

Casa Privacy and Data Protection Policy

This Privacy and Data Protection Policy describes the policies and procedures of Casa Inc. (“Casa”, “we”, “our” or “us”) regarding our collection, use and disclosure of your information in connection with your access and use of <https://keys.casa> (the “Site”), our mobile application for iOS and Android (the “App”), and the other services, features, products, content or applications offered by Casa (together with the Site and the App, the “Services”). As used in this Privacy and Data Protection Policy, “Personal Data” means any information that can be used to individually identify a person. All defined terms not defined herein shall have the meaning ascribed to them in the Casa Terms of Service, of which this Privacy and Data Protection Policy is a part.

We urge you to read this Privacy and Data Protection Policy in full, but wanted to mention a few things upfront:

- a. This Privacy and Data Protection Policy covers our treatment of Personal Data that we collect about you (a) from you directly, when you register for and use your Account on the Services; (b) from your web browser and/or device, as you interact with the Services generally; and (c) from third party websites and services, including our business partners and service providers.
- b. In this Privacy and Data Protection Policy, we describe the various purposes for which we use your Personal Data, as well as the legal bases supporting those purposes. As you’ll read below, the legal basis on which we rely for a given use of your Personal Data may be contractual necessity (*i.e.*, where we need to use your Personal Data to complete a contract with you), consent (which you must freely give us, and which you can withdraw at any time), and/or certain legitimate business interests of ours or of others, but only where we have determined that those interests are not overridden by your own interests, rights, and freedoms.
- c. The Services are hosted and operated in the United States and elsewhere throughout the world through us and certain of our service providers. By using the Services, you acknowledge that any Personal Data you provide to us will be hosted on United States servers and servers in other countries.
- d. If you are using the Services in the European Economic Area, you may have certain rights regarding the Personal Data we collect from you, under the European Union General Data Protection Regulation (“GDPR”), as outlined

[below](#), and for purposes of the GDPR, Casa would be a controller of Personal Data collected from you through the Services. If you have any questions about this Privacy and Data Protection Policy or whether any of the following applies to you, please contact us directly at help@team.casa, or at PO Box 20575 Charleston, SC 29413 United States, or at (908) 793-8654 if you have any questions or concerns about our collection and use of your Personal Data.

- e. As noted in our [Terms of Service](#), we do not knowingly collect or solicit Personal Data from anyone under the age of 18. If you are under the age of 18, you are not allowed to use the Services, so please do not access or use the Site or the App, or attempt to send us any Personal Data. If we confirm that we have collected Personal Data from an individual under the age of 16, we will delete that information as quickly as possible.
- f. This Privacy and Data Protection Policy does not apply to the practices of third parties that we do not own or control, including, but not limited to, any third party websites, services, products or applications (each a “Third Party Service”) that you elect to access and may interact with during your use of the Services, or to individuals that we do not manage or employ. We take steps to ensure that we only work with Third Party Services that share our respect for your privacy, although we cannot take responsibility for the content, products, services or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.
- g. Casa takes the protection of your personal data very seriously. To find out more, go to [“How Do We Protect Your Personal Data?”](#)

What Does This Privacy and Data Protection Policy Cover?

This Privacy and Data Protection Policy covers Casa’s processing of Personal Data that Casa gathers when you are accessing and using the Services. As used in this Privacy and Data Protection Policy, “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure.

This Privacy and Data Protection Policy also covers Casa’s treatment of any Personal Data that Casa’s business partners and service providers share with Casa, or that Casa shares with its business partners and service providers.

This Privacy and Data Protection Policy does not apply to the practices of third parties, and their sites, services or applications that Casa does not own or control, or to individuals that Casa does not employ or manage (“Third Parties”). While we attempt to provide access only to those Third Parties that share our respect for your privacy, we cannot take responsibility for the content, actions or data protection policies or practices of those Third Parties. We encourage you to carefully review the data protection policies and practices of any Third Parties you access, and to carefully consider what kind of Personal Data you choose to post or otherwise make available through the Services.

What Personal Data does Casa Collect From You?

We collect Personal Data about you when you provide such information directly to us, when third parties such as our business partners or service providers provide us with Personal Data about you, or when Personal Data about you is automatically collected in connection with your use of our Services.

By providing Personal Data of others to Casa, you represent that you have authority to do so. We disclaim responsibility for the information of others that you provide to us in the course of your use of the Services.

Information we collect directly from you:

We receive Personal Data directly from you when you provide us with such Personal Data, including without limitation the following:

- a. Account information, including your: first name, and email address.
- b. Any Personal Data that you make available on or through the Services.
- c. Any Personal Data you provide when you communicate with us or our customer service representatives (so please only provide what is necessary).
- d. Any Personal Data you provide us when purchasing Products, including your: first name, last name, email address, and shipping address.

If applicable, in order to collect payments on your behalf, and provide payments to you, we, using Stripe as a third-party payment processor, collect payment information from

you, your attendees and customers, your vendors, and other parties to whom we provide payments on your behalf and from whom we collect payments on your behalf. You should review the terms of service and privacy policies of Stripe, available at <https://stripe.com/us/privacy>.

Information we automatically collect when you use our Services:

Some Personal Data is automatically collected when you use our Services, such as the following:

- a. IP address,
- b. Web browser information,
- c. Operating system information,
- d. Pages you visit and links you click on for the Services only (not for marketing purposes), and
- e. Certain Cookies (see below for more information) (collectively, "Usage Data").

Information we do NOT collect when you use our Services:

- a. Date of birth, social security number, driver's ID number or any other government-issued identification, or proof of address, except when provided to cryptocurrency exchange service partners to facilitate bitcoin purchases,
- b. Phone number, except when you provide it to us in certain cases to facilitate parcel delivery or bitcoin purchases,
- c. Browsing history outside of the Services, including the pages you visit when you exit the Services,
- d. Publicly available information about your social media profiles, interests or preferences, or page view information,
- e. Event tracking or screen recording in our iOS or Android apps for session replay analytics, and

- f. Cookies for targeting and marketing purposes.

Please note that when you access or use the Services, we use information from your web browser, including your IP address, and your device's settings and unique identifiers in order to reliably and accurately provide you with Services and information that apply to you.

Additional Information about Cookies:

The Services use "Cookies" as defined herein to enable our servers to recognize your web browser and tell us how and when you visit and use our Site and Services in order to operate our Services. Cookies are small files – usually consisting of letters and numbers – placed on your computer, tablet, phone, or similar device when you use that device to visit our Site.

We **do not** use Cookies to target you with advertising or promotions for our products and services.

- a. We **will not** supplement the information we collect from you with information received from third parties.
- b. We **do not** use similar technologies such as pixel tags, web beacons, clear GIFs, and JavaScript to track nor identify you.

Cookies can either be "session Cookies" or "persistent Cookies". Session Cookies are temporary Cookies that are stored on your device while you are visiting our Site or using our Services, whereas "persistent Cookies" are stored on your device for a period of time after you leave our Site or Services. The length of time a persistent Cookie stays on your device varies from Cookie to Cookie. We use persistent Cookies to keep a more accurate account of how often you visit our Services, how often you return, how your use of the Services may vary over time. We do not use persistent Cookies to measure the effectiveness of advertising efforts nor to collect information about your online activity after you leave our Services. Your browser may offer you a "Do Not Track" or "DNT" option, which allows you to signal to operators of websites, and web applications, and services that you do not wish such operators to track certain of your online activities over time and across different websites. Because we collect browsing and persistent identifier data, the Services do not support Do Not Track requests at this time, which

means that we may collect information about your online activity while you are using the Services. We will not collect information about your online activity after you leave our properties.

We do not control third party Cookies. Although some Cookies may have been placed by a third party on your device we do not collect or use such information.

We use the following types of Cookies:

- a. Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Site or Services, maintain your preferences over time and recognize you when you return to our Services. Disabling these Cookies may make certain features and services unavailable.

We do not use the following types of Cookies:

- a. Performance/Analytical Cookies.
- b. Retargeting/Advertising Cookies.

You can decide whether or not to accept Cookies. One way you can do this is through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your computer. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some Services and functionalities may not work. To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <https://ico.org.uk/for-the-public/online/cookies/> or <http://www.allaboutcookies.org/>.

How Do We Use Your Personal Data?

We process Personal Data to operate, maintain and understand our Services. For example, we use Personal Data to:

- a. Verify and establish your Account
- b. Process and fulfill your purchases of Products
- c. Protect against or deter fraudulent, illegal or harmful actions
- d. Communicate with you about the Services, including sending you updates, offers, emails, newsletters and other information that we believe may be of interest to you.
- e. Provide support and assistance for the Services
- f. Identify trends and other statistical information that may be useful to our business
- g. Comply with our legal or contractual obligations
- h. Respond to user inquiries
- i. Fulfill user requests
- j. Resolve disputes
- k. Enforce our [Terms of Service](#) (including, for clarity, this Privacy and Data Protection Policy)

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- a. **Contractual Necessity:** We process the following categories of Personal Data as a matter of “contractual necessity,” meaning that we need to process the data to perform under our [Terms of Service](#) with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.

- Account Information that you provide us.
- Information that you provide us when purchasing Products through the Services.
- Information that you provide us when making a request or inquiry with our customer service representatives.

b. **Legitimate Interest:** We process the following categories of Personal Data when we believe it furthers the legitimate interest of our business.

- Account Information that you provide us.
- Usage Data we collect in connection with your use of the Services.

Examples of these legitimate interests include:

- Protection from fraud or security threats
- Operation, maintenance and improvement of our business, products and services
- Provision of customer support
- Compliance with legal obligations
- Completion of corporate transactions.

c. **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

d. **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

How and With Whom Do We Share Your Data?

We share limited Personal Data with vendors, third party service providers, and agents who work on our behalf and provide us with services related to the purposes described

in this Privacy and Data Protection Policy or our [Terms of Service](#). We limit this based on the minimum information required for such vendors, third party service providers, and agents to perform the required services. These parties include:

- a. Hosting service providers;
- b. Email providers;
- c. Payment processors;
- d. Cloud communication service providers;
- e. Shipping providers;
- f. Contractors; and
- g. Cryptocurrency exchange service providers

We also share Personal Data when we believe it is necessary to:

- a. Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies.
- b. Protect us, our business or our users, for example to enforce our [Terms of Service](#), prevent spam or other unwanted communications and investigate or protect against fraud.

As part of the Services, you will receive from Casa email and other communications. You acknowledge and agree that by availing yourself of the Services, you allow Casa to send you email and other communication that it determines in its sole discretion relate to your use of the Services.

Last, we also share information with third parties when you give us your express consent to do so.

Furthermore, Casa will NOT buy or sell Personal Data to or from a third party under any circumstances, except solely in the event that we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, in which case Personal Data

would be one of the assets that is transferred to or acquired by the third party that is acquiring our assets. HOWEVER, you should know that:

- a. Casa would only choose to sell its business or assets to, or to be acquired by, an entity that we believe will take a customer-first approach to Personal Data, like Casa does; and
- b. Any entity acquiring our business or assets would have an obligation to use the Personal Data that comes with it strictly in accordance with this Privacy and Data Protection Policy, as we've outlined above in ["How Do We Use Your Personal Data?"](#).

You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data only as set forth in this policy.

How Long Do We Retain Your Personal Data?

We retain Personal Data about you for as long as you have an open Account with us or as otherwise necessary to provide you Services, or until you contact us to request deletion (see below). In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

How Do We Protect Your Personal Data?

We seek to protect Personal Data using appropriate technical and organizational measures based on the type of Personal Data and applicable processing activity. As a security-first company we go to extreme measures to protect the security and privacy of our customers and our employees.

- a. We keep Personal Data tracking at a minimum, and only store that which we need to in order to deliver the Services.

- We employ 'least privilege principles' when it comes to giving employees access to Personal Data – employees should only be able to access data if it is

necessary for them to carry out the duties of their role. We also minimize the use of Third Party Services to only those required to deliver the Services.

- For example, we do not use Google Analytics, third party Cookies, or any similar technologies such as pixel tags, web beacons, clear GIFs, and JavaScript although it negatively impacts our ability to track customer activity and trends.

b. Other examples of the steps we've taken to protect customer data and keep it from third parties include:

- We use self-hosted, end-to-end encrypted chat software to keep internal conversations completely protected our internal chat system on Company servers in order to minimize security threats.

To prevent unauthorized access to your Account and Personal Data you should select and protect (and periodically update) your password appropriately and use a password manager to randomly generate your password. You should also limit access to your device and browser by signing off after you have finished accessing your Account.

We understand the importance of the security of the information we collect, but we cannot promise that our security measures will eliminate all security risks or avoid all security breaches. However, Casa cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

Do We Store the Personal Data of Children?

As noted in the Terms of Service, we do not knowingly collect or solicit Personal Data from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any Personal Data about yourself to us. If we learn that we have collected Personal Data from a child under age 16, we will delete that information as quickly as possible. If you believe that a child under 16 may have provided us Personal Data, please contact us at help@team.casa.

What Do Users Need to Know?

Rights Regarding Your Personal Data:

By law, users in the European Union, United Kingdom, Lichtenstein, Norway, or Iceland have certain rights with respect to their Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at help@team.casa. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need to you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

If you are a user of the Services, you have the following rights:

- a. **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by logging into your online account.
- b. **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data by emailing help@team.casa.
- c. **Erasure:** You can request that we erase your Account from our systems. To request us to delete your Account, please send an email to help@team.casa from the email address we have on file for your Account. We reserve the right to permanently erase your Account information from our systems immediately or promptly after we receive the request, subject only to legal requirements or appropriate exceptions under applicable law. (We also reserve the right to delete Accounts on our own initiative.) Please note that Account deletion may not ensure complete or comprehensive removal of the content or information you have posted on or submitted to the Services, and will not remove content or information that has been stored, shared or re-posted by other users and other third parties.
- d. **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for

the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services. You may withdraw your consent by sending an email to help@team.casa.

- e. **Portability:** You can ask for a copy of certain of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- f. **Objection:** You can contact us at help@team.casa to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- g. **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data by contacting us at help@team.casa.
- h. **Right to File Complaint:** You have the right to lodge a complaint about our practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

Transfers of Personal Data

The Services are hosted and operated in the United States (“U.S.”) and elsewhere throughout the world through Casa and its service providers, where the laws may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Casa and will be hosted on U.S. servers and elsewhere throughout the world, and you authorize Casa to transfer, store and process your information to and in the U.S. and elsewhere throughout the world as necessary to perform our duties in providing you with the Services. Additionally, you understand that your Personal Data may be processed in countries (including the United States) where laws regarding processing Personal Information may be less stringent than in your country. Please contact us at help@team.casa with any questions or concerns.

What If You Have Questions Regarding Your Personal Data?

If you have any questions about this Privacy and Data Protection Policy or our data practices generally, please contact us using the following information:

Casa, Inc.

help@team.casa

(857) 598-4354

PO Box 20575 Charleston, SC 29413 United States

Changes to this Privacy and Data Protection Policy

Casa may amend this Privacy and Data Protection Policy from time to time. Use of information we collect now is subject to the Privacy and Data Protection Policy in effect at the time such information is used. If we make changes in the way we use Personal Data, we will notify you by posting an announcement on our Site or Services or sending you an email. Users are bound by any changes to the Privacy and Data Protection Policy when he or she uses the Services after such changes have been first posted.

Effective Date of Privacy and Data Protection Policy:

Oct. 28, 2020