

SPINS Privacy Policy

This privacy policy describes the privacy practices of SPINS LLC (“SPINS”) and explains how we use, collect, and disclose Personal Information (defined below). We want to assure you that we respect your privacy, so we have prepared this privacy policy to explain to you how we treat your Personal Information that we obtain in connection with your use of the SPINS offerings. In connection with your use of the offerings or by an authorized third party on behalf of SPINS and/or its affiliates, we may obtain a variety of information about you. We refer to information that is linked to your identity as “Personal Information”.

When we use the term “offerings” or “SPINS offerings”, we are referring to the SPINS website, SPINS services, SPINS digital platforms, SPINS mobile applications, the Satori application, the Pinto digital platforms and services, or any other SPINS products or services we may make available over time. These offerings will link and are subject to this Privacy Notice.

Please read this privacy policy so that you can make an informed decision about using these offerings. By using the SPINS offerings or submitting Personal Information to SPINS, you are agreeing to this privacy policy and providing your consent to our collection, use, and disclosure of your Personal Information as described in this privacy policy.

In this privacy policy, words like "we", "us" and "our" refer to SPINS LLC and our affiliates and service providers, collectively. We may disclose information, including your Personal Information, to these other entities in connection with operating our business, as described further below, and these other entities may use and disclose information as provided in this privacy policy.

This privacy policy was last modified on March 28, 2023.

Personal Information

We obtain Personal Information about you in the following ways:

- Information that you provide to us. We may obtain Personal Information when you request information, products, or services from us. As you use the SPINS offerings, there may be other circumstances in which you provide us with additional information about yourself such as your name, phone number, and email address.
- Information that we obtain from your use of the SPINS offerings. When you use the SPINS offerings, we may obtain information about how you use our offerings. This may be related to the products you’re interested in, the offerings you view or purchase, or how you interact with our systems.
- Information that we obtain from other sources. From time to time we may obtain information from other sources, such as providers of other services where you have consented to that service providing information about you to us, or from third parties that develop information about consumers.
- Information collected automatically. We may obtain information about you through the use of first or third party cookies, web beacons, web logs, IP addresses, and other technologies that receive and store certain types of information whenever you interact with us by using the SPINS offerings. These technologies may collect data related to your devices like IP address, mobile device identification, the type of device or operating system in use, or the type of browser being used. They may collect data related to your online activity like the duration of your use of the

offerings, the number and frequency of uses of our offerings, or any search terms you used in the offerings. These technologies may also collect the precise geolocation of your device when you grant such access in your device's settings. These types of technical information do not identify you personally.

Use of Personal Information

We use your Personal Information to provide the offerings to you, to provide our offerings to our clients, to understand usage of the offerings so that we can make improvements to the offerings, to analyze in an effort to better understand our offerings and business in general, to understand your behavior and preferences so we can offer additional offerings and other opportunities that we believe will be of value to you, and to market and promote our, our affiliate's, and our partners' products and offerings.

Disclosure of Personal Information for Our Business Purposes

We have several affiliates that provide services to us, and we may disclose Personal Information to these affiliates. The affiliates are entities that we control, are controlled by, or are under common control with. Our affiliates may use and disclose Personal Information only as permitted in this privacy policy.

We may use third parties to provide services to us in connection with our offerings, and we may provide Personal Information to these third parties. We allow certain clients to place tracking technologies like cookies and pixels in our offerings, which allow those parties to receive information about you or your activity on SPINS offerings that are associated with your Personal Information. These parties may use that data to serve you more relevant ads on SPINS offerings or other websites. Except for this kind of selling or sharing, we don't otherwise sell any of your Personal Information. You may opt out of this selling or sharing at any time. For more details about opting out, please see the "Opt-Out Request" section of this policy.

Please note that we will share Personal Information with third parties only if they agree to maintain the confidentiality of your Personal Information. These other entities may use and disclose information only as provided in this privacy policy.

Disclosure of Personal Information to Unaffiliated Third Parties for Other Purposes

We may disclose Personal Information to any unaffiliated third party for any legally permissible use by that third party, including without limitation for marketing purposes. Third parties may combine Personal Information with other data and be able to identify you personally, which would allow them to link your Personal Information to you personally. If you do not want us to disclose your Personal Information to third parties as permitted in this paragraph, you may opt out of our disclosing your Personal Information. For more details about opting out, please see the "Opt-Out Request" section of this privacy policy.

Disclosure of Non-Identifiable Personal Information

We may derive information from your Personal Information that is not personally identifiable to you. For example, we may aggregate certain information regarding use of the SPINS offerings so that the usage of the offerings is not discernable from the aggregate usage. We may use, sell, and share with

third parties any information that we derive from Personal Information that is not personally identifiable to you.

Disclosure of Personal Information with your Consent

We may obtain your consent to disclose your Personal Information to a third party, in which case we will limit our disclosure and the use of your Personal Information only to the purposes for which we obtain your consent. If we disclose your Personal Information to a third party with your consent, then your Personal Information will become subject to the privacy policy or other privacy commitments, if any, of that third party. For example, we may enable you to post Personal Information to a social media account, in which case that Personal Information will become subject to the privacy policy of that social media platform. It is your responsibility to understand the third party's privacy policy or other privacy commitments.

Disclosure of Personal Information for Legal Purposes

We may disclose Personal Information if compelled to in connection with a legal or regulatory proceeding, or in connection with enforcing our rights or defending ourselves in a legal or regulatory process.

Exercising Your Personal Information Rights

We limit access to your Personal Information to people and entities that have a need to use your Personal Information for our business purposes. You may access or request to correct, amend, or delete any Personal Information that is inaccurate or incomplete, by contacting us at privacy@spins.com. You may opt out of the sharing and selling of your Personal Information by following the steps in the Opt-Out Requests portion of this policy.

You may limit our use of your Personal Information, request that your Personal Information be erased, or object to the processing of your Personal Information. If you have previously provided us with consent to process your Personal Information, you may withdraw consent you have previously provided us at any time. If you decide not to provide or to limit your Personal Information, it may diminish the functionality of the offerings, you may not be able to use certain features of, or in some circumstances, the full SPINS offering, and we may not be able to provide certain services to you.

To exercise the rights listed above, please contact us at privacy@spins.com. If you do not want to receive email offers or other notices from us in the future, you may opt-out of receiving email communications by following the opt-out instructions located within an email received from us. Despite opting out of these emails, you may continue to receive service-related and other essential communications, including notices of any updates to our Permissible Uses Policies or this policy.

Procedures for Exercising Your Personal Information Rights

Remember that we cannot process your request to exercise your rights if you do not provide us with sufficient detail to allow us to understand and respond to it. We verify all requests through email before actioning them and reserve the right to deny a request where we are unable to verify an identity satisfactorily. This also applies to requests submitted on your behalf by someone else, such as an administrator. Once you have submitted a request, we may take a few days to process the request.

Opt-Out Requests

You may opt out of the sharing and selling of your Personal Information by contacting us at privacy@spins.com. Please note that opt-out requests are browser specific, so opting out on one browser will not affect a second browser. Also, if you log onto a SPINS offering from a new device, from a different browser, or if you clear all your cookies, you will have to opt-out again.

Retention of Personal Information

We will retain your Personal Information for as long as necessary to meet our business needs, to comply with applicable legal and regulatory requirements, or until you ask us to delete it. Your Personal Information is primarily stored in digital media, and when we no longer need to retain your Personal Information we will dispose of your Personal Information, whether stored in digital media or in hard copies, in a secure manner.

Data Security

We use industry-standard security measures to protect your Personal Information and require our service providers to do the same. However, you must understand that no data transmission over the Internet or information storage technology can be guaranteed to be 100% secure. We are not responsible for the data security or the privacy practices of any third party to whom we disclose Personal Information. In addition, we limit access to your Personal Information as explained above in the section on Exercising Your Personal Information Rights.

Third Party Websites

You may access other third party services through the SPINS offerings. This privacy policy does not address, and we are not responsible for the operation of any third party websites, your access or use of such third party website, and the privacy practices of any third parties.

No Use by Children

The SPINS offerings may be used only by adults who are United States residents and are of sufficient age and otherwise able to enter into a legally binding contract. We do not knowingly collect or use any Personal Information from children under the age of 16. In no event may the SPINS offerings be used by a child under the age of 16.

Transfer of Personal Information

We reserve the right to transfer all Personal Information in our possession to a successor organization in the event of a merger, acquisition, or bankruptcy or other sale of all or a portion of our assets. Subject to legal requirements, the use and disclosure of all Personal Information will be subject to this privacy policy, or to a new privacy policy, so long as you are given notice of the new policy and provided with the opportunity to opt out of it.

Notice to California Residents

Residents of California have additional rights under the California Consumer Privacy Act (“CCPA”) and California Consumer Rights Act. If you are a resident of the state of California, you may request specifics regarding the Personal Information collected by us during the preceding twelve months. You may request the following: i) the specific Personal information we have collected about you, ii) information regarding the categories of Personal Information we have collected from you, iii) the categories of sources from which we have collected this Personal Information, (iv) the commercial purposes for collecting the Personal Information, and (v) the categories of third parties with whom we have shared the Personal Information. To exercise your rights by making this request, please contact us at privacy@spins.com.

We do not use or disclose sensitive Personal Information as defined under the CCPA.

Contact for Questions or Complaints

If you have questions or complaints regarding this privacy statement, our privacy practices, or your Personal Information, you may contact us at privacy@spins.com. You may also send us mail to:

SPINS LLC
222 W. Hubbard Street Suite 300
Chicago, IL 60654
Attn: General Counsel

Notice of Changes

We reserve the right to change, modify or add to this policy at any time, and to apply any such change, modification, or addition to Personal Information that we have already collected. We may provide you with notice of a change, modification, or addition by posting a notice or a revised privacy policy via the SPINS offerings. When we update this privacy policy, we will note the date of its most recent modification above. By continuing to use the SPINS offerings after any such notice of modification, you agree to the terms of the privacy policy as modified.

You agree to review this privacy policy from time to time and any changes, modifications, or additions.