

PRIVACY POLICY

RabbitQuest and its companies takes your privacy very serious. This is the Privacy Policy of RabbitQuest B.V. and its related companies. ("RabbitQuest," "we," "NewU", "us" or "our"), a company having its address at Uilenstede 31, Amstelveen. Our Privacy Policy explains how we collect, use, share and protect information in relation to our mobile services, our web based application named NewU, our website www.rabbitquest.com, our website www.newu-app.com, and any software provided on or in connection with RabbitQuest services (collectively, the "**Service**"), and your choices about the collection and use of your information.

By using our Service, you understand and agree with this privacy policy and RabbitQuest's data processing as stated in this Privacy Policy. Our Privacy Policy applies to all visitors, users, and others who access the Service ("**Users**").

What kinds of information do we collect?

Information you provide

We collect the following information you provide us with directly:

- a. Your username, password, employer and e-mail address when you register for an account;
- b. Profile information that you provide for your user profile;
- c. "User Content" (e.g., group challenges, photos, comments and other material) that you post to the Service;
- d. Data about your usage of the Service, for example, selection and completion of challenges, tracking of challenges.
- e. General location identification such as, country and city the Service is used. We use this information to provide features of our Service, to improve and customize our Service.

Log file information

We collect information that your browser sends whenever you visit our Service. This log file information may include information such as your computer's Internet Protocol address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics.

Metadata

Metadata is usually technical data that is associated with User Content. For instance, metadata can describe how, when and by whom a piece of User Content was collected and how that content is formatted. This makes your User Content more searchable by others and more interactive.

Data Retention

The retention periods applied by RabbitQuest comply with applicable legislation in effect on the date hereof, namely:

- a. for data relating to your account.
- b. for transactional data relating to the purchase or start of the usage of the Service: such data is kept for the entire period of the contractual relationship, then in accordance with legal obligations and the applicable statute of limitation periods. Please note that this data does not include Payment Card information, which is processed by our third-party payment processors, and not RabbitQuest.
- c. for data collected based on your consent to receive our marketing communications: we will use such data until you withdraw consent or applicable law requires that such data is no longer used.
- d. when your data are collected in the context of requests/queries: such data are kept for the period necessary to process and reply to such requests or queries.
- e. when cookies or other trackers are placed on your terminal.

In accordance with the law, RabbitQuest does not retain data any longer than is required for attaining the purposes for which they were collected. Other data will be kept as long as necessary for the purposes pursued and in compliance with our legal obligations, including the applicable statute of limitations.

Analytics services (non-personally identifiable information only)

We use third-party analytics tools to help us measure traffic and usage trends for the Service. These tools collect information sent by your device or our Service, including the web pages you visit, add-ons, and other information that assists us in improving the Service. The tools use 'cookies', which are text files placed on your device, to collect your log information and behavior information in an anonymous form. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User. With respect to Google Analytics, although Google Analytics plants a permanent cookie on your web browser to identify you, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits by disabling cookies.

Automatic suggestions

Some parts of the Service may be automated for the purpose of optimizing the output of the Service. This includes for example but not exclusively the suggestion of challenges to the User.

How do we use this information?

We use all of the information we have to help us provide and support our Services. Here is how:

- a. remember information so you will not have to re-enter it during your visit or the next time you visit the Service;
- b. provide, improve, test, and monitor the effectiveness of our Service;
- c. to help you efficiently access your information after you sign in;
- d. monitor metrics such as total number of visitors, and traffic;
- e. diagnose or fix technology problems;
- f. develop and test new products and features;
- g. optimize the Service for the benefit of the Users by for example but not exclusively, optimizing challenge suggestion, notification and challenge tacking; and
- h. automatically update the Service on your device.
- i. ensure the health of the user is optimized, and no health compromising suggestions are given to the user;
- j. to give the user adequate health and habit-formation suggestion, by creating an user profile (profiling).

Communications

We may use your information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt-out of receiving any, or all, of these communications from us by following the unsubscribe link.

How is this information shared?

We will not rent or sell your information to third parties outside RabbitQuest.

People you share and communicate with

Any information or content that you voluntarily disclose for posting to the Service, such as User Content or your status on a group challenge becomes visible to everyone within that group, as controlled by any applicable privacy settings that you set. To change your privacy settings on the Service, please change your profile setting. Subject to your profile and privacy settings, any User Content that you make public is searchable by other Users. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users or third parties have copied or saved that information.

Change of control

If we sell or otherwise transfer part or the whole of RabbitQuest or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information such as name and email address, User Content and any other information collected through the Service may be among the items sold or transferred. You will continue to own your User Content. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

Legal requests and preventing harm

We may access, preserve and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

Corporate sharing

The usage by the Service of large consumer communities (companies, universities, hospitals, government agencies, etc.) ("Communities") to introduce the Service to their employees and members. If you have registered to use the Service through a code or other registration credential furnished by a Community (a "Community Subscription"), one responsible representative person (for example an HR manager) of the Community will have access to your email address, the date you registered to use the Service, and the date on which you last used the Service. The Community will also have access to your Community's aggregated and anonymized general usage data.

Your Community may also have limited access to your usage data on a group challenge basis, but only if you have provided appropriate consent under applicable law for such sharing. For example, many Communities are offering incentive programs based on members' participation in health and wellness programs, and desire to better understand how their employees are using the Service. You have at any time the right to stop the sharing of your group challenge data.

Business administration usage

The usage of the Service by large consumer Communities will be monitored by a Business admin. This business admin has the right to create Community challenges–

Safety and security

RabbitQuest has taken appropriate technical and organizational measures by using the latest technologies to protect your information against loss or unlawful processing. This includes for example HTTPS secure login, CSRF-token for login and Drupal security. All data you provide to us through the Service is stored on our secure servers located in the EU, using Amazon Web Services. In order to maximize the privacy of the user and ensure full data protection, some data will be anonymized if the user wants to. Data anonymization is done by encrypting identifiers that connect an individual to stored data.

We use safeguards to help keep the information collected through the Service secure and take steps (such as requesting a unique password) to verify your identity before granting you access to your account. However, RabbitQuest cannot ensure the security of any information you transmit to RabbitQuest or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed. We request you to do your part to help us. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and RabbitQuest, at

all times. We are not responsible for the functionality, privacy, or security measures of any other organization.

International transfer

Your information may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction. If you are located outside the Netherlands and choose to provide information to us, please note that we transfer the information to The Netherlands. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Rights

In accordance with the GDPR, the rights of the User are:

- a. Right of access: you have the right to obtain (i) confirmation as to whether personal data concerning you are processed or not and, if processed, to obtain (ii) access to such data and a copy thereof.
- b. Right to rectification: you have the right to obtain the rectification of any inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- c. Right to erasure: in some cases, you have the right to obtain the erasure of personal data concerning you. Upon request, RabbitQuest will permanently and irrevocably anonymize your data, by encrypting identifiers that are connecting to personal stored data, such that it can never be reconstructed to identify you as an individual. However, this is not an absolute right and RabbitQuest may have legal or legitimate grounds for keeping such data.
- d. Right to restriction of processing: in some cases, you have the right to obtain restriction of the processing of your personal data.
- e. Right to data portability: you have the right to receive the personal data concerning you which you have provided to RabbitQuest, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance from RabbitQuest. This right only applies when the processing of your personal data is based on your consent or on a contract and such processing is carried out by automated means.
- f. Right to object to processing: you have the right to object at any time, on grounds relating to your particular situation, to processing of personal data concerning you when such processing is based on the legitimate interest of RabbitQuest. RabbitQuest may, however, invoke compelling legitimate grounds for continued processing. When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of such data. You may, in particular, exercise that right by clicking on the “unsubscribe” link provided at the bottom of any messages received, or by managing your privacy preferences by logging in to your RabbitQuest account and following the instructions here.
- g. Right to lodge a complaint with the competent supervisory authority: you have the right to contact the supervisory authority to complain about RabbitQuest’s personal data protection practices.
- h. Right to give instructions concerning the use of your data after your death: as required by applicable law, you may have the right to give RabbitQuest instructions concerning the use of your personal data after your death. To exercise one or more of these rights, you can email: info@rabbitquest.com.
- i. Right to cancel at any time the permission of RabbitQuest to store your data and information. This, however, may cause the User to lose part or all the functionality of the Service.
- j. Right to access your personal data to modify or update at any time via an online account, or by emailing info@rabbitquest.com.

You can contact us at any time by emailing info@rabbitquest.com. We will respond to your request in a reasonable timeframe in accordance with applicable law.

Legal bases of personal data processing

In accordance with GDPR, RabbitQuest provides the following information regarding lawfulness of processing for personal data. The performance of the contract (the RabbitQuest Terms & Conditions) between you and RabbitQuest for the data processing relating to your use of the Services;

RabbitQuest's base for personal data processing, more specifically:

- a. the User has given consent to the processing of personal data, by accepting this Privacy Policy and/or the Terms and Conditions; and
- b. processing of the data of the User is necessary for the performance of the Service.

RabbitQuest's legitimate interest, more specifically:

- a. The agreement between RabbitQuest and the Users to collect the data discussed in the Privacy policy;
- b. The necessity for RabbitQuest to collect the data as further explained in "How do we use this information";
- c. Our business interest in providing you with emails and push notifications for timely introductory materials and information about the Service, features and updates'
- d. Our business interest in offering you personalized or adapted content and challenges based on your usage of the Service'
- e. Our business interest in collecting data regarding your general usage activities for the purpose of improving the Service user experience;
- f. Our business interest in requesting that you partake in the Service, surveys in order to better understand your needs and expectations;
- g. Our business interest in providing you with customer service communications regarding your account, questions about the Service, or any other matters directed to customer service staff, in order to have clear and easy communication with you and to respond to all your requests;
- h. Our business interest in collecting data related to unplanned downtime or errors in the Service;
- i. Our business interest in complying with our legal obligations, such as maintaining accurate financial records; and
- j. Our business interest in verifying your eligibility in a Community and providing limited reporting to such Community.

Third-party applications, websites and services

We are not responsible for the practices employed by any applications, websites or services linked to or from our Service, including the information or content contained within them. Please remember that when you use a link to go from our Service to another application, website or service, our Privacy Policy does not apply to those third-party applications, websites or services. Your browsing and interaction on any third-party application, website or service, including those that have a link on our Services, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your User Content. If you are using a third-party app, website or service and you allow them to access your User Content you do so at your own risk.

Children's privacy

Our Service does not address anyone under the age of 13 ("**Children**"). We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you are aware that your Children have provided us with personal information, please contact us. If we become

aware that we have collected personal information from a child under age 13 without verification of parental consent, we take steps to remove that information from our servers.

Changes to this privacy policy

We may modify or update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

How to contact us

If you have any questions about this Privacy Policy of the Service, please send an email to: info@rabbitquest.com by addressing Bart Spangenberg.