

PATHEARN PRIVACY POLICY

Effective: [December 2024]

This Pathearn Privacy Policy (the “**Policy**”) describes how “VMobile” AD (“**VMobile**”, “**we**”, “**us**”, “**our**”) collects, uses, discloses, and protects personal information of visitors to the Pathearn web based software platform <https://pathearn.ai> (“**Site**”) and users (“**user/s**”, “**you**”, “**your**”, “**yours**”) of our mobile application (“**Application**”) (collectively our “**Services**”). This Privacy Policy also provides information to individuals whose information may be collected by users of the Application. It also tells you about the rights and choices you have concerning your personal information, and how you can reach us to get answers to your questions. Please note, our privacy practices are subject to the applicable laws of the places in which we operate.

Please note that if a) you work for us and part of your duties are to use the Application or b) if you work for a company with which we have B2B relationship and part of your duties are to use the Application you are also a user, as defined hereabove. The difference is that you might not be rewarded via points and cryptocurrency but as set out in your contract with us or our partner. This does not change in any way the information provided below about users’ data, nor the guarantees about and protection of users’ data that we provide.

Pathearn is a software solution for the gathering of data for vehicles, IoT devices and multiple moving and stationary objects, for the needs of data consumers in a distribution ecosystem (“**Pathearn**”).

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1. Personal Information We Collect and Disclose

a. Categories of Personal Information, Sources of Personal Information, and Purposes for Use

The personal information we collect about you depends on how you interact with our Services.

Information You Provide Us Directly

Identifiers – When you register by creating your account in the Application and/or the Site, we collect your email address (as a username) and password for log-in purposes (you can either provide your email directly or login via Google authentication). Please note that the email address we collect for login purposes is solely and exclusively used for user authentication in the Application. User email addresses are neither visible nor accessible to anyone (including us), as they are hashed (i.e., transformed into a generated ID that is not associated with you).

We can collect your email address if you provide such when you contact us via the form on our Site. It will be used to contact us and answer your queries. Additionally provided personal information via our contact form which is not requested by us will not be used or stored by us and will be deleted as soon as technically possible.

Information We Collect Automatically

- **Internet or Other Network Activity** - When visiting (browsing) the Site or using our Application, we may collect information about your online activity and interaction with our Services such as access times, webpages or content viewed, features used, cookies, how the webpage or online feature performed, and other websites visited for advertising and analytics purposes.
- **Points** – When you use the Application (and subject to the exception described in this Policy), you can acquire points for capturing and transmitting verifiable information and geolocation data on surrounding vehicles, road signs and/or imagery to us. You may generate points by simply using Pathearn on your device(s). You can access the accumulated points via the Application as well as via the Pathearn web based software platform on our Site. Accumulated points can be converted via our partner's platform into the PTRN cryptocurrency, which can then be exchanged for any other cryptocurrency through third-party platform/s.

NB! Please note, that the information that is automatically collected from your device to provide you points, such as geolocation data and current time, is not stored or used in a way that can be associated with you in a personally identifiable way. This means in practice that the received by us geolocation data and time stamp is in no way linked to your geolocation and time as well. This is so for the following reasons: (i) you provide us with minimum data for your registration and the use of the Application (i.e., your email); (ii) when you enter your email address and password at the Application, the Application automatically transforms this data (i.e., hashes it) into a generated ID that is displayed in place of the user's email address in all our systems. The Application authenticates you via your email and password, but we see only the generated ID. Therefore, we do not link your email with the data you provide us with via the Application, including your location and/or the location of others around you. There is also no link between your email and the generated ID, as the described process of transformation cannot be reversed.

For Information for Individuals Other than Users of the Application and Visitors to our Website please see p. 13 hereunder.

You can also find us on LinkedIn. We do not receive any information about the content of the transmitted data, nor about its use by LinkedIn. For more information, see LinkedIn's privacy policy.

b. Categories of Recipients of Personal Information

We only disclose information that is associated with you for the purposes of providing the Services you requested or for other purposes as described below.

The categories of recipients of your personal information include:

- Service providers – We may disclose your personal information with companies and individuals that provide services on our behalf or help us operate the Services or our business.
- Data Analytics Companies. We may disclose your personal information with our analytics providers.
- To comply with applicable law or respond to valid legal process (including from law enforcement, other government agencies, the courts or others)
- We may disclose your personal information as part of a proposed or completed corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution or proceedings involving a transfer, divestiture, or sale of all or a portion of our business or assets.

With respect to the service providers which we use for the Application (Android or iOS depending on your device) please consult the correspondent websites and privacy policies to learn more about these services and their privacy options (including opt-out). We are not responsible for any usage of your personal data by these providers.

2. Retaining Your Personal Data

Except where permitted or required by law or to resolve disputes, we will retain your personal information as long as necessary to fulfil the purposes for which we collected it. In determining the retention period, we consider legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your personal information, and whether those purposes can be achieved through other means.

In general, we keep your account data as a registered user for as long as it exists. An account that has not been used at all for 24 months would be deleted and the data on it not stored by VMobile.

3. Sell, Share, Targeted Advertising (for USA users)

Except where permitted or required by law or to resolve disputes, we will retain your personal information as long as necessary to fulfil the purposes for which we collected it. In determining the retention period, we consider legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized

use or disclosure, the purposes for which we process your personal information, and whether those purposes can be achieved through other means.

In general, we keep your account data as a registered user for as long as it exists. An account that has not been used at all for 24 months would be deleted and the data on it not stored by VMobile.

4. Your Rights

Depending on your jurisdiction, applicable law may entitle you to consumer rights, including the right:

- To know the categories and/or specific pieces of personal information collected about you, including the source of your personal information, whether your personal information is sold or disclosed and the purpose, and with whom your personal information was disclosed;
- To request deletion of personal information, if permissible by law;
- To correct inaccurate personal information we retain about you;
- To opt-out of “sale” and/or “share” of your personal information, targeted advertising, and profiling;
- To limit the use of your sensitive personal information;
- To nondiscrimination based on the exercise of a consumer’s privacy rights;
- To appeal a decision regarding your request

a. Exercising Your Right to Know, Delete and Correct

Depending on where you live, you may exercise the right to know, delete, and correct your personal information. To exercise these rights, submit a request by contacting us using the contact information at the end of this Privacy Policy.

b. Opt-Out of Sale, Share, and Targeted Advertising

(i) Opt-Out of Sale, Share, and Targeted Advertising. We and our third-party partners and service providers (such as advertising and analytics providers) use pixels, web beacons, software developer kits, third-party libraries, cookies, and other similar online tracking technologies (collectively, “online tracking technologies”) to gather information when you interact with our Sites, Application, and email communications. The online tracking technologies that we use on our website or mobile application(s) are deemed to be a “sale”/ “sharing”/“targeted advertising” under applicable U.S. state laws. You can opt-out of these online tracking technologies by submitting a request via Your Privacy Choices, which is available at the bottom of the Site.

We do not knowingly sell or share personal information of consumers under 16 years of age.

(ii) Opt-Out via the Opt-Out Preference Signal. Depending on where you live, you may opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). To download and

use a browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to ensure that the browser or browser extension you use supports the GPC signal.

If you do not have a Pathearn account or if you are not logged into your account, your request to opt-out of sale/sharing will be linked to your browser identifier only and not to any account information because the connection between your browser and your Pathearn account is not known to us.

If you would like us to make the connection between your browser and your account when you send the opt-out of “sale”/“sharing”/“targeted advertising” or GPC signal, and you have not yet opted out of “sale”/“sharing”/“targeted advertising,” we recommend you submit the Do Not Sell or Share Personal Information form that is in Your Privacy Choices which is linked at the bottom of our website and [list location in mobile app].

(iii) Do Not Track. We do not currently respond to web browser “do not track” signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate.

c. Right to Appeal a Decision.

Depending on where you live, you may have the right to appeal requests that have been denied by contacting us at support@pathearn.ai.

d. Right to Non-Discrimination

We do not discriminate against you for exercising the rights described in our privacy policy.

5. Verifying Your Identity

For us to process some requests, we will need to verify your identity to confirm that the request came from you. We may contact you by e-mail to verify your request. Depending on your request, we will ask for information such as your name, an e-mail address that you have used with Pathearn.

6. Submitting a Request through an Authorized Agent

Depending on where you live, you may permit an authorized agent to submit a request to exercise the rights described above. If you are an authorized agent trying to exercise an opt-out right on behalf of a consumer, please contact us at the contact information at the end of our privacy policy with supporting verification information, which includes proof that you have access to the consumer’s interface and proof of your own identity. We reserve the right to deny your request if we cannot verify your identity. Where we deny your request in whole or in part, we will inform you of the denial, provide an explanation of our actions, and the reason(s) for the denial.

7. Children and Minors

Our website is not intended for or directed to children under the age of 13. We do not knowingly collect or use any information from consumers younger than 13 years of age. We do not knowingly collect personal information directly from children under the age of 13 without parental consent. If we become aware that a child under the age of 13 has provided us with personal information, we will delete the information from our records.

8. California's "Shine the Light" Law

If you are a California resident, you are entitled, once a year, free of charge, to request information regarding our disclosure, if any, of certain categories of Personal Information to third parties for their direct marketing purposes in the preceding calendar year.

9. Legal Bases for Processing Your Data

We need the data processed in connection with your registration for the operation of the Application and the Site and their use by you. The legal ground for such processing is our legitimate interest to offer you a better and easily accessible service. It is also our legitimate interest to stay in touch with you when you reach us via our contact form. In addition to the above, you are in a contractual relationship with us, as you use the Application and/or the Site based on your agreement with our Terms of Use.

10. Data Transfer

As to EU residents, we do not transfer your personal data outside the EU and / or the European Economic Area. The cloud database of VMobile is located in Bulgaria. VMobile respects any local legislation restrictions. With this respect the data of Turkish data subjects is stored in Turkey and the data accessed from abroad is not disclosed. For the purposes of data storage, we take your privacy seriously and, therefore, encrypt your personal data.

11. Amendments

We reserve the right to amend this Policy at any time. When we do revise this Policy, we will update the "Effective" date at the top of this page so that you can tell if it has changed since your last visit. The effective date of this Policy is the date in which this Policy was last updated.

12. Information for Individuals Other than Users of the Application and Visitors to our Website

Based on the use of the Application and the Site we will process the following information, depending on the country at hand (please check Exhibit 1 "List of countries and data processed" to find out what data might be processed about you):

- 1) about an indefinite circle of vehicles - vehicle registration plate, GPS coordinates, current time, cropped photo of the registration plate (the "Data"). VMobile cannot reasonably identify an individual based on a photo of a vehicle registration mark

alone nor does VMobile combine this data with any other data to identify an individual associated with the vehicle registration mark. On these grounds, VMobile reserves the right to decline any privacy rights request seeking deletion or access to photos of vehicle registration marks.

Users of the VMobile Application do not have any access whatsoever to the photos on their devices and may not use them for personal or commercial purposes on their own.

VMobile may share photos of vehicle registration plate information with third parties who may combine this data with other data already in the third party's possession in order to identify the individual associated with the registration plate. In such cases, the third party is responsible for providing a legally compliant notice to individuals.

In some countries, we might gather only information about a number of passing vehicles (without processing the registration plates) where in this case the information would not represent personal data at all.

- 2) about an indefinite circle of data subjects – you might be captured by our Application in case in your country the users can use our imagery function. This function provides the opportunity for the users to capture random exterior pictures + GPS coordinates, current time. Users do not have any access whatsoever to the photos on their devices and may not use them for personal or commercial purposes on their own. When the photos are sent to us, the user's device automatically blurs the faces of all data subjects accidentally caught in the photos. Once we receive the photos, we perform a second stage of anonymization, checking for missing faces of people, which we blur immediately, along with inappropriate content and/or other identifying marks. Only if we judge that we need it and depending on the country in which you are located, we may save the vehicle registration plates of the captured cars to use them as described in item 1).

Notwithstanding the above clarifications, we have taken all necessary technical and organizational measures to protect the Data by processing it via encrypted channel and in a pseudonymized and/or anonymized form.

With respect to the implementation of our project and the benefits to the society we envisage with the large implementation of that it, it is our legitimate interest to process all personal information in compliance with all applicable data protection rules and regulations.

With respect to the processing of any personal information, we have conducted Data Protection Impact Assessments (the "DPIAs") which gives the assurance that the risk for the rights and interests of the data subjects is not high but moderate and acceptable. All residual risks have been taken into consideration and covered with proportional measures. Consolidated version of the two DPIAs are available for you [here](#).

13. Contact Us

e-mail: support@pathearn.ai

Coverage

Albania, Armenia, Australia, Austria, Bahrain, Belgium, Bosnia, Brazil, Bulgaria, Croatia, Cuba, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Iran, Italy, Latvia, Lithuania, Luxembourg, Malaysia, Moldova, Montenegro, Netherlands, Norway, Poland, Portugal, Romania, San Marino, Saudi Arabia, Scotland, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkiye, UAE, UK, Ukraine, USA