

# MULTISENDER SUPPLEMENTAL PRIVACY NOTICE FOR US RESIDENTS

## LAST UPDATED: JULY 12, 2023

This US Supplemental Privacy Notice (“**Supplemental Notice**”) applies only to information collected about California, Colorado, Virginia, Utah, and Connecticut consumers. It provides information required under the following laws (collectively, as amended from time to time, “**US State Privacy Laws**”):

- California Consumer Privacy Act of 2018 and California Privacy Rights Act of 2020 (collectively, the “**CPRA**”)
- Colorado Privacy Act of 2021 (the “**CPA**”)
- Connecticut Data Privacy Act (“**CTDPA**”)
- Utah Consumer Privacy Act of 2022 (the “**UCPA**”)
- Virginia Consumer Data Protection Act of 2021 (the “**VCDPA**”)

We also provide information collected about Nevada consumers under the heading “Privacy Notice for Nevada Residents” at the end of this Supplemental Notice. The other portions of this Supplemental Notice do not apply to Nevada consumers.

This Supplemental Notice describes practices carried out by Shultzprime Solutions, Inc. on the Multisender platform (collectively, the “**Company**”, “**we**”, “**us**”) regarding the collection, use, and disclosure of Personal Information and provides instructions for submitting data subject requests. This Supplemental Notice is parallel in scope to our General Privacy Policy and should be read in conjunction with our General Privacy Policy.

Company’s policy is not to sell or share personal information; for clarity, your transactions and some other activities on the Multisender site relating to Digital Assets may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Because blockchains are decentralized networks which are not controlled or operated by Company or its affiliates, we are not able to erase, modify, or alter personal data from such networks. As used above, “Digital Asset” means a digital representation of value (also referred to as “cryptocurrency,” “virtual currency,” “digital currency,” “crypto token,” “crypto asset,” or “digital commodity”), such as bitcoin, or ether, which is based on the cryptographic protocol of a computer network that may be (i) centralized or decentralized, (ii) closed or open-source, and (iii) used as a medium of exchange and/or store of value. For the avoidance of doubt, the term “Digital Asset” includes non-fungible tokens (NFTs). Certain public information (blockchain-based public wallet information) may be used solely for processing to screen for potentially illegal or risky transactions, and solely in connection with Company’s own account.

We do not provide Financial Incentives for use of the Multisender platform.

Some portions of this Supplemental Notice apply only to consumers of particular states. In those instances, we have indicated that such language applies only to those consumers.

Please note that if you are an employee of the Company, a contractor to the Company or a third-party provider, your personal information may be used in connection with your employment contract or your contractual relationship, whichever applies.

## A. Definitions

- **“Personal Information”** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information includes “personal data” as that term is defined in the applicable US State Privacy Law. Personal Information also includes “Sensitive Personal Information,” as defined below, if such is collected. Company does not seek to collect Sensitive Personal Information; however, social media or email information may be collected to implement only the Massdrop product and the content of emails, is used solely by Company for its own and its customer’s business purpose.
- **“Sensitive Personal Information”** is generally defined to include Personal Information that reveals a consumer’s social security, driver’s license, state identification card, or passport number; account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious beliefs, or union membership; contents of email or text messages; and genetic data. Sensitive Personal Information also includes processing of biometric information for the purpose of uniquely identifying a consumer and Personal Information collected and analyzed concerning a consumer’s health, sex life, or sexual orientation. Sensitive Personal Information also includes “sensitive data” as that term is defined in the applicable US State Privacy Law.
- **“Third Party”** has the meanings afforded to it in the applicable US State Privacy Law.
- **“Vendor”** means a service provider, contractor, or processor as those terms are defined in the applicable US State Privacy Law.

To the extent other terms used in this Supplemental Notice are defined terms under the applicable US State Privacy Law, they shall have the meanings afforded to them in those statutes, whether or not capitalized herein. As there are some variations between such definitions in each of the state statutes, the definitions applicable to you are those provided in the statute for the state in which you are a consumer. For example, if you are a Virginia consumer, terms used in this Supplemental Notice that are defined terms in the VCDPA shall have the meanings afforded to them in the VCDPA as this Supplemental Notice applies to you. For more information about how the Company handles data, please refer to the Compliance Policy and General Policy; please note though, the provisions of the General Policy only applies to the extent applicable to you by the laws of your jurisdiction.

## B. Collection & Processing of Personal Information – Notice of Collection

We, and our Vendors, may have collected and processed the following categories of Personal Information about you in the preceding 12 months:

1. Identifiers, such as name, alias, online identifiers, account name, or description;
2. Contact information, including, email or social media address at customer’s choice (For Massdrop product only and only used to perform transaction or otherwise communicate directly with customer),
3. Financial information, such as transaction information, payment information, and purchase history;
4. Internet or other electronic network activity information, such as browsing history, search history and interactions with our websites or advertisements; and,
5. Account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials for allowing access to an account.

We do not seek to collect “Sensitive Personal Information.”

**Retention of Personal Information.** We retain your Personal Information for the period reasonably necessary to provide goods and services to you and for the period reasonably necessary to support our business operational purposes listed in Section E.

### **C. Categories of Personal Information We May Disclose to Vendors & Third Parties**

**No Prior Sale of Personal Information:** We have not sold Personal Information in the last twelve (12) months as those terms are defined under CPRA. To the extent that, in the future, we engage in data transfers that constitute a “sale” of your Personal Information under CPRA, you may exercise your right to opt out by contacting us at [team@multisender.app](mailto:team@multisender.app) or by clicking at the specified location on the landing page of our platform(s). We do not seek to collect or to sell the Personal Information of consumers we know to be less than the age of majority. Should a parent or guardian of a minor determine that a minor has utilized the platform, please contact us [team@multisender.app](mailto:team@multisender.app).

We do not seek to share or sell Personal Information. In general, a customer does not need to create an account to exercise your right to opt out of the sale of Personal Information. However, should you make a request pursuant to this right, and depending on your request, we may ask you to provide additional Personal Information so that we can properly identify you in our dataset and track compliance with your opt-out request. We will only use such Personal Information to review and comply with the request. If you choose not to provide sufficient information, we may only be able to process your request to the extent we are reasonably able to identify you in our data systems. If you opt out, you may change your mind and opt back into sales of Personal Information at any time by contacting us at [team@multisender.app](mailto:team@multisender.app) or by contacting us through the website as indicated thereon.

We may disclose the following categories of Personal Information to Vendors:

1. Identifiers, such as name, alias, online identifiers, account name or description;
2. Contact information, including, email address or social media;
3. Financial information, such as transaction information, payment information, and purchase history;
4. Internet or other electronic network activity information, such as browsing history, search history and interactions with our websites or advertisements;
5. General Geolocation data, such as device location;

**Disclosure for California Consumers:** Unless specifically stated, we have not used Personal Information outside of the business purpose for which a consumer has contracted with Company; we have not sold or shared Personal Information about California consumers to third parties for their own use in the past twelve months. Relatedly, we do not have actual knowledge that we collect, sell, or share Personal Information of California consumers under 18 years of age. If you are a parent or guardian of a California consumer under 18 years of age and you become aware that this consumer has provided personal information to us, you may request to exercise your applicable access, rectification, cancellation, and/or objection rights by contacting us at [team@multisender.app](mailto:team@multisender.app) or via our website.

However, we may provide your personal information to our Company-affiliated companies, if any, and Vendors or Service Providers. In these arrangements, use of the information we provide is limited by policies, contracts, or similar restrictions. Please see also Terms of Service.

For purposes of the CPRA, a “sale” is the disclosure of Personal Information to a Third Party for monetary or other valuable consideration, and a “share” is the disclosure of Personal Information to a Third Party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

**Disclosure for Colorado, Virginia, Utah, and Connecticut Consumers:** Unless specifically stated, we do not sell or share Personal Information to Third Parties for their own use. However, we may share or process one or more of the above categories of personal information with our Company affiliates and vendors, service providers or contractors in arrangements for purposes of marketing or targeted advertising, as the terms “sell,” “share,” “process,” and “targeted advertising” are defined in the CPA,

VCDPA, UCPA, and CTDPA. In these arrangements, use of the information we provide is limited by policies, contracts or similar restrictions, and is anonymized or deidentified.

#### **D. Sources from Which We Collect Personal Information**

We may collect Personal Information directly from California, Colorado, Virginia, Utah, and Connecticut consumers, as well as from our affiliates, business partners, joint marketing partners, public databases, providers of demographic data, publications, professional organizations, social media platforms, caregivers, third party information providers, affiliates with whom you have a business relationship, service providers with which we have a contractual relationship and to which you have provided your personal information, cookies and other tracking technologies, and Vendors and Third Parties when they share the information with us.

#### **E. Purposes for Processing Personal Information**

We, and our Vendors, collect and process the Personal Information (excluding Sensitive Personal Information) described in this Supplemental Notice to:

- Operate, manage, and maintain our business;
- Respond to your inquiries and to fulfill your requests;
- Send you important information regarding our relationship with you or regarding this website, changes to our terms, conditions, and policies and/or other administrative information;
- Conduct audits, to verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual requirements;
- Prevent fraud or crime, and specifically to ensure compliance with anti-money laundering and related laws and regulations, and for risk and technical security monitoring purposes;
- Facilitate the development of new products and services;
- Enhance, improve or modify our website or products and services;
- Perform research, analytics and data analysis;
- Determine the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users;
- Personalize, advertise, and market our products and services;
- Comply with law (including regulations and rules), legal process, and internal policies;
- Maintain records;
- Exercise and defend legal claims; and
- Otherwise accomplish our business purposes and objectives.

We do not seek to collect Sensitive Personal Information. To the extent that We or our Vendors were to collect and process Sensitive Personal Information, We, and our Vendors, would collect and process the Sensitive Personal Information described in this Supplemental Notice for:

- Performing the services or providing the goods reasonably expected by an average consumer who requests those goods or services;
- Ensuring security and integrity to the extent the use of the consumer's Personal Information is reasonably necessary and proportionate for these purposes;

- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf;
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us;
- Personalizing, advertising, and marketing our products and services;
- Conducting research, analytics, and data analysis;
- Performing accounting, audit, and other internal functions, such as internal investigations;
- Complying with law, legal process, and internal policies;
- Maintaining records;
- Exercising and defending legal claims; and
- Otherwise accomplishing our business purposes and objectives.

#### **F. Categories of Entities to Whom We Disclose Personal Information**

- **Affiliates & Vendors.** We may disclose your Personal Information to our Company-affiliates and Vendors for the purposes described in Section E (“**Purposes for Processing Personal Information**”) above. Our Vendors provide us with services for our websites, as well as other products and services, such as web hosting and moderating, mobile application hosting, data analysis, payment processing, order fulfillment, customer service, infrastructure provision, technology services, email and direct mail delivery services, auditing, legal services, and other similar services. We grant our Vendors access to Personal Information only to the extent needed for them to perform their functions, and require them to protect the confidentiality and security of such information.
- **Third Parties.** We may disclose your Personal Information to the following categories of Third Parties:
  - **At Your Direction.** We may disclose your Personal Information to any Third Party with your consent or at your direction.
  - **Business Transfers or Assignments.** We may disclose your Personal Information to other entities as reasonably necessary to facilitate a reorganization, merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
  - **Third Party Co-Branding and Co-Marketing Partners.** We may share your Personal Information with our third-party partners with whom we offer a co-branded or co-marketed promotion (if any).
  - **Third Party Advertising Partners.** To improve the effectiveness of our communication with you and our marketing campaigns, we may share our data with our third party advertising partners, (if any) including social media, medical journals and publishers.
  - **Legal and Regulatory.** We may disclose your Personal Information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.

- **Blockchain Analytics Providers.** For safety and security purposes to protect, investigate, and stop fraudulent, unauthorized, or illegal activity.

**Transition to Vendors' or Third Parties' Site:** In the event you transition to a Vendors' or Third Parties' site, and you voluntarily share with them your own personal information, then a direct relationship between you and the Vendor and/or Third Parties will be created and, as a result, you acknowledge that the Company would not be disclosing, selling or sharing the said information. Under this scenario, you acknowledge that you would not be able to exercise the right to opt-out in our platform because the Company would not be collecting your data. Upon transferring to a third-party site, your relation with such entity shall be governed by the third party's own privacy policy.

We recommend reviewing the privacy policy of the Vendor or Third Party to understand how your personal information will be collected, used, and protected by them. Any interactions or transactions conducted on third-party sites are subject to the privacy policy and terms of that specific site.

## **G. Data Subject Rights**

- **Exercising Data Subject Rights.** California, Colorado, Virginia Utah, and Connecticut consumers have certain rights with respect to the collection and use of their Personal Information. Those rights vary by state. As required by the CPRA, we provide detailed information below regarding the data subject rights available to California consumers. Colorado, Virginia, Utah, and Connecticut consumers have similar rights and can find more detail by referencing the applicable US State Privacy Law.

You may exercise the data subject rights applicable to you under the applicable US State Privacy Law by contacting us at [team@multisender.app](mailto:team@multisender.app) or at the pertinent contact location on our website. While we will make reasonable efforts to accommodate your request, we reserve the right to impose certain restrictions or requirements on your request, if allowed by or required by applicable law.

Consumers in some states, including California, may also authorize an agent to make data subject requests on their behalf.

- **Verification of Data Subject Requests:** We may ask you to provide information that will enable us to verify your identity in order to comply with your data subject request. In particular, when a California or Connecticut consumer authorizes an agent to make a request on their behalf, we may require the agent to provide proof of signed permission from the consumer to submit the request, or we may require the consumer to verify their own identity to us or confirm with us that they provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under applicable law. We will respond to your request consistent with applicable law.
- **Non-Discrimination:** We will not discriminate against you for exercising your data subject rights. For example, we will not deny goods or services to you, or charge you different prices or rates, or provide a different level of quality for products or services as a result of you exercising your data subject rights.
- **Data Subject Rights Disclosure:** You have a right to request disclosure of their personal information, and to receive additional details regarding the personal information we collect and its use purposes, including any third parties with which we share information. We will respond to your request consistent with applicable law.
- **Right to Receive Information on Privacy Practices:** You have the right to receive the following information at or before the point of collection:
  - The categories of Personal Information to be collected;

- The purposes for which the categories of Personal Information are collected or used;
- Whether or not that Personal Information is sold or shared;
- If the business collects Sensitive Personal Information, the categories of Sensitive Personal Information to be collected, the purposes for which it is collected or used, and whether that information is sold or shared; and
- The length of time the business intends to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period.

We have provided such information in this Supplemental Notice, and you may request further information about our privacy practices by contacting us at [team@multisender.app](mailto:team@multisender.app) or at the pertinent place on our website.

- **Right to Deletion:** You may request that we delete any Personal Information about you that we collected from you; please note, however, that our ability to delete blockchain-based information is largely limited by said infrastructure. See discussion in introduction.
- **Right to Correction:** You may request that we correct any inaccurate Personal Information we maintain about you.
- **Right to Know:** You may request that we provide you with the following information about how we have handled your Personal Information in the 12 months preceding your request:
  - The categories of Personal Information we collected about you;
  - The categories of sources from which we collected such Personal Information;
  - The business or commercial purpose for collecting Personal Information about you;
  - The categories of Personal Information about you that we shared or disclosed and the categories of Third Parties with whom we shared or disclosed such Personal Information; and
  - The specific pieces of Personal Information we have collected about you.
- **Right to Receive Information About Onward Disclosures:** You may request that we disclose to you:
  - The categories of Personal Information that we have collected about you;
  - The categories of Personal Information that we have sold or shared about you and the categories of Third Parties to whom the Personal Information was sold or shared; and
  - The categories of Personal Information we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- **Right to Non-Discrimination:** You have the right not to be discriminated against for exercising your data subject rights. We will not discriminate against you for exercising your data subject rights.
- **Right to Restrict or Limit the Use of Sensitive Personal Information:** You have the right to restrict the use and disclosure of Sensitive Personal Information to certain purposes related to the offering of goods or services as listed in the CPRA. Please note that Company does not seek to collect Sensitive Personal Information such as email contents other than for its own business purpose. To exercise this right, you or your authorized representative may submit a request by contacting us at [team@multisender.app](mailto:team@multisender.app) or by clicking on the relevant button on the landing page of our website.

- **Right to Opt Out of Sharing, Disclosure, or Sale of Personal Information:** You have the right to direct us to not share, disclose, or sell your personal information. To exercise this right, you or your authorized representative may submit a request by contacting us at [team@multisender.app](mailto:team@multisender.app) or by clicking on the relevant button on the landing page of our website. Please note that Company does not share or sell personal information.

## H. Other Disclosures

- **California Residents Under Age 18.** If you are a resident of California under the age of 18 and a registered user of our website, you may ask us to remove content or data that you have posted to the website by contacting us at [team@multisender.app](mailto:team@multisender.app). Please note that your request does not ensure complete or comprehensive removal of the content or data, as, for example, some of your content or data may have been reposted by another user.
- **Disclosure About Direct Marketing for California Residents.** California Civil Code § 1798.83 permits California residents to annually request certain information regarding our disclosure of Personal Information to other entities for their direct marketing purposes in the preceding calendar year. We do not distribute your Personal Information to other entities for their own direct marketing purposes.
- **Financial Incentives for California Consumers.** Various platforms may offer various types of financial incentives in exchange for your personal information, such as coupons, discounts, promotions, loyalty points, sweepstakes, contests, surveys, and other exclusive offers for California consumers who sign up to receive our marketing emails or join our loyalty program. The amount and terms of such offers should be presented to you at the time of the offer. When you participate in a financial incentive, a platform may collect personal information from you, such as identifiers (like your email address) and commercial information (like your purchase history). Solely for purposes of California privacy law, a platform must then reasonably estimate the value of the discount, coupon, or other financial incentive that we offer to you to be equal to or greater than the value we receive from a consumer's personal information collected in connection with the offer. A company would reasonably estimate the value of a consumer's data by estimating the expenses related to the provision of each incentive program per consumer. A platform may incur a variety of expenses for providing financial incentives, such as administrative and technical expenses associated with maintaining a loyalty program and costs associated with discounts on purchases. Participation in financial incentives should be voluntary. Generally, you may opt into a financial incentive by following the sign-up or participation instructions provided, and you have the ability to opt out by unsubscribing from the emails or closing your loyalty member account. Company does not offer Financial Incentives.
- **Changes to our Supplemental Notice.** We reserve the right to amend this Supplemental Notice at our discretion and at any time. When we make material changes to this Supplemental Notice, we will notify you by posting an updated Supplemental Notice on our website and listing the effective date of such updates.

## PRIVACY NOTICE FOR NEVADA RESIDENTS

This Privacy Notice for Nevada Residents adds to the information contained in the Company's General Privacy Policy, and applies only to Nevada residents ("You," "your" or "consumer").

### Personal Information Collection and Purposes of Use

We collect certain personal information of Nevada consumers through our Internet websites or other online services. In general, this information may include one or more of the following elements of personally identifiable information; however please note that we do not seek to collect possible personal information other certain media identifiers to communicate with you; this information is required to facilitate our service and to communicate with you:

1. Contact information or identifier that allows the customer to be contacted via the internet.



2. An electronic mail address or social media contact information.
3. Any other information concerning a person collected from the person through the Internet website or online service of the operator and maintained by the operator in combination with an identifier in a form that makes the information personally identifiable.

We collect this personal information for the following purposes:

- to respond to your inquiries and to fulfill your requests;
- to send you important information regarding our relationship with you or regarding this website, changes to our terms, conditions, and policies and/or other administrative information;
- for audits, to verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual requirements;
- for fraud or crime prevention, and for technical security monitoring purposes;
- to facilitate the development of new products and services;
- to enhance, improve or modify our website or products and services;
- for data analysis that will allow us to understand website usage trends;
- to determine the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users.
- to better understand you, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.

**Your Privacy Rights:** Right to access and/or correct your personal information or opt out of sale of personal information.

If you would like to review, correct, or update your personal information, you or your authorized representative may submit your request to [team@multisender.app](mailto:team@multisender.app) or on the website. We will respond to your verified request as soon as reasonably practicable, but no later than sixty (60) days after receipt. If circumstances cause any delay in our response, you will be promptly notified and provided a date for our response. Please note limitations above for blockchain public data which we generally cannot delete.

**We generally do not disclose or share personal information for profit.** Generally, under Nevada law, you have the right to direct us to not sell or license your personal information to third parties. To exercise this right, if applicable, you or your authorized representative may submit a request via email [team@multisender.app](mailto:team@multisender.app) or to the pertinent contact point on the Multisender platform. Platforms are required to respond to your verified request as soon as reasonably practicable, but no later than sixty (60) days after receipt. If circumstances cause any delay in our response, you will be promptly notified and provided a date for our response.