

# Privacy Policy

Last Updated: March 9, 2022

We are a technology empowered, experience ecosystem to connects businesses and their goods, services, and products (“Brands”) with those who want unique experiences with those Brands. To facilitate this we support the Brands, their websites, and affiliates’ web sites with software, services, coins (e.g. “Ocavu”), non-fungible tokens, emails, and various forms of physical or digital networks or physical or digital impressions, images, platforms, interactions, experiences, environments or engagements (each individually a “Network”, and collectively, the “Networks”). Privacy is of utmost importance at us and as such, we have taken an anonymous individual or “user-blind and administrator-blind” Networks approach. This means the network is anonymous by design, and we ask and expect our members not to provide us with information that can be used to identify them directly or indirectly.

It is paramount to the ecosystem of the Networks that each member may connect and collaborate with the other members in the system. But the Networks are designed for anonymity. Therefore, the following rules ensure that your identity and privacy are preserved, and the integrity of the “blind” Networks are maintained:

**1. USERNAME AND CONTACT INFORMATION:** The Networks are designed to allow Brands to promote their products to a randomly generated and anonymous username, via the email or telephone number you provide. We will not collect your actual name, your address, online identifier, Internet Protocol address, country of residence, or other similar identifiers, date of birth, or any other identifiable information that can be used to identify you directly or indirectly. You may change your username, but you acknowledge and agree it is against our policies for you to

create a username that can be used to identify you directly or indirectly, and you agree not to do so. If you do recreate a username with a first and last name like “TomSmith123” or “LukeSkywalker777”, because of our anonymity policy, we will reasonably assume that it is NOT your actual name, but that every name used in a username is false name. This means that you agree to not use your first and last name, or any other handle or username that is associable with you. Because it is anonymous and random, we will treat your username as publicly available information (as that term is defined in our future-version of the Universal Terms and Conditions available at [www.SeekXR.com/Terms](http://www.SeekXR.com/Terms) (“Terms”)) (which you have agreed govern and control this policy and override any inconsistency between this policy and the Universal Terms). If you desire to keep your email or telephone number private, please obtain a new email or telephone number you are willing to allow to be used publicly to interact with the Networks. We expect you to keep information that can be associated with you to identify you directly or indirectly, out of the Networks and will treat the username, telephone number, and email you do provide to us as Publicly Available Information.

**2. PRIVACY LAWS ARE INNAPPLICABLE.** We are an anonymous Network enhancer. We do not know who is using our services. By creating an account, or membership with a Network or using any of the Networks you agree that you are anonymous and your account or membership is not indirectly or directly associable with your actual identity, or primary or associable telephone number or email, and therefore this relationship is beyond the scope of General Data Protection Regulation (“GDPR”), as enacted by the European Commission and the California Consumer Privacy Act (“CCPA”). Because your membership and related contact information are deemed Publicly Available Information, you hereby authorized us to introduce your username, email, or telephone number to the Brands, and their vendors and clients, for the purpose of synergies and/or

collaborative benefit to enhance your experiences. Consequently, if you desire to keep your email or telephone number private, please obtain a new email or telephone number you are willing to allow to be used publicly to interact with the Networks. If you do not agree with this Privacy Policy, in general, or any part of it, you should not use the Network or Networks, and non-use is your only recourse or remedy.

**3. PAYMENT PROCESSING AND MARKETING ACTIVITIES.** All payment processing and marketing interactions or activities will be conducted by third parties (“Processors”) or by the Brands or vendors on the Networks. Because your activities on the Network will create a separate business relationship between you and the Brand (if one does not already exist) we let the Processors or Brands engage with you directly if they desire further interaction. We will not provide the Processors or Brands with any information related to your identity other than the Publicly Available Information you provide to us, namely the username, telephone number, or email address you created to join the Networks. As such, these Processors or Brands may reach out to your username, email or telephone number directly and ask you to volunteer additional information about you. But that is between you and the Processors or the Brand. We have no visibility into that exchange or any exchange between you and a Processor or a Brand and will be unable to identify you directly or indirectly due to your interactions with the Processors or Brands.

**4. POTENTIAL FUTURE APPLICABILITY.** If at some point in the future, we decide to collect, store, process, subprocess, manage, maintain, or otherwise access information that can be used to identify you directly or indirectly, this Privacy Policy will then address regulatory requirements of the jurisdictions in which the Networks operate, including the General Data Protection Regulation (“GDPR”), as enacted by the European Commission and the California

Consumer Privacy Act (“CCPA”). However, that is not our current intent or design. Therefore, and specifically, we do NOT collect any of the following from anyone, let alone from California residents:

CATEGORY	EXAMPLES
Identifiers	E-mail address, unique personal identifier, online identifier, Internet Protocol address, country of residence, or other similar identifiers.
Information under the California Customer Records statute	“Personal Information” described in subdivision (e) of Section 1798.80 (California Customer Records statute). This means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, social security number, address, telephone number, passport number, driver’s license or state identification card number, bank account number, credit card number, debit card number, or any other financial information.
Commercial information	Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies on our site
Internet or other similar network activity	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement
Geolocation data	Geolocation data
Inferences drawn from other personal information	Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

**5. PERIODICALLY REVIEWED.** This Privacy Policy is periodically reviewed to ensure that any new obligations and changes to our business model are taken into consideration. We may amend this Privacy Policy at any time by posting an amended version on our website.

**6. UNDESIGNATED DATA PROTECTION OFFICER.** We currently do not process personal data, but if we do in the future, the organization responsible for ensuring that your Personal Data is processed in compliance with applicable regulations will be identified in this section (the “Data Controller”). In the future, if you have any concern, question or if you would like to exercise any of your rights with respect to your Personal Data, you may contact our Data Protection Officer (“DPO”) at [[support@SeekXR.com](mailto:support@SeekXR.com)].

**7. NO COOKIES.** Because we are operating the Networks on the websites of the respective Brands, any and all cookies will be subject to the cookie policy of the Brand, which we have no input in or control over, and therefore please contact the applicable Brand if you have questions or concerns regarding the same.

**8. CHANGES TO THE POLICY.** We may update this policy to reflect changes to our information practices, but we will not reduce your rights under this Privacy Policy without your express consent. We will post any changes to this page and, if the changes are significant, we will provide notice. We may also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to periodically review our Privacy Policy for the latest information on our privacy practices and to contact us if you have any questions or concerns.