

## Privacy Policy

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### Introduction

We ("we", "us", "our") take the protection of the data of the users ("users" or "you") of our website and / or our mobile app (the "website" or the " Mobile app ") and we undertake to protect the information that users provide to us in connection with the use of our website and / or our mobile app (collectively: " digital assets "). Furthermore, we undertake to protect and use your data in accordance with applicable law.

This Privacy Policy explains our practices regarding the collection, use and disclosure of your information through your use of our digital assets (the "Services") when you access the Services through your devices.

Please read the privacy policy carefully and make sure you fully understand our practices in relation to your data before using our services. If you have read this policy, fully understood it and do not agree with our approach, you must stop using our digital assets and services. By using our services, you accept the terms of this privacy policy. Further use of the services constitutes your acceptance of this privacy policy and all changes to it.

In this privacy policy you will find out:

- How we collect data
- What data we collect
- Why we collect this data
- Who we pass the data on to
- Where the data is stored
- How long the data will be kept
- How we protect the data
- How we deal with minors
- Updates or changes to the privacy policy

What data do we collect?

Category: Always

Below is an overview of the data we can collect:

Unidentified and unidentifiable information that you provide during the registration process or that is collected through the use of our services ("non-personal data"). Non-personal data does not allow any conclusions to be drawn about who collected it. Non-personal information that we collect consists primarily of technical and aggregate usage information.

Individually identifiable information, i. H. all those through which you can be identified or identified with reasonable effort ("personal data"). The personal information we collect through our services may include information that is requested from time to time, such as names, email addresses, addresses, phone numbers, IP addresses and more. If we combine personal data with non-personal data, we will treat these as personal data as long as they exist in combination.

How do we collect data?

Category: Always

Below are the main methods we use to collect data:

We collect data when you use our services. So when you visit our digital assets and use services, we can collect, record and store the usage, sessions and related information.

We collect data that you provide to us yourself, for example when you contact us directly via a communication channel (e.g. an email with a comment or feedback).

We may collect data from third party sources as described below.

We collect data that you provide to us when you log into our services via a third party provider such as Facebook or Google.

Why do we collect this data?

Category: Always

We can use your data for the following purposes:

to provide and operate our services;

to develop, customize and improve our services;

to respond to your feedback, inquiries and requests and offer help;

to analyze requirement and usage patterns;

for other internal, statistical and research purposes;

to improve our data security and fraud prevention capabilities;

to investigate violations and to enforce our terms and conditions and to comply with applicable law, regulations or government orders;

to provide you with updates, news, promotional materials and other information related to our services.

In the case of promotional emails, you can decide for yourself whether you want to continue receiving them. If not, just click the unsubscribe link in those emails.

Who do we share this data with?

Category: Always

We can pass on your data to our service providers in order to operate our services (e.g. storage of data via third-party hosting services, provision of technical support, etc.).

We may also disclose your information in the following circumstances: (i) to investigate, detect, prevent or take action against illegal activities or other misconduct; (ii) to establish or exercise our rights of defense; (iii) to protect our rights, property, or personal safety, and the safety of our users or the public; (iv) in the event of a change of control at us or at one of our affiliated companies (by way of a merger, acquisition or purchase of (essentially) all assets, etc.); (v) to collect, hold and / or manage your data using authorized third-party providers (e.g. cloud service providers), insofar as this is appropriate for business purposes; (vi) to work with third parties to improve your user experience. To avoid misunderstandings, we would like to point out that we can transfer or pass on or otherwise use non-personal data to third parties at our own discretion.

Category: User has a blog or forum

Please note that our services enable social interactions (e.g. post content, information and comments publicly and chat with other users). We would like to point out that any content or data that you provide in these areas can be read, recorded and used by other people. We do not recommend posting or sharing information with others that you do not want to make public. If you upload content to our digital assets

or otherwise make it available as part of the use of a service, you do so at your own risk. We cannot control the actions of other users or members of the public with access to your data or content. You acknowledge and confirm that copies of your data can still be accessed by third parties even after they have been deleted on cached and archived pages or after a copy / storage of your content has been made.

#### Cookies and Similar Technologies

When you visit or access our services, we authorize third parties to use web beacons, cookies, pixel tags, scripts and other technologies and analysis services (“tracking technologies”). These tracking technologies can enable third parties to automatically collect your data in order to improve the navigation experience on our digital assets, to optimize their performance and to ensure a tailor-made user experience, as well as for security and fraud prevention purposes.

To find out more, please read our Cookie Policy.

Category: The user is NOT connected to an advertising service.

We will not pass on your email address or other personal data to advertising companies or advertising networks without your consent.

Category: The user is connected to an advertising service, a campaign manager or Facebook Ads.

We may serve advertising through our services and our digital assets (including websites and applications that use our services) that may also be tailored to you, such as: B. Ads based on your recent browsing habits on websites, devices or browsers.

To serve these advertisements to you, we may use cookies and / or JavaScript and / or web beacons (including clear GIFs) and / or HTML5 local storage and / or other technologies. We can also use third parties, such as B. Network advertisers (i.e. third parties who show advertisements based on your website visits) to serve targeted advertisements. Third-party advertising network providers, advertisers, sponsors and / or website traffic measurement services may also use cookies and / or JavaScript and / or web beacons (including clear GIFs) and / or Flash cookies and / or other technologies to ensure effectiveness Measure your ads and customize advertising content for you. These third-party cookies and other technologies are subject to the specific privacy policy of the respective third party and not this one.

Where do we store the data?

Category: Always

Non-personal data

Please note that our companies, as well as our trusted partners and service providers, are located around the world. For the purposes outlined in this privacy policy, we store and process all non-personal data that we collect in different legal systems.

Category: User collects personal data

Personal data

Personal data may be maintained, processed and stored in the United States, Ireland, South Korea, Taiwan, Israel and to the extent necessary for the proper provision of our services and / or required by

law (as further explained below) in other jurisdictions.

How long will the data be kept?

Category: Always

Please note that we keep the collected data for as long as is necessary to provide our services, to comply with our legal and contractual obligations to you, to resolve disputes and to enforce our agreements.

We can correct, supplement or delete incorrect or incomplete data at our own discretion at any time.

How do we protect the data?

Category: Always

The hosting service for our digital assets provides us with the online platform through which we can offer you our services. Your data can be stored via the data storage, databases and general applications of our hosting provider. It stores your data on secure servers behind a firewall and offers secure HTTPS access to most areas of its services.

Category: User accepts payments / eCom

All payment options offered by us and our hosting provider for our digital assets comply with the regulations of the PCI-DSS (data security standard of the credit card industry) of the PCI Security Standards Council. This is a collaboration between brands such as Visa, MasterCard, American Express and Discover. PCI-DSS requirements help to ensure the secure handling of credit card data (including physical, electronic and procedural measures) by our shop and the service providers.

Category: Always

Regardless of the measures and efforts taken by us and our hosting provider, we cannot and will not guarantee the absolute protection and security of the data that you upload, publish or otherwise pass on to us or others.

For this reason, we would like to ask you to set secure passwords and, if possible, not to provide us or others with confidential information, the disclosure of which, in your opinion, could seriously or permanently harm you. Since e-mail and instant messaging are not considered secure forms of communication, we also ask you not to pass on any confidential information via any of these communication channels.

How do we deal with minors?

Category: User does NOT collect data from minors

The services are not intended for users who have not yet reached the legal age of majority. We will not knowingly collect information from children. If you are under the age of majority, you should not download or use the Services or provide any information to us.

We reserve the right to request proof of age at any time so that we can verify that minors are using our services. In the event that we become aware that a minor is using our services, we can prohibit these users from accessing our services and block them, and we can delete all data stored by us about this user. If you have reason to believe that a minor has passed on data to us, please contact us as explained below.

Category: User collects data from minors

Children can use our services. However, if you want access to certain functions, you may need to provide certain information. Some data (including data collected through cookies, web beacons, and

other similar technologies) may be collected automatically. If we knowingly collect, use, or disclose information we have collected from a child, we will notify it and obtain parental consent in accordance with applicable law. We do not make a child's participation in an online activity conditional on the child providing more contact information than is reasonably necessary to participate in that activity. We only use the information we collect in connection with the services that the child has requested.

We may also use a parent's contact details to communicate about the child's activities on the Services. Parents can view information we have collected from their child, prohibit us from collecting any other information about their child, and request that any information we collect be deleted from our records.

Please contact us to view, update or delete your child's data. To protect your child, we may ask you to provide proof of your identity. We can deny you access to the data if we believe that your identity is questionable. Please note that certain data cannot be deleted due to other legal obligations.

Category: Always

We will only use your personal data for the purposes set out in the privacy policy and only if we are convinced that:

- the use of your personal data is necessary to perform or conclude a contract (e.g. to provide you with the services yourself or to provide customer service or technical support);
- the use of your personal data is necessary to comply with relevant legal or regulatory obligations, or
- the use of your personal data is necessary to support our legitimate business interests (provided that this is done at all times in a manner that is proportionate and respects your data protection rights).

As an EU resident, you can:

- request confirmation as to whether or not personal data relating to you is being processed and request access to your stored personal data and certain additional information;
- request the receipt of personal data that you have provided to us in a structured, common and machine-readable format;
- request the correction of your personal data that is stored by us;
- request the deletion of your personal data;
- object to the processing of your personal data by us;
- request the restriction of the processing of your personal data, or
- submit a complaint to a supervisory authority.

Please note, however, that these rights are not unlimited and may be subject to our own legitimate interests and regulatory requirements. If you have general questions about the personal information we collect and how we use it, please contact us as detailed below.

In the course of providing the services, we can transfer data across borders to affiliated companies or other third parties and from your country / legal system to other countries / legal systems worldwide. By using the services, you consent to the transfer of your data outside of the EEA.

If you are based in the EEA, your personal data will only be transferred to locations outside the EEA if we are convinced that there is an adequate or comparable level of protection of personal data. We will take appropriate steps to ensure that we have adequate contractual arrangements with our third parties to ensure that appropriate security measures are in place so that the risk of unlawful use, alteration,

deletion, loss or theft of your personal data is minimized and that these third parties act in accordance with applicable law at all times.

#### California Consumer Law Rights

If you use the Services as a California resident, you may be entitled under the California Consumer Privacy Act ("CCPA") to request access to and deletion of your information.

To exercise your right to access and delete your data, please read below how to contact us.

Category: The website does not sell any of its users' data

We do not sell users' personal data for the intentions and purposes of the CCPA.

Category: Websites with a blog or forum

Users of the Services who are California residents and are under the age of 18 can request and obtain the deletion of their published content by email at the address provided in the "Contact Us" section below. These requests must all be marked with "California Removal Request". All requirements must include a description of the content that you wish to be deleted and sufficient information to enable us to locate the material. We will not accept communications that are not flagged or properly delivered, and we may not be able to respond if you do not provide sufficient information. Please note that your request does not ensure that the material will be completely or completely deleted. For example, material you post may be republished or reposted by other users or third parties.

#### Updates or changes to the privacy policy

Category: Always

We may revise this data protection guideline from time to time at our own discretion; the version published on the website is always up-to-date (see information on the "status"). We ask you to check this data protection guideline regularly for changes. In the event of significant changes, we will publish a notice on our website. If you continue to use the services after being notified of changes to our website, this will be considered as your confirmation and consent to the changes to the privacy policy and your agreement to be bound by the terms of these changes.

#### Contact

Category: Always

If you have general questions about the Services or the information we collect about you and how we use it, please contact us at:

Name: Stephanie Smith

Address: Hainburgerstrasse 60/16, 1030 Wien, Austria

Email address: [info@omspiretri.com](mailto:info@omspiretri.com)

#### EXCLUSION CLAUSE

The information contained herein is not a substitute for legal advice and should not be relied on alone. Specific requirements regarding legal terms and guidelines may vary from state to state and / or from legal system to legal system. As set out in our Terms of Use, it is your responsibility to ensure that your services are permitted and that you comply with the law that governs you.

To ensure that you fully comply with your legal obligations, we expressly recommend that you seek professional advice so that you can better understand which requirements apply specifically to you.