumstances, you have the following data protection rights:

- a. the right to access, update or to delete the information we have on you.
- b. the right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- c. the right to object. You have the right to object to our processing of your Personal Data.
- d. the right of restriction. You have the right to request that we restrict the processing of your personal information.
- e. the right to data portability. You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format.
- f. the right to withdraw consent. You also have the right to withdraw your consent at any time where we rely on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. Please note that we may not be able to provide Services to you without some necessary data.

You have the right to complain to a Data Protection Authority about our collection and use of any Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

9. **Your Data Protection Rights under the California Privacy Protection Act (CalOPPA)**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. See more at: <https://consumercal.org/about-cfc/cfc-education-foundation/california-online-privacy-protection-act-caloppa-3/>.

According to CalOPPA we agree to the following:

- a. users can visit our site anonymously.

- b. our Privacy Policy link includes the word “Privacy,” and can easily be found on the home page of our Website.
- c. users will be notified of any privacy policy changes on our Privacy Policy Page.
- d. all users are able to change their personal information by updating the personal information fields of your Manage Profile page in your account.

Our Policy on “Do Not Track” Signals:

We do not respond to Do Not Track signals. Third-party technology providers we utilize for our Service may also not respond to Do Not Track signals. Do Not Track is a preference setting some web browsers support to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

10. **Your Data Protection Rights as a resident of any State in the United States, including California under the California Consumer Privacy Act (CCPA)**

If you are a resident of any State in the United States, including California, you are entitled to learn what data we collect about you, ask to delete your data and not to sell (share) it. To exercise your data protection rights, you can make certain requests and ask us:

- a. **What personal information we have about you.** If you make this request, we will return to you:
 - i. The categories of personal information we have collected about you
 - ii. The categories of sources from which we collect your personal information
 - iii. The business or commercial purpose for collecting or selling your personal information
 - iv. The categories of third parties with whom we share personal information
 - v. The specific pieces of personal information we have collected about you
 - vi. A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with

Please note that you are entitled to ask us to provide you with this information up to two times in a rolling twelve (12) month period. When you make this request, the information provided may be limited to the Personal Data that we collected about you in the previous twelve (12) months.

- b. To delete your personal information.** If you want any Personal Data to be removed from our systems, you should delete your account from the Login & Security section of your Account page and all of the information we hold about you will be destroyed. If you make this request, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be accomplished through de-identification of the information. If you choose to delete your personal information, you may not be able to use certain functions that require your personal information to operate. To delete your personal information, you should delete your account from the Login & Security section of your Account page. If you do not have an active Account with us and are not subscribed to our email newsletter, we do not maintain any personal information about you.
- c. To stop selling your personal information.** We do not sell or rent any Personal Data to any third parties for any purpose. You are the only owner of your Personal Data and can request disclosure or deletion of your Personal Data at any time.

Please note that if you request the deletion of any Personal Data, it will impact your experience with us as several functions of our Service will not function without your personal information, and you may not be able to participate in certain programs or membership services which require the usage of your personal information to function. But in no circumstances, we will discriminate against you for exercising your rights.

If you have an account active for our Service, you can delete your account from the Login & Security section of your Account page.¹

To exercise your data protection rights described above, please submit a request from this page on our website: <https://account.freeze.com/en/c1f8ecf2a2cb7a4a/>

If you are a resident of California, your data protection rights, described above, are covered by the CCPA, short for the California Consumer Privacy Act. To find out more, visit the official California Legislative Information website. The CCPA went into effect on January 1, 2020.

11. Children Under the Age of 18

Our Website and Services are not intended for children under 18 years of age. No one under age 18 may provide any personal information to us whether via the Website or any of our other product or service offerings. We do not knowingly collect personal information from children under 18. If you are under 18, please do not (i) create an account on the Website or on our mobile application, (ii) use or provide any personal information to us on the Website or our mobile application or on or through any of the Website's or mobile application's features, (iii)

make any purchases through the Website or the mobile application, (iv) use any of the interactive or public comment features of the Website or mobile application or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information and close the account. If you believe we might have any information from or about a child under 18, please contact us at <https://account.freeze.com/en/431b5a79cdb0b660/>.

12. Changes to Our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the primary e-mail address specified in your account and/or through a notice on the Website home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes. Your continued use of the Website and/or the Services following the posting of any changes to this Privacy Policy means that you accept and agree to the changes.

13. Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, please contact us by submitting a message here: <https://account.freeze.com/en/431b5a79cdb0b660/>