PRIVACY POLICY BADGER POST

BadgerPost Platform and its subsidiaries and affiliates (collectively, "Platform" or "we") respect the privacy of Personal Data and are committed to protecting it. This Privacy Policy (the "Policy") describes the policies and procedures the Platform has implemented to protect Personal Data processed by the Platform in accordance with applicable Data Protection Laws. This Policy also describes how the Platform collects, uses, and discloses Personal Data from your interactions with us, including when you visit the Platform websites and other online platforms, as well as your privacy rights. This Policy does not apply to the Personal Data of Platform's employees, contractors, or job applicants, which are subject to separate data protection policies.

Platform has voluntarily opted to apply the protections and obligations outlined in this Policy to all Data Subjects. However, such protections and obligations may be beyond the legal requirements of the jurisdiction of certain Data Subjects. Data Protection Laws vary widely across jurisdictions, and while Platform will strive to meet this Policy for all Data Subjects, the Data Protection Laws for the Data Subject ultimately govern the protections conferred in the specific jurisdiction applicable to that Data Subject. Additionally, there may be certain rights applicable to you for which we may provide separate notice informing you of your rights and how to adequately exercise them.

DEFINITIONS

"Controller" means a natural or legal person, public authority, agency, or other body that, independently or jointly with others, determines the purpose and means of Processing Personal Data, as defined in Data Protection Laws. For purposes of applicable Data Protection Laws, the Controller of the Personal Data Processing described below is THE BADGER HUB SRL (business registered in Romania under EUID ROONRC.J12/1663/2024), owner of BadgerPost Platform, and its subsidiaries and affiliates, and with regard to certain Processes, THE BADGER HUB SRL, owner of Badger Post Platform may act as joint Controller with a third party. All references in this policy to "BadgerPost","Badger Post ", "Badger Post Platform" "our", "us" or "we" refer THE BADGER HUB SRL, or our group companies and suppliers which provide services to us, as appropriate.

"Data Protection Laws" means privacy laws and regulations that apply to THE BADGER HUB SRL, owner of Badger Post Platform's Processing of your Personal Data. This primarily includes the Regulation (EU) 2016/679 (GDPR), the Singapore Personal Data Protection Act 2012 (PDPA), the Chinese Cyber Security Law (the CS Law), the Chinese Personal Information Protection Law (PIPL), and applicable state and federal privacy laws in the United States, but may extend to other applicable privacy laws.

"Data Subject" refers to you, as a natural person who can be identified, directly or indirectly, by reference to your Personal Data.

"Personal Data" means any information attributable to an identified or identifiable natural person (a Data Subject), as defined in Data Protection Laws. Personal Data does not include data where the identity has been removed (anonymous data). Personal Data shall encompass Special Category Data.

"Process" or "Processing" or "Processed" or "Processes" means, as applicable, any operation or set of operations performed upon Personal Data, whether or not by automatic means, such as collecting,

recording, using, organizing, structuring, storing, adapting or altering, retrieving, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing, or purging.

"Processor" means a natural or legal person, public authority, agency, or other body that Processes Personal Data on behalf of a Controller, as defined in Data Protection Laws. A Processors' activities are limited to the more "technical" aspects of a Process and do not include the exercise of professional judgment or significant decision-making in relation to Personal Data. Processors may include third-party service providers, applications, or agencies utilized by Badger Post Platform in the course of business.

"Special Category Data" (also known as "Sensitive Personal Data") means Personal Data revealing racial or ethnic origin, criminal history, political opinions, religious or philosophical beliefs, sexual orientation, trade union membership, precise geolocation, or health, genetic, or biometric data, or data pertaining to a child or minor.

COLLECTION OF PERSONAL DATA

a. Website Data

Badger Post Platform may collect your Personal Data on our websites. The technologies we use to track your movements around our websites may include cookies, tracking scripts and pixels, or tagging technologies, which we may employ to understand your preferences, improve your experience on our websites, etc. We, or third parties on our behalf, collect and use personal information which may include: your first and last name; your email address; your telephone number your inquiry and/or general information about your interest in our Services; and information you provide when you correspond with us; any updates to the information provided to us; your job title; your bank/payment details; details about how you use our Services; your social media usernames/handles; information provided when you correspond with us; information provided when you access our rooms and office spaces (including your photo), including entry and exit times; any updates to the information provided to us; personal information we collect about you or that we obtain from our third-party sources; information you provide to help us provide you with improved services, for example, if we ask you to fill in a survey or questionnaire; information about your marketing preferences;

Most internet browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your end device, or a message always appears when you receive a new cookie. Further information can be found on http://www.aboutcookies.org.

Cookie settings:

Cookie settings in Microsoft Edge: https://support.microsoft.com/en-us/microsoft-edge/view-cookies-in-microsoft-edge-a7d95376-f2 cd-8e4a-25dc-1de753474879

Cookie settings in Chrome: https://support.google.com/chrome/answer/95647?hl=en&ref_topic=14666

Cookie settings in Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redir ectlocale=en-US&redirectslug=Cookies

Cookie settings in Safari and iOS: https://support.apple.com/ro-ro/guide/safari/sfri11471/mac

Please note that disabling cookies may prevent you from using all the features of our websites.

b. Tracking Tools

We use tracking tools, such as Google Analytics, which generate information about your use of our websites. Such information may include a navigation path that you follow on our websites; how long you spend on our websites and subpages; the subpage from which you leave our websites; the country, region, or city from where you access our websites; returning or new visitor; and host name of the accessing computer (IP address).

This information is transmitted to Google servers in the USA and stored there. Such information is used to evaluate the use of our websites, compile reports on Website activities, and provide other services associated with Website and internet use. Google may transfer such information to third parties where required to do so by law, or where such third parties Process the information on Google's behalf. For additional information, see Google's Privacy Policy at

https://policies.google.com/privacy?gl=US&hl=en.

HOW WE USE YOUR PERSONAL DATA

Badger Post Platform processes personal data to operate, improve, understand, and personalize our services. We collect and use personal data for the following purposes:

- To Access and Read Data: Import content from platforms like Google Drive or WordPress.
- To Publish and Share Content: Distribute your content across CMS platforms and social media channels.
- To Automate Processes: Streamline repetitive tasks by automating interactions with different tools.
- To fulfill the reason you provided the information to us.
- To communicate with you about our services, including service announcements, updates, or offers.
- To provide support and assistance for our services.
- To create and manage your account or other user profiles.
- To personalize website content and communications based on your preferences.
- To deliver newsletters, emails, and facilitate events.
- To facilitate career counselling services.
- To manage visitors to our offices and protect our proprietary information and intellectual property.
- To respond to user inquiries and fulfill user requests.
- To improve and develop our services, including testing, research, analysis, and product development.
- To protect against or deter fraudulent, illegal, or harmful actions and maintain the safety, security, and integrity of our services.

- To comply with our legal or contractual obligations, resolve disputes, and enforce our Terms of Use.

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For any other business purpose stated when collecting your personal data or as otherwise set forth in applicable data privacy laws.

We will not collect additional categories of personal data or use the personal data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

As noted in the list above, we may communicate with you if you've provided us the means to do so. If you do not want to receive communications from us, please indicate your preference by contacting us at office@badgerhub.com.

We may create aggregated, de-identified, or anonymized data from the personal data we collect, and we may use and share such data with third parties for our lawful business purposes, provided that we will not share such data in a manner that could identify you.

HOW WE SHARE YOUR PERSONAL DATA

We disclose your personal data to the following categories of service providers and other parties:

- Service providers
- Categories of personal data shared: We disclose contact information, usage analytics, and demographic data to our service providers.
- Purposes for sharing: These third-party service providers help us provide our services and operate our business, including ad networks, analytics providers, security and fraud prevention providers, hosting and other technology and communications providers, and staff augmentation and contract personnel. We also use third-party service providers to help us manage newsletter signups and email services and for event registration. When we share your personal data with service providers, they may only use your personal data for specific purposes relating to assisting us with running our business.
- Successors to our business
- Categories of personal data shared: All personal data.
- Purposes for sharing: Your personal data may be transferred to a third party if we undergo a merger, acquisition, bankruptcy, or other transaction in which that third party assumes control of our business (in whole or in part).

In certain situations, Badger Post Platform may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Badger Post Platform is a global company and may transfer personal data to Badger Post Platform entities, affiliates, and service providers located in jurisdictions that may not provide the same level of protection as your country of residence. However, Badger Post Platform shall not transfer personal

data to a country or territory outside the jurisdiction in which it was processed, except in accordance with the requirements prescribed under data protection laws. Badger Post Platform ensures that all data transfers comply with applicable data protection laws and provides an adequate level of protection for personal data.

Any third parties with whom we share your personal information are limited by law in their ability to use your personal information for any purpose other than to provide services for us. In addition, we take steps to ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this Privacy Notice and applicable laws.

We will also disclose your personal information to third parties where it is in our legitimate interests to do so to run, grow and develop our business, such as:

- if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets; and

- if substantially all of Badger Post's Platfom or any of its affiliates' assets are acquired by a third party, in which case personal information held by Badger Post's Platfom will be one of the transferred assets;

- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation, any lawful request from government, regulator or law enforcement officials or prevent illegal activity;

- in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party or prevent any illegal activity; or

- to protect the rights, property, or safety of Badger Post's Platfom, our staff, our customers or other persons.

We may also disclose and use anonymized, aggregated reporting and statistics about users of our Website or our products and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymized, aggregated reports or statistics will enable our users to be personally identified.

Except as expressly set out above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent.

SECURITY MEASURES TAKEN TO PROTECT PERSONAL DATA

Badger Post Platform has implemented appropriate elements of privacy by design in conjunction with technical and physical safeguards designed to protect the security of Personal Data from unauthorized or unlawful Processing. In assessing the appropriate level of security, as well as the risks of varying likelihood and severity for the rights and freedoms of Data Subjects, Badger Post Platform assesses the risks presented by the Processing of Personal Data. Such risks may include, but are not limited to, any accidental, unlawful, or unauthorized destruction, loss, disclosure, alteration, or access to Personal Data Processed by or on behalf of Badger Post Platform, or other factors that may impact Data Subject rights and freedoms. Badger Post Platform shall make reasonable attempts to ensure that any risks presented by the Processing of Personal Data are sufficiently mitigated by

technological and/or organizational controls, including limited access to Personal Data utilizing access controls and password protections. However, nobody can guarantee that data transmitted through or stored on the Internet will be 100% secure all the time.

Here's how we protect your information:

Secure Authentication: We use secure OAuth authentication to connect your Facebook account, ensuring that your account credentials are never stored on our servers. We only store the necessary data required to manage your Facebook Pages on your behalf.

Limited Access: We only request the minimum permissions necessary to provide our services. Each permission is used solely for the purposes outlined above.

Data Encryption: All data transmitted between Badger Post and Facebook/Google Drive is encrypted using industry-standard protocols.

Privacy Compliance: We comply with all relevant data protection regulations, including GDPR, to ensure your data is handled responsibly.

User Control: You can revoke Badger Post's access to your Facebook/Google Drive account at any time through your Facebook/Google Drive account settings.

RETENTION OF PERSONAL DATA

Badger Post Platform will only retain your Personal Data (including your Sensitive Personal Information) for as long as is reasonably necessary for the purpose for which the Personal Data was collected, or as legally required. We will not hold or Process your Personal Data for any longer than we are legally permitted to. The criteria used to determine the appropriate retention period include:

- Regulatory requirements that we are subject to, including laws and regulations related to tax, employment, accounting, and securities;
- Whether a legal claim might be brought against us, for which the information would be relevant;
- The necessity of the information to provide our services, and whether other information

may suffice; and

- The types and sensitivity of personal information being Processed.

INTERNATIONAL DATA TRANSFERS

Badger Post Platform may transfer your Personal Data to countries other than the country in which you initially provided the information. These countries may not have the same data protection laws as the country in which you initially provided the information. When Badger Post Platform transfers your Personal Data to other countries, we will protect that information as described in this Privacy Policy and in compliance with applicable legal requirements.

Badger Post Platform may use mechanisms such as the European Commission-approved Standard Contractual Clauses or the Privacy Shield Framework to facilitate the lawful transfer of Personal Data across international borders. If you have any questions or concerns regarding the cross-border transfer of your Personal Data, please contact our Data Protection Officer at office@badgerhub.com.

PERMISIONS

Facebook Connection

These permissions allow Badger Post to perform various actions on your behalf, such as posting content and managing comments. Below is a detailed explanation of each permission we request and why it is necessary.

Permission	Description	Reason
public_profile	Allows BadgerPost to read your public profile information.	We need this to authenticate your Facebook account with our app.
email	Allows BadgerPost to read your primary email address.	We display your connected account email in the connection info for easy identification.
pages_show_list	Allows BadgerPost to retrieve the list of Pages you manage.	We need this to show you the Pages you manage and ensure you have the necessary access to use these Pages in your automations.
pages_read_engagement	Allows BadgerPost to read content posted on the Page and view engagement data.	This is required to read Page posts for automations that involve moderating user comments or analyzing engagement.
pages_manage_posts	Allows BadgerPost to create, edit, and delete posts on your Page.	We need this to automate content publishing from your CMS (e.g., WordPress) to your Facebook Page.
pages_manage_metadata	Allows BadgerPost to receive updates about activity on your Page.	Necessary for automations that include auto-replies or other dynamic interactions on your Page.
pages_read_user_content	Allows BadgerPost to read user-generated content on your Page and delete comments.	This is essential for automations that moderate user comments, ensuring inappropriate content can be managed effectively.

Permission	Description	Reason
pages_manage_engagement	Allows BadgerPost to create, edit, and delete comments on your Page.	Required for comment moderation, enabling BadgerPost to manage engagement and maintain a positive community environment.

Google Drive Connection

These permissions allow Badger Post to perform various actions on your behalf, such as reading and downloading files. Below is a detailed explanation of each permission we request and why it is necessary.

Permission	Description	Reason
drive.readonly	Allows BadgerPost to see and download all your Google Drive files.	We need this permission to read the content of the files that you wish to use in your automations, such as when reading from Google Drive to post on your CMS (e.g., WordPress).
userinfo.email	Allows BadgerPost to see your primary Google Account email address.	We display your connected account email in the connection info for easy identification.

YOUR RIGHTS AND CHOICES

Depending on your jurisdiction, you may have certain rights and choices regarding the Personal Data we collect and process about you. These rights may include:

- Right of access: You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation of whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").

- Right to update your information: You have a right to request an update to any of your personal information which is out of date or incorrect.

- Right to delete your information: You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us. We will pass your request on to other recipients of your personal information unless that is impossible or involves disproportionate effort.

- Right to restrict use of your information: You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. We will pass your request on to other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are.

- Right to stop marketing: You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

- Right to data portability: You have a right to ask us to provide your personal information to a third-party provider of services. This right only applies where we use your personal information on the basis of your consent or performance of a contract and where our use of your information is carried out by automated means.

- Right to object: You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

If an exception applies, we will tell you this when responding to your request. We may request you provide us with the information necessary to confirm your identity before responding to any request you make. To exercise any of these rights, please write an email at office@badgerhub.com. We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). It may be necessary to ask you to verify your identity.

Certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

Please note that we may ask you to verify your identity before responding to your request.

Platform is committed to responding to your requests in a timely manner and will make every effort to honor if possible your rights as provided under applicable data protection laws. In some cases where it is needed, we can mention Astra Labs, the developer of Badger Post.

AUTOMATED DECISION-MAKING AND PROFILING

We may use automated decision-making processes, including profiling, in certain situations, such as when it is necessary for entering into or performing a contract with you, with your explicit consent, or as otherwise permitted by law. If you have any concerns or objections to our use of automated decision-making processes or profiling, please contact our Data Protection Officer at office@badgerhub.com.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our data processing practices, the types of information we collect, or for other operational, legal, or regulatory

reasons. If we make material changes to this Privacy Policy, we will notify you by posting an updated version on our website or by other means, such as email. Please review this Privacy Policy periodically to stay informed about our data processing practices and your rights under applicable data protection laws.

CONTACT INFORMATION

If you have any questions or concerns about this Privacy Policy or our data processing practices, or if you would like to exercise your rights under this Privacy Policy, please contact our Data Protection Officer at office@badgerhub.com.

By using our services and providing your Personal Data to us, you acknowledge that you have read and understood the terms of this Privacy Policy.