

# NURITOPIA

## Privacy Policy

Effective Date: August 15, 2022

This Privacy Policy applies to the use of (including any and all registration or pre-registration for use of) [www.nuritopia.io](http://www.nuritopia.io) and any mobile or PC applications relating to Nuritopia, the Nuritopia platform (the “Application”), and all related pages (the “Website”). It explains how we collect information from users of the Website and how we use such information. Your use of the Website constitutes your acceptance of this Privacy Policy. If you do not agree with the terms of this Privacy Policy, you should immediately stop using or visiting the Website.

All information provided by you in the pre-registration process may be used by us for registration with the Application and/or Website.

### **1. The Information We Collect and Use**

A. Non-Personally Identifiable Information. When you visit the Website, we may collect certain data that does not tell us specifically who you are. This is “Non-Personally Identifiable Information.” It includes things like your Internet Protocol (IP) address, browser type, and the last domain you visited before coming to our Website or the domain you go to when you leave. It also includes various statistical data such as which pages you visit on our Website, how long you stay on them, and what you click.

We may place a “cookie” on your computer. A cookie is a small amount of data, which often includes an anonymous unique identifier, sent to your browser from a website’s computers and stored on your computer’s hard drive. We may use cookies to keep track of your choice of language and home page preference; to understand your exposure to certain Internet advertisements as you use the Website, and to gather usage data that will help us generally improve the quality of the Website. There is a simple procedure in most browsers that allows you to deny or accept cookies. You should note that cookies may be necessary to provide you with certain features on the Website and, therefore, disabling cookies on your device or browser settings may affect the functionality of the Website.

We also may use a small piece of code (sometimes referred to as “1x1 clear pixel,” “Web beacon” or “clear GIF”) placed in the pages of the Website to help us gather additional information about which parts of the site receive the most visitors and other user traffic patterns, and enable us to administer the site.

No Personally Identifiable Information (as defined below) is collected through our cookies or Web beacons however we may, from time to time, allow advertisers, third-party advertising networks, and third-party advertising serving companies to serve advertisements directly to you within our Website, Services, and Software. By serving these advertisements directly to you, these companies can set their own cookies on your computer, which may not expire, and trigger their own Web beacons. If you would like to

contact the advertisers, third-party advertising networks, and third-party advertising serving companies with which we have relationships to learn more about their privacy policies and what options (if any) they offer to opt out of their data collection, please visit their web sites.

**B. Personally Identifiable Information.** We also may collect information that can be used to identify you (“Personally Identifiable Information”). We only collect Personally Identifiable Information when you specifically provide it to us. When you sign up to create a user account or to register or pre-register for use of the Application and/or Website, we may ask you for information such as your username, password, email address, cryptocurrency wallet address, date of birth, gender, city, postal code, and/or country. We may use Personally Identifiable Information to fulfill your requests, respond to your inquiries and provide other services, and to alert you to information, offers or publications in which we think you may be interested. The emails that we send contain information that enable you to “unsubscribe” from such mailings. We do not sell Personally Identifiable Information or other information you make available to the Website, or share such information with third parties, except as described below.

If you connect to the website using credentials from a third party application, website or service (“Third Party Applications”), you authorize us to collect your authentication information, such as your username and encrypted access credentials. We may also collect other information available on or through your Third Party Application account, including, for example, your name, profile picture, country, hometown, email address, date of birth, gender, friends’ names and profile pictures, and networks. These Third Party Applications may have their own terms and conditions of use and privacy policies and your use of these Third Party Applications will be governed by and subject to such terms and conditions and privacy policies. You understand and agree that NuriFlex Holdings Inc. (including its affiliated entities) does not endorse and is not responsible or liable for the behavior, features, or content of any Third Party Application or for any transaction you may enter into with the provider of any such Third Party Applications.

When you create a user account with us, you agree to be automatically opted in to be included on promotion by or through the Website or our affiliated partners, including marketing for special event, branded email lists and other messaging. You can manage some of your messaging preferences, but note that you cannot opt out of receiving certain administrative, transactional or legal messages from the Website. You may contact us at support@nuritopia.io if at any time you would like to opt out of marketing-related email lists.

We may share your Personally identifiable Information with companies/brands that are affiliated with our Website. (NuriFlex World PTE, LTD., NuriFlex Inc., NuriFlex Limited, Nuri Telecom Company Limited, NuriFlex Afrique Centrale SA, Nuriworld DMCC, Nuri Works Co., Ltd., NuriFlex Co., Ltd., NuriFlex Japan Co., Ltd., NuriFlex Vietnam Co., Ltd., (NuriVoice Co., Ltd., Nuri Vista Co., Ltd., Nuri Bill Co., Ltd., Medihub Co., Ltd.) We may also share Personally Identifiable Information with third parties, who may contact you

to offer products and services. At any time, you can contact us at support@nuritopia.io to request that we not share your Personally Identifiable Information with third parties.

We may disclose your Personally Identifiable Information to third parties in connection with a corporate transaction where all or a portion of our business (e.g., a portion that includes our customer lists) is sold or transferred. We also may disclose your Personally Identifiable Information if disclosure is required by law or as part of a lawsuit or government investigation or proceeding, or in order to permit us to exercise or preserve our legal rights or take action regarding potentially illegal activities or to protect the safety of any person.

From time to time, we may partner with unaffiliated companies or individuals for market research, product development or similar purposes. These companies or individuals may be provided with access to Personally Identifiable Information and Non-Personally Identifiable Information, but we will require by contract that they agree to maintain the confidentiality, security and integrity of such information. We also may subcontract with other companies and individuals to do work on our behalf; they may be provided with access to Personally Identifiable and Non-Personally Identifiable Information, but only as needed to perform their functions.

We reserve the right, but have no obligation, to monitor information, comments or other content that you voluntarily disclose and post to the Website. We reserve the right to remove any such information or material for any reason or no reason, including without limitation, if in our sole opinion such information or material violates, or may violate, any applicable law or the Terms of Use or to protect or defend our rights or property or those of any third party. We also reserve the right to remove information upon the request of any third party.

We reserve the right to investigate abuses on the Website and enforce and apply this Privacy Policy, the Terms of Use and any other terms or conditions applicable to the Website or the use thereof. We may disclose information about you to third parties if we have a good faith belief that such disclosure is reasonably necessary to (1) take action regarding suspected illegal activities; (2) enforce or apply all applicable terms of use that may be required for use of the Website; (3) comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding or other legal process served on us; (4) protect our rights, reputation and property or that of our users or the public; or (5) protect against legal liability.

We will never share your Personal Identifiable Information with any other user of the Website.

C. Location Information. We may obtain information about your physical or geographic location through information provided by you or by use of such means as GPS or by using other geolocation tools in your smart phone or other mobile device.

## **2. Data Security**

We cannot ensure or warrant the security or privacy of any information you transmit to us. We follow generally accepted industry standards to protect Personally Identifiable Information. But we can make no guarantees or promises in this regard, and you provide information to us at your own risk.

We may store the Personally Identifiable Information we hold about you indefinitely. We may store this information in the United States or we may transfer it to any other country. The data protection laws of the countries where we store your personal data may or may not provide a level of protection equivalent to the laws in your home country. Wherever we hold the data, we will apply the terms of this Privacy Policy.

Please be advised that we will never send emails asking you to provide or confirm credit card numbers, physical addresses, usernames or passwords. Such an email is an example of “phishing” or “spoofing” (i.e., counterfeit websites purporting to be from a legitimate company and designed to trick recipients into divulging personal information in order to steal identities and financial account credentials). If you receive a “phishing” or “spoofing” email, DO NOT click on any link contained in the email. Delete it from your computer or device immediately and contact us at support@nuritopia.io.

## **3. Children**

In compliance with the requirements of COPPA (Children’s Online Privacy Protection Act), the Website is not directed at children under the age of 13 and we endeavor not to knowingly collect any Personally Identifiable Information from children under the age of 13. If a parent or guardian believes that this site has collected the Personally Identifiable Information of a child under the age of 13, please contact support@nuritopia.io. If we become aware that a child under the age of 13 has created an account and/or provided us with personal information without parental consent, we take steps to remove such information and terminate the child’s account.

## **4. Access to your information**

You may contact us at support@nuritopia.io if at any time you would like to see the Personally Identifiable Information we hold about you, or to ask us to correct or update this information, or to ask us to delete it. Please contact us if you have questions or wish to take any action with respect to information to which this Privacy Policy applies (see below for contact information).

If you are a user of the Website and a California resident, California’s “Shine the Light” law (California Civil Code § 1798.83) permits you to request and obtain from us once a year, free of charge, information regarding our disclosure of your Personally Identifiable Information (if any) to third parties for direct marketing purposes. If this law applies to you and you would like to make such a request, please submit your request in writing to the address provided in Section 7 below.

## **5. Links to Other Website; Offline Information**

This Privacy Policy applies only to the Website. The Website may contain links to other websites that we may not own or operate. The links from the Website do not imply that we endorse or has reviewed these websites. The policies and procedures we describe here do not apply to these websites. We neither can control nor are responsible for the privacy practices or content of these websites. We suggest contacting these websites directly for information on their privacy policies. This Privacy Policy applies only to information collected through the Website and not to information collected offline.

## **6. Compliance with EU Privacy Laws and Privacy Shield**

The Website complies with the General Data Protection Regulation (GDPR). We act as Data Controllers, as defined under the GDPR, and process personal data based on our legitimate interests. The Website relies on various legal bases to lawfully execute international transfers of personal information, including the European Union Commission approved standard contract clauses.

The Website is responsible for the processing of personal information it receives or subsequently transfers to a third party acting as an agent on the Website's behalf. The Website is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

### **a. Exercising Your Data Rights**

Users in certain locations may have certain rights under the General Data Protection Regulation (GDPR) or under the California Consumer Privacy Act (CCPA) regarding data that the Site controls as a Data Controller as defined under the GDPR, including:

- The right of access to their personal data;
- The right to correct or rectify any inaccurate personal data;
- The right to restrict or oppose the processing of personal data;
- The right to erase or delete their personal data;
- The right to personal data portability; and
- The right to opt-out of the sale of personal information.

You can exercise rights over your data on the Site by contacting us at [support@nuritopia.io](mailto:support@nuritopia.io).

### **b. Contacting our Data Protection Officers**

If you have privacy concerns or questions, you can contact our Data Protection Officer (DPO) via email at [support@nuritopia.io](mailto:support@nuritopia.io).

### **c. Establishing an Authorized Agent**

You may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government ID, and the authorized agent's valid

government ID. Please contact [support@nuritopia.io](mailto:support@nuritopia.io) with your request. To protect your information from account takeover, we may decline access to or recovery of your account at our discretion.

## **7. How To Contact Us**

You may contact us regarding our privacy practices and this Privacy Policy at [support@nuritopia.io](mailto:support@nuritopia.io) or the following mailing address:

NuriFlex Holdings Inc. c/o NURITOPIA  
#2109 – 4710 Kingsway, Burnaby, BC V5H 4J5, Canada  
Attn: Privacy

## **8. Changes To The Privacy Policy**

This Privacy Policy is effective as of the Effective Date written above. We reserve the right to change this Privacy Policy at any time. We do not undertake to provide you with personal notice of any changes. In the event of material changes, we will provide notice by means that are reasonable under the circumstances, such as by posting a notice on the Website. Your continued use of the Website following the posting of changes to this Privacy Policy means you accept those changes.

## **9. Consent**

By visiting and using the Website or by registering (including pre-registration) for use of the Website, you consent to this Privacy Policy.