

Refereum Inc. Privacy Policy

Last Updated January 8, 2018

We Respect the Privacy of Visitors to Refereum.com

Your (hereinafter “you,” “your,” or “User”) privacy is important to us at Refereum Inc. (hereinafter “Refereum,” “our,” “we,” or “us”). We have developed this Privacy Policy to clearly and transparently communicate what information we collect, as well as how we collect, use, share, store and protect that information.

BY VISITING, ACCESSING, OR USING REFEREUM’S WEBSITE (REFEREUM.COM), AND THE ASSOCIATED SERVICES, FEATURES AND CONTENT (HEREINAFTER “THE SERVICES”) YOU SIGNIFY YOUR ACCEPTANCE OF THIS PRIVACY POLICY AND CONSENT TO THE DATA POLICIES AND PRACTICES PRESCRIBED THEREIN.

Refereum proactively encourages each of its Users to engage in privacy best practices. Refereum does its best to ensure that everyone that is part of its ecosystem is aware of those practices and has received concrete guidance and/or training concerning implementation. However, this Privacy Policy does not apply to the practices of companies that Refereum does not own or control, including any third-party products or services that are integrated with the Services, or to individuals that Refereum does not employ or manage.

Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in our Terms of Service. Refereum may periodically post changes to this Privacy Policy, and it is the User’s responsibility to review this Privacy Policy frequently and Refereum encourages the User to visit this page often.

Refereum complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Refereum has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>. Refereum is also subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Under certain conditions, there is a possibility for you to invoke binding arbitration. For the EU-U.S. Privacy Shield Framework, the Department of Commerce selected the International Centre for Dispute Resolution-American Arbitration Association (ICDR-AAA) to administer the arbitration.

The following are Refereum’s promises to each User:

(1) **Notice.** When Refereum collects your personal information, we give you timely and appropriate notice describing what personal information we are collecting, how we will use it and the types of third parties with whom we may share it. This notice is located in this policy.

(2) **Choice.** Refereum will give you choices about the ways we use and share your personal information, and we will respect the choices you make.

(3) **Relevance.** Refereum will collect only as much personal information as is required to meet the specific, identified purposes of the Services it is effectuating, and we will not use it for other purposes without obtaining your consent.

(4) **Retention.** Refereum will keep your personal information only as long as we need it for the purposes for which we collect it, or as permitted by law.

(5) **Accuracy.** Refereum will take appropriate steps to make sure your personal information in our records is accurate, as much as is within the power of Refereum

(6) **Access.** Refereum will provide ways for you to access your personal information as quickly as possible upon request, as required by law, so you can correct inaccuracies. Please use the address below to request access to your information.

(7) **Security.** Refereum will take appropriate physical, technical and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction. Refereum uses the highest industry standards with respect to storage of data and the security of its system.

(8) **Sharing.** Except as described herein, Refereum will not share your personal information with third parties without your consent.

(9) **International Transfer.** If Refereum is used to transfer your personal information to another country, Refereum will take appropriate measures to protect your privacy and the personal information transferred.

(10) **Enforcement.** Refereum will regularly review how we are meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices (see immediately below).

To access your information, ask questions about our privacy practices, or issue a complaint, contact us at team@refereum.com.

To learn more about our Privacy Policy for the Services, please read below.

TYPE OF INFORMATION WE COLLECT AND HOW WE COLLECT INFORMATION

Your Identifiable Information.

Through this Website and the associated Services, we may collect information that can identify you (“Identifiable Information”) when it is voluntarily submitted to us.

Your Identifiable Information may include:

- Your name;
- Email address;
- Username;
- Date of Birth;
- Address or principal place of business, including country of residence;
- Identification number, such as a social security number, tax identification number, or passport number;
- Government-issued identification or for entities documents proving status as a legal entity in that country;
- A Cryptocurrency Wallet address, such as an ethereum wallet address; and
- Other similar information.

You may submit information, such as your name and email address, through the Website by creating an Account. When you enter your name and email address you are voluntarily submitting this information to Refereum. Additionally, you can create an Account by using Discord or Twitch. If you create an Account using Discord or Twitch, your Identifiable Information, may include your name, email address, and username. Discord and Twitch are third-party providers that have separate privacy policies and terms of service. We recommend you review Discord’s privacy policy and terms of service, available at <https://discordapp.com/privacy> and <https://discordapp.com/terms>; and/or Twitch’s privacy policy and terms of service, available at <https://www.twitch.tv/p/legal/privacy-policy/> and <https://www.twitch.tv/p/legal/terms-of-service/>.

Additionally, you may need to provide information, such as your date of birth, an identification number, a government-issued identification, your address or principal place of business, or your Cryptocurrency Wallet address, before receiving any prizes earned during the Sweepstakes. You acknowledge and agree that when you provide a Wallet address, certain information is disclosed, including, but not limited to, the amount of Cryptocurrency in the Wallet, the type of Cryptocurrency in the Wallet, and the number of transactions performed with the Wallet.

Additionally, by clicking the “Subscribe” button and entering your email address, you consent to receiving emails with Refereum’s newsletter, or other updates and information about our products, prizes, or services. You also consent to Refereum providing your email address to AutoPilot, a third-party service provider, in order to send you emails via AutoPilot’s services. AutoPilot provides marketing automation and allows Refereum to create, send, and manage Refereum’s

email communication. Please see AutoPilot's Privacy Policy, available at <https://autopilothq.com/privacypolicy.html> to learn and understand how they collect, store and protect your information. Refereum may also disclose your email address to third-party providers that perform marketing and advertising services on Refereum's behalf.

Usage Information.

Refereum may also collect certain types of usage information when you visit our Website, such as information about your device and its software, including, but not limited to the User's:

- IP Address;
- Browser Type;
- Internet service provider;
- Platform type;
- Device identifier;
- Device type and manufacturer;
- Operating system;
- Browser settings;
- Language preference;
- Browser version;
- Location information;
- Other device settings;
- Previous webpage visited;
- Length of visit and usage;
- Navigate of Website;
- Number of clicks;
- Frequency of clicks and visits;
- Date and time stamps of activity on the Website; and
- Any other technological usage information.

To collect such information, we may use a third-party provider, including but not limited to, Google Analytics. Additionally, when you use the Services, Refereum may collect information about your other activities on our Website for fraud prevention purposes, to monitor for possible breaches of the User's Account, and to identify any malicious software or other activity that may harm Refereum, our third-party providers or other Users. Data about your use of our Website or Services, from which personal information has been removed, may be collected.

We or our third-party partners may also use cookies, web beacons, or other technologies to collect and store other information about your visit to, or use of the Services, including, but not limited to, your duration or specific links you click on. We may later associate the usage and other information we collect online with personal information about you.

Further, any information a User discloses to Refereum may be collected. If you encounter a crash or error while using our Services, a crash report may be generated that includes, technical usage,

and if you are logged in, your Account information so that we can diagnose and potentially prevent the problem in the future. Third-party tools are used to collect this information.

We or our third-party providers may ask your permission before collecting certain information, such as precise geo-location information.

Non-Identifiable Information.

Other non-identifiable information may also be automatically collected in connection with your visit to this Website. (“Non-Identifiable Information”).

HOW WE USE COOKIES

Refereum, or our service providers and other companies we work with, may deploy and use cookies, web beacons, local shared objects and other tracking technologies to track your use of the Website and the Services, or for various other purposes, such as fraud prevention and monitoring, as well as advertising and marketing performance. These tools may detect characteristics or settings of the specific device you use to access the Website or Services. Additionally, information such as the types of Services used and the number of Users the Website or Services receive daily may be collected. The servers automatically log information about your computer, but this information is not used to identify you personally.

Cookies are small amounts of data a website can send to a visitor’s web browser. They function as your computer’s identification card and enables Refereum to improve your experience by securely maintaining your authenticated session and preferences. Cookies may also enable us or our service providers and other companies we work with to relate your use of the Services over time to customize your experience.

A web beacon embeds a small transparent gif image in a webpage or email, and is used to help recognize Users, identify when Users access the webpage or view the email, assess traffic patterns and measure website engagement. Local shared objects may be stored on your hard drive using a media player or other software installed on your device. Local shared objects are similar to cookies in terms of their option, but may not be managed in your browser the same way and may not function as an identification card nor store any data on your device.

Most Internet browsers are set up to accept cookies automatically. You can set your browser to notify you when you receive a cookie, allowing you to decide whether or not to accept it. For some web pages requiring an authorization, cookies are not optional. Users choosing not to accept cookies or similar devices may not be able to access those webpages or the Services.

HOW WE USE THE INFORMATION WE COLLECT

The primary purpose in collecting the information is to provide you with a secure and efficient experience. The information may be used for the following purposes:

- Allow Users to create and operate an Account;
- Verify a User's identity;
- Provide the Services;
- Transfer Prizes and process Transactions;
- Send notices about the Sweepstakes or a Transaction;
- Resolve disputes and troubleshoot problems;
- Prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted Terms of Service;
- Generate statistics about how the Services are being used;
- Perform analytics concerning your use of the Services;
- Target advertising and communications;
- Deliver targeted marketing and promotional offers; and
- To meet any legal or regulatory requirements.

If you submit your email address through the Website's subscribe button, then that information will be used to email you Refereum newsletters, or other updates and information about our products, prizes or services. We may also use data that we collect on an anonymous basis, such that it does not identify any individual customer, for various business purposes, where permissible under applicable laws and regulations. Such data is used to help us understand consumer trends, needs, interests, and preferences so we can improve our Services.

Interacting With You.

Your Identifiable Information will be used to communicate with you, manage your Account, respond to requests or complaints you may submit and for the sole purpose of your participation at the Website.

Making Our Platform Better.

From time to time, your Identifiable Information may be referenced to better understand your needs and how the Services can be improved or developed. Non-Identifiable Information may also be referenced to analyze the performance of, and make improvements to, the Website. Your Identifiable Information will not be sold to any third parties.

WHEN WE DISCLOSE YOUR INFORMATION TO OTHERS

Except to the extent required by applicable law or governmental or judicial body, Refereum will not disclose your Identifiable Information to any third-party other than to a regulator, our affiliates, a third-party service provider, a partner, a vendor, an affiliated third-party, or representative to

whom we are required to disclose such information to in order for them to assist us in providing our Services to you.

To achieve the purposes described herein, Refereum employs the services of individuals and companies, such as those described above, to perform tasks on our behalf. Our agents, as well as those individuals and companies noted above, do not have any right to use your Identifiable Information we share with them beyond what we authorize or beyond what is necessary to assist us in providing the Services to you as described in this Privacy Policy. Refereum may disclose your email address to third party providers that perform marketing and advertising services on Refereum's behalf. Any third-party which receives or has access to your Identifiable Information shall be required by us to protect such information. Your email address may be disclosed to third-party providers that perform marketing services on our behalf.

Your Identifiable Information may be shared to comply with requests by law enforcement or governmental authorities or where we have any other legal obligation to disclose the information sought. Your information may be disclosed or transferred as part of, or during negotiations of, a merger, consolidation, sale of our assets, as well as equity financing, acquisition, strategic alliance or in any other situations where such information may be transferred as one of the business assets of Refereum.

We may also release Identifiable Information when we believe in good faith that release is necessary to enforce or apply our conditions of use and other agreements, or protect the rights, property, or safety of Refereum, our employees, our Users, or others.

Your information may also be shared or disclosed with your consent or under your direction to do so.

MARKETING AND PROMOTIONAL COMMUNICATION

The email address collected during the Account creation process may also be shared with third-party providers to perform marketing services and display ads that may be relevant to your interests. However, you have the right to ask that your information not be processed for marketing purposes, and can exercise this right by emailing Refereum at team@refereum.com.

Additionally, by clicking the subscribe button on Refereum's Website and submitting your email address to Refereum, you consent to receiving Refereum's newsletters, or other information about our products, prizes, or other updates. If you change your mind and no longer want to receive Refereum newsletters, you may unsubscribe by following the instructions at the bottom of the email or mailing your request to Refereum Inc. at 1459 18th Street, Suit #169, San Francisco, California 94107.

HOW WE STORE AND PROTECT INFORMATION WE COLLECT

Refereum will take reasonable precautions, as well as physical, technical, and organizational measures in accordance with industry standards, as described herein, to protect your Identifiable Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Information you provide is transmitted to and stored by Refereum using industry-standard methods for each type of information.

The Services are maintained in the United States of America and all servers, which store your Identifiable Information, are secured and located in the United States of America. Computer safeguards, such as firewalls and data encryption are used to protect your information. We authorize access to your information only for those employees or agents who require it to fulfill their job responsibilities and these individuals are required to treat this information as confidential.

However, the security of information on or transmitted via the Internet cannot be guaranteed. Unauthorized entry of use, hardware or software failures, and other factors may compromise the security of your Identifiable Information. All information you send to us electronically or through email is not secure. Any transmission is at your own risk as the transmission of information via the Internet is not completely secure. Users are solely responsible for protecting their passwords, limiting access to their computers, and signing out of the Account after their sessions.

Although Refereum has Users from all over the world, by accessing the Services, the User consents to and authorizes the export of their Identifiable Information to the United States and its storage and use as specified in the Privacy Policy.

Your information will be retained for as long as your Account is active or is needed to provide you the Services, having regard to the purposes described in the Privacy Policy and the legal and regulatory requirements. The Accounts and Identifiable Information will be retained for a period of time, as necessary to comply with the legal obligations or to resolve disputes.

The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

LINKS TO OTHER WEBSITES

On the Website, you have the option to create an account using Discord or Twitch. If you choose to create an account in connection with Discord or Twitch, this Privacy Policy does not apply. Discord's or Twitch's privacy policy will apply to the information you provide to them directly. We recommend that you read Discord's or Twitch's privacy policy, which is available at <https://discordapp.com/privacy> or <https://www.twitch.tv/p/legal/privacy-policy/>, in order to understand how they collect, store and protect your information.

The Refereum Website and Services may contain links to other third-party websites not operated or controlled by Refereum. This Privacy Policy only applies to the Refereum Website and

Services. Refereum is not responsible for the content, accuracy, or opinions expressed in other websites. Refereum is not responsible for the privacy policies and/or practices of third parties.

Using or participation on third-party websites, such as Discord, Twitch, Facebook, or other social media websites, may be required or offer a benefit in the Sweepstakes. However, those third-party websites are in no way sponsored, endorsed, administered by, or associated with Refereum's Sweepstakes. Those third-party website's accounts are created for free and you acknowledge that you are providing your information to those third-parties when creating an account on those websites. You also understand that by participating via these third-party websites, you are also subject to each of those third-party website's terms of service and privacy policy.

Please note that when you use a link to go from the Refereum Website to another website, our Privacy Policy is no longer in effect. Refereum encourages you to review all policies, rules, terms and regulations, including the privacy policy, of each website that you visit.

HOW TO ACCESS, UPDATE & DELETE YOUR INFORMATION

The User has the right to review, correct, update, or amend the Identifiable Information where it is inaccurate, and the User may do so at any time by logging into their Account or by sending a request to team@refereum.com. The User is also entitled to request the deletion or destruction of both the Account and Identifiable Information by sending a request to team@refereum.com. Additionally, you may request a copy of the information we have collected about you by contacting us with your full name and email address. Please send all requests to team@refereum.com.

If you do not wish to have your Identifiable Information used or shared as described in this document, please discontinue the use of the Services or do not provide such information. While we strive to honor all reasonable requests, please be aware that we backup the data to prevent accidental or malicious destruction of your information. Information on backup servers may take some time to be completely deleted from the system. If you request that we remove you from our system and delete your Account, please note that you may still receive materials while your request is being processed.

If you request that your Account be deleted, we will keep your Account information for a period of time in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their Account and opening a new Account. However, if you delete your Account, your Identifiable Information will not be used by Refereum or our third-party providers for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

NOTICE CONCERNING CHILDREN'S INFORMATION

We do not knowingly collect information about children. We are committed to respecting the privacy of children online and ensuring that Refereum is compliant with the Children's Online

Privacy Protection Act (COPPA). If Refereum learns that the information of a child under the age of 13 is stored within its system, Refereum will promptly delete any information in that User's Account or any other profile information that Refereum has been used for. If you become aware that a child under the age of 13 has provided us with personal information, please notify us immediately at team@refereum.com and we will terminate the Account.

UPDATES TO THIS POLICY

We reserve the right to change, modify, update, add, or remove portions of this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting to this page. When we do update it, for your convenience, we will make the updated policy available on this page. If you opt out of receiving communications, you may not receive certain notifications, however, they will still govern your use of the Services, and you are responsible for proactively checking for any changes. Refereum encourages all Users to check this Website Privacy Policy frequently to stay up to date on any changes. You can determine if changes have been made by checking the effective date on the Privacy Policy. Continued use of the Website after the effective date of any change in this Privacy Policy will constitute acceptance of such changes and it will signify that you agree to abide by and be bound by the modified Privacy Policy.

CONTACT REFEREUM

If you have questions, comments, or concerns regarding this Privacy Policy, please contact us at the following email address team@refereum.com.

Please include the following information in your request:

- 1) Your Name;
- 2) Your contact information, including phone number, mailing address, and email address;
and
- 3) The precise nature of your request, inquiry, or complaint.

In compliance with the Privacy Shield Principles, Refereum commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Refereum at 1459 18th Street, Suite #169, San Francisco, California 94107, or at team@refereum.com. Refereum has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU and Switzerland.

REFEREUM'S POLICY FOR DATA TRANSFER FROM THE EUROPEAN UNION

Some of our Users' use of the Refereum system may require a cross-border transfer of personal information. Refereum is already committed to adhering to the principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability in accordance with the requirements of the laws of the European Union.

Definitions

"Personal Information" or "Information" means any information or set of information that (1) is transferred from the EU to another country; (2) is recorded in any form or medium; (3) is about, or pertains to a specific individual; and (4) that identifies, or can be used to identify, a specific individual.

"Sensitive Personal Information" means Personal Information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information that concerns health or sex life. In this privacy policy, all references to Personal Information include Sensitive Personal Information.

Principles

Notice. Refereum shall inform an individual of the purpose for which it collects and uses the Personal Information and the types of third parties to which Refereum discloses or may disclose that Information. Refereum shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Refereum, or as soon as practicable thereafter, and in any event before Refereum uses or discloses the Information for a purpose other than for which it was originally collected. Such notice may be disseminated, for example, through the provision of this Privacy Policy.

The types of Personal Information that may be collected in order to provide Services to the Users include, but are not limited to, the first and last names, email address, date of birth, current address or principal place of business, passwords created at registration and phone numbers.

We collect Personal Information for various purposes, which include, but are not limited to, your specific use of the Refereum Website and Services.

Choice. Refereum will offer individuals the opportunity to choose (opt in or out) of whether their Personal Information is (1) to be disclosed to a third-party, or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. We will comply with the requirements of the laws of the European Union with respect to disclosures of Sensitive Personal Information, including, when applicable, obtaining the explicit consent (i.e., opt in consent) of the individual prior to disclosing sensitive information to a third-party or using Sensitive Personal Information for purposes other than those for which it was

originally collected or subsequently authorized by the individual. Refereum shall treat Sensitive Personal Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information.

Please contact Refereum for further details.

Accountability for Onward Transfers to Third Parties. Refereum is potentially liable in cases of onward transfers of Personal Information to third parties. Prior to disclosing Personal Information to a third-party, Refereum shall notify the individual of such disclosure and allow the individual the choice (opt-out) of such disclosure. As stated above, prior to disclosing Sensitive Personal Information to a third-party, Refereum, in most instances, will obtain the individual's affirmative express (opt in) consent. Refereum shall ensure that any third-party to which Personal Information may be disclosed subscribes to the Principles or are subject to law and/or agreements providing the same level of privacy protection as is required by the Principles, and agree in writing to provide an adequate level of privacy protection. We may transfer Personal Information to third-party agents, or service providers, who perform functions on our behalf. We enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection that the laws of the European Union require and limiting their use of the data to the specified services provided on our behalf.

At this time, we do not transfer Personal Information to unaffiliated third parties acting as data controllers. If we choose to begin transferring your Personal Information to such third parties, we will notify you by updating this Privacy Policy.

In some rare cases, it may be necessary to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Data Security. Refereum shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Refereum has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Refereum has a continued commitment to create and maintain the most stringent controls needed to ensure the highest quality and security of Services provided to its Users. Refereum cannot guarantee the security of Information on or transmitted via the Internet.

Data Integrity. Refereum shall only process Personal Information in a way that is compatible with and relevant to the purposes for which it was collected or authorized by the individual. To the extent necessary for this purpose, Refereum shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

Access. An individual has the right to obtain Refereum's confirmation as to whether we maintain Personal Information relating to you. Upon request, Refereum shall allow an individual access to his or her Personal Information and allow the individual to correct, amend or delete inaccurate information. An individual's right to access Personal Information may be restricted in exceptional circumstances, including, but not limited to, when the burden or expense of providing access would

be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual may be violated. If Refereum determines that an individual's access should be restricted in a particular instance, Refereum will provide the individual with an explanation of the determination and respond to any inquiries the individual may have.

To request to access, correct, or amend Personal Information, an individual may contact Refereum at the contact information provided below.

Recourse, Enforcement, and Liability. Refereum uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the requirements of the laws of the European Union. We encourage interested persons to raise any concerns or complaints using the contact information provided below, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the European Data Protection Authorities (EU DPAs) as an independent recourse mechanism. Refereum will cooperate with the DPAs in the investigation and resolution of complaints brought by you. Refereum agrees to comply with any advice given by the DPAs where the DPAs take the view that the organization needs to take specific action.

Amendments

This Privacy Policy may be amended from time to time consistent with the requirements of the laws of the European Union. Refereum will provide notification of such changes through the Refereum.com Website.

Inquiries and Complaints of EU Individuals

In compliance with the Privacy Shield Principles, Refereum commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Refereum at 1459 18th Street, Suite #169, San Francisco, California 94107, or at team@refereum.com. Refereum has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

Contact Information for Refereum's Privacy Compliance

To request to access, modify, or delete Personal Information, inquire about this Privacy Policy, or file a privacy complaint, please send an email to team@refereum.com.

Please include the following information in your request:

- 1) Your Name;

- 2) Your contact information, including phone number, mailing address, and email address;
and
- 3) The precise nature of your request, inquiry, or complaint.

General Amendments and Updates to this Privacy Policy

This Privacy Policy may be amended from time to time consistent with applicable laws. Refereum will provide notification of changes to this Privacy Policy through the Refereum.com Website.