

## RECURRENT VENTURES

### PRIVACY POLICY

Last Modified: June 21, 2022

#### INTRODUCTION

This Privacy Policy explains how Recurrent Ventures Inc. and its affiliates (“Recurrent”; “we”; “us”; or “our”) collect and process information through our websites at recurrent.io, and through the websites of our brands, including but not limited to, at thedrive.com; carbibles.com; thewarzone.com; wearethemighty.com; popsci.com; domino.com; taskandpurpose.com; melmagazine.com; livingly.com; actonmedia.com; brooklinemedia.com; camdenmedia.com; futurism.com; outdoorlife.com; fieldandstream.com; saveur.com; saveurselects.com; donut.media; zimbio.com; range365.com; stylebistro.com; shotbusiness.com; lonny.com; bobvila.com; kitchenistic.com; milspousefest.com; popphoto.com; betteryoumag.com; and interestingthings.com (collectively, the “Recurrent Websites”). Some of the Recurrent Websites may also offer certain services, such as subscriptions, merchandise for sale, or other services (the “Services”). The Recurrent Websites and Services are collectively called the “Website.” Note that some Recurrent websites and applications may have supplemental terms which would govern in the event of a conflict with this Privacy Policy.

Please read this Privacy Policy carefully to understand our policies and practices regarding such information. By accessing or using the Website, you agree to this Privacy Policy. If you do not agree with our policies and practices, you should not use the Website, or otherwise provide us with Personal Information.

Our Website is provided from the United States and all servers that make it available reside in the United States. You understand that data stored in the United States may be subject to lawful requests by the courts or law enforcement authorities in the United States.

#### OVERVIEW

- We automatically collect information from users of our Website and Services for analytical purposes and in order to provide the Website and Services
- We collect Personal Information (as defined below) from users of our Website and Services when it is voluntarily provided to us and we use it for the purposes for which it was provided
- We will not use or share information we collect from you with anyone except as described in this Privacy Policy

## **INFORMATION WE COLLECT AUTOMATICALLY**

We, our service providers, or our third-party partners may automatically collect information from you when you visit our Website. Such information does not directly identify you as an individual and may include:

- **Cookies and Similar Technology**

“Cookies” are pieces of information that may be placed on your device by a service for the purpose of facilitating and enhancing your communication and interaction with that service. Many services use cookies for these purposes. We may use cookies (and similar items such as clear gifs, web beacons, mobile application identifiers, tags, pixels, etc.) through our Website to customize your visit, to analyze how you use our Website and for other purposes to make your visit more convenient, to manage your account or to enable us to enhance our Website or Services. We do not use cookies or similar items to automatically retrieve personally identifiable information from your device without your knowledge, but we may use them to store your login credentials.

Based on your web browser, you may have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Website. Further information on cookies is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

- **Clickstream Data**

As you use the Internet, a trail of electronic information is left at each website you visit. This information, sometimes referred to as "clickstream data," can be collected and stored by a website's server. Clickstream data can tell us the type of computer and browsing software you use and the address of the website from which you linked to the Website. We may collect and use clickstream data as a form of aggregate information to anonymously determine how much time visitors spend on each page of our Website, how visitors navigate throughout the Website and how we may tailor our web pages to better meet the needs of visitors. This information will be used to improve our Website and our Services.

- **Website Analytics**

We may work with third-party service providers who use the technologies described in this section to conduct website analytics to help us track and understand how visitors use the Website. One such provider is Google Analytics, a web analytics service provided by Google, Inc. (“Google”), which uses cookies to help analyze how users use the Website. The information generated by these cookies about your use (including your IP address) will be transmitted to and stored by website analytics service providers on servers in the United States. Such providers will use this information for the purpose of evaluating your use of the Website, compiling reports on activity for its staff, and providing other services relating to web page activity and internet usage. The website analytics service providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf. You may refuse the use of cookies by selecting the appropriate settings in your browser. By using the Website and accepting cookies, you consent to the processing of data about you by such website analytics service providers in the manner and for the purposes set out above. You can find out more about how Google, for example, uses data when you use our Website by visiting “How Google uses data when you use our partners’ sites or apps” (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)). Please refer to the currently available opt-outs for Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>.

#### **INFORMATION WE COLLECT DIRECTLY FROM YOU**

“Personal Information” is information that specifically identifies you or that may be used to locate or identify you. We may collect information, including Personal Information, when you provide such information to us directly, such as when you send us an email, or otherwise interact with us on the Website or in connection with the Services. Your providing Personal Information to us is completely voluntary. We do not collect Personal Information unless you submit that information to us.

Types of Personal Information we may collect directly from you on the Website and Services include: contact information, such as your name, email address, gender, phone number and zip code; social media accounts; and payment information for some Services. We may also collect other information that you directly provide us, including forms filled out by you on the Website; participation in discussion boards or other social media functions; information to enter a competition, promotion or survey; job application information; content of correspondence with us by phone, e-mail or otherwise; and marketing and communications data (e.g., your preferences in receiving marketing from us). We may also collect your consent to accept cookies. Through some features of the Services and through certain promotions, you may also submit information about other people. For example, you might submit a person’s name, mailing and/or e-mail address to send a gift or electronic greeting card.

## **PAYMENT CARD DETAILS**

If you make a payment through the Service, such as using our self-service advertising platform, your payment card details are provided directly to our payment processing service providers, such as Stripe or Shopify. You may read their privacy policies at their websites, such as at <https://stripe.com/privacy> and <https://www.shopify.com/legal/privacy> to understand how they use your information.

## **HOW WE USE YOUR INFORMATION**

We may use Personal Information and other information as described herein including for the following purposes:

- to contact you about our services,
- to personalize your experience with us,
- to conduct testing, research, analysis, and product development,
- to respond to your direct inquiries,
- to allow you to apply for a job or sign up for special offers from third parties through our Website and services,
- to send you newsletters to which you have subscribed,
- to facilitate the sale of merchandise that you purchase through our Website,
- to enable Website features such as geographically-specific pricing or logging,
- to add you to our mailing lists and send alerts from time to time, including communications about changes to your account, and our Website's and services' terms or policies,
- to verify your identity,
- to investigate or settle disputes,
- to maintain the safety, security, and integrity of our Website,
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations,
- as described to you at the point of collection of your information or as otherwise set forth in the CCPA, and
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which information held by us about our Website users is among the assets transferred.

We reserve the right to use and disclose information that is Non-Personally Identifiable Information (see below) in any manner permitted by law except as otherwise provided in this Privacy Policy.

## **NON-PERSONALLY IDENTIFIABLE INFORMATION**

As noted above, we may collect information that is not Personally Identifiable Information (“Non-Personally Identifiable Information”). We may aggregate or de-identify Personally Identifiable Information so that the information does not personally identify you or anyone else directly. Because Non-Personally Identifiable Information, including aggregate or de-identified information, does not personally identify you directly, we may collect, use and disclose Non-Personally Identifiable Information for any purpose permitted by law and subject to the section titled “**California Consumer Notice**”. In some instances, we may combine Non-Personally Identifiable Information with Personally Identifiable Information. If we combine any Non-Personally Identifiable Information with Personally Identifiable Information, the combined information will be treated by us as Personal Information.

## **HOW WE SHARE YOUR INFORMATION**

Besides using your Personal Information ourselves, we may send your Personal Information and other information to other companies, affiliates, and third parties in the following instances:

- *Service Providers.* We may share your Personal Information with third parties who may use your information to provide us services such as website hosting, data analysis, infrastructure provision, security, maintenance, information technology services, customer service, email delivery services, payment processing, auditing, and anti-fraud monitoring. These third parties may have access to Personal Information that is necessary to perform their functions.
- *Legal Compliance and to Defend Our Rights.* We may disclose Personal Information and other information as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our Terms and Conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- *Business Transfers.* We may share your Personal Information and other information with third parties in connection with a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the assets of Recurrent Ventures or its affiliates, whether as a going concern or as part of bankruptcy, liquidation, or similar

proceeding, in which information held by Recurrent Ventures or its affiliates about our Website users is among the assets transferred.

- *Aggregated or Non-Personal Information.* We may share aggregated information or Non-Personally Identifiable Information with unaffiliated third parties, such as business partners, manufacturers, distributors, and retailers, in a form in which the shared information will not contain nor be linked to any Personal Information, to improve and enhance your experience using the Website and Services, and for our market research activities.

Please note that we may share your Personal Information for any other purpose(s) disclosed to you at the time we collect your Personal Information or with your consent.

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### **INTEREST-BASED ADVERTISING**

We believe that advertising is more effective and relevant when it is targeted to your interests and behaviors. Therefore, we may work with third parties who collect information on our Website through the use of cookies and similar methods in order to serve you with relevant advertisements on other services or to determine that you have seen our advertisements on other services. We may also collect and process information to serve you with advertisements through other platforms and services that you use. You do have the ability to control certain advertising practices. You can learn more about interest-based advertising and opt-out of targeted advertising from certain providers with whom we work by visiting <https://youradchoices.com/control> and <http://www.aboutads.info/choices>. To learn how to opt-out of such targeted advertising through industry programs, see **YOUR RIGHTS, CHOICES AND OPT OUT** below.

### **LINKS TO OTHER SITES AND SOCIAL MEDIA SERVICES**

We may create links to other websites that we think may be of interest to you, such as providers of various products and services. We do not endorse any other websites and providers by providing such links, and our privacy policy applies only to your use of our Website and services. We are not responsible for the privacy policies of any websites and services we link to on our Website, and you should read the privacy policies of each site you visit to determine what information that site may collect about you.

### **SOCIAL NETWORKING SERVICES**

The Website may integrate with social networking services. We do not control such services and are not liable for the manner in which they operate. While we may provide you with the

ability to use such services in connection with our Website, we are doing so merely as an accommodation and, like you, are relying upon those third party services to operate properly and fairly.

You should be aware that personal information which you voluntarily include and transmit online in a publicly accessible blog, forum, social network or otherwise online may be viewed and used by others. We are unable to control such uses of your personal information, and by using such services you assume the risk that the personal information provided by you may be viewed and used by third parties.

#### **DATA RETENTION**

We will retain your information for as long as your account is active or as needed for us to manage and provide our services and for our business needs. Even if we delete some or all of your personal information, we may continue to retain and use de-identified or aggregate data previously collected.

#### **OUR CLIENTS**

If you are a client or business partner of ours, then the contract between your company and Recurrent shall prevail over this Privacy Policy.

#### **YOUR RIGHTS, CHOICES AND OPT OUT**

**California Consumer Notice** - If you are a resident of California, you have certain rights under the California Consumer Privacy Act ("CCPA") as described below. The CCPA indicates that companies should disclose whether the following categories of information are transferred for consideration or for an organization's "business purpose" as that term is defined under California law. We collect the following categories of personal information, as set forth in the CCPA, and have collected the following categories of personal information from individuals within the last twelve (12) months, for the following categories of purposes and from the following categories of sources, and we share personal information with the following categories of third parties:

Categories of Personal Information	Sources of Such Personal Information	Business Purpose for Collecting Such Personal Information	Categories of Third Parties to Whom Information Is Disclosed	Disclosed in the Preceding Twelve (12) Months for a Business Purpose	“Sold” (as defined by CCPA) in the Preceding Twelve (12) Months
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers	Collected from you directly, such as when you send us an email, sign up for a newsletter, or otherwise provide such information	We use such information to respond to your communications to us, to send you newsletters and to manage our offerings to you	We share such information with our service providers	Yes	No
<i>Online identifiers:</i> Identifiers such as cookies, mobile device IDs, IP address, type of browser and operating system	Collected from you directly when you use the Website	We use such information to better understand how the Website is being used, customize our Website for your use and to improve our Website’s functionality	We share such information with our service providers	Yes	No



Categories of Personal Information	Sources of Such Personal Information	Business Purpose for Collecting Such Personal Information	Categories of Third Parties to Whom Information Is Disclosed	Disclosed in the Preceding Twelve (12) Months for a Business Purpose	“Sold” (as defined by CCPA) in the Preceding Twelve (12) Months
<i>Internet or other electronic network activity information:</i> Browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement	Collected from you directly when you use the Website	We use such information to better understand how the Website is being used, customize our Website for your use and to improve our Website’s functionality	We share such information with our service providers	Yes	No
<i>Customer records information:</i> Name, email address, physical address, telephone number, payment information	Collected from you when you provide it on the Website	We use such information to manage your subscriptions and newsletters, to facilitate purchases you make on our Website	We share such information with our service providers	Yes	Yes*

Categories of Personal Information	Sources of Such Personal Information	Business Purpose for Collecting Such Personal Information	Categories of Third Parties to Whom Information Is Disclosed	Disclosed in the Preceding Twelve (12) Months for a Business Purpose	“Sold” (as defined by CCPA) in the Preceding Twelve (12) Months
<i>Commercial information:</i> products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Collected from you directly when you use the Website or make a purchase	We use such information to better understand how the Website is being used, customize our Website for your use and to improve our Website’s functionality	We share such information with our service providers	No	No
Geolocation data	Directly from your device by observing your actions on our Website	To customize the Website and Services provided to you, to analyze and improve use of the Website, develop analytics, for advertising, for testing and research purposes	We share such information with our service providers	No	No

Categories of Personal Information	Sources of Such Personal Information	Business Purpose for Collecting Such Personal Information	Categories of Third Parties to Whom Information Is Disclosed	Disclosed in the Preceding Twelve (12) Months for a Business Purpose	“Sold” (as defined by CCPA) in the Preceding Twelve (12) Months
Inferences drawn from any of the information identified in this chart to create a consumer profile	Developed from other information collected under the Privacy Policy and by us	To customize the Website and Services provided to you, to analyze and improve use of the Website, develop analytics, for advertising, for testing and research purposes	We share this information with service providers	No	No

\*We may sell customer records information related to registration forms you fill out on the Website when signing up for events.

### **1. Right to Know About Personal Information Collected, Disclosed or Sold**

If you are a resident of California, you have the right to request that we disclose certain information to you about our collection, use, disclosure or sale of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Deletion and Opt-out Rights*), and subject to certain limitations that we describe below, we will disclose such information to you.

You have the right to request any or all of the following:

- The categories of personal information we collected or sold about you.
- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

### **2. Right to Request Deletion**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Deletion and Opt-out Rights*), we will delete (and direct our service providers to delete) your personal information from our records. However, we may retain personal information that has been de-identified or aggregated.

Furthermore, we may deny your deletion request if retaining the information is necessary for us or our service provider(s) to perform certain actions, such as detecting security incidents and protecting us from illegal activity, or an exception under the CCPA applies which allows us to retain the information.

### **3. *Sale of Personal Information***

We may “sell” your personal information, as that term is defined under the CCPA. This means that personal information, such as your IP address or data collected via a tracking cookie, may be provided to third parties for their own independent use.

### **4. *Exercising Access, Deletion and Opt-out Rights***

To exercise the access, deletion and opt-out rights described above, please submit a request to us by either:

- Emailing us at [compliance@recurrent.io](mailto:compliance@recurrent.io).
- Filling out [this form](#)

Only you, or a person or business entity registered with the California Secretary of State that you authorize to act on your behalf (an “authorized agent”), may make the requests set forth above. The request should include your contact information and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. In addition, you should provide sufficient information that allows us to reasonably verify that you are the person about whom we collected the personal information. If you use an authorized agent to make request, you must provide the authorized agent written permission to do so, and we may require that you verify your identity directly with us. In order to protect the security of your personal information, we will not honor a request if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. The method used to verify your identity will vary depending on the nature of the request. You have the right not to receive discriminatory treatment for exercising any of your privacy rights.

**Non-Discrimination** We will not discriminate against you for exercising any of your CCPA rights, including, but not limited to, by:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Nevada Privacy Rights**

If you are a Nevada resident, you have the right to request that we do not sell your covered information (as those terms are defined in N.R.S. 603A) that we have collected, or may collect, from you. We do not sell your covered information, however, if you would like to make such a request you may do so by contacting us at [compliance@recurrent.io](mailto:compliance@recurrent.io).

**Industry behavioral advertising opt-out** - You may opt-out of being tracked online by certain companies listed at <http://www.aboutads.info/choices/> or [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and may also learn more about online behavioral advertising at such websites. If you opt-out, you will still receive advertisements, but they will not be delivered to you by such companies from whom you have opted-out based upon your behavioral data possessed by the companies from whom you have opted-out. The opt-out process through the DAA relies upon the placement of an opt-out cookie on your device, and you must repeat this process on each device or if your cookies are purged from your device. Cookie-based opt-outs are not effective on certain mobile services. Users may opt-out of certain advertisements on mobile applications or reset advertising identifiers via their device settings. To learn how to limit ad tracking or to reset the advertising identifier on your iOS and Android device, click on the following links:

iOS – <https://support.apple.com/en-us/HT202074>

Android – <https://support.google.com/ads/answer/2662922?hl=en>

You may also download and set your preferences on the DAA's App Choices mobile application(s) available in Google Play or the Apple App stores. More information about opting out on mobile devices is available here – <https://www.networkadvertising.org/mobile-choice/>. We do not respond to or honor "do not track" (a/k/a DNT) signals or similar mechanisms automatically transmitted by web browsers for which we are cannot evaluate your choice.

## **NOTICE TO EU, UK AND SWISS USERS**

If you are situated in the European Economic Area, United Kingdom or Switzerland and the General Data Protection Regulation (“GDPR”) or a similar law applies, as a data subject, you have the following rights:

- **Right to access** – This right allows individuals to obtain confirmation as to whether or not personal data concerning them is being processed and provide access to such personal data. It also allows individuals to request details of the processing of their personal data including, without limitation, categories of recipients to whom the personal data have been or will be disclosed and purposes of processing.
- **Right to rectify** – This right allows individuals to rectify any inaccurate personal data about them.
- **Right to restrict processing** – This right allows individuals to block or suppress processing of personal data under certain circumstances.
- **Right to be forgotten** – This right is also known as the “right to erasure”. It is an individual’s right to have personal data erased or to prevent processing in specific circumstances.
- **Right of data portability** – This right allows individuals to move, copy or transfer personal data from one place to another in a secure manner without interrupting the integrity and usability of the information.
- **Right to object to processing** – This right allows individuals to object to certain types of processing, including direct marketing, profiling and providing for purposes of scientific or historical research and statistics.

Recurrent Ventures is the Controller of all personal data we collect through the Website and Services.

We shall only process your personal data pursuant to a lawful basis, which will usually be with your consent, when we have a legitimate interest, or to perform a contract to which we are subject. Additionally, if we rely on consent for the processing of your personal data, you have the right to withdraw it at any time and free of charge. When you do so, this will not affect the lawfulness of the processing before your consent withdrawal.

### **Provision of personal data and failure to provide personal data:**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the

contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may not be able to provide certain services to you.

#### Collection of personal data from third party sources:

We may obtain personal data and other information about you through our third party partners who help us provide our products and services to you. We may obtain cookie data about you from Google Analytics or other website analytics service providers.

#### Withdrawing your consent:

If we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. To withdraw your consent at any time, please contacting us at [compliance@recurrent.io](mailto:compliance@recurrent.io).

#### Data Transfer:

We may transfer personal data from the EU, UK or Switzerland to the USA and other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. Where we use certain service providers, we may use specific contracts approved by the European Commission that give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.

#### Use of your personal data for marketing purposes:

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

- Promotional offers from us: We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or used our services and, in each case, you have consented to our use of your personal data for marketing purposes.
- Third-party marketing: We will get your express opt-in consent before we share your personal data with any company outside our company for marketing purposes.

If you are situated in the EU, UK or Switzerland and have any complaints regarding our privacy practices, you have the right to make a complaint at any time to your local supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach your supervisory authority so please contact us in the first instance. To exercise your rights under the GDPR, please contact us at [compliance@recurrent.io](mailto:compliance@recurrent.io). Please note that in order

for you to assert these rights, we may need to verify your identity to confirm your right to access your personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. In order to verify your identity, we may need to gather more personal data from you than we currently have.

## **SECURITY**

We take the security of our data and information seriously. We take what we believe are reasonable precautions to protect against unauthorized access to our systems and to prevent data from being disclosed to unauthorized parties. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

## **CHANGES TO OUR PRIVACY POLICY**

We may change this Privacy Policy at our discretion at any time. If we do make any changes, such change will appear on this page of our Website. The date the Privacy Policy was last revised is identified at the top of the page. Your continued use of the Website or services following any changes means that you have accepted, consent to, and agree to be bound by such revised Privacy Policy.

## **CHILDREN UNDER THE AGE OF 16**

Our Service is not intended for children under 16 years of age. We do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any personal information from or about a child under 13, please contact us at [compliance@recurrent.io](mailto:compliance@recurrent.io).

## **UNITED STATES OF AMERICA / CROSS-BORDER DATA TRANSFERS:**

Unless otherwise stated on a particular Recurrent Website, our Website is maintained in the United States of America. By using the Website, you authorize the export of personal information to the USA and its storage and use as specified in this Privacy Policy. We transfer personal information from the EU, UK and Switzerland to the USA and other countries. Information stored in the USA may be subject to lawful requests by the courts or law enforcement authorities in the USA.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [compliance@recurrent.io](mailto:compliance@recurrent.io).