

PRIVACY POLICY

We at Base Tech Inc. (the “**Company**”, “**we**”, “**us**”, “**our**”) respect your privacy. This Privacy Policy (“**Policy**”) explains how we collect and process your information when you access and use the Base customer growth campus, available at <https://clgcampus.base.ai/> (the “**Platform**”). It also describes the rights and options available to you with respect to your information.

If you have any questions, comments or concerns relating to this Policy or our privacy practices, please contact us by email at Legal@base.ai.

KEY POINTS OF THIS POLICY

The following key points are provided for your reading convenience, but do not substitute the full Policy that is provided thereafter.

- To use the Platform, you must register and provide your details as stipulated herein. Please use discretion when interacting with the courses or other users of the Platform.
- We will collect and process your data only for the purposes listed in this Policy. We will not process your information for other purposes without obtaining your prior consent.
- We will not share your information with third parties except as detailed in this Policy.
- We may transfer your personal data for processing at locations outside of your jurisdiction, and we will do so in accordance with applicable law.
- We do not knowingly or intentionally collect the information of minors under the age of 13.
- We use several types of cookies, as explained herein. Some are necessary for the operation of the Platform, and some are not.
- We retain your personal information for as long as we deem necessary or as otherwise required by law.
- We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information, but do not guarantee that the Platform will be immune to all information security risks.
- If you reside in the EEA or the UK, or if you are a resident of the State of California, you may have additional rights as detailed in the Policy.
- We may, from time to time, change this Policy. Your continued use of the Platform indicates your consent to the new policy.

PERSONAL DATA WE COLLECT

We collect the information you knowingly provide us

Registration Information. Access to and use of the Platform are subject to registration. When you register, we collect information such as your first name, last name, company, email address, and area of interest.

Inquiry Information. When you contact us we collect your name, email address and the text of your message.

Interactions Information. When you post comments and feedback to courses or interact with other users through dedicated forums, we collect your name and the text of your comment, feedback or message. Your Interactions will be publicly available to all users. Please use discretion when deciding to include, in those Interactions, the personal information of you or of others.

You do not have a legal duty to provide any of the above information, however, we will not be able to allow you to access the Platform or respond to your inquiries.

We automatically collect Usage Information. When you use the Platform, we collect

analytics information and logs about your use of the Platform

information about your use of the Platform, including courses you have watched or commented on, your progress on courses and your quiz results.

Analytics. When you access and use the Platform, we record and collect certain information about your interaction with the Platform, including the IP address from which you access the Platform, time and date of access, type of browser used, language used, links clicked, and actions taken while using the Platform.

HOW WE USE PERSONAL DATA

To create your account and allow you to access and use the Platform

We will use your Registration Information to create your account and allow you to access and use the Platform and all any content therein.

To provide you with content recommendations

We will use your Usage Information to offer you personalized recommendations for content you should check out next, based on the content you previously viewed.

To respond to your inquiries

We will use your Inquiry Information to contact you about your inquiry and handle your inquiry.

To send you, from time to time, marketing and promotional content and other updates

If you have consented to it, we will use your information to send you, from time to time, marketing and promotional content and other messages and updates regarding our Platform and the products and services we offer.

You may opt-out of receiving marketing content at any time by the methods stipulated in the emails we send you. Please note that we may still send you, from time to time, updates regarding our Platform, that are not for marketing purposes.

To operate and maintain the Platform

We process your Interactions Information and Analytics to provide, maintain and improve your user experience when accessing and using the Platform. We will also process this information for troubleshooting, quality assurance and development and enhancement of the Platform.

For record-keeping purposes, dispute resolution and defending against fraud and other wrongdoings

We will also process all your information for accounting and record-keeping purposes, to resolve disputes, and to detect, prevent, and defend against fraud, misuse, and other wrongdoings.

WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS

We will not share your information with third parties, except in the events listed below or when you provide us your explicit and informed consent

We share your information with our service providers helping us to operate our business and the Platform

We will share your personal information with our service providers, who assist us with the internal operations of the Platform and our business. These companies are authorized to use your personal information only as necessary to provide these services to us and not for their own promotional purposes. We do not sell your personal information to third parties.

We would share your information if you violated the law or abused your rights to use the Platform

If you have violated this Policy or our Terms of Use, abused your rights to use the Platform, or violated any applicable law, we will share your information with competent authorities and with third parties (such as legal counsel and advisors), for the purpose of handling of the violation or breach.

We will share your information if we are legally required

If we are required to disclose your information by a judicial, governmental, or regulatory authority, we will share your information as required with the competent authority or court.

We will share your information in any event of change in the Company's structure

If the operation of the Company or the Platform is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition) we will share your information to enable the structural change.

We do not sell your information, nor have we done so in the past 12 months.

INTERNATIONAL DATA TRANSFERS

We may transfer your information internationally, in accordance with applicable laws

If we transfer your personal data for processing at locations outside your jurisdiction, we will abide by data transfer rules applicable to these situations.

INFORMATION OF MINORS

We do not knowingly or intentionally collect information of minors

Our Services are not intended for minors under the age of 13. We do not knowingly or intentionally collect information from minors under the age of 13. If you have reason to believe that we have received the personal information of a minor, please contact us at Legal@base.ai. and we will endeavor to delete that information from our databases.

COOKIES

What are cookies?

Cookies are text files, comprised of a small amount of data, that are saved on your computer or other devices (e.g., smartphone, tablet, etc.) when you use the internet and visit various websites.

The information that the cookies maintain is read by the website you visit, during the session of your visit to the website (session cookies), and when you return to visit it again (persistent cookies).

Cookies we use

We use several types of cookies as briefly explained below:

Necessary. Cookies that are strictly necessary for the functioning of the Platform. The Platform cannot operate properly without these cookies.

Performance. Cookies that help us understand how you use the Platform, in order to improve its performance. Performance cookies generate aggregated, de-identified information which provide insights into trends and usage patterns.

Preferences and Personalization. Cookies that allow us to recognize your device and remember your selections and preferences while visiting our Platform, in order to personalize your user experience.

Advertising and Third-Party. Cookies that allow us to tailor the advertisement you see on the Platform to you. We may work with third parties to place these cookies but will not disclose your personal information to them in the process.

You can always delete or disable cookies

you can always delete the cookies saved on your device through the settings of your computer browser or device. You can also disable cookies for future use through the settings of your computer browser or device. However, if you do so, some parts or features of the Platform may no longer be available to you.

For further information please refer to our Cookies Policy posted at <https://base.ai/cookie-policy/>

SECURITY AND DATA RETENTION

We will retain your personal information for as long as we deem necessary, or as required by law

We retain personal data for the duration required to support our ordinary business activities operating the Platform and interacting with customers. Data that is deleted from our servers may remain as residual copies on offsite backup media for up to approximately 12 months afterward.

Thereafter, we may still retain your personal information as necessary to comply with our legal obligations, bookkeeping requirements, resolve disputes, establish, and defend legal claims and enforce our agreements.

We implement measures to secure your information

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although we make efforts to secure your information, we cannot guarantee, and you cannot expect that the Platform will be immune from information security risks.

ADDITIONAL INFORMATION FOR USERS IN THE UK OR THE EUROPEAN ECONOMIC AREA

Data Controller

Base Tech, Inc. is the data controller for the purposes of the personal data we process when you visit and use the Platform.

You may contact us by email at Legal@base.ai.

Legal bases for processing your information

The legal basis for collecting and processing:

- your Registration Information – our legitimate business interest in offering our services to you.
- your Usage Information – our legitimate business interest in enhancing and improving your user experience.
- your Inquiry Information – our legitimate business interest in responding to your inquiry and developing our customer leads.
- your Interactions Information and Analytics – our legitimate business interest in maintaining our Platform and improving your user experience when accessing and using the Platform.
- your email address to send you our marketing and promotional content and other updates – your consent and our legitimate business interest in promoting our services and providing information about them to you.
- your information to resolve disputes, and to detect, prevent, and defend against fraud, misuse, and other wrongdoings – our legitimate business interest in protecting our business interests and property from abuses and violation of law.

The legal basis for sharing:

- your information with our service providers who assist us in the operation of our Platform – our legitimate business interest in offering our services to you.
- your information with competent authorities, or other such third parties, if you violated the law or abused your rights to use the Platform, or breached the contract with us – our

legitimate business interest in protecting our business from abuses and violation of law.

- your information to enable the structural change at the Company – our legitimate business interest in our business continuity.

You have certain rights to access, update or delete your information, obtain a copy of your information, withdraw your consent, and object or restrict certain data processing activities

If you are in the UK or EEA, you have the following rights under the GDPR:

Right to Access your personal data that we process and receive a copy of it.

Right to Rectify inaccurate personal data we have concerning you and to have incomplete personal data completed.

Right to Data Portability, that is, to receive the personal data that you provided to us, in a structured, commonly used, and machine-readable format. You have the right to transmit this data to another service provider. Where technically feasible, you have the right that your personal data be transmitted directly from us to the service provider you designate.

Right to Withdraw your Consent to us processing your information if you previously provided us your consent to process your information.

Right to Object, based on your particular situation, to using your personal data on the basis of our legitimate interests. However, we may override the objection if we demonstrate compelling legitimate grounds, or for the establishment, exercise of defense of legal claims. You may also object at any time to the use of your personal data for direct marketing (newsletter) purposes, by simply opting out of our newsletters.

Right to Restrict processing your personal data (except for storing it) if you contest the accuracy of your personal data, for a period enabling us to verify its accuracy; if you believe that the processing is unlawful and you opposes the erasure of the personal data and requests instead to restrict its use; if we no longer need the personal data for the purposes outlined in this policy, but you require them to establish, exercise or defense relating to legal claims, or if you object to processing, pending the verification whether our legitimate grounds for processing override yours.

Right to be Forgotten. Under certain circumstances, such as when you withdraw your consent to our newsletters, you have the right to ask us to erase your personal data relating to that processing. However, we may still process your personal data if it is necessary to comply with a legal obligation, we are subject to under laws in EU Member States or for the establishment, exercise, or defense of legal claims.

If you wish to exercise any of these rights, contact us at Legal@base.ai.

We reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you with information that you have asked for, we will explain the reason for this.

You have a right to submit a

Subject to applicable law, you have the right to lodge a complaint

complaint to the relevant supervisory data protection authority

with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, particularly in the Member State of your residence, place of work or place of an alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click [here](#).

If you are in the UK, you can lodge a complaint to Information Commissioner’s Office (ICO) pursuant to the instructions provided [here](#).

ADDITIONAL INFORMATION FOR USERS IN CALIFORNIA

Pursuant to the California Consumer Privacy Act (CCPA), below is a detailed description of the information we have collected from you and the business or commercial purposes for which we use each category of personal information, in the past 12 months.

We do not sell your personal information to third parties and have not done so in the past 12 months.

Categories of personal information pursuant to the CCPA

- Identifiers ("**Identifiers**")
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual ("**Information Capable of Association**")
- Internet or other electronic network activity information ("**Electronic Activity**")

Specific types of personal information collected and their source

a. Identifiers

- Name
- Email Address

b. Information capable of association

- Your account password
- Your Interactions with the Platform and content therein
- The contents of your inquiry message to us

c. Electronic Activity

- Information about your use of the Platform

Business or commercial purposes pursuant to the CCPA

- Performing services – Identifiers, Information Capable of Association, Electronic Activity
- Providing customer service – Information Capable of Association
- Undertaking activities to verify or maintain the quality of the service and to improve, upgrade or enhance the service – Information Capable of Association, Electronic Activity
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity – Identifiers, Information Capable of Association, Electronic Activity

Specific Purposes. Our specific purposes for collecting the personal information are specified in the section above titled “Personal Data We Collect” and “How We Use Personal Data”

The source of information. You and the device you use to access our Platform are the sources of information for interactions you make with us through our Platform.

Your rights under the CCPA if you are a resident of California

Right to Know. You have the right to know:

- The categories of personal information we have collected about you;

- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting personal information;
- The categories of third parties with whom we share personal information, if any;
- The specific pieces of personal information we have collected about you.

Right to deletion. Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Protection against discrimination

You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:

- Deny goods or services to you;
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Provide a different level or quality of goods or services to you; or
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising your CCPA rights

If you would like to exercise any of your CCPA rights as described in this Policy, please do so by emailing us your request at Legal@base.ai.

We will ask you for additional information to confirm your identity and for security purposes before we comply with your request to access or delete your information. Depending on the nature of your request, we will verify your identity by asking you to provide us two or three data points that we maintain about you, and a signed declaration of identity verification.

THIRD PARTY LINKS

The Platform may contain links to third party websites which are governed by their own privacy policies

The Platform may contain links to third party websites and pages which are not operated or controlled by the Company. Those sites and the information that you share with them are governed by their own privacy policies and not by this Policy.

CHANGES TO THIS POLICY

We may change this Policy from time to time, and will try to proactively notify you of such change

From time to time, we may change this Policy, in which case we will post the updated Policy on the Platform and will try to proactively notify you of such change by email. The latest version of the Policy will always be accessible on the Platform.

Last Update: August 2022