

# Privacy Policy

*Effective Date: November 9, 2021*

Your privacy is important to Supernal and its parent companies and affiliates (“Supernal” “we,” “us” or “our”), as is your trust in Supernal’s products and services. We strive to protect your privacy, while providing opportunities to receive desired information regarding Supernal’s products, services, and offers that are relevant and useful to you. This Supernal Privacy Policy (this “Privacy Policy”) describes how we collect, use, and share your personal information, including, as applicable, your rights regarding access, deletion, opting-out, and correction of your personal information.

## OVERVIEW

This list provides a summary of the personal information we collect and how we use it, both of which are further explained in our Privacy Policy below. The list provides a general overview of the categories of personal information we collect and the purposes for which we use such information. The actual information we collect and our use of such personal information varies depending upon the nature of our relationship and interactions, but includes such purposes as: providing our services; analyzing and improving our services; personalizing content and experiences; marketing and promotional purposes; supporting our general business operations; securing and protecting our rights; complying with our legal obligations.

- Identifiers: such as a real name, alias, address, IP address and online identifiers, email address, account name, or other unique personal identifiers.
- Internet or other electronic network usage data: including, but not limited to, browsing history, clickstream data, search history, and information regarding interactions with an internet website, application, or advertisement, including access logs and other usage data related to your use of any company website, applications or other online services.
- Geolocation data: precise location information about a particular individual or device.
- Profiles and inferences: including inferences drawn from any of the information identified above to create a profile reflecting a resident’s preferences, characteristics, behavior or attitudes.

California residents. If you are a California resident, please be sure to review the section Additional Information for California Residents below for important information, as required by California privacy laws, about the categories of personal information we collect and disclose and your rights under California privacy laws.

## Scope

This Privacy Policy applies to our collection, use and disclosure of personal information related to (a) users of our website (each a “Site”) and mobile applications (each as “App”) that link to or display this Privacy Policy, and (b) users of our products and services that we make available to you, ((a) and (b)

collectively the “Services”), (e) individuals that contact us, interact with us or express interest in our products or Services, and (f) our efforts to operate and expand our business.

**Additional Privacy Notices.** We may also provide additional privacy notices for specific services, which apply to and provides additional information about our collection, use and disclosure of personal information related to our products and services.

**Personal Information.** Personal information includes any information that identifies, relates to, describes, or is reasonably capable of being associated, or reasonably linked or linkable with a particular individual or household. Personal information includes information that can identify you, such as contact information, geolocation data, web tracking information, payment card information, and demographic data.

**Not Covered by this Policy.** This Policy does not apply to job applicants and candidates who apply for employment with us, or to employees and non-employee workers.

### **User Consent**

Your use of our services is subject to the applicable terms of use, which may include our [Terms of Use](#) (the “Terms”), including applicable limitations on liability and the resolution of disputes. Our terms are incorporated by reference into this Privacy Policy.

By disclosing your personal information to us or using our services, you understand and agree that Supernal may collect, use and disclose your personal information in accordance with this Privacy Policy and the Terms. If required by applicable law, we will obtain your consent to our collection, use, transfer and disclosure of your personal information. **IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR TERMS, THEN PLEASE DO NOT USE THE SERVICES.**

### **Personal Information We Collect**

We collect information about you directly from you, from third parties, and automatically through your use of our services or interactions with us. We may combine the information we collect from these various sources.

**Sources of Personal Information.** The personal information we collect varies depending upon the circumstances. For example, we collect personal information when you engage with Supernal, directly, such as when creating an account, requesting information from us; participating in promotional activities, such as surveys, sweepstakes, contests, special events, blogs and chats; or when you contact us or otherwise voluntarily provide information to us.

Supernal may also automatically collect usage data when you use Supernal’s services. This may include data collected via cookies and web beacons; and web analytics and log files. Please see below for additional information regarding our collection of this type of information. Some of our services may capture and record geolocation.

### **Categories of Personal Information**

Certain privacy laws, such as the California Consumer Privacy Act (“CCPA”), require that we disclose

the categories of personal information that we may collect about individuals. While the actual information we collect varies depending upon the circumstances, generally we may collect the following categories of personal information:

- Identifiers: such as a real name, alias, address, IP address and online identifiers, email address, account name, or other unique personal identifiers.
- Internet or other electronic network usage data: including, but not limited to, browsing history, clickstream data, search history, and information regarding a resident's interaction with an internet website, application, or advertisement, including access logs and other usage data related to your use of any company website, applications or other online services.
- Geolocation data: precise location information about a particular individual or device.
- Profiles and inferences: including inferences drawn from any of the information identified above to create a profile reflecting a resident's preferences, characteristics, behavior or attitudes.

### **Use of Personal Information**

Supernal uses the information collected above in a number of ways. And we may use your information individually or combine it with other information to generate aggregate statistical information. The primary uses of your information include:

- Running our business and providing our services: to provide and maintain our services; to improve our Services; to authenticate users; to perform technical operations, such as updating software; to communicate with you about our products and services; to respond to your requests; to administer Events that you participate in; to fulfill your orders and process your payments; to provide technical support; and for other customer service and support purposes.
- Analyzing and improving our services and offerings: to better understand how users access and use our products, and the services; for research and analytical purposes, such as to evaluate and improve our services and business operations; to develop new features, products, or services; and to otherwise improve our Services and user experiences.
- Personalizing content and experiences: to tailor content we send or display on the services in order to offer location customization and personalized help and instructions and to otherwise personalize your experiences; to reach you with more relevant ads and to measure ad campaigns.
- Marketing and promotional purposes: to send you newsletters, offers or other information we think may interest you; to contact you about our products, services or information we think may interest you; to administer promotions and contests; and to promote other services we offer.
- In support of our general business operations: where necessary to the administration of our general business, accounting, record keeping and legal functions, including to analyze operational and business results and risks, to collect outstanding amounts owed, and maintain business records.
- Securing and protecting our rights: to protect our business operations, secure our network and information technology, assets and services; to prevent and detect fraud, unauthorized activities, access and other misconduct; where we believe necessary to investigate, prevent or take action regarding suspected violations of our Terms and other agreements with you, as well as fraud, illegal activities and other situations involving potential threats to the rights or safety of any person or third party.
- Complying with legal requests and obligations: to comply with the law or legal proceedings. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements.
- Anonymous and De-identified Information. We also may de-identify information and create

anonymous and aggregated data sets and reports in order to assess, improve, and develop our business, products, and services; prepare benchmarking reports; and for other research and analytics purposes.

### **Disclosure of Personal Information**

We disclose personal information to provide and improve our services; to reach you with more relevant information and offers; to provide you with information about third party offers you may be interested in; to honor your consent or authorization; and to achieve other purposes set out below:

- **Affiliates and Subsidiaries:** Supernal may share your personal information with one of our parent companies and/or its other affiliates located inside and outside the United States.
- **Service providers and suppliers:** We may disclose personal information to our vendors, service providers, suppliers, contractors or agents who use such data in order to perform functions on our behalf.
- **Marketing partners and third parties:** Supernal may share personal information, including information about users of services or product owner information, with third parties including our affiliates and subsidiaries, and licensees. In addition, personal information may be used by our business partners, including marketing and promotional partners, to conduct joint marketing programs with Supernal, show you advertisements about our products and services on third party sites, and to offer you other valuable products and services.
- **Programs:** Supernal may invite you to participate in promotional activities, such as surveys, sweepstakes, contests, special events, blogs and chats ("Programs"). These Programs are often-times co-marketed with an unaffiliated Supernal business partner. If you participate in a Program, we may use personal information you provide. For example, we may send you email messages to invite you to join a contest. Your personal information may also be shared with our business partners and may also be used by our business partners if you indicate your interest in receiving communications directly from that company. If you elect to receive communications from our business partners, your information will be used by that company in accordance with its policies and this Privacy Policy will not apply to that company's use of your information. Sometimes the rules, terms and conditions, or disclaimers that apply to a particular Program include information on how we may use the personal information that you provide to us through your participation in the Program. If there is a conflict between the rules, terms, and conditions that apply to a particular Program and this Privacy Policy, those applying to the particular Program will govern. Please review all of the information about a Program before you provide us (or our business partners) with any personal information.
- **Participating vendors:** Some of our services offer opportunities to make purchases online from special participating vendors. On services with online purchase opportunities for products and merchandise, we may also give participating vendors the order information and authorization for the merchant bank. Any time you order from a participating vendor, that vendor will automatically have all the information related to the order. Participating vendors may use that information to advise you directly of other products and offerings that they provide.
- **Credit card companies and payment services:** In some cases, we use third party payment and transaction services to facilitate your transactions and process your orders. In such cases, we will share your personal information and credit card information with third party payment services companies solely for the purpose of completing the transaction or processing your order.
- **Public postings:** You should be aware that if you voluntarily disclose information, personal or otherwise, online in any community area (whether through Supernal's website or any other Service available online), that information can be collected and used by others. Accordingly, you

should use caution when sharing any personal information or other sensitive information with others in any community area (whether through Supernal’s website or any other Service available online).

- **Business transfers:** We may disclose and transfer personal information as part of any merger, acquisition, financing, sale of company assets or interests in the respective company, or in the case of insolvency, bankruptcy, or receivership, including during negotiations related to such business transfers.
- **Protecting rights and interests:** We may disclose your information to protect or defend the safety, rights, property, or security of Supernal, third parties or the general public, including to protect the services, to detect, prevent, or otherwise address fraud, security, technical issues, or other activity which we, in our sole discretion, consider to be, or to pose a risk of being, illegal, unethical, or legally actionable activity. We may also use personal information as evidence in litigation in which we are involved, and as necessary to enforce this Privacy Policy, our Terms of Use, and other applicable agreements with you.
- **Legal compliance and lawful requests:** We may disclose your information to comply with applicable legal or regulatory obligations, including as part of a judicial proceeding, in response to a subpoena, warrant, court order, or other legal process, or to cooperate with investigations or lawful requests, whether formal or informal, from law enforcement or government entities.

**Anonymized and Aggregated Data.** We may share aggregate or de-identified information with third parties for research, marketing, analytics, and other purposes, provided such information does not reasonably identify you.

**Categories of Personal Information Disclosed.** Certain privacy laws, such as the CCPA, require that we tell you about the categories of personal information that we have disclosed for a business purpose as well as the categories that we have “sold”. Please review the section Categories of Personal Information Collected above for further descriptions of each category of personal information.

- **Disclosed for a business purpose.** In general, we may disclose the following categories of personal information for the business purposes described above:

Categories of personal information disclosed for our business purposes	Categories of third parties to whom this information was disclosed
Identifiers	Affiliates and subsidiaries; service providers and suppliers; marketing partners; digital advertising and analytics providers; payment services companies; and government entities.
Customer records	Affiliates and subsidiaries; service providers and suppliers; marketing partners; payment services companies; and government entities.
Commercial information	Affiliates and subsidiaries; service providers and suppliers; marketing partners; digital advertising and analytics providers; payment services companies; and government entities.

Identifiable internet or other electronic network activity information	Affiliates and subsidiaries; service providers and suppliers; marketing partners; digital advertising and analytics providers; and government entities.
Geolocation data	Affiliates and subsidiaries; service providers and suppliers; and government entities
Profiles and inferences	Affiliates and subsidiaries; service providers and suppliers; marketing partners; digital advertising and analytics providers; payment services companies; and government entities.

- Sold. The CCPA defines a "sale" as disclosing or making available to a third party personal information in exchange for monetary or other valuable consideration. While we do not disclose personal information to third parties in exchange for direct monetary compensation from such third parties, we do disclose or make available personal information to third parties, in order to receive certain services or benefits from them pursuant to written agreement. Additionally, we allow third party tags to collect information such as browsing history on our Sites to improve and measure our ad campaigns, including: identifiers; customer records; commercial information; internet or other electronic network usage data; and profiles and inferences. The categories of information disclosed under this section, and third parties to whom the information was disclosed, is as follows.

Categories of personal information disclosed or made available	Categories of third parties to whom this information was disclosed or made available
Identifiers	Affiliates and subsidiaries; vendors; marketing partners; and digital advertising and analytics providers.
Customer records	Affiliates and subsidiaries; vendors; marketing partners; and digital advertising and analytics providers.
Commercial information	Affiliates and subsidiaries; vendors; marketing partners; and digital advertising and analytics providers.
Internet or other electronic network activity information	Affiliates and subsidiaries; vendors; marketing partners; and digital advertising and analytics providers.
Profiles and inferences	Affiliates and subsidiaries; vendors; marketing partners; and digital advertising and analytics providers.

## Cookies and Tracking

We and our third-party providers may use cookies, clear GIFs/pixel tags, JavaScript, local storage, log files, and other mechanisms to automatically collect and record information about your browsing activities, and use of the Website and other services. We may combine this data with other personal information we collect about you. This data is used to understand how our services are used, track bugs and errors, provide and improve our services, verify account credentials, allow logins, track sessions, prevent fraud, and protect our services, as well as for targeted marketing and advertising, to personalize content and for analytics purposes. We provide additional information about tracking technologies below. You can learn about how to register your preferences regarding certain uses of the technologies by reading the Cookies and Tracking Choices section below.

**Cookies.** We may collect certain information regarding website activities through the use of HTTP cookies which are small files stored on your web browser. Cookies enable us to track website usage so that we may better target the interests of our users and enhance their experience on our website as well as to remember user preferences and optimize the design of our website. You can set your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies.

**Web beacons.** Some of our web pages, commercial email messages and/or newsletters may contain electronic images known as web beacons, which are also called single-pixel GIFs. Web beacons collect information including a cookie number, time and date of a page view and a description of the page on which the web beacon resides. Web beacons are a technique we may use to enhance and personalize the website and the products and services we offer, to provide product information and advertisements that are more relevant to your interests, compile aggregated statistics about the usage of our website, improve and personalize our advertising, and to track the number of users who have opened and acted upon our commercial email messages.

**Log files.** We collect log information to analyze trends, administer the services, track users' movement around our services and gather broad demographic information for aggregate use in improving the website.

**Do Not Track.** Our Sites do not support Do Not Track at this time. Do Not Track (DNT) is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across website when you have not interacted with that service on the page. For all the details, including how to turn on Do Not Track, visit [donottrack.us](https://donottrack.us).

**Third-Party Analytics.** We may use third-party analytics companies to evaluate use of our services. We use these tools to help us understand use of, and to improve, our services, performance, ad campaigns, and user experiences. These entities may use cookies and other tracking technologies, such as web beacons or local storage objects (LSOs), to perform their services.

**Interest-Based Advertising.** On some of our services, we may work with third-party ad networks, analytics companies, measurement services and others ("third-party ad companies") to display advertising and to manage our advertising on third-party sites, mobile apps and online services. We and these third-party ad companies may use cookies, pixels tags and other tools to collect information on our Services (and on third-party sites and services), such as browsing history, IP address, device ID, cookie and advertising IDs, and other identifiers, general location information and, with your consent,

your device's geolocation information; we and these third-party ad companies use this information to provide you more relevant ads and content and to evaluate the success of such ads and content.

**Custom Audiences and Matching.** We may share certain hashed customer list information (such as your email address) with third parties—such as Facebook and Google—so that we can better target ads and content to our customers, and others with similar interests, within their services. These third parties use the personal information we provide to help us target ads and to enforce their terms, but we do not permit them to use or share the data we submit with other third-party advertisers.

**Cookies and Tracking Choices.** If you would like to opt-out of third party collection of information on our Sites via cookies and similar tracking technologies, you can [Manage Preferences](#). This tool provides you with information about the third parties that collect information via cookies and similar technologies and allows you to opt out of such collection. You will need to visit Manage Preferences on all of the browsers and devices you use to access our website. If you clear cookies on your browser, you will need to reset your preferences at Manage Preferences.

In addition, for more information or to opt out of third party advertising cookies and tags, you may visit [www.privacyrights.info](http://www.privacyrights.info). You may also obtain more information about targeted or “interest-based advertising” by visiting the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#). Opting out of participating ad networks does not opt you out of being served advertising. You may continue to receive generic or “contextual” ads on our services. You may also continue to receive targeted ads on other website, from companies that do not participate in the above programs.

## **Your Rights and Choices**

You may access, delete and update certain of your personal information by accessing and adjusting your account settings (if you have an account), or by [contacting us](#). Please note that we may maintain copies of information that you have updated, modified or deleted, as permitted, in our business records and in the normal course of our business operations.

**Opting-Out of Certain Communications.** Supernal offers you the opportunity to opt-out from marketing communications from Supernal, and to opt out of certain disclosures of personal information to third parties.

You may opt-out of marketing emails or manage your subscription preferences for emails from us at any time by using the unsubscribe mechanism within any marketing email we send to you. Even if you opt out, we may still send you non-commercial emails, such as registration confirmation and responses to direct requests.

If you wish to opt-out or request that we cease sending you commercial or other information via postal mail, you may opt out by submitting a request to [contact@supernal.aero](mailto:contact@supernal.aero).

You may also opt out of our sharing of your personal information (including Covered Information) with third parties for marketing purpose by [contacting us](#).

**Accessing and Updating Your Information.** If you register for an account, you can access and update certain information we have relating to your account within your account settings. You may also update or delete your contact information by [contacting us](#). Please note that we may maintain copies of

information that you have updated, modified or deleted, as permitted, in our business records and in the normal course of our business operations.

If you have opted out of receiving future emails from us, we will implement your opt-out request within ten (10) business days of receiving the opt-out request. If you have opted out of receiving future promotional materials by regular mail, we will implement your opt-out request within a commercially reasonable time. In those instances, we will retain your information in a "do not promote" file in our database, and you will receive no further communications from us except as required by law.

California Residents. California residents have certain rights, under California privacy laws, regarding their personal information, which are set forth in the *Additional Information for California Residents* section below.

### **The Security of Your Information**

We use security policies, procedures, and tools which are designed to safeguard the personal information we collect. However, the security of information transmitted through the Internet can never be guaranteed regardless of the level of security. We are not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of data. Users of our services are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our website. In order to protect you and your data, we may suspend your use of any of the website, without notice, pending an investigation, if any security issue arises. Access to and use of password protected and/or secure areas of any of the website are restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution or civil action.

### **Third Party Sites**

We may offer links to or from our website to other websites within the Supernal family as well as to website, services, and resources operated by third parties. We offer links to third party websites so that you can conveniently visit our vendors and advertisers or locate other content likely to be of interest to you. We are not responsible for the privacy practices, content or policies of websites operated by third parties and urge you to inquire about their privacy and information sharing practices before providing any personal information. In the event that you provide personal information to any third party website or service, you understand that Supernal is not responsible for such third parties' use or misuse of your personal information. You further acknowledge and agree that Supernal shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such third party website, service, or resource.

### **Children's Privacy**

We do not knowingly collect or maintain personal information from any person under the age of sixteen (16). No parts of our products or services are directed to or designed to attract anyone under the age of sixteen (16).

### **Changes to this Privacy Policy**

Supernal reserves the right to change this Privacy Policy at any time. Supernal will use, share, and disclose all personal and other user information in accordance with the Privacy Policy in effect at the time the information is collected. We will post any changes to this Privacy Policy on this page so check back frequently so that you are always aware of what information we collect, how we use it, and under what circumstances we may disclose it. Continued interaction with us following changes to these terms will mean that you accept the changes.

### **Additional Information for California Residents**

This section provides information for California residents about their rights regarding their personal information, as required under California privacy laws, including the CCPA.

**Notice at Collection.** We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

**Do Not Sell.** California residents have the right to opt-out of our sale of their personal information for all purposes, including direct marketing by third parties. Opt-out rights can be exercised by [contacting us](#). We do not sell personal information about residents who we know are younger than 16 years old without opt-in consent. To opt-out of the sharing, including sales, of personal information with third parties that collect information from our Sites via cookies or similar tracking technologies, you can Manage Preferences. You will need to visit [Manage Preferences](#) on all of the browsers and devices you use to access our website. If you clear cookies on your browser, you will need to reset your preferences at Manage Preferences.

**Verifiable Requests to Delete, and Requests to Know.** Subject to certain exceptions, California residents have the right to make the following requests:

- **Right of Deletion:** California residents have the right to request deletion of their personal information that we have collected about them, subject to certain exemptions, and to have such personal information deleted, except where necessary for any of a list of exempt purposes.
- **Right to Know – Right to a Copy:** California residents have the right to request a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance.
- **Right to Know – Right to Information:** California residents have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:
  - o categories of personal information collected;
  - o categories of sources of personal information;
  - o business and/or commercial purposes for collecting and selling their personal information;
  - o categories of third parties with whom we have disclosed or shared their personal information;
  - o categories of personal information that we have disclosed or shared with a third party for a business purpose;
  - o categories of personal information collected; and
  - o categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

**Submitting Requests.** You may submit requests to us by [email](#) or regular mail. Please note that we may require additional information from you in order to honor your request, including your name, email address, phone number, and mailing address.

If you are submitting a request through an authorized agent, the authorized agent must confirm their relationship with you. We may also request that any authorized agents verify their identity, including by providing information about themselves, such as their name, email, phone number, and address. We may reach out to you directly to confirm that you have provided the agent with your permission to submit the request on your behalf.

There may be circumstances where we will not be able to honor your request. For example, if you request deletion, we may need to retain certain personal information to comply with our legal obligations or other permitted purposes. However, we will only use personal information provided in a verifiable consumer request to verify your identity or authority to make the request.

**Discrimination and Incentives.** The CCPA prohibits discrimination against those who exercise their rights under the CCPA and imposes requirements on any financial incentives offered to California residents related to their Personal Information. A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, provided it is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time, and may not be included in such incentives without their prior informed opt-in consent.

**Shine the Light.** You may exercise your rights under California's Shine the Light law (Civil Code Section 1798.83) by utilizing the Do Not Sell My Personal Information request on the CCPA portal.