

Website Privacy Policy

Last updated: September 09, 2024

1. General

- 1.1. We at Qii Limited (the “**Company**”, “**Qii**”, “**Business**”, “**We**”, “**Us**” or “**Our**”), are committed to securing your (“**You**”, “**Your**” or “**User**”) Personal Data (as defined below) and Your privacy. As part of this commitment, it is important for Us to be transparent about how We handle the information that We (or others on Our behalf) collect about Our users, when We collect information about them, and how We use such information.
- 1.2. This privacy policy (the “**Policy**”) provides information regarding the use of information that We collect about the users of Our website <https://qii78.com/> (the “**Website**”), and various services offered through a mobile app digital platform and the services offered by the Company (the “**Platform**” and collectively, the “**Services**”).
- 1.3. This Policy is part of and should be read in conjunction with Our Terms of Service qii78.com/terms-conditions.
- 1.4. In this Policy, any reference to “**Personal Data**” is to any information relating to an identified or identifiable living natural person; an identifiable natural person is one who can be identified, directly or in combination with additional information that We have or that We have access to.

2. When do We collect Personal Data about You?

- 2.1. We may collect Personal Data about You in the following circumstances:
 - 2.1.1. When You access or use the Website;
 - 2.1.2. When Users use the Platform;
 - 2.1.3. When You are using the Platform as an employee or a representative of a key place provider or a key provider that is interested in using Our Services, or When You register Your company or school as a Provider to Our Services;
 - 2.1.4. When You interact with Us in any manner, including by sending Us messages through third party messaging applications or in any other manner; and
 - 2.1.5. When You submit Personal Data for a job applications.

3. No Obligation To Provide Personal Data To The Company And Its Implications

You are not obligated to provide Us with any Personal Data about You. However, in some instances, not providing such Personal Data will prevent Us from providing You with the Services You requested Us to provide You, and will prevent Your use of the Services or a part thereof.

4. What types of Personal Data do We collect?

We (or others on Our behalf) may collect the following types of Personal Data about You:

When You are a User

- 4.1. Key User information and personal data. Upon creation of an account with Us, You provide Us with certain information, that can be used to identify You including Your Gender, Age, full name, home/work address, marital status as well as any other information as the Company may deem necessary to collect at the point of registration. While some of the details mentioned above are required fields in the pages of registration, others are not required, but We recommend that You complete them so that We can provide You with the best services We can.
- 4.2. Registration as a Key Provider Representative. (key place provider – schools) Upon creation of an account for a Key provider with Us as an authorized employee, You provide Us with certain information, including Your name, email address, Your Key provider name and address, Your position in the Key provider, as well as any other information as the Company may deem necessary to collect at the point of registration. While some of the details mentioned above are required fields in pages of registration, others are not required, but We recommend that You complete them so that We can provide You with the best Website.
- 4.3. Registration as a Key place provider. Upon creation of an account with Us for a Key place provider, You provide Us with certain information, including Your name, email address, Your Key place provider name and address, Your position in the Key place provider, as well as any other information as the Company may deem necessary to collect at the point of registration. While some of the details mentioned above are required fields in pages of registration, others are not required, but We recommend that You complete them so that We can provide You with the best Website.
- 4.4. Platform activity information. Whenever You use the Platform, We monitor Your use of the Platform and record Your activity. The information that We gather about You in this context includes any activity that You perform through the Platform, including Your current Platform wallet credit, Your recycling history, GPS location, and any text, images, or videos that You upload or provide to us in the context of the Platform.
- 4.5. Website usage information. This information includes online activity log, traffic information (including, without limitation, IP address, time of access, date of access, web and mobile page(s) visited, language used, crash reports and type of browser used, and information regarding the device You used. Some of this information may not identify You personally, and therefore does not constitute Personal Data.
- 4.6. Website activity information. Whenever You use the Website, We monitor Your use of the Website and record Your activity. The information that We gather about You in this context includes any activity that You perform in the Website, such as the digital assets You are involved or interested with, dates and times on which You will use the Website, the length of time You will be watching content on the Website, Your interaction with content in the Website, etc.
- 4.7. When You are using the Services on behalf of Your company, in certain circumstances, We are able to link the natural person using the Services to the organization on whose behalf such person created the account and therefore, the information You provide and that We collect about You as mentioned above, may constitute Personal Data about You.

- 4.8. Aggregate Information. We will also create statistical, aggregated and anonymized data relating to Our Users and the Service for analytical purposes, including business development and Services improvements. We will share this aggregate information with Our third party partners. Aggregated data is derived from personal information and user data but in its aggregated form it does not relate to or identify any particular client or individual or any specific user's data. This data is used to understand Our customer base and to develop, improve and market Our Services.
- 4.9. Communication information. When You contact Us, through any channel whatsoever, including the "Contact us" section, when You subscribe to Our Newsletter on the Website or social media networks, You may provide Us with Your full name, business name and e-mail address, job description, telephone number and the content of Your communication with Us.

5. The Purposes Of The Processing Of Personal Data

The Company processes Your Personal Data for one or more of the purposes outlined in this section and according to the appropriate legal basis.

The Company will not process Personal Data about You unless there is a legal basis for such processing.

The legal bases according to which the Company may process Personal Data about You are as follows:

- 5.1. **Processing is necessary for the purposes of provision of the Services or any other legitimate interests pursued by the Company or by a third party.** By way of example, for the purpose of improving Our Services We will use the data collected during Your use of the Services to improve Our Website App or Platform, or for the exercise or defence of legal claims.
- 5.2. **Your consent that the Company will process Personal Data about You for one or more specific purposes as detailed in this Policy, including,** for providing the Services.

6. How do We use Personal Data?

6.1. We may use Personal Data about You for the following purposes:

- 6.1.1. to operate the Website, App or Platform and provide the Services;
- 6.1.2. to contact You for the purpose of operational requirements.
- 6.1.3. to personalize content and/or offers to You;
- 6.1.4. to respond to Your queries, requests and/or complaints;
- 6.1.5. to send You materials regarding the Services, events and other information We think will be of interest to You, subject to Your consent;
- 6.1.6. to analyze and improve the Services, as well as to develop and offer new ones;
- 6.1.7. to analyze and track usage to determine the usefulness or popularity of certain content and to better understand the online activity of the Website users;

- 6.1.8. monitor and analyze trends, usage and activities in connection with the Platform and the Services;
- 6.1.9. to perform and maintain various activities supporting the offering and provision of the Platform, including, but not limited to, the Platform (such activities include back-office functions, business development activities, strategic decision making, financing management, third party services integration etc.);
- 6.1.10. to protect Our and third parties' interests, rights and assets, including detecting, investigating and preventing fraudulent transactions or unauthorized or illegal activities and initiation or exercise or defense of legal claims and preventing; and
- 6.1.11. to fulfil Our legal or regulatory requirements.

7. Sharing Of Personal Data To Third Parties

- 7.1. We will not disclose Personal Data about You to third parties except as detailed in this Policy.
- 7.2. We may transfer Personal Data under the following circumstances:
 - 7.2.1. to entities that control Us, entities that are under Our control and/or to entities under common control or ownership with Us, as shall be from time to time (collectively, the “**Group**”). Such entities may use the Personal Data to support the needs of the Group;
 - 7.2.2. upon Your consent or instruction;
 - 7.2.3. in the event that We sell, assign or transfer some or all of Our business or assets to a successor or acquirer, or if We are acquired by or merge with a third party, or if We apply for winding-up or become insolvent, or any other situation where Personal Data may be sold, assigned or transferred to a successor or acquirer;
 - 7.2.4. in the event that We will be subject to an audit or a due diligence process;
 - 7.2.5. to protect Our rights, property and interest or those of third parties; and
 - 7.2.6. to fulfil Our legal or regulatory requirements or to comply with a national authority request or a court order.
- 7.3. The Company may also share Personal Data about You with third parties that provide Us with the following services:
 - 7.3.1. Storage and hosting providers, including cloud computing services and data security services;
 - 7.3.2. IP address information;
 - 7.3.3. analysis of user experience;
 - 7.3.4. customer support;
 - 7.3.5. marketing;
 - 7.3.6. CRM data management;
 - 7.3.7. third party services and integrations;

7.3.8. accounting and legal services; and

7.3.9. research, analytical, technical, and diagnostic services.

7.4. We will note that we may share aggregate information with Our third party partners, which, in its aggregated form, does not relate to or identify any particular User.

8. **Retention**

We will retain Personal Data about You only for as long as necessary for the fulfilment of the purposes for which such Personal Data is collected. We may retain Personal Data about You for longer periods if We find it necessary to comply with legal requirements applicable to Us.

9. **Cookies and Trackers**

9.1. We may use certain third party services, such as analytics companies or companies delivering advertisements, which may also use cookies or other technologies, and those practices and providers are subject to their own policies.

9.2. Cookies (which are a small text file) are installed on the device via which You visit or access the Platform. The cookies allow Us to collect information about You and Your behaviour in order to improve Your user experience, to remember Your preferences and settings, and to customize and offer You products and services that may interest You. Cookies are also used to collect statistics and perform analytics.

9.3. Some of the cookies We use are session cookies, which are downloaded temporarily to Your device and last until You close Your web browser, while others are persistent cookies, which last on Your device after You cease browsing the Service and are used to help the Service remember You as a returning visitor when You return to the Service.

Types of cookies:

The cookies We may use have been classified according to their functionality, as follows:

Type of Cookie	Purpose	Additional Information
Strictly Necessary Cookies	These cookies are strictly necessary to enable You to navigate the Platform and use features You have requested. They are used to provide You with Our content, products, and Website that You have requested.	These cookies collect Personal Data about You, such as username and last login date, and identify You as being logged in to the Platform. These cookies are deleted when You close Your web browser (session cookies).

	Such cookies are essential to help Your device download or stream information so that You can navigate around the Platform, use its features, and return to pages You have previously visited.	
Functionality Cookies	These cookies are used to recognize You when You return to the Platform and allow Us to remember Your choices and preferences and measure how You use Our website.	These cookies survive the closing of Your web browser, and last until their applicable expiry time.
Performance Cookies	These cookies are used to provide aggregated statistics in respect of the performance of the Platform and to test and improve such performance in order to provide better user experience. In addition, they allow Us to carry out analytical functions on the Platform.	These cookies collect anonymized data that is not related to an identified or identifiable natural person. These cookies are valid for varying periods; some are deleted once You close Your browser, while others have an indefinite validity period.
Third Party Marketing/Targeting Cookies	These cookies are used to deliver ads and marketing communications, and to display the Platform in a manner that is more relevant to You. They are also used to measure the effectiveness of an advertising campaign. These cookies record Your visit to the Platform and the pages You have visited.	Some of these cookies are provided and used by third parties. These cookies are valid for varying periods; some are deleted once You close Your browser, while others have an indefinite validity period.

The Cookies incorporated in Our Platform are as follows:

Third Party	Name	Retention	Type	Function
Yes	Google analytics _ga	2 years	Performance	Distinguish users

Yes	Google Analytics _gid	24 hours	Performance	Distinguish users
Yes	Google IDE	1 years	Targeted Marketing	Ad targeting
Yes	Facebook (Meta) fr	90 days	Targeted Marketing	Tracks user activity across websites
Yes	Cloudflare	30 days	Necessary	Identifies individual clients
Yes	HubSpot __hstc	13 months	Targeted Marketing	Tracking visitors
Yes	HubSpot hubspotutk	13 months	Performance	Keeps track of a visitor's identity
Yes	HubSpot hssc	30 minutes	Performance	Tracks session data
Yes	HubSpot hssrc	Session	Performance	Tracks browser
Yes	HubSpot __huid	Persistent	Performance	Tracks user behavior
Yes	HubSpot hs_high_contrast	Persistent	Performance	Improves accessibility for visually impaired users
Yes	HubSpot hs_opt_out	6 months	Necessary	Stores user cookie preferences
Yes	HubSpot hs_c2l	Persistent	Functionality	Provides chat functionality on the website
Yes	HubSpot hubspotutktzo	Persistent	Functionality	Used for timezone-specific tracking

Yes	AWS AWSELB	Session	Performance	Distributes traffic across multiple servers
Yes	AWS AWSALB	7 days	Performance	Distributes traffic across multiple servers
Yes	Vercel vercel_uid	Session	Performance	Tracks user sessions for performance
Yes	Vercel (Cloudflare) _cfuid	Session	Necessary	Ensures stability and performance
Yes	Vercel (Cloudflare) cf_bm	30 minutes	Necessary	identify and manage bot traffic
Yes	Vercel (Cloudflare) __cfduid	30 days	Necessary	manage client security

Blocking and removal of cookies

You can change Your browser settings to block and delete some or all cookies. Please see below links to instructions on how to do this in respect of some of the most popular web browsers:

- **Firefox**
- **Edge**
- **Internet Explorer**
- **Google Chrome**
- **Safari**

Please note, however, that if You do so, some or all of the Service’s features and functionalities might not perform as intended.

ONLINE TRACKING NOTICE

AT THIS TIME, THIS SERVICE DOES NOT SUPPORT DO-NOT-TRACK SIGNALS.

10. Security

We have implemented suitable security policies, rules and technical measures to protect and safeguard the Personal Data under Our control from unauthorized access, improper use or disclosure, unauthorized modification, or unlawful destruction. We have contractual arrangements with third party service providers that we use for the storage, transfer and processing of Personal Data, which protect the security and confidentiality of Personal Data.

11. Links to Other Websites

- 11.1. The Website may contain links to websites and/or applications of third parties. Other websites and applications may also reference or link to Our Website. We do not control such websites and applications, nor the collection and/or processing of Personal Data about You by such websites and applications, and thus We are not responsible for the privacy practices. This Policy does not apply to any actions taken via such websites and/or applications.
- 11.2. Whenever You access such third parties' websites and/or applications, We recommend that You carefully review their privacy policies prior to using such websites and/or applications and prior to disclosing any Personal Data about You.

12. Your Rights in Respect of the Personal Data

- 12.1. Generally, You have the right to request that We provide You with confirmation as to whether Personal Data about You is being collected by Us, to ask to review such data, to rectify the content if applicable and to erase the Personal Data no longer required by Us. You may also restrict Your consent to certain processing of Your Personal Data.
- 12.2. Where the legal basis for the processing of the Personal Data about You is consent, You may at any time withdraw Your consent for the purposes for which You provided Your consent by sending a notice free of charge to the following email address: legal@qii78.com.
- 12.3. Where You withdraw Your consent for the processing of Personal Data about You, We might not be able to provide You with some or all of the Services You requested or in the form intended to be provided to You, and You will have no claim in respect of that.
- 12.4. At any time, You may approach Us by sending a notice to the email address legal@qii78.com in order to receive information concerning the review performed by Us. This is so You can conclude that We may process the Personal Data about You on account of such processing being necessary for the purposes of the legitimate interests pursued by the Company or by a third party.
- 12.5. The Company may provide You with offers that are tailored for You specifically, in order to connect You to brands, products and services in ways that are important to You. This may include ads, offers and other sponsored content related to products and services of Our's or of third parties. This is done following the processing of Personal Data about You in order to adjust the materials presented to You, on the basis of Your preferences, behaviour, characteristics and interests.

12.6. Similar analysis and conclusions are used to the extent that You agreed to receive marketing materials from Us, as such materials are tailored to offer You products and services which We think may be of more interest to You.

12.7. In addition, You may withdraw Your consent from receiving marketing materials via email at any time, by sending an email free of charge with the title “unsubscribe” to the following email address: legal@qii78.com or by clicking the unsubscribe option in any marketing material sent to You. You can withdraw Your consent from receiving marketing materials via push notifications in Your mobile device’s settings page.

12.8. Please note that if You opt out of receiving marketing communications from Us, We may still communicate with You from time to time if We need to provide You with non-marketing information about Our services or for other legitimate non-marketing reasons.

If You reside in the U.S.A, please read below with respect to the California Consumer Privacy Act (CCPA), California Privacy Rights Act (CPRA), the Virginia Consumer Data Protection Act (VCDPA), and the Colorado Privacy Act (CPA)) rights You might have:

	Right	Scope
1	Right to know	<p>You have the right to receive the following information:</p> <ul style="list-style-type: none"> • The specific pieces of Personal Data We have collected about You; • What types of Personal Data collected; • categories of personal data collected; • What are the types of sources of the Personal Data collected; • the purpose of collecting the Personal Data; and • Types of third parties with whom We share Personal Data, if any.
2	Right of Erasure	<p>You may ask Us to delete Your Personal Data and direct Our service providers to do so.</p> <p>Please note that We may not delete Your Personal Data if it is necessary to complete Our legal obligation to You to provide the Website or Services otherwise protect Our legal rights, comply with an existing legal obligation, or use Your Personal Data, internally, in a lawful manner that is compatible with the context in which You provided the information.</p>
3	Right to non selling or sharing	You may ask Us to not sell or share Your Personal Data.

4	Right to Non-Discrimination for the exercise of Your privacy rights	You have the right to not be discriminated by Us because You exercised any of Your rights under the CCPA.
5	Right to designate an authorized agent to submit CCPA requests on Your behalf	You may designate an authorized agent to make a request under the CCPA on Your behalf. To do so, You need to provide the authorized agent written permission to do so and the agent will need to submit to Us proof that such agent has been authorized by You. We will also require that You verify Your own identity, as explained below.

In order to exercise Your rights, please contact us using the following details: legal@qii78.com.

If You are an EEA resident, please read this section below:

- 12.9. You are entitled to the following rights in respect of the Personal Data about You. To exercise such rights, You may send a request to exercise Your rights to the following email address: legal@qii78.com.
- 12.10. We will grant Your right to receive information how Personal Data about You is processed by Us; to rectify any inaccuracy in Your Personal Data; to erase Your Personal Data processed and stored by Us; to restrict the processing thereof or object thereto if applicable under the circumstances; the right to receive the Personal Data about You, which You have provided to the Company, in a structured machine readable manner and the right to withdraw Your consent when such is the legal basis of Our processing.
- 12.11. We may reject Your requests where the request harms the rights and freedoms of others or comply with legal requirements applicable to Us. We may also charge a reasonable fee where applicable.
- 12.12. You will also have the right to lodge a complaint with a supervisory authority established by a Member State to protect the fundamental rights and freedoms of natural persons in relation to the processing of Personal Data within the European Union.
- 12.13. Please note that We may need to receive Personal Data from You in order to verify Your identity prior to allowing You to exercise Your rights.

13. Transfer of Personal Data

- 13.1. Personal Data about You may be transferred to a third country (i.e. jurisdictions other than the one You reside in) or to international organizations. In such circumstances, the Company shall take appropriate safeguards to ensure the protection of Personal Data about You and to provide that enforceable data subject rights and effective legal remedies for data subjects are available.
- 13.2. If You are an EEA resident, please note that these safeguards and protection will be available if any of the following are met:
- 13.2.1. The transfer is to a third country or an international organization that the EU Commission has decided provides an adequate level of protection to the

Personal Data that is transferred to it pursuant to Article 45(3) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (“GDPR”);

13.2.2. The transfer is according to a legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR; or

13.2.3. The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR.

You may request that the Company provide You with details concerning the safeguards employed by it to protect the Personal Data about You that are transferred to a third country or an international organization, by sending an email to the following address: legal@qii78.com.

14. Changes to the Policy

14.1. We may amend the terms of this Policy, from time to time. Whenever We amend this Policy, We will notify You of such amendments by publishing the updated Policy on the Platform. In addition, when We make significant amendments to this Policy, We will strive to inform You about such amendments via means of communication We believe are reasonably appropriate to inform You of such amendments and by publishing a notice about such amendments on the Platform. Unless stated otherwise, all amendments will enter into force upon publication of the updated Policy on Our website or the designated page on the Website.

15. Contact Us

15.1. For any queries relating to this Policy and data protection, please contact Us at legal@qii78.com.