

(Last Updated: July 8, 2025)

Welcome to BrandMart!

We are dedicated to safeguarding your security and privacy while offering a seamless and trustworthy Marketplace for white-label products. This document outlines our security and privacy practices to protect your information and provide a secure online experience. By accessing or using BrandMart, you agree to abide by these policies. Please read them carefully before proceeding.

## 1. INTRODUCTION

We at BrandMart and its related website (collectively “**BrandMart**”, the “**Marketplace**” or “**we**”) recognize the importance of privacy and confidentiality of personal information. BrandMart is a business to business (“**B2B**”) Marketplace which connects and facilitates sales and purchases of products and/or services between suppliers (“**Manufacturers**”) and retailers (“**Retailers**”). Collectively, the Manufacturers and Retailers shall be referred to as the “**Users**”. The Marketplace is for B2B transactions and therefore is only made available for use by businesses and not for individual or personal use.

The controllers of your personal information are the legal entities set out in section 13. “HOW TO CONTACT US”.

This BrandMart Privacy Policy (“**Privacy Policy**”) sets out how we collect, process and disclose information in connection with the operation of the Marketplace for visitors (i.e., non-registered Marketplace Users) and the Users based outside of China (“**you**”) including personal information about the visitors and, representatives and employees of the Users. This Privacy Policy also applies to your use of the Marketplace via a mobile device, either through mobile applications or mobile-optimized websites.

If you are from the European Union or the United Kingdom, specific disclosures can be found in this Section “7. USERS FROM EUROPEAN UNION AND THE UNITED KINGDOM”. If you are from the United States, specific disclosures can be found in Section “8. USERS FROM THE UNITED STATES”. If you are from California, specific disclosures, including “Notice at Collection” details, can be found in the addendum at the end of this document titled “Additional Information for California Residents”.

If you have any questions or concerns about the use of your personal information, then please contact us using the contact details provided at Section “13. HOW TO CONTACT US” of this Privacy Policy. All capitalized terms not defined in this Privacy Policy shall have the meanings ascribed to them in the BrandMart Terms and Conditions, which can be found here: <https://BrandMart.com/terms-and-conditions>

## 2. DETAILS OF DATA PROCESSING

Purpose	Data categories
<b>Account administration.</b> We use your information to verify your eligibility to register as a User in accordance with our Terms; and set up/administer user accounts, such as providing log-in IDs and developing a User profile	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Business information</li> </ul>
<b>Purchase and delivery of products and services.</b> We use your information to assist in intermediation of transactions, the delivery of products and services on the Marketplace, process payment, and provide Users with customer service support, such as responding to queries, feedback, and managing claims and/or disputes. We do not facilitate customs clearance declarations/applications via the Marketplace.	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Business information</li> <li>• Transaction information</li> <li>• Payment information</li> <li>• Communication information</li> <li>• User-generated content</li> <li>• Location information</li> </ul>
<b>Communicate with you.</b> We use your personal information to facilitate communication between Users and us, and between the Retailers and Manufacturers via the Marketplace, for the purpose of processing transactions and settlement between the Retailers and Manufacturers made over the Marketplace, assessing fund withdrawal requests from Manufacturers and improving the services and products of the Marketplace	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Transaction information</li> <li>• Payment information</li> <li>• Device information</li> <li>• Location information</li> <li>• Communication information</li> <li>• Online activity information</li> </ul>
<b>Provide voice, image and camera services.</b> When you use services that require access to contents stored in and/or functions on your devices (including but not limited to photos, videos, microphone and/or camera), we will use your photos, videos and other personal information to respond to your requests, provide the requested services to you, and improve our Services	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• User-generated content</li> <li>• Communication information</li> <li>• Device information</li> </ul>
<b>Recommendations and personalization.</b> We use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with the Marketplace. If you are a Retailer, we may share details of the last viewed products on the Marketplace to enable Manufacturers, their respective affiliates and/or their third-party services provider to contact you with details of products and/or services that might interest you. You can opt not	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Business information</li> <li>• Transaction information</li> <li>• Online activity information</li> <li>• Marketing and advertising information</li> <li>• Location information</li> </ul>

to share this information with Manufacturers by giving us notice	
<p><b>Marketing and advertising.</b> We may use your personal information to send and serve you tailored marketing and advertising that we believe will be of interest to you based on the ways in which you use the Marketplace, your browsing records, and order history. Cookies or other similar technologies may be used to provide you with advertising based upon your browsing activities and interests. Please see section 5 “COOKIES” below for more information about how we use cookies</p>	<ul style="list-style-type: none"> <li>● Contact information</li> <li>● Business information</li> <li>● Transaction information</li> <li>● Online activity information</li> <li>● Marketing and advertising information</li> <li>● Location information</li> </ul>
<p><b>Research and development.</b> We use your personal information to perform research or statistical analysis in order to improve the content and layout of the Marketplace, and use your personal information to improve the product offerings and services on BrandMart, including, for example, using anonymized data for machine learning purposes</p>	<ul style="list-style-type: none"> <li>● Contact information</li> <li>● Account information</li> <li>● Business information</li> <li>● Device information</li> <li>● Location information</li> <li>● Online activity information</li> <li>● User-generated content</li> </ul>
<p><b>Fraud prevention and credit risks.</b> We use personal information to prevent and detect fraud and abuse in order to protect the security of the Marketplace, the Services, our customers and others. We may also use scoring methods to assess and manage credit risks</p>	<ul style="list-style-type: none"> <li>● Contact information</li> <li>● Account information</li> <li>● Business information</li> <li>● Transaction information</li> <li>● Payment information</li> <li>● Communication information</li> <li>● User-generated content</li> <li>● Device information</li> <li>● Location information</li> </ul>
<p><b>Comply with legal obligations.</b> In certain cases, we collect and use your personal information to comply with relevant laws. For instance, we may use your information to verify your identity and conduct security checks, KYC (know-your-customer) and anti-money laundering due diligence in order to set up user accounts</p>	<ul style="list-style-type: none"> <li>● Contact information</li> <li>● Account information</li> <li>● Business information</li> <li>● Communication information</li> <li>● Transaction information</li> <li>● Payment information</li> <li>● Online activity information</li> </ul>

Below you will find an overview of what kind of personal information we process about you and for which purposes we collect this personal information. The categories of personal information described in the table above are detailed below:

### **Information you provide to us**

If you are a representative or employee of any Retailer or Manufacturer or a sole trader Retailer or Manufacturer, subject to your use of the applicable functions and/or services on the Marketplace, we may ask you to provide:

- contact information, such as contact/legal representative name, address, phone number of the company/the contact, email address of the company and the contact/legal representative, job title and department, ID information.
- account information, such as your username and password, gender and your account settings.
- business information for user and business verification.
- Customer logos and colour preferences, collected to personalize white-label products based on your requests. Note that in order to facilitate your use of the Services available on the Marketplace (including on mobile-optimized websites and/or mobile applications), we may request for access to, and you may provide us with, content stored on your devices including but not limited to photos, videos, calendar and/or other files. If you are using the communication tools available on the Marketplace (particularly in case of voice communication), we may require access to your camera and/or microphone.
- transaction information, such as transaction statements, billing/delivery address of the recipient of your order, payments and orders placed, and other details of the products you have supplied or purchased through the Marketplace.
- payment information, such as bank account numbers, credit/debit card numbers, credit/debit card holders, expiration dates and security code and tracking information from cheques or money orders, bank statement and account opening page.

From time to time, we may also collect information about the existing and prospective Users, during or in connection with trade shows, industry events and/or other functions, including representative contact names, addresses, phone numbers, fax numbers and email addresses.

### **Information that we collect automatically**

If you are a Retailer or Manufacturer or prospective Retailer or Manufacturer, we will automatically collect:

- device information, such as the type of device you use, unique device identification numbers, IP addresses, browser type, browsing patterns, advertising identifiers and other types of identifiers.
- online activity information, such as page views and searches, information about content that has been viewed and/or downloaded, information about your activity on a page or

screen, access times and duration of access, and other details of how you have interacted with our Marketplace.

- location information, such as your general geographic location, and, with your permission, the approximate location data of your mobile device. Please note that for most mobile devices, you can manage or disable the use of precise location services for all applications in the settings menu of your mobile device.
- communication information, such as posts and/or contents uploaded on the Marketplace, any comments on content you have uploaded to the Marketplace or on other Users' content on the Marketplace.
- We may collect marketing and advertising information to tailor our communications and offers to better suit your preferences. This includes, but is not limited to, your interests based on your use of the Marketplace and your purchases, responses to surveys, promotions you participate in, preferences in receiving marketing content from us, communication preferences, preferences for particular products or services, and your subscription data.
- user-generated content, such as profile photos, videos or audio recordings that you upload to the Marketplace as part of product reviews or by sharing content in socializing within the Marketplace.
- other information, such as statistical information about the Marketplace and visitors to the Marketplace including, browser software, operating system, software and hardware attributes, number of sessions and unique visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under our Cookies Policy.

**Information that we receive from third parties:**

- communication information, such as feedback and other communications with us (including when you interact with our subcontracted customer support agents), disputes/complaints from Manufacturers/Retailers on the Marketplace, copy of your correspondence if you contact us such as via our customer services department chat service, telephone or email (including in the case wherein those functions involved integration of services provided by third-party service providers).
- third parties that are engaged by us to provide verification services, such as conducting applicable anti-money laundering, fraud and "Know Your Customer" checks on the Retailers and Manufacturers, conducting due diligence and verification on Users. This includes your name, email address, company details, and contact information.

- In the future, we may collect information about your interactions with products and services offered by our group companies and affiliates. This information will help us enhance your experience and provide tailored services based on your interests.
- If you choose to participate in reviewing or rating products and/or services on BrandMart, we may receive personal information about you from third parties that work with us to conduct reviews into our services and/or rate us.

### **3. DISCLOSURE OR SHARING OF PERSONAL INFORMATION**

We may disclose (or provide access to) personal information to the following categories of recipients:

- Other Marketplace Users where necessary in connection with the facilitation of purchases and communications made between you and the other Users.
- Our group companies and affiliates and/or their designated service providers that work with us to provide processing services such as software, tools, systems and messaging services for purposes described in this Privacy Policy.
- Third party business partners and service providers engaged by us or working with us to assist us to provide services to you or who otherwise process personal information for purposes described in this Privacy Policy or notified to you when we collect your personal information. Categories of these partners or service providers include:
  - our business partners that offer supplementary services to those provided by us, such as partners that resell our products and services, to the extent you consent to such sharing (where required by applicable law);
  - marketing and advertising platforms, such as Google, Twitter, Facebook and Instagram, and providers of analytics services relating to Users' behaviour, in order to tailor the content you see when visiting our Marketplace. These platforms may combine information they collect on our Marketplace with data on their platforms and data they collect from other websites or through other sources in order to conduct targeted advertising. Some of this information may be collected using cookies and similar tracking technology, as explained further under the section 5. "COOKIES" below. The processing activities of these third-party marketing platforms are governed by their own privacy policies, not this Privacy Policy;
  - due diligence and verification service providers, who collect and process personal information to perform due diligence and business verification services;
  - payment service providers who collect and process personal information to assist with settling the payments for transactions or process withdrawal requests for Manufacturers. The activities of payment service providers may be governed by their own privacy policies, not this Privacy Policy;
  - credit risk assessment providers to conduct risk assessment on Manufacturers to determine whether a Manufacturer can be permitted to make a fund withdrawal;

- logistics partners for providing delivery services for Retailers, including return and exchange of products, and warehousing services for Manufacturers;
  - We do not share information with custom agents for customs clearance purposes.
  - cloud computing service providers to provide cloud storage services;
  - instant messaging service providers for enabling communications between the Retailers and Manufacturers via the Marketplace;
- External professional advisers, law enforcement agencies, insurers, government and regulators and other organizations where it is necessary to comply with applicable laws or to exercise, establish or defend our legal rights or protect your vital interests or those of any other person, we may also disclose and transfer your personal information or as otherwise required or permitted by applicable laws.
  - Actual or potential business acquirers (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the acquirer that it must use your personal information only for the purposes disclosed in this Privacy Policy.

We may provide anonymized data to third parties, but when we do so, the information we share is in a de-identified format that does not personally identify you.

We have established relationships with third parties and websites to offer you products and services which we do not offer. We offer you access to these other parties and their websites either through the use of hyperlinks to these sites from our Marketplace or through offering co-branded sites in which both we and other parties share the same uniform resource locator (URL), domain name or pages within a domain name on the Internet. In some cases, you may be required to submit personal information to register or apply for products or services provided by such third parties or co-branded partners. This Privacy Policy does not apply to these third-party sites or co-branded sites. The privacy policies of those other parties may differ from ours, and we have no control over the information that you submit to those third parties. You should read the relevant privacy policy for those third-party sites and co-branded sites before responding to any offers, products or services advertised by those parties.

## 4. RETENTION

We retain your personal information as long as we have an ongoing legitimate business need to do so, for example, to provide services or products to you, or as required or permitted by applicable laws, such as tax and accounting laws.

When we have no ongoing legitimate business need to process your personal information, we will anonymize it.

## 5. COOKIES



To enable our systems to recognize your browser or device and to provide and improve our services, we or our authorized service providers may use cookies, beacons and/or other similar technologies (collectively, “**Cookies**”).

### **What are Cookies?**

A Cookie is a small amount of data that is sent to your browser and stored on your computer's or mobile device's hard drive. The purpose of the installation of Cookies depends on the type of Cookies installed in your browser. Some Cookies record your activity on the Marketplace while others are essential for the operation of the Marketplace. In addition, other Cookies may deliver personalized advertisements through the Marketplace or display interactive videos and graphics within the Marketplace.

Cookies set by the website or app owner are called "**First-Party Cookies**". Cookies set by parties other than the website owner are called "**Third-Party Cookies**". Third-Party Cookies enable third party's features or functionality to be provided on or through the website. The parties that set these Third-Party Cookies can recognize your device both when it visits the website in question and also when it visits certain other websites.

Cookies can also be categorized as session Cookies (which are erased once you close the browser or shut down the device) and persistent Cookies (which remain even after closing the browser or shutting down the device/application and which are activated each time you visit the website). The session Cookies use encrypted data to authenticate you. The persistent Cookies do not store account numbers or passwords. We use both session Cookies and persistent Cookies.

### **Why do we use Cookies?**

We use First-Party Cookies and Third-Party Cookies for several reasons. Some Cookies are required for technical and/or security reasons in order for our Marketplace to operate, and we refer to these as "essential" or "strictly necessary" Cookies. First-Party Cookies are mainly served to enable basic functionality on our Marketplace, including web analytics Cookies that help us understand how users use our web pages and how we can improve their use.

In addition, we also use social media Cookies. You may register for the Marketplace membership and "share" the Marketplace content through social media such as Facebook and Twitter. Sometimes you opt to embed videos from websites like YouTube on your account on the Marketplace. The aforementioned actions may entail the use of the relevant Third-Party Cookies. These websites have their own privacy policies which govern their use of information, which you can find on the respective websites.

We also use Cookies to enable us to track and target the interests of the Marketplace visitors to enhance the experience on our Marketplace by researching visiting patterns and conducting interest-based advertising; assisting our partners to track user visits to the Marketplace; and to track progress and participation in promotions. We use First-Party Cookies and Third-Party Cookies for these purposes.

### **Cookies we use**



The specific categories of First-Party Cookies and Third-Party Cookies served through our Marketplace and the purposes they perform are described in the table below (please note that the specific Cookies served may vary):

Types of Cookies	Who serves these Cookies	How to refuse
<p><b>Essential Cookies:</b> These Cookies are strictly necessary for enabling access and use of our Marketplace. They provide necessary functionality to ensure the proper performance, security and functionality of our Marketplace.</p>	<p><a href="https://BrandMart.com/">https://BrandMart.com/</a></p>	<p>These Cookies cannot be disabled as they are essential for the functionality and security of the Marketplace.</p>
<p><b>Statistical Cookies:</b> Statistical Cookies including analytics Cookies collect information in aggregate form to help us determine and understand how users interact with and use our Marketplace. We use this information to help us to improve and optimize our Marketplace and its security.</p>	<p>Statistical Cookies are primarily served through third-party services like Google Analytics, as well as built into the BrandMart website to analyze user interactions.</p>	<p>Users can usually restrict or manage these types of cookies through their browser settings or directly on the BrandMart website, allowing them to control their cookie preferences.</p>
<p><b>Personalization and Service Cookies:</b> These Cookies are used to remember your computer or mobile device when you visit a website. They remember your registration and login details and your settings and preferences such as language and region.</p> <p>Personalization Cookies are also used to recommend content we think you will be interested in by serving and measuring relevant advertising, based on what you have looked at before.</p> <p>Personalization Cookies may also include social media Cookies which are used to enable you to log into our Marketplace using your social media accounts and to share pages and content that you find interesting on our Marketplace through third party social networking and other websites. These Cookies may also be used for advertising purposes.</p>	<p>Personalization Cookies are built into the BrandMart website and may also be served through third-party platforms such as Google, Facebook, Twitter (X), or LinkedIn.</p>	<p>Users can usually restrict or manage these types of cookies either through their browser settings or directly on the BrandMart website, allowing them to control their cookie preferences</p>
<p><b>Marketing Cookies:</b> Marketing Cookies help us to provide you with more targeted and relevant</p>	<p>Marketing cookies can be implemented on the BrandMart</p>	<p>Users can usually restrict or manage</p>

marketing. We will also use marketing Cookies to evaluate the effectiveness of our marketing communications by monitoring open rate and conversions.	website as well as through third-party platforms to enhance targeted advertising efforts.	marketing cookies through their browser settings or via options available on the BrandMart website.
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## Web Beacons

Cookies are not the only way to recognize or track visitors to our Marketplace. We may use other, similar technologies from time to time, like web beacons (sometimes called "**tracking pixels**" or "**clear gifs**"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Marketplace or opened an e-mail that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our Marketplace to another, to deliver or communicate with Cookies, to understand whether you have come to our Marketplace from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of e-mail marketing campaigns. In many instances, these technologies are reliant on Cookies to function properly, and so declining Cookies will impair their functioning.

## How can I control Cookies?

You can determine if and how a Cookie will be accepted by configuring the privacy setting of the browser you are using to access the Marketplace or the "privacy setting" of your device. As the means by which you can refuse Cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information. If you adjust the privacy setting in the browser, your mobile device will continue collecting data unless you adjust the privacy setting of the device, and vice versa. If you choose to set your web browser controls to reject Cookies, you may still use our website though your access to some functionality and areas of our website may be restricted.

In addition, most advertising networks offer you a way to opt out of targeted advertising. Alternatively, you can follow the applicable links of the respective third-party personalization Cookie provided in the table above for details of how to opt out of use of particular advertising or personalization Cookies.

## **How to Manage Your Cookies**

You can manage your cookie preferences directly through your browser settings. Below are instructions for managing cookies in popular browsers:

- **Google Chrome:**
  - Open Chrome.
  - Click on the three dots in the upper right corner and select **Settings**.
  - Under **Privacy and security**, click on **Cookies and other site data**.
  - Here you can see your current cookie settings and make changes.
- **Mozilla Firefox:**

- Open Firefox.
  - Click on the three horizontal lines in the upper right corner and select **Options**.
  - Click on **Privacy & Security** on the left menu.
  - In the **Cookies and Site Data** section, you can manage your cookie settings.
- **Safari:**
  - Open Safari.
  - Click on **Safari** in the menu bar and select **Preferences**.
  - Go to the **Privacy** tab to adjust your cookie settings.
- **Microsoft Edge:**
  - Open Edge.
  - Click on the three dots in the upper right corner and select **Settings**.
  - Click on **Privacy, search, and services**.
  - Under **Clear browsing data**, click on **Choose what to clear** to manage cookies.

In addition, most advertising networks offer you a way to opt out of targeted advertising. You can follow the applicable links of the respective third-party personalization cookies provided in the table above for details on how to opt out of particular advertising or personalization cookies.

Certain features of the Marketplace depend on the use of Cookies. Please be aware that if you choose to block the Cookies, some features and services may not work.

### Use of Google Analytics

Our Marketplace uses Google Analytics, an internet analytics service provided by Google LLC (“Google”). Google’s Cookies allow us to analyze use of the Marketplace by telling us which pages our users are viewing, which ones are most popular, what time and day our Marketplace is visited, if users have previously visited our Marketplace, from which website users are redirected to our Marketplace, and similar data.

The data generated by the Cookies about your use of the Marketplace will be transmitted to Google and stored by Google on servers in the United States. Google uses the data on our behalf to evaluate your use of the Marketplace, to compile reports on website activity for the website operators, and for other website activity and internet usage services. Google may disclose this information to third parties under the terms of the law or for further processing by third parties on behalf of Google.

For more information about Google Analytics Cookies, visit the Google Help pages and Privacy Policy: Google Privacy Policy; and the Google Analytics Help Centre: Google Analytics Help Centre.

Through the add-on “Google Analytics Opt-out,” you can opt-out of the use of Google Analytics through your current web browser from then on: Google Analytics Opt-out.

More information can be found here: Google Analytics Support.

## 6. YOUR RIGHTS

As a User of the Marketplace, you may have the following data protection rights, which you can exercise pursuant to applicable laws at any time by contacting us using the contact details provided under section 13. “HOW TO CONTACT US” below:

- The right to access, correct, update or request deletion of your personal information.
- The right to object to processing of your personal information when it is based on our legitimate interests, and separately the right to object to direct marketing.
- The right to ask us, in some situations, to restrict processing of your personal information or request portability of your personal information.
- The right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing please contact us using the contact details provided under section 14. “HOW TO CONTACT US” below.
- If we have collected and processed your personal information with your consent, then you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- The right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. If you live in a jurisdiction that provides for a right to appeal a denial of your request to exercise such rights, you may submit your appeal using the contact details provided under section 14. “HOW TO CONTACT US” below.

If you are aware of changes or inaccuracies in your information, you should inform us of such changes so that our records may be updated or corrected.

## **7. USERS FROM THE EUROPEAN UNION OR THE UNITED KINGDOM**

If you are from the European Union or the United Kingdom, below you will find an overview of what kind of personal information we process about you, for which purposes, on which legal basis and where we collect this personal information.

If you need us to provide you with our services or fulfil a contract with you, or because we are required to do so by law, but do not provide us with your personal information, we may be unable to provide our services or fulfil our contractual obligations to you.

Purpose	Data categories	Legal basis (where applicable)
<p><b>Account administration.</b> We use your information to verify your eligibility to register as a Marketplace user in accordance with our Terms of Use; and set up/administer user accounts, such as providing log-in IDs and developing a Marketplace profile</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Business information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (b) GDPR - establishment, performance, or termination of the contract with you</li> <li>• Art. 6 (1) (f) GDPR - our legitimate interest in the security, stability, and usability of our Marketplace</li> </ul>
<p><b>Purchase and Delivery of products and services.</b> We use your information to take and handle orders, deliver products and services on the Marketplace, process payment, provide logistics and warehousing services via the Marketplace, facilitate customs clearance declarations/ applications via the Marketplace and provide Users with customer service support, such as responding to queries, feedback, and managing claims and/or disputes</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Business information</li> <li>• Transaction information</li> <li>• Payment information</li> <li>• Communication information</li> <li>• User-generated content</li> <li>• Device information</li> <li>• Online activity information</li> <li>• Location information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (b) GDPR - establishment, performance, or termination of the contract with you</li> </ul>
<p><b>Communicate with you.</b> We use your personal information to facilitate communication between Users and us, and between the Retailers and Manufacturers via the Marketplace, for the purpose of processing transactions and settlement between the Retailers and Manufacturers made over the Marketplace, assessing fund withdrawal requests from Manufacturers and improving the services and products of the Marketplace</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Transaction information</li> <li>• Payment information</li> <li>• Device information</li> <li>• Location information</li> <li>• Communication information</li> <li>• Online activity information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (b) GDPR - establishment, performance, or termination of the contract with you</li> </ul>

<p><b>Provide voice, image and camera services.</b> When you use services that require access to contents stored in and/or functions on your devices (including but not limited to photos, videos, microphone and/or camera), we will use your photos, videos and other personal information to respond to your requests, provide the requested services to you, and improve our services</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• User-generated content</li> <li>• Communication information</li> <li>• Device information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (b) GDPR - establishment, performance, or termination of the contract with you</li> <li>• Art. 6 (1) (f) GDPR - our legitimate interest in improving our services based on the information obtained</li> <li>• Art. 6 (1) (a) GDPR - your consent</li> </ul>
<p><b>Recommendations and personalization.</b> We use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with the Marketplace. We use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with the Marketplace. If you are a Retailer, we will share details of the last viewed products on the Marketplace to enable Manufacturers, their respective affiliates, and/or their third-party service providers to contact you with details of products and/or services that might interest you. Retailers should share this information with Manufacturers.</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Business information</li> <li>• Transaction information</li> <li>• Online activity information</li> <li>• Marketing and advertising information</li> <li>• Location information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (a) GDPR - your consent</li> <li>• Art. 6 (1) (f) GDPR - our legitimate interest in offering recommendations.</li> </ul>
<p><b>Marketing and Advertising</b></p> <p>We use your personal information to send and serve you tailored marketing and advertising that we believe will be of interest to you based on the ways in which you use the Marketplace, your browsing records, and order history. Cookies or other similar technologies may be used to provide you with advertising based upon your browsing activities and interests. Please see section</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Business information</li> <li>• Transaction information</li> <li>• Online activity information</li> <li>• Marketing and advertising information</li> <li>• Location information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (a) GDPR - your consent</li> <li>• Art. 6 (1) (f) GDPR - our legitimate interest in offering recommendations.</li> </ul>

<p>5. “COOKIES” below for more information about how we use cookies.</p>		
<p><b>Research and development.</b> We use your personal information to perform research or statistical analysis in order to improve the content and layout of the Marketplace, and use your personal information to improve the product offerings and services on BrandMart, including, for example, using anonymized data for machine learning purposes</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Business information</li> <li>• Device information</li> <li>• Location information</li> <li>• Online activity information</li> <li>• User-generated content</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (f) GDPR - our legitimate interest in improving the content and layout of the Marketplace.</li> </ul>
<p><b>Fraud prevention and credit risks.</b> We use personal information to prevent and detect fraud and abuse in order to protect the security of the Marketplace, our customers and others. We may also use scoring methods to assess and manage credit risks</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Business information</li> <li>• Transaction information</li> <li>• Payment information</li> <li>• Communication information</li> <li>• User-generated content</li> <li>• Device information</li> <li>• Location information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (f) GDPR - our legitimate interest in preventing and detecting fraud and carrying out assessments to evaluate credit risks.</li> </ul>
<p><b>Comply with legal obligations.</b> In certain cases, we collect and use your personal information to comply with laws. For instance, we use your information to verify your identity and conducting security checks, KYC (know-your-customer) and anti-money laundering due diligence in order to set up user accounts</p>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Account information</li> <li>• Business information</li> <li>• Communication information</li> <li>• Transaction information</li> </ul>	<p>The data processing is based on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Art. 6 (1) (c) GDPR – Compliance with legal obligations</li> </ul>



	<ul style="list-style-type: none"><li>• Payment information</li><li>• Online activity information</li></ul>	
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If we ask you to provide personal information to comply with a legal requirement or to enter into a contract with you, we will make this clear at the relevant time. We will advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). In some instances, you may be required to provide us with personal information for processing as described above, in order for us to be able to provide you all of our services, and for you to use all the features of our Marketplace.

For processing operations based on our legitimate interests, we have carried out a legitimate interest assessment to ensure that our interests are not prejudiced by your interests or fundamental rights and freedoms.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under section 13. "HOW TO CONTACT US" below.

## 8. USERS FROM CANADA

If you are located in Canada, the following additional information applies to you:

### **Consent and Withdrawal of Consent**

Under Canadian privacy laws, we are required to obtain your consent to collect, use and disclose your personal information. By using the BrandMart Marketplace, you consent to our collection, use and disclosure of your personal information as described in this Privacy Policy.

You have the right to withdraw your consent at any time, subject to legal or contractual restrictions. To withdraw your consent, please contact us using the information provided in the "How to Contact Us" section below. Please note that if you withdraw your consent, we may not be able to provide you with some of our services.

### **Cross-Border Transfers**

As mentioned in the Privacy Policy, we may transfer your personal information to service providers and other third parties located outside of Canada, including in the United States. When we do so, we use appropriate safeguards, such as standard contractual clauses, to protect your personal information in accordance with applicable privacy laws.

You have the right to be informed about the existence, use and disclosure of your personal information, and the right to access your personal information. You also have the right to request the correction of any inaccuracies in your personal information.

If you have any questions or concerns about our privacy practices or your rights under Canadian privacy laws, please contact our Privacy Officer at the contact information provided in the "How to Contact Us" section below.

## **9. USERS FROM THE UNITED STATES**

If you are based in the United States, the personal information you provided to us will be stored in Canada and will be processed as described in this Privacy Policy. Additional information for California residents can be found in the Addendum at the end of this Privacy Policy.

If you are a Retailer, Manufacturers will also act as a data controller of personal information about you, your Marketplace purchases and communications with them. Please refer to the privacy policies of those Manufacturers for more information about the ways in which they will process such information.

## **10. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

We will store the personal information we collect from you through the Marketplace in Canada, the United States, and other jurisdictions as necessary, depending on the country in which you reside.

Being a cross-border B2B Marketplace, it is inevitable that there will be certain cases that require international transfers of personal information of Users among the above-mentioned countries. These countries have data protection laws that may have different provisions to the laws of your country. We ensure that any such international transfers will only be conducted to achieve legitimate purposes and with legal basis or as otherwise permitted by applicable law. We take appropriate steps to ensure that recipients of your personal information are bound to duties of confidentiality and we implement appropriate technical and organizational measures to ensure your personal information will remain protected in accordance with this Privacy Policy, such as standard contractual clauses. A copy of those clauses can be requested.

## **11. MINORS**

The Marketplace is intended for adults. Our Marketplace is not directed to and we do not intend to, or knowingly, collect, or solicit personal information online from users under the age of 18 (**"Minors"**).

We do not intend to act as intermediary for transactions with or sell any of our products or services to Minors. If a Minor has provided us with personal information without parental or guardian consent, the parent or guardian should contact [support@BrandMart.com](mailto:support@BrandMart.com) to remove the information.

## **12. SECURITY MEASURES**

We implement appropriate technical and organisational measures to prevent unauthorized access to the Marketplace, to maintain data accuracy and to ensure the correct use of the information we hold.

For registered Users of the Marketplace, some of your information can be viewed and edited through your account, which is protected by a password. It is your responsibility to keep your password secure and confidential. You must not divulge your password to anyone. Our personnel will never ask you for your password in an unsolicited phone call or in an unsolicited email. If you share a computer with others, you should not save your log-in information (e.g., user ID and password) on that shared computer. Remember to sign out of your account and close your browser window when you have finished your session.

No data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we use appropriate technical and organizational measures to protect the information we hold for you, we cannot guarantee the security of any information you transmit to us and you do so at your own risk.

## **13. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time including in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to notify you, consistent with the significance of the changes we make. We will obtain your consent if and when we materially change this Privacy Policy in a way that reduces the protection of your personal information collected in the past. Any changes to this Privacy Policy will be communicated by us posting an amended Privacy Policy on the Marketplace. Once posted on the Marketplace, the new Privacy Policy will be effective immediately. You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

## **14. HOW TO CONTACT US**

You can opt out in the website to exercise your rights after accessing your account. If you have any requests, questions or concerns about our use of your personal information and this Privacy Policy, you can contact our Data Protection Officer at:

Company Name: BRAND-MART CORPORATION

Address: 305-2150 Bellevue Ave. West Vancouver, BC., V7V 1C3 Canada

Telephone number: (778) 682-1194

E-mail: [support@Brand-Mart.com](mailto:support@Brand-Mart.com)

## **15. LANGUAGE**

If there is any conflict between the English version and any other translation of this Privacy Policy, the English version shall prevail.

## 16. RIGHT TO MODIFY PRIVACY POLICY

BrandMart reserves the right to modify this Privacy Policy. Updates will be posted on the website, and continued use signifies acceptance of the revised policies.

## Addendum for California Residents

This Privacy Policy Addendum for California Residents (“**California Addendum**”) explains and supplements the BrandMart Privacy Policy, provides additional details for residents of California on how we collect, use and disclose Personal Information, and sets forth the rights such residents may have with respect to that Personal Information. For capitalized terms that we use but are not defined in this California Addendum, you may refer to the BrandMart Privacy Policy.

### I. Information for California Residents

This section supplements the description of our information collection and sharing practices elsewhere in the Privacy Policy to provide certain disclosures to California residents whose personal information we process pursuant to the *California Consumer Privacy Act*, as amended and other applicable laws (collectively, “**California Privacy Laws**”).

**Notice at Collection.** At or before the time of collection, you have a right to receive notice of our practices, including the categories of personal information to be collected and the purposes for which such information is collected or used (see section 2. “DETAILS OF DATA PROCESSING” in the Privacy Policy), whether such information is sold or shared (see “Disclosure of Personal Information” below), and how long such information is retained. (see Section 4. “RETENTION” in the Privacy Policy). You can find those details in the Privacy Policy by reviewing the referenced sections.

**Disclosure of Personal Information.** We disclose or make available personal information to third parties in the ways described above in section 3. “DISCLOSURE OR SHARING OF PERSONAL INFORMATION” in the Privacy Policy including by allowing third parties that provide us analytics and advertising services to collect information through Cookies and other similar technologies. Some of these disclosures may be considered a “sale” or “sharing” of personal information as defined under California Privacy Laws. Please see the “Your Rights” section below for more details and information on how to opt-out from the sale or sharing of personal information.

**Your Rights.** In addition to the users’ rights in the Privacy Policy, you can exercise the following data protection rights under California Privacy Laws:

- You have the right to request a copy of the specific pieces of personal information that we have collected about you.

- You have the right to request additional information about our collection, use, disclosure, or sale of such personal information. Note that much of this information is provided in the Privacy Policy.
- You have rights to request that we correct inaccurate personal information and that we delete personal information under certain circumstances, subject to a number of exceptions.
- You have a right to opt-out from future “sales” or “sharing” of personal information as those terms are defined by California Privacy Laws. As noted above, because California Privacy Laws define “sell” and “share” very broadly, some of the data disclosures described in this privacy statement may be considered a “sale” or “sharing” under those definitions. In particular, we let advertising and analytics providers collect identifiers (IP addresses, cookie IDs, and mobile IDs), activity data (browsing, clicks, app usage), and device data through our sites and apps when you use our online services, but do not “sell” or “share” any other types of personal information. If you do not wish for us to “sell” or “share” personal information relating to your visits to our platform for advertising purposes, you can click [here](#) to exercise your right to opt-out, using a browser-based Global Privacy Control as described below, or using the contact details provided under section “HOW TO CONTACT US” below. If you opt-out using these choices, we will not disclose or make available such personal information in ways that are considered a “sale” or “sharing” under California Privacy Laws. Further, using these choices will not opt you out of the use of previously “sold” or “shared” personal information or stop all interest-based advertising.
- You have a right to limit our use of sensitive personal information for any purposes other than to provide the services or goods you request or as otherwise permitted by law. Note that we do not collect or use sensitive personal information for any such additional purposes.
- You have the right not to be discriminated against because you exercise your rights under California Privacy Laws. We will not charge you different prices or provide different quality of services unless those differences are related to your information or otherwise permitted by law.

You may exercise your rights as described above or by using the contact details provided under section “HOW TO CONTACT US” below. You may also designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights under California Privacy Laws. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us. Further, to provide, correct, or delete specific pieces of personal information we will need to verify your identity to the degree of certainty required by law. We may verify your request by asking you to send it from the email address associated with your account or requiring you to provide information necessary to verify your account.

**California Shine the Light Law.** You are entitled once a year, free of charge, to request and obtain certain 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. We do not share personal information with third parties for their own direct marketing purposes without obtaining your consent or providing the ability to opt-out.

**Global Privacy Control (GPC) and Do Not Track (DNT).**

- Some browsers and browser extensions support the “Global Privacy Control” (GPC) that can send a signal to the websites you visit indicating your choice to opt-out from certain types of data processing, including data sales and sharing as defined in California Privacy Laws. When we detect such a signal, we will make reasonable efforts to respect your choices indicated by a GPC setting or any similar control as required by law.
- Some browsers include a “Do Not Track” (DNT) setting that can send a signal to the websites you visit indicating you do not wish to be tracked. Unlike the GPC described above, there is not a common understanding of how to interpret the DNT signal; therefore, our platform does not respond to browser DNT signals. Instead, you can use the range of other tools to control data collection, use, and disclosures including the GPC and cookie controls referenced above.

**II. How to Contact Us**

If you have any requests, questions or concerns about our use of your personal information and this California Addendum or the Privacy Policy, you can contact us at [support@Brand-Mart.com](mailto:support@Brand-Mart.com)