



Proprietary of Anzu Virtual Reality Ltd.

Last Updated: October 2024

ANZU PRIVACY POLICY

This privacy policy (“**Privacy Policy**” or “**Policy**”) describes how **Anzu Virtual Reality Ltd.**, including its affiliated companies and subsidiaries (collectively “**Anzu**”, “**we**”, “**us**”, or “**our**”) collect, use and disclose certain information, including your Personal Data and the choices you can make about your Personal Data we process.

Anzu is the developer, owner and operator of an innovative in-game ads solutions (“**Anzu Technology**”), which enables, among others, the display of non-disruptive content and ads provided by third-party advertisers and advertising networks (“**Ads**” and “**Advertisers**” respectively) within various types of digital assets such as mobile games applications, PC games, console video-games and other games platforms (“**App(s)**”) owned or operated by Anzu’s third-party business partners implementing the Anzu Technology (as an SDK, API, etc.) (“**Publishers**”).

This Privacy Policy governs the processing of data collected by Anzu in connection with: (i) visitors of our website, available at: <https://www.anzu.io/> or other official digital assets, such as our social media accounts (“**Prospects**” and “**website**” respectively); (ii) Publishers (and each of their authorized users) signing up (or log in) for and use of Anzu Technology and ancillary services, including a designated account (“**Publisher Account**”) dashboard environment, marketplace, execution of marketing campaigns, etc. (“**Anzu Platform**”); and (iii) Publishers’ end users, where the Anzu Technology is initiated by the App (“**End Users**”).

Anzu Technology, Anzu Platform and the Website shall be collectively referred to herein as the “**Services**”. Prospects, Publishers and End Users shall be further, separately and collectively, referred to herein as “**you**”.

This Policy is incorporated in and constitute an integral part of our [Publishers’ Terms and Conditions](#), [Metaverse Terms and Conditions](#), and [Advertisers’ Terms and Conditions](#) and it applies to all information about you that we collect in connection with the Services throughout the world, and explains what data we may collect from you, how such data may be used or shared with others, how we safeguard it, data transfers, and how you may exercise your rights related to your Personal Data (as defined below) under the applicable privacy laws.

Anzu participates in the IAB Transparency & Consent Framework and complies with its Specifications and policies. Anzu vendor number within the framework is 733.

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1. POLICY AMENDMENTS:

We reserve the right to amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be posted on the website. The updated date of the Policy will be reflected in the “Last Updated” heading, indicated above. We will provide notice to you if these changes are material, and, where required by applicable law, we will obtain your consent. Any amendments to the Policy will become effective within 30-days upon the display of the modified Policy.

We recommend you to review this Policy periodically to ensure that you understand our most updated privacy practices.

2. DATA CONTROLLER & CONTACT INFORMATION:

Anzu Virtual Reality Ltd. incorporated under the laws of the State of Israel, and is the data controller (as such term is defined under the EU General Data Protection Regulation known as the “**GDPR**” or equivalent privacy legislation) of the Personal Data processed by it related to:

- Prospects’ interaction with our website;
- Publishers and their interactions with the Platform;

With regards to End-Users’ Personal Data, in most cases, we will be acting as data processors on behalf of the Publishers in their role as data controller of End Users’ Personal Data, however, under certain circumstances, and depending on applicable law requirements, type of Services and our business relationship with the Publisher, we may serve as the data controller as well (meaning independent and separate “co-controllers”, for the purposes of GDPR). Given the above, this Privacy Policy further details the Personal Data we collect from End Users, however you should review the Publisher’s policies as they further and independently apply to its data collection practices, as well as further contact the Publisher in connection with a request to exercise your rights related to your Personal Data and where applicable, we will work with the Publisher to comply with your request.

If you have any question, inquiry or concern related to this Privacy Policy or the processing of your Personal Data, you may contact our privacy team as follows:

Data Protection Officer:

You may reach our Data Protection Officer (“**DPO**”) at DPO@anzu.io

Data Protection Representative for Data Subjects in the EU and UK:

We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact in the EU and in the UK.

Anzu Data Subjects Requests:

We value your privacy, and in order to enable you an easy way to exercise your privacy rights you may reach out to us in the following [web-form](#), and if you are EU or UK resident you may also reach our privacy representative [Prighter](#).

3. DATA SETS WE COLLECT AND FOR WHAT PURPOSE:

You can find here information regarding the types of Personal Data we collect, the purposes for which we process your Personal Data as well as our lawful basis for processing (where the GDPR applies to your Personal Data), and how it is technically processed. **Depending on your interaction with us, we may collect two types of information from you:**

“Non-Personal Data” meaning aggregated, non-personal non-identifiable information, which may be made available or gathered via your access to and use of the Services. We are not aware of the identity of the user from which the Non-Personal Data is collected. Such Non-Personal Data may include aggregated usage information and technical information transmitted by your device, such as browser version, operating system type and version, mobile network information, device settings, properties, and software data.

“Personal Data” or **“Personal Information”** meaning individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual.

For the avoidance of doubt, any Non-Personal Data connected or linked to any Personal Data shall be deemed as Personal Data as long as such connection or linkage exists.

We do not knowingly collect or process any Personal Data constituting or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning a person's health or data concerning a person's sex life or sexual orientation (**“Special Categories of Personal Data”**).

The table below details the specific types and data sets of Personal Data we collect, the purpose of processing and processing operations, as well as our lawful basis for processing Personal Data (where the GDPR applies), and depending if you are a Prospect, Publisher or End User.

With regards to End Users Personal Data:

Please note that the types of Personal Data processed, depends on the Ads' category as decided **only** by the Publisher. Such Ads' categories mainly include contextual ads, behavioral ads, and safe-mode ads. According to the category of Ads, as decided by the Publisher, in addition to the data collection by Anzu as detailed below, Advertiser may collect additional types of data through technologies and other tracking tools, or combine your Personal Data with information regarding your activities and your device they have collected from other sources (i.e., to serve behavioral ads).

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
PROSPECTS & PUBLISHERS		
Online Identifiers and Usage Data: When you access our website or the Platform, we collect certain online identifiers such as: IP address, cookie ID, similar unique online identifiers generated, advertising ID, tags (“Online Identifiers”). We may further collect information	Marketing and Analytics: We process such data through our or third-party cookies and tracking technologies for analytic, marketing and advertising purposes.	Where we collect such data for analytic and advertising purposes, we process the data based on your consent which we will obtain through our cookie notice and consent management. You may withdraw

<p>related to your use and interaction with our website and Platform such as directing campaign and URLs, pages viewed, access time and date, duration, clickstream, etc. (“Usage Data”).</p>	<p>For example, we process this data to understand how Prospects use our website and Publishers use our Platform, as well as to measure effectiveness of our features and content. We further use this data to track conversions from ads and understand the effectiveness of our promotional campaigns, and remarket to people who have taken some action on the website.</p> <p>In addition, Usage Data related to our website and Platform helps us to better understand our business, analyze our operations, maintain, improve, design, and develop the Service and new products, conduct statistical analysis purposes, to test and improve our offers, decide how to improve the Service based on the results obtained from this processing.</p> <p><u>Maintaining the website and Platform:</u></p> <p>In addition, we process such data for operation, website and Platform’s functionality, security and fraud prevention purposes, debugging purposes and to resolve technical problems.</p>	<p>consent at any time by using the cookie preference settings.</p> <p>Where we collect such data for operation and security, we process your data based on our legitimate interest.</p>
<p><u>Contact Communications:</u></p> <p>If you voluntarily contact us, through any means of communications we make available (for example, digital contact forms, social media, etc.)</p>	<p>We process such data to respond to your inquiry, and provide you with the support, materials and information you have requested.</p>	<p>We process these data based on our legitimate interest.</p>

<p>for support or other general inquiries you will be required to provide us with certain information such as your name, job title, your organization name (i.e., on behalf of which you contact us), email address, where applicable your social media profile, and any additional information you decide to share with us (“Contact Communication Data”).</p>	<p>The correspondence with you may be processed and stored by us in order to improve our customer service and in the event, as well as in the event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.</p>	
<p><u>Newsletter Registration:</u></p> <p>When you sign up to our mailing list (newsletter or other marketing materials), webinars and events, you will be requested to provide your contact details, such as name, email address, your organization name (i.e., on behalf of which you contact us) and country.</p> <p>Further, you should be aware that we may video record certain webinars and events and also may use transcription services (including certain AI based transcription services) (“Webinars Recordings”).</p>	<p><u>Newsletter Registration:</u></p> <p>We process such data in order to add you to our mailing list, and send you the content you have signed up to receive, such as updates, offers, invitations, etc.</p> <p>We may further collect data related to your interaction with such marketing materials, for statistic analytic and assess the performance of our campaigns, and for example, to understand how many users opened our emails, and to improve our content.</p> <p><u>Events and Webinar Registration:</u></p> <p>We process such data in order to register you as a guest of our events and enable your participation.</p> <p>We may further process your data to send you needed information related to our webinars and events as well as additional occasional communications and</p>	<p>We process such data subject to the consent. You may withdraw consent at any time through the “unsubscribe” link within the email or by contacting us directly.</p> <p>Furthermore, if you opt-out, we will further retain your email address, however solely as part of our internal suppression file to ensure we comply with such preference and choice, based on our legitimate interest.</p> <p>We process Webinars Recordings’ data, subject to our legitimate interests.</p> <p>Direct Marketing is based on our legitimate interest, you may opt-out at any time through the “unsubscribe” link within the email or by contacting us directly.</p>

	<p>updates related to our Services, promotional and marketing emails (“Direct Marketing”).</p> <p><u>Webinars Recordings:</u></p> <p>We will use the Webinars Recording for our internal purpose (such as improve our content and Services, etc.) as well as for marketing purposes, provided however that if we record webinars we will provide a prior notification, and in any event, we will not use your name or video record in our marketing materials without first obtaining your consent.</p>	
<p><u>Publisher Account Set-Up and Log-In:</u></p> <p>To use Anzu Technology, the Publisher shall be required to sign up and create an account (independently, or otherwise provide information to Anzu team, to designate the Publisher Account. In order to create the Publisher Account, the Publisher shall be requested to provide, regarding each of its authorized users, full name, email address, phone number, and company name.</p> <p>In addition, in the event you are our Publisher (or an authorized user on its’ behalf), the information provided during the login to your Publisher Account will include your email address or phone number and password.</p> <p>Publishers will be further required to provide their bank</p>	<p>We process such data to allow you to sign up to our Services, create or log-in to the Publisher Account, as well as enable access and use by your authorized users. We will further use such data to designate your Publisher Account and validate access, (e.g., account management, support and to provide other Services related to your relationship with Anzu), as well as send you communications related to our Services such as invoices, etc.</p> <p>We may further process the email addresses provided through registration for Direct Marketing purposes.</p>	<p>We process this information for the purpose of performing our contract with you.</p> <p>Direct Marketing is based on our legitimate interest, you may opt-out at any time through the “unsubscribe” link within the email or by contacting us directly. Please note that if you opt-out we will not send you our marketing materials however we will continue to send you Services related communications such as communications related to transactions, our agreements, etc.</p>

account information, as needed for us to fulfil transactions.		
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CANDIDATE

<p>Job Applications Information:</p> <p>In the event you apply for a position posted on our website or other digital assets, and submit your CV we will process the information included in the CV and your application, including name, email address and phone number, employment history and education.</p> <p>Also, where allowed or required by law, we may process diversity and inclusion data regarding your candidacy.</p> <p>In addition, we may collect further information from public and online sources, referees, and former employers and combine such data with your other data.</p> <p>(collectively “Recruitment Data”)</p> <p>For additional information please review Anzu's Candidates Notices, which governs the collection and use of data concerning candidates.</p>	<p>Recruitment:</p> <p>We will use such data as part of our recruitment efforts to decide whether you can suit a position in Anzu.</p> <p>Further, we may process your information in order to comply with corporate governance, legal and regulatory requirements (including the retention of such information), and to ensure compliance with applicable export control and/or sanctions regime, which apply to Anzu.</p> <p>We may use third parties’ services and platforms to manage the recruitment process, such providers will process your information on our behalf and will be bound by certain terms in order to secure your information.</p>	<p>We process this information subject to our legitimate interest.</p> <p>If we process sensitive data to ensure diversity, we will do so upon your explicit consent, which you may withdraw at any time by contacting us.</p> <p>Following the completion of the recruitment process, we may further retain and store the data (including other interactions with us under such process) as part of our internal record keeping, including for legal defense from any future claim, as well as, subject to applicable law requirements, to contact you in the future for other job position.</p> <p>Where you provided your consent, we will process your Recruitment Data in order to contact you with further job offers which we believe you might be interested in.</p>
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PUBLISHERS’ END-USERS

Information collected when the Anzu Technology is initiated on a Publisher App

<p>Contextual Advertisement:</p> <p>When the Publisher implements Anzu Technology and chooses the Contextual mode, we will process the following information from End Users:</p>	<p>Mode</p> <p>We will process this information to initiate the operation of Anzu Technology as follow:</p> <ul style="list-style-type: none"> To serve Ads based on the category determined by the Publisher (and where applicable to ensure 	<p>Identifiers, Approximate Location, and Device language data is processed subject to our legitimate interest. We make sure in such case our legitimate interest does not override the End Users’ rights.</p>
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<ul style="list-style-type: none"> • IP address, UDID or User Agent (a text string which includes information regarding your devices such as type of device, operating system, type of browser) ("Identifier"); • Approximate location (estimated from the IP address) which includes: country, city, zip, metro code, latitude, longitude ("Approximate Location"); • Device language; • Basic information regarding End Users' interaction with the Ads (viewability etc.) ("Interaction"); and • Preference, TC String, Privacy String, or as applicable, meaning the End Users' choice regarding the Ads displayed to it ("Preference Strings"); • Analytics data (session start, session end, click and etc.). <p>(collectively "Basic End User Data")</p>	<p>consent was obtained);</p> <ul style="list-style-type: none"> • Preference- To share the Ad Call (including users' preferences), with Advertisers, so they will be able to serve Ads aligned with the category; • To measure Ad performance, monitor, analyze and optimize the Services; • To apply market research to generate audience analyze campaign performance and improve our marketing campaigns. 	<p>However, certain Basic End User Data (such as user's Interactions, String, etc.) is based on End Users' consent provided through a consent management, cookie notice, or similar technology. You may withdraw consent at any time by using the preference setting provided by the Publisher within the App.</p>
<p>Behavioral Mode Advertisement:</p> <p><u>In addition to the Basic End User Data, when the Publisher implements Anzu Technology and chooses the Behavioral mode, we further process:</u></p> <ul style="list-style-type: none"> • where applicable, as provided by Publisher, estimated or accurate End User age and gender; and • where applicable, as provided by Publisher, Hashed e-mails of End Users • Interest segments which we collect or receive from third 	<p>We will process this information to initiate the operation of Anzu Technology as follow:</p> <ul style="list-style-type: none"> • To serve Ads based on the category determined by the Publisher (and where applicable to ensure consent was obtained); • To match data for behavioral and targeted advertising; 	<p>Behavioral Ads Data is based on End Users' consent provided through a consent management, cookie notice, or similar technology. You may withdraw consent at any time by using the preference setting provided by the Publisher within the App.</p>

<p>party partners (such as DMPs);</p> <p>Collectively "Behavioral Ad Data".</p> <p>(Basic End User Data, together with Behavior Ad Data will be defined herein as "End User Ad Data").</p>		
<p>Kids Safe-Mode Advertisement:</p> <p>This category means that the Publisher requested to limit the data collection and type of Ads, in a manner that the End Users' shall be treated as children. Therefore, the only data collected is</p> <ul style="list-style-type: none"> • IP address however, the IP address is truncated immediately upon collection (i.e., we do not store the full IP address) • Estimated location only on a Country/ State/ level (estimated from the IP address); • Preference Strings; and • Interaction. <p>Note that, for such categories of Ads, the Publisher may decide, at its discretion, to share additional information, and you should review the Publisher's privacy policy for additional information in this regard.</p> <p>(Collectively "Kids Safe-Mode Ads Data".)</p>	<p>We will process this information to initiate the operation of our Anzu Technology, and to serve Safe-Mode Ads based on the category determined by the Publisher by limiting the data collection and type of ads presented and displayed (and where applicable to ensure consent was obtained).</p>	<p>Certain Safe Mode Ads Data is processed based on our contract with the Publishers.</p> <p>However, we will process End User's Interaction and String data based on End Users' consent provided through a consent management, cookie notice, or similar technology. You may withdraw consent at any time by using the preference setting provided by the Publisher within the App.</p>
<p>PLEASE NOTE: In addition to the above Anzu processes "Non-Personal Data" that it is transmitted from the Publisher to Anzu via the Anzu Technology. Although such Non Personal Data IS NOT by itself a Personal Information, however if and for as long as it is linked to Personal information, Anzu will treat it as such.</p>		

Please note that the actual processing operation per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by

transmission, erasure, or destruction. The transfer of Personal Data to third-party countries, as further detailed in the *Data Transfer Section*, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the Services and to enforce our agreements, as well as to protect the security or integrity of our databases and the Services, and to take precautions against legal liability. Such processing is based on our legitimate interests.

We may collect different categories of Personal Data and Non-Personal Data from you, depending on the nature of your interaction with the Services provided through the website and Platform, as detailed above.

4. OUR LEGITIMATE INTEREST CLAIM (DISCLOSURE AS REQUIRED BY TCF 2.2):

In addition to the information provided in the section above, we want to explain the legitimate interest at stake when we process End User Ad Data, as it directly impacts the services we provide to our Publishers and Advertisers. In most cases when we, or our Publisher, deliver interest based, cross contextual Ads that suits to your interests and preferences, we will base the processing of Personal Data on consent, as required under applicable laws, such as ePrivacy or other regulations, and detailed in the table above, and transfer your preference to our Publishers and Advertisers. However, when we use certain data, which includes Personal Data such as Identifiers and Preference Strings, for improving the services, to share the Ad Call (including the users' preferences) with Advertisers, or technically delivering the Ads, we do so based on our legitimate interest which is essential to the sustainability of Anzu Technology and Services. This processing was concluded in various ruling and guidelines to be based on legitimate interest and thus we did not conduct a self-assessment and relies on the DPAs, ICO, and EDPB rolling and guidelines. We understand that privacy is of utmost importance, and we are committed to protecting your rights. We adhere to applicable privacy standards and regulations, provide transparent information about our data processing practices, and you have the ability to control your preferences and opt out. We want to assure you that we conduct a careful balancing test to ensure that our legitimate interest does not unduly infringe upon your rights and freedoms.

5. HOW WE COLLECT YOUR INFORMATION:

- Automatically, when you visit our website or interact with our Services, including through the use of Anzu Technology and tracking technologies, (such as Image Pixels, JS Tag(s) and cookies, as detailed below), owned and operated by Anzu or third parties.
- When you voluntarily choose to provide us with information, such as when you contact us, all as detailed in this Policy.
- Provided from third-parties, such as our Publishers, applicable cookie management platforms and Data Management Platforms ("DMP").

6. COOKIES AND SIMILAR TRACKING TECHNOLOGIES:

We use "cookies" (or similar tracking technologies) when you access our website. The use of cookies is a standard industry-wide practice. A "cookie" is a small piece of information that a website assigns and stores on your computer while you are viewing a website.

Cookies can be used for various purposes, including allowing you to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and marketing. You can find more information about our use of cookies here: www.allaboutcookies.org.

The cookies we use on our website are: <https://www.anzu.io/cookie-policy>

Most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You may set your browser to block all cookies, including cookies associated with our website and Services, or to indicate when a cookie is being used by us, by adjusting the privacy and security settings of your web browser. Please refer to the support page of your browser to learn more about how you can adjust your privacy and security settings. Additionally, you may opt out of certain advertisers' cookies and browser-enabled, interest-based advertising.

Please note that once you choose to opt out or disable cookies, some features of the Services may not operate properly and your online experience may be limited. In addition, even if you do opt-out, you may still receive some content and advertising, however, it will not be targeted content or advertising.

Please note that, where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and are responsible for their practices.

For additional information, please see the *User Rights and Opt-Out* section below.

7. DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH:

We share your Personal Data with third parties, including our Advertisers or service providers that help us provide our Services. You can find here, and in our [CCPA Notice](#), information about the categories of such third-party recipients.

CATEGORY OF RECIPIENT	DATA THAT WILL BE SHARED	PURPOSE OF SHARING
Advertisers	End User Ad Data & Safe-Mode Ads Data	Serving Ad, as a part of our Services, and according the Ads' category set by the Publisher.
Publishers	Online identifier associated with interaction with an Ad	We may share this data through reports which includes analytic, performance of ad campaigns, ads viewed and clicked in an aggregated way, as well as for and security purpose (such as fraud detection).
Data Enrichment Tech Providers	Online identifier and Behavioral Ad Data	We may share this data with third-party technological providers (" Tech Providers ") for the purpose of displaying "Behavioral Mode Advertisements" (" Purpose "). Nevertheless, we may share this data with the Tech Providers for

		<p>additional commercial needs, other than the Purpose, and Publisher explicitly agrees to permit the Tech Providers to control, collect, process and use such data for their internal purposes, including to improve, maintain, and develop the services they provide to Anzu, Publisher, and other partners.</p> <p>For further information, regarding those Tech Providers processing practices, you are requested to review their privacy policies. Accordingly, as of today, Anzu uses the following Tech Providers:</p> <ul style="list-style-type: none"> • ID5 Technology Ltd. – you may opt-out with ID5 User ID at the ID5 Privacy Preference Center available at: https://id5-sync.com/privacy • Intent IQ LLC- you may review the Intent IQ’s privacy practices at https://www.intentiq.com/technology-privacy-policy and opt-out with at: https://www.intentiq.com/opt-out/
Service Providers	All types of Personal Data	We may disclose Personal Data to our service providers, contractors and third parties, including, but not limited to, our cloud and hosting provider, analytics and marketing providers, ad measurements vendors, payment processors, recruitment providers, CRM systems, etc., the service providers are limited by contracts which limit their use of the data, and requires implementing security measures. The service providers process the data solely to provide the needed services. These entities are prohibited from using your Personal Data for any purposes other than providing us with requested services.
Any acquirer of our business	All types of Personal Data	We may share Personal Data, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Policy.
Affiliated Companies	All types of Personal Data	We may share aggregate or Non-Personal Data with our affiliated companies and additional third parties in accordance with the terms of this Policy. We may store any type of information on our servers or cloud servers, use or share Non-Personal Data in any of the above circumstances, as well as for the purpose of providing and improving our Services, aggregate statistics,

		marketing and conduct business and marketing analysis, and to enhance your experience.
Governmental agencies, or authorized third parties.	Subject to law enforcement authority request.	We may disclose certain data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to terror acts, criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other user to legal liability, and solely to the extent necessary to comply with such purpose.

When we share information with services providers, we ensure they only have access to such information that is strictly necessary for us to provide the Services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (such service providers may use other non-personal data for their own benefit).

8. USER RIGHTS AND OPT-OUT OPTIONS:

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We allow you to exercise certain choices, rights, and controls in connection with your information. Depending on your relationship with us, your jurisdiction and the applicable data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

For California residents, please see our CCPA Notice.

For detailed information on your rights and how to exercise your rights, please see the Data Subject Request Form (“**DSR**”) available [here](#).

Certain rights can be **easily** executed independently by you without the need to fill out the DSR Form:

- If you are our Publisher, you can correct certain data provided under your Publisher Account (such as contact information) through the account settings;
- You can opt-out from receiving our emails by clicking “unsubscribe” link;
- You can use the cookie settings tool on our website to change your preferences.
- Opt-out from cross-contextual interest-based advertising, please see the section below and the [CCPA Notice](#).

Interest-Based Advertising Opt-Out:

You may opt-out directly from third party retargeting cookies or other ad-technology trackers through your device or self-regulatory services .For more information, please visit:

HOW TO OPT OUT	INTERFACE
<p>Publisher/App toggle in the EU</p>	
<p>You may opt out or influence personalized advertising iOS:</p> <p>On your iPhone or iPad, go to Settings > Privacy > Apple Advertising and deselect Personalized Ads.</p> <p>To learn even more about how to affect advertising choices on various devices and different versions, please look at the information available here.</p>	<p>Apple Interface:</p> <p>iOS Settings.</p>
<p>To opt-out of ads on an Android device:</p> <p>go to Settings > Privacy > Ads and enable opt out of Ads personalization.</p> <p>In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads).</p> <p>To learn even more about how to affect advertising choices on various devices and different versions, please look at the information available here.</p>	<p>Android Interface.</p>

You may opt-out directly from third party retargeting cookies or other ad-technology trackers through self-regulatory services .For more information, please visit:

Digital Advertising Alliance (US) [HERE](#)

Digital Advertising Alliance (Canada) [HERE](#)

Digital Advertising Alliance (EU) [HERE](#) .

Network Advertising Initiative [HERE](#)

Digital Advertising Alliance AppChoices [HERE](#)

Use the [Global Privacy Control](#) ("GPC" ("signals").

You can also opt out of interest-based advertising with some of the service providers we use, such as Google [HERE](#) ,Google Analytic [HERE](#) .

Please note that, if you opt out of interest-based advertising, some information will still be collected for other purposes, such as research, analytics, and internal operations. You will also continue to receive contextual advertisements, but they may be less relevant to your interests.

Ad choices settings and options will vary depending on your browser and device settings, and this is not an exhaustive list. Please note that your opt-out choices will only apply to

the specific browser or device from which you opt out. We encourage you to explore your device and browser settings to better understand your choices.

9. DATA RETENTION:

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you express your preference to optout, where applicable.

The retention periods are determined according to the following criteria:

- (i) For as long as it remains necessary in order to achieve the purpose for which the Personal Data was initially processed. For example: if you contacted us, we will retain your contact information at least until we will address your inquiry.
- (ii) To comply with our regulatory obligations. For example: transactional data will be retained for up to seven years (or even more under certain circumstances) for compliance with our bookkeeping obligations purposes.
- (iii) To resolve a claim we might have or a dispute with you, including any legal proceeding between us, until such dispute will be resolved, and following, if we find it necessary, in accordance with applicable statutory limitation periods.

Please note that except as required by applicable law, we will not be obligated to retain your data for any particular period, and we may delete it for any reason and at any time, without providing you with prior notice if our intention to do so.

10. SECURITY MEASURES:

We work hard to protect the Personal Data we process from unauthorized access, alteration, disclosure, or destruction. We have implemented physical, technical, and administrative security measures for the Services that comply with applicable laws and industry, such as minimize the amount of data that we store on our servers, restricting access to Personal Data to Anzu employees, contractors, and agents, etc. Note that we cannot be held responsible for unauthorized or unintended access beyond our control, and we make no warranty, express, implied, or otherwise, that we will always be able to prevent such access.

Please contact us at: privacy@anzu.io if you feel that your privacy was not dealt with properly, in a way that was in breach of our Privacy Policy, or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data. We will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

11. INTERNATIONAL DATA TRANSFER:

Our data servers in which we host and store the information are located in the US. The Company's HQ are based in Israel in which we may access the information stored on such servers or other systems such as the Company's ERP, CRM, and other systems. In the event that we need to transfer your Personal Data out of your jurisdiction, we will take appropriate measures to ensure that your Personal Data receives an adequate level of protection as required under applicable law. Furthermore, when Personal Data that is

collected within the European Economic Area ("**EEA**") is transferred outside of the EEA to a country that has not received an adequacy decision from the European Commission, we will take necessary steps in order to ensure that sufficient safeguards are provided during the transferring of such Personal Data, in accordance with the provision of the standard contractual clauses approved by the European Union. Thus, we will obtain contractual commitments or assurances from the data importer to protect your Personal Data, using contractual protections that EEA and UK regulators have pre-approved to ensure your data is protected (known as standard contract clauses), or rely on adequacy decisions issued by the European Commission. Some of these assurances are well-recognized certification schemes.

12. ELIGIBILITY AND CHILDREN PRIVACY:

Anzu website is not intended for use by children (the phrase "child" shall mean an individual that is under the age defined by applicable law, which concerning the EEA is under the age of 16, and with respect to the US, under the age of 13), and Anzu does not knowingly process children's information under the operation of the website. We will discard any data we receive from a user that is considered a "child" immediately upon discovering that such a user shared data with us. Please contact us at: privacy@anzu.io if you have reason to believe that a child has shared any data with us.

Under the Anzu Technology, we do not knowingly collect information from children under the age of 16. Anzu Technology enables Publishers to choose the Ads category "Safe Mode" in which any identifier will be trunked and hashed as detailed above, as well as the Ad category "Contextual" in which the data collection will be limited and Ads will not be based on End-User's online activities outside of the App.

13. JURISDICTION- SPECIFIC NOTICES:

13.1. Additional Notice To California Residents

This section applies only to California residents. Pursuant to the California Consumer Privacy Act of 2018 ("**CCPA**") effective November 2020, and as amended by the CPRA, effective January 1, 2023.

Please see the [CCPA Notice](#) which discloses the categories of personal information collected, purpose of processing, source, categories of recipients with whom the personal information is shared for a business purpose, whether the personal information is sole or shared, the retention period, and how to exercise your rights as a California resident.

13.2. Additional Notice to Colorado Residents

Under the Colorado Privacy Act ("**CPA**") if you are a resident of Colorado, acting **only** as an individual or household context (and **not** in a commercial or employment context, as a job applicant or as a beneficiary of someone acting in an employment context), your rights with respect to your personal data are described below.

"**Personal Data**" as defined in the CPA means: "*information that is linked or reasonably linkable to an identified or identifiable individual*" and does **not** include any of the following: *publicly available information, de-identified or aggregated consumer, and information excluded from the CPA scope, such as: Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) or 42 CFR Part 2- "Confidentiality Of Substance Use Disorder Patient Records", Personal information*

covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or and the Driver's Privacy Protection Act of 1994, Children's Online Policy Protection Act of 1998 (COPPA), Family Educational Rights and Privacy Act of 1974, national Security Exchange Act of 1934, higher education data and employment data.

Sensitive Data includes **(i)** racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life or sexual orientation; **(ii)** Genetic or biometric data that can be processed to uniquely identify an individual; or **(iii)** child data. We do not process or collect any sensitive data.

Section 3 "[DATA SETS WE COLLECT AND FOR WHAT PURPOSE](#)" of the Privacy Policy, we describe our collection and processing of personal data, the categories of personal data that are collected or processed, and the purposes. Additionally, in Section 7 "[DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH](#)" details the categories of third-parties the controller shares for business purposes.

13.2.1. Your Rights Under CPA:

Herein below, we will detail how consumers can exercise their rights, and appeal such decision, or if Anzu sells the personal data, or sells the personal data for advertising and how to opt-out.

Right to Access/ Right to Know	You have the right to confirm whether and know the Personal Data we collected on you	You can exercise your right by reviewing this Privacy Policy, in case you would like to receive the Personal Data please fill in this form to receive a copy of your data
Right to Correction	You have the right to correct inaccuracies in your Personal Data, taking into account the nature of the Personal Data and the purposes of the processing of your Personal Data.	You can exercise this right directly through your account or by filling in this form
Right to Deletion	You have the right to delete the Personal Data, this right is not absolute and in certain circumstances we may deny such request. We may deny your deletion request, in full or in part, if retaining the information is necessary for us or our service provider(s) for any of the following reasons: (1) Complete the transaction for which we collected the Personal Data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you,	If you would like to delete your Personal Data please fill in this form You do not need to create an account with us to submit a request to know or delete.

	<p>fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you; (2) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; (3) Debug products to identify and repair errors that impair existing intended functionality; (4) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; (5) Comply with the law or legal obligation; (6) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent; (7) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us; (8) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.</p> <p>We will delete or de-identify personal information not subject to one of these exceptions from our records and will direct our processors to take similar action.</p>	
<p>Right to Portability</p>	<p>You have the right to obtain the personal data in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.</p>	<p>If you would like to receive the Personal Data please fill in this form to receive a copy of your data we will select a format to provide your Personal Data that is readily usable and should allow you to transmit the information from one</p>

		entity to another entity without hindrance.
Right to opt out from selling Personal Data	<p>You have the right to opt out of the sale of your Personal Data for the purposes of targeted advertising, sale to a third party for monetary gain, or for profiling in furtherance of decisions that produce legal or similarly significant effects concerning you or any other consumer.</p> <p>You may authorize another person acting on your behalf to opt out, including by broad technical tools, such as DAA, NAI, etc.</p>	See Section 8 USER RIGHTS AND OPT OUT OPTIONS for opt out options regarding selling or sharing your personal data.
Right to opt out from Targeted Advertising		To opt out from the use of cookies on our website, please click the “do not sell or share my personal information” in the footer of the website which will enable you to customize the use of cookies on our website.
Right to opt out from Profiling		We do not profile you, in a manner that produce legal or similarly significant effects thus we do not provide an opt-out.
Right to Appeal	If we decline to take action on your request, we shall so inform you without undue delay, within 45 days of receipt of your request. The notification will include a justification for declining to take action and instructions on how you may appeal .	Not more than 60 days after receipt of an appeal we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reason for the decisions.
Duty not to violate the existing laws against discrimination or non-discrimination	Such discrimination may include denying a good or service, providing a different level or quality of service, or charging different prices.	We do not discriminate our users.

13.2.2. How to Submit a Request Under CPA?

Only you, or someone legally authorized to act on your behalf, may make a request to **know** or **delete** related to your Personal Data. If the [DSR](#) is submitted by someone other than the consumer about whom information is being requested, proof of authorization (such as power of attorney or probate documents) will be required.

We will respond to your request within 45 days after receipt of a verifiable Consumer Request and for no more than twice in a twelve-month period. We reserve the right to extend the response time by an additional 45 days when reasonably necessary and provided consumer notification of the extension is made within the first 45 days. If we refuse to take action on a request, you **may appeal our decision** within a reasonable period

time by contacting us at DPO@anzu.io and specifying you wish to appeal. Within 60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint as follows: Colorado AG at <https://coag.gov/file-complaint/>

If you have an account with us, we may deliver our written response to that account or via email at our sole discretion. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. You do not need to create an account for submitting a request.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

13.3. Additional Notice to Virginia Residents

Under the Virginia Consumer Data Protection Act, as amended ("**VCDPA**") if you are a resident of Virginia acting in an individual or household context (and **not** in an employment or commercial context), you have the following rights with respect to your Personal Data.

"Personal Data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does **not** include de-identified data or publicly available information. Personal Data does not include de-identified data or publicly available data, and information excluded from the scope such as: HIPAA, GBPA, non-profit entities, higher education, employment data and FCRA, Driver's Privacy Protection Act of 1994, Family Educational Rights and Privacy Act, Farm Credit Act.

"Sensitive Data" means Personal Data revealing racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, or citizenship or immigration status; the processing of genetic or biometric data for the purpose of uniquely identifying a natural person; Personal Data collected from a known child; or precise geolocation data.

The VCDPA requires Anzu disclose the Categories of data processing and the purpose of each category, as detailed in Section 3 "[DATA SETS WE COLLECT AND FOR WHAT PURPOSE](#)" of the Privacy Policy, the categories of data shared and the third parties with whom it is shared, as detailed in Section 7 "[DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH](#)". Disclosure of sale of data or targeted advertising are detailed in Section 8 [USER RIGHTS AND OPT OUT OPTIONS](#) above, and in the [DSR Form](#). Further, the table above under Section 13.2.1 "[ADDITIONAL NOTICE TO COLORADO RESIDENTS](#)" details the rights you have under VCDPA and how you may exercise your rights.

13.3.1. [How to Submit an Appeal Under VCDPA?](#)

We shall respond to your request within 45 days of receipt. We reserve the right to extend the response time by an additional 45 days when reasonably necessary and provided consumer notification of the extension is made within the first 45 days. If we refuse to take action on a request, you may appeal our decision within a reasonable period time by contacting us at DPO@anzu.io and specifying you wish to appeal. Within 60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint as follows: Virginia Attorney General at <https://www.oag.state.va.us/consumercomplaintform>

We shall provide information in response to your request free of charge, up to twice annually, unless requests are manifestly unfounded, excessive or repetitive. If we are unable to authenticate your request using commercially reasonable efforts, we may request additional information reasonably necessary to authenticate you and your request. If we cannot authenticate you and your request we will not be able to grant your request.

13.4. Additional Notice to Connecticut Residents

Under the Connecticut Data Privacy Act, Public Act. No. 22-14 (the “**CDPA**”) if you are a resident of Connecticut, acting in an individual or household context (and **not** in a commercial or employment context or as a representative of business, non-profit or governmental entity), your rights with respect to your personal data are described below.

“**Personal data**” means any information that is linked or reasonably linkable to an identified or identifiable individual. It does **not** include de-identified data or publicly available information. It further does not include information excluded from the scope such as: HIPAA, GBPA, non-profit entities, higher education, employment data and FCRA, Driver's Privacy Protection Act of 1994, Family Educational Rights and Privacy Act, Farm Credit Act.

“**Sensitive Data**” means data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation, citizenship, or immigration status; The processing of genetic or biometric data for the purpose of uniquely identifying an individual; Personal data collected from a known child; Precise geolocation data.

The categories of personal data processed, purpose of processing, are detailed in Section 3 “[DATA SETS WE COLLECT AND FOR WHAT PURPOSE](#)”, categories of personal data shared with third parties, categories of third parties with whom data is shared, are detailed in Section 7 “[DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH](#)”. Disclosure of sale of data or targeted advertising are detailed in Section 8 [USER RIGHTS AND OPT OUT OPTIONS](#) above, and in the [DSR Form](#).

Instructions on how to exercise your rights are detailed in the table above under Section 13.2.1 “[ADDITIONAL NOTICE TO COLORADO RESIDENTS](#)” details the rights you have under CDPA and how you may exercise your rights.

13.4.1. How to Submit an Appeal Under CDPA?

We shall respond to your request within 45 days of receipt. The response period may be extended once by 45 additional days when reasonably necessary, taking into account the complexity and number of requests and we inform you of such extension within the initial 45 days response period, together with the reason for the extension.

If we decline to take action on your request, we shall so inform you without undue delay, within 45 days of receipt of your request. The notification will include a justification for declining to take action and instructions on how you may appeal. Within 60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the Connecticut Attorney General at link: <https://www.dir.ct.gov/ag/complaint/> or (860) 808-5318.

We shall provide information in response to your request free of charge, up to twice annually, unless requests are manifestly unfounded, excessive or repetitive. If we are unable to authenticate your request using commercially reasonable efforts, we may

request additional information reasonably necessary to authenticate you and your request. If we cannot authenticate you and your request, we will not be able to grant your request.

13.5. Additional Notice to Utah Residents (effective January 2024)

Under the Utah Consumer Privacy Act (the “UCPA”) if you are a resident of Utah, acting in an individual or household context (and **not** in a commercial or employment context) your rights with respect to your personal data are described below. “**Personal Data**” refers that is linked or reasonably linkable to an identifiable individual, and does not include de-identified data and publicly available data.

The categories of personal data processed, purpose of processing, are detailed in in Section 3 “[DATA SETS WE COLLECT AND FOR WHAT PURPOSE](#)”, categories of personal data shared with third parties, categories of third parties with whom data is shared, are detailed in Section 7 “[DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH](#)”. Disclosure of sale of data or targeted advertising are detailed in Section 8 [USER RIGHTS AND OPT OUT OPTIONS](#) above, and in the [DSR Form](#).

Further, the table above under Section 13.2.1 “[ADDITIONAL NOTICE TO COLORADO RESIDENTS](#)” details the rights you have under CDPA and how you may exercise your rights.

Notwithstanding the aforesaid in Section 13.2.1 “[ADDITIONAL NOTICE TO COLORADO RESIDENTS](#)”, the UCPA does not provide the Right to Correction and the Right to Opt Out From Profiling, as granted under the CDPA.