

GLOBAL SUSTAINABLE MARKETS HOLDINGS CORPORATION

DBA 'STOCS'

PRIVACY POLICY

Effective Date: April 17th, 2023

Global Sustainable Markets Holdings Corporation and its subsidiaries and affiliates (collectively, “GSM”, “us” or “we” and Doing Business As / Trading As ‘STOCS’) are committed to protecting your (“you” or “your”) privacy and empowering you with this privacy policy (this “**Privacy Policy**”). This Privacy Policy explains how we collect, use, disclose, and apply the information collected when you use or access our online website (<https://www.stocs.com/>), products, services, or applications that link to this Privacy Policy (collectively, the “**Services**”).

By using the Services or interacting with us, you are agreeing to this Privacy Policy. Please read the following carefully to understand how we collect, use, disclose, and maintain information that can be used to identify you. In addition, this Privacy Policy describes your choices for use, access, and correction of your personal data. If you do not agree to be bound by this Privacy Policy, please stop using the Services.

1. Changes to this Privacy Policy. We may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our Services. We will post the changes to this page and encourage you to review this Privacy Policy to stay informed of ways you can protect your privacy. If we make changes that materially alter your privacy rights, we may provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your account and stop using the Services.

2. Information We Collect and Receive. We collect your information in a variety of ways and from a variety of sources when you interact with the Services. More information about the categories and sources of information is provided below.

2.1 Information You Provided to Us. We collect information that you decide to share with us including but not limited to:

- (a) Contact information, such as name, phone number, and email and postal address;
- (b) Account information, such as online password and other log-in details used to access the Services;
- (c) Payment information, such as name, billing address and payment card details, including card number, expiration date and security code, which is collected and stored by our third-party payment processor on our behalf. We store only the last four digits of your payment card and the expiration date;
- (d) Data about your interactions with our Services including product ratings and reviews that you may post;

- (e) Social media handles, content, and other data posted on our official social media pages;
- (f) Purchase, return, and/or exchange information; and
- (g) Other personal data contained in content you submit to us, such as when you use our “Contact Us” feature or customer support tools on our websites or mobile apps, respond to our surveys, or connect with us regarding an actual or potential business relationship with us.

2.2 Information We Obtain from Others. We obtain information from other sources, including, but not limited to:

- (a) Updated delivery and address information from our carriers or other third parties, which we use to correct our records and deliver your next purchase or communication more easily;
- (b) Information about your interactions with products and services offered by our subsidiaries and affiliates;
- (c) Credit history information from credit bureaus, which we use to help prevent and detect fraud and to offer certain credit or financial services to some customers; and
- (d) Information we obtain from third-party social media services (e.g., Facebook) if you choose to link to, create, or log into your account through these services.

2.3 Information We Automatically Collect.

(a) When you interact with our products and services, we obtain certain information by automated means, such as cookies, web server logs, web beacons, and other technologies. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. To learn more about cookies and other technologies, please see our Cookies Policy.

(b) We may also use these automated technologies to collect information about your equipment, browsing actions, and usage patterns. The information we obtain in this manner may include your device IP address, identifiers associated with your devices, types of devices connected to our services, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of website or app visits. These technologies help us (i) remember your information so you will not have to re-enter it; (ii) track and understand how you use and interact with our products and services; (iii) tailor the services around your preferences; (iv) measure the usability of our products and services and the effectiveness of our communications; and (v) otherwise manage and enhance our products and services, and help ensure they are working properly.

3. How We Use Your Information.

(a) We may use the personal data that we collect for our legitimate interests and the limited purpose of providing the Services and related functionality and services, as described in this Privacy Policy and as permitted by applicable laws. These purposes include circumstances where it is necessary to provide or fulfill the Services requested by or for you or where you have given us your express consent. We may use your personal data to:

- (i) Fulfill and manage purchases, orders, payments, and returns/exchanges you;
- (ii) Establish and manage your account and profile;
- (iii) Respond to requests for information about our products and services in our stores, on our websites or mobile application(s) or to otherwise serve you;
- (iv) Personalize your experience with our Services;
- (v) Increase and maintain the safety and security of our Services and prevent misuse;
- (vi) Communicate with you (including providing you with offers and other communications about our products and services) and provide customer support;
- (vii) Allow you to interact with certain third-party products or services (for example, to enable you to link to, or view content from, third-party sites within our services);
- (viii) Perform analytics (including market and consumer research, trend analysis, financial analysis, and anonymization of personal information);
- (ix) Manage career opportunities at GSM; including for recruitment purposes, employee onboarding and other HR purposes;
- (x) Operate, evaluate, develop, manage and improve our business (including operating, administering, analyzing and improving our Services; developing new products and services; managing and evaluating the effectiveness of our communications; performing accounting, auditing, billing reconciliation and collection activities and other internal functions);
- (xi) Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;
- (xii) Comply with and enforce applicable legal requirements, relevant industry standards and policies, including this Privacy Policy and our Website Terms of Use & Terms of Sale; and
- (xiii) Use for any other purpose for which we provide notice at the time of collection.

(b) We may aggregate and/or de-identify information collected through the Services and from other sources so that such information can no longer be linked to you or your device

("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including, without limitation, for research and marketing purposes

4. How We Share and Disclose Information. Information shared with third parties in accordance with this Privacy Policy includes some or all of the personal data we collect (as described and listed in this Privacy Policy). We do not sell or otherwise disclose personal data we collect about you, except as described herein or otherwise disclosed to you at the time the data is collected. More information about we share and disclose your personal data is provided below.

4.1 Service Providers. We may share the information we collect with companies that provide support services to us (such as email providers, mobile marketing services, analytics providers, web hosting providers, call center/chat providers, payment processors, data enhancement services, fraud prevention providers or shipping services providers, including product vendors) or that help us market our products and services. These companies may need information about you in order to perform their functions. We limit information shared with service providers to what is necessary to fulfill the services.

4.2 Other Businesses Products and Services. We allow other businesses to make their products or services available to you. You may purchase products or services from these other businesses through our Services. When you purchase such products or services, we will share personal data related to your purchase with those businesses.

4.3 Your Consent. We may share your personal data for other purposes pursuant to your consent or with your further direction.

4.4 Aggregate/De-Identified Data. From time to time, we may share Aggregate/De-Identified Information about use of the Services, such as by publishing a report on usage trends. The sharing of such data is unrestricted.

4.5 Legal Reasons. We may also disclose information about you when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose information about you to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of our Services; to enforce or apply our Website Terms of Use & Terms of Sale or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others. We will attempt to notify users about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority.

4.6 Sale, Merger, or Other Business Transfer. As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions (including in contemplation of such transactions), personal data may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third-party, your personal data would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.

5. Your Choices.

(a) If you have registered for an account, you may access, review, and update certain personal data that you have provided to us by logging into your account and using available features and functionalities or by contacting us in accordance with the “Contact Us” section below.

(b) Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services. For more information, please see our Cookies Policy.

(c) You have a choice at any time to stop us from sending you emails for marketing purposes by following the “unsubscribe” link included in these messages. Please note that despite any indicated email marketing preferences, we may continue to send you administrative emails regarding GSM, including, for example, notices of updates to our Website Terms of Use & Terms of Sale or this Privacy Policy, if we choose to provide such notices to you in this manner.

(d) If you do not provide the personal data that we need to provide the Services, we may not be able to provide with the Services or certain functionalities. We will tell you what personal data that you must provide in order to receive the Services.

(e) If you choose to connect to the Services through your social media account or another third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

(f) Some browsers offer a “do not track” (“**DNT**”) option. Since no common industry or legal standard for DNT has been adopted by industry groups, technology companies, or regulators, we do not respond to DNT signals. We will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

6. Security. We take reasonable precautions intended to help protect your personal data that we collect. Unfortunately, no system or online transmission of data is completely secure, and we cannot guarantee the security of data transmitted across the Internet. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

7. Information Retention. We will retain information required to comply with privacy requests, manage active accounts, as required by law, in order to resolve disputes or enforce our agreements. We will retain personal data we process on behalf of our clients as directed by them. We may also retain copies of your information for disaster recovery purposes.

8. International Users. The Services are hosted in the United States and are intended for and directed to users in the United States. If you are a user accessing the Services from the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from United States laws, please be advised that through your continued use of Services you are transferring your personal information to the United States and you consent to that transfer. The Services are not intended to subject us to the laws or jurisdiction of any state, country, or territory other than those of the United States. Your information may be stored and processed in any country where we have facilities or in which we engage service providers and, by using the Services, you consent to the transfer

of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

9. Links to Third-Party Websites. The Services may provide the ability to connect to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we strongly suggest you review. If any linked website is not owned or controlled by us, we are not responsible for its content, any use of the website, or the privacy practices of the operator of the website.

10. Children’s Privacy. The Services are directed to individuals at the age of 13 and over. We do not knowingly collect personal data from individuals under the age of 13. If we become aware of individuals who have provided us with personal data and are under the age of 13, we will take steps to deactivate the account and delete the personal data. If you become aware of information from individuals under the age of 13 which has been provided to us, please contact us in accordance with the “Contact Us” section below.

11. Contact Us. If you have any questions or concerns about our Privacy Policy, please contact us via email at privacy@stocs.com.