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### **FlexSpace Privacy Policy**

EFFECTIVE DATE: June, 9, 2020

Meet Technologies, Inc. (“we”, “us” or “our”) values your privacy. In this Privacy Policy (“Policy”), we describe how we collect, use, and disclose information that we collect from users of website at flexspace.ai and/or any other subdomains or websites that we operate or control on which this Policy is posted (the “Site”) and our reservation and booking services for meeting and conference rooms, hot desks and offices (“Booking Locations”), including any mobile applications we may provide for services, (collectively, the “Services”), and how we use and disclose that information.

By visiting the Site, or using any of our Services, you agree that your personal information will be handled as described in this Policy. Your use of our Site or Services, and any dispute over privacy, is

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subject to this Policy and the Terms of Use, including its applicable limitations on damages and provisions for the resolution of disputes.

### **The Information We Collect About You**

We collect information about you directly from you and from third parties, as well as automatically through your use of our Site or Services.

***Information We Collect Directly From You.*** You may browse certain areas of the Site without registering with us or providing us personal information. If you register for our Services, then you must provide your name, email address, company name and phone number. In addition, if you are making a booking or reservation through our Services, we will collect the following additional information from you about your booking and reservation: start time, end time, event name, and attendees and any other information that we may collect in our booking and reservations forms as may be amended from time to time.

You will be required to pay for a booking and reservation by providing a valid credit card. We do not collect your credit card information, but use a third-party payment processor, Stripe, to collect that information and process payments. You should review Stripe privacy policy at <https://stripe.com/privacy#:~:text=Stripe%20has%20updated%20its%20Privacy,customers%20for%20interest%2Dbased%20advertising>.

If you are providing personal information for third parties in connection with using our Services, you are responsible for ensuring that you have all required permissions and consents to provide such personal information to us for use in connection with the Services and that our use of such personal information to provide the Services does not violate any applicable law, rule, regulation or order.

***Information We Collect Automatically.*** We may automatically collect the following information about your use of our Site or Services through cookies and other technologies: your domain name; your browser type and operating system; web pages you view; links you click; your IP address; the length of time you visit our Site or use our Services; and the referring URL, or the webpage that led you to our Site. We may combine this information with other information that we have collected about you, including, where applicable, your user name, name, and other personal information. Please see the section “Our Use of Cookies and Other Tracking Mechanisms” below for more information.

***Geolocation.*** If you have provided permission through your mobile device to allow us to collect location information through the App, we may obtain your physical location information in terms of latitude and longitude from technologies like GPS, Wi-Fi, or cell tower proximity. You are able to withdraw your permission for us to acquire such physical location information from your mobile device through your mobile device settings, although we do not control this process. If you have questions about how to disable your mobile device's location services, we recommend you contact your mobile device service provider or the mobile device manufacturer.

### **How We Use Your Information**

We use your information, including personal information, for the following purposes:

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- **Provide our services**

We use your information to book and reserve meeting and conference rooms, hot desks and offices, we communicate with you about such reservations and your use of our Site and Services, to respond to your inquiries, to fulfill your orders, and for other customer service purposes.

- **Provide personalized services**

We use your information to tailor the content and information that we may send or display to you, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the Site and Services.

- **Improve and develop our services**

We use your information to ensure our Site and Services are working as intended, to better understand how users access and use our Site and Services, both on an aggregated and individualized basis, to make improvements to our services, to develop new Services, and for other research and analytical purposes.

- **Offer promotions**

We may use your information for marketing and promotional purposes. For example, we may use your information, such as your email address, to send you news and newsletters, special offers, and promotions, to conduct contests and sweepstakes, or to otherwise contact you about products or information we think may interest you. We also may use the information that we learn about you to assist us in advertising our Services on third party websites.

### How We Share Your Information

We may share your information, including personal information, as follows:

- ***Providers of Booking Locations.*** We provide your information to the provider of the Booking Location, such as a hotel or office property manager, so that they can process your reservation and provide you the booked location. Please note that their use of your information is subject to their privacy policies. You expressly direct us to share your personal information with the Booking Location for these purposes and other purposes specified in their privacy policy, including for marketing their products and services to you.
- ***Consent.*** Where you have provided consent, we share your information, including personal information, as described at the time of consent, such as when you authorize a third party application or website to access your Meet Technologies, Inc. account or when you participate in promotional activities conducted by Meet Technologies, Inc. partners or third parties.
- ***Affiliates.*** We may disclose the information we collect from you to our affiliates or subsidiaries solely for the purpose of providing Services to you; however, if we do so, their use and disclosure of your personally identifiable information will be maintained by such affiliates and subsidiaries in accordance with this Policy.
- ***Service Providers.*** We may disclose the information we collect from you to third party vendors, service providers, contractors or agents who perform functions on our behalf. For example, as noted above, Stripe is our payment processor that collects your credit card and other information to process payments on our behalf.

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- ***Business Transfers.*** If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, or are in negotiations for any of these types of transactions, we may transfer the information we have collected from you to the other company.
- ***In Response to Legal Process.*** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena.
- ***To Protect Us and Others.*** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we are involved.
- ***Aggregate and De-Identified Information.*** We may share aggregate or de-identified information about users and their use of the Services with third parties and publicly for marketing, advertising, research or similar purposes.

Please note that except as noted above, we will not sell or share your personal information with any third party for their direct marketing purposes without your consent.

### **Our Use of Cookies and Other Tracking Mechanisms**

We and our service providers use cookies and other tracking mechanisms to track information about your use of our Site and Services. We may combine this information with other personal information we collect from you (and our third party service providers may do so on our behalf).

Currently, our systems do not recognize browser “do-not-track” requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies), but such disabling will impair use of the Site and Services.

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer’s hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site and Services, while others are used to enable a faster log-in process or to allow us to track your activities at our Site and Services. There are two types of cookies: session and persistent cookies.

- Session Cookies. Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Site. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Site.
- Persistent Cookies. Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity.

***Disabling Cookies.*** Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when

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you receive a new cookie, or how to disable cookies altogether. Visitors to our Site who disable cookies will not be able to browse certain areas of the Site or use the Services.

**Third Party Analytics.** We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site and our Services. We also may use other analytic means to evaluate our Services. We use these tools to help us improve our Services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties.

### **Third-Party Services**

Our Site and Services may contain links to third-party websites or third-party services, such as the Booking Locations (“Third-Party Services”). Any access to and use of such Third-Party Services is not governed by this Policy, but instead is governed by the privacy policies of those Third-Party Services. We are not responsible for the information practices of such Third-Party Services.

### **Security of My Personal Information**

We have implemented commercially reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee 100% security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

### **What Rights Do I Have Regarding My Personal Information**

You may request access, a copy, modification or deletion of personal information that you have submitted to us by contacting us at our email: [help@flexspace.ai](mailto:help@flexspace.ai). We will use reasonable efforts to accommodate such requests to the extent required by law, provided that we may be required to retain personal information to comply with legal obligations, accounting requirements, or for other business purposes. We may request additional information to verify the identity of the requesting party before responding to a request. Please note that copies of information that you have updated, modified or deleted may remain viewable in cached and archived pages of the Site for a period of time.

### **What Choices Do I Have Regarding Use of My Personal Information for Marketing?**

We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any Services you have requested or received from us.

### **Location of Information**

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Our Site and Services are offered from the United States. We store any information we collect in the United States. If you access the Services or Site from outside the United States, you agree to the transfer of your information to the United States, which may have less protections for your personal information than your jurisdiction of residence.

### **Children Under 13**

Our Site and Services are not designed for children under 13<sup>1</sup>. If we discover that a child under 13 has provided us with personal information, we will delete such information from our systems.

### **Contact Us**

If you have questions about the privacy aspects of our Site or Services or would like to make a complaint, please contact us at our email [help@flexspace.ai](mailto:help@flexspace.ai).

### **Changes to this Policy**

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on the Site. If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site or if you have an account with us, providing notice to the email address in your account (for this reason you should make sure to update your account information promptly if it changes).

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<sup>1</sup> Note for GDPR we usually recommend a minimum age of 16.

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### **CALIFORNIA PRIVACY NOTICE**

Under California Civil Code § 1798.83, California residents who have provided personal information to Meet Technologies, Inc. may obtain information regarding Meet Technologies, Inc.'s disclosures, if any, of personal information to third parties for third-party direct marketing purposes. Requests must be submitted to the following address: help@flexspace.ai. Within 30 days of receiving such a request, we will provide a California Privacy Disclosure, which will include a list of certain categories of personal information disclosed during the preceding calendar year to third parties for their direct marketing purposes, along with the names and addresses of the third parties. This request may be made no more than once per calendar year.

Meet Technologies does not believe it is currently subject to California Consumer Privacy Act ("CCPA"). At such time it does become subject to the CCPA, it will update and revise its Policy to comply with the CCPA requirements.

### **GDPR Notice**

This GDPR Notice applies to data subjects of the European Union with respect to the processing of your personal information, pursuant to applicable local laws. Capitalized terms not otherwise defined in this GDPR Notice, shall have the meaning ascribed to them by the European Union General Data Protection Regulation 2016/679 and its amendments ("GDPR").

The controller of personal information collected through the Site and Services is [insert legal name and address]

### **LEGAL BASIS FOR PROCESSING OF PERSONAL INFORMATION**

We process the personal information collected for the purposes described in the section entitled "The Information We Collect About You" in our Policy. The legal basis for our processing activities include processing personal information as necessary to comply with our contractual obligations, compliance with our legal obligations, protecting the safety of our employees, guests and others, for our legitimate business interests, and pursuant to your consent. The particular legal basis for the processing of your personal information is based on the purpose for which such information was provided or collected.

For example, we use personal information as necessary for the performance of contracts with you, or in order for us to take steps, at your request, prior to entering into a contract, such as your reservation of meeting and conference rooms through our Services. For example, we are not able to provide our services and products according to contracts unless you provide us with necessary personal information. This collection and processing of the Personal Data is based on Art. 6 para. 1 (b) GDPR (necessary for the performance of a contract with you).

We may also process your personal information if we have received your consent, to respond to requests from you or to take actions in our legitimate interest (except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal information) such as for marketing purposes or to otherwise inform you of our business operations, and to improve our products and services. Please note that if we rely on consent, you may withdraw your consent at any time, but such withdrawal will not affect the lawfulness of the processing prior to the

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withdrawal. The collection and processing of personal information based on your consent is in accordance with Art. 6 para. 1 (a) GDPR; the collection and processing of personal information based on legitimate interest is in accordance with Art. 6 para 1(f) GDPR.

### **DATA RETENTION**

We retain personal information about you for the time necessary to accomplish the purpose for which such information was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect applicable statute of limitation periods and legal requirements.

### **DATA SUBJECT RIGHTS**

Data Subjects of the European Union have the following rights:

- Access, Correction and Erasure Requests: You have the right to:
  - contact us to confirm whether we are processing your personal information
  - receive information on how your personal information is processed
  - obtain a copy of your personal information
  - request that we update or correct your personal information
  - request that we delete personal information in certain circumstances
- Right to Object to Processing: You have the right to request that we cease processing of your personal information: for marketing activities, including profiling for statistical purposes where such processing is based on our legitimate business interests, unless we are able to demonstrate a compelling legitimate basis for such processing or we need to process your personal information for the establishment, exercise or defense of a legal claim.
- Right to Restrict Processing: You have the right to request that we limit the processing of your personal information:
  - while we are evaluating or in the process of responding to a request by you to update or correct your personal information where such processing is unlawful and you do not want us to delete your data
  - where we no longer require such data, but you want us to retain the data for the establishment, exercise or defense of a legal claim
  - where you have submitted an objection to processing based on our legitimate business interests, pending our response to such request
- Data Portability Requests: You have the right to request that we provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that



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we have obtained directly from you and only where our processing is based on consent or the performance of a contract.

If you believe our processing of your personal information violates data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged violation.

**Submitting Requests:** You can submit requests by contacting us at [help@flexspace.ai](mailto:help@flexspace.ai). We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requestor's identity. We may charge you a reasonable fee for subsequent copies of personal information that you request. In addition, if we consider that a request is manifestly unfounded or excessive, we may either request a reasonable fee to deal with the request or refuse to deal with the request.