

## NEOC - PRIVACY AND COOKIES POLICY

Last updated April 2022.

This is the privacy policy of Kosa NFT Limited, trading as New Era of Creation (shortened to NEOC), a company registered in England and Wales under company number 13622692 whose registered office is at Marshall House, Ring Way, Preston, PR1 2QD (“we” and “us”). It describes policies and procedures by which we storage, use, process and disclose personal data that individuals, companies or legal entities (“you”) decide to share with us when you use our website at [neoc.io](https://neoc.io) or any pages under our brand including any tablet or mobile phone applications owned and/or operated by us. It also summarises your rights in respect of this personal data.

This policy, together with our terms of use available on our website at [neoc.io](https://neoc.io), applies to your use of our website.

Our website may contain links to third party websites that are not covered by this policy. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.

This policy contains the following information:

- Information about us
- Information on what we may collect
- How we store your personal data
- How we disclose your information
- When you interact with our website - Information on cookies
- Your rights regarding your personal data
- What happens when we link to other websites?
- The changes we may make to this policy.

### Information about us

We respect your right to privacy and will only process personal information about you in accordance with applicable data protection laws. We comply with the UK Data Protection Act 2018. If any of these laws are replaced or superseded, we will also comply with that.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([ico.org.uk](https://ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### What we may collect

Personal data, or personal information, is any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you when you engage with us. Whenever we collect personal data about you, we must have a legal ground (lawful basis) to do so. We must also observe the principles of data minimisation and only collect as much personal data as necessary, and retain that data for no longer than necessary.

	<u>Type of data</u>	<u>Purpose and Lawful Basis</u>
Identity and contact information you provide to us when you contact us or you win any giveaway we may operate from time to time (Personal Data)	Includes: <ul style="list-style-type: none"> <li>● Name</li> <li>● Email address</li> <li>● Postal address</li> </ul>	<p>The purpose of collecting this information is so that we can respond to your correspondence or to post you the prize for any giveaway we may operate from time to time. If you contact us with a customer service issue, we may use your name and email address to send you information about your matter or issue raised and we may also provide you with updates on changes to this policy or security information.</p> <p>The lawful basis for collection of this information is that it is needed to perform our contract with you (i.e., to respond to your correspondence or to post you your prize), it is in our legitimate interest and that you have consented (i.e., by contacting us).</p>
Identity and contact information you provide to us when you sign up to receive our marketing or promotional materials (Marketing and Communications Data)	Includes: <ul style="list-style-type: none"> <li>● Name</li> <li>● Email address</li> </ul>	<p>The purpose is to provide you with marketing and promotional material. The lawful basis for this is that you have provided your consent and it is in our legitimate interest to present relevant content, products, and services to you. You can withdraw your consent at any time by contacting us at <a href="mailto:info@neoc.io">info@neoc.io</a>.</p>
Technical Data	Includes: <ul style="list-style-type: none"> <li>● Internet protocol (IP) address</li> <li>● Your login data, browser type and version</li> <li>● Time zone setting and location</li> <li>● Browser plug-in types and versions</li> <li>● Operating system and website</li> <li>● Other technology on the devices you use to access our website.</li> </ul>	<p>This data is automatically collected when you use our website. The purpose is to enable your access to our website. The lawful basis is this is necessary for us to perform our contract with you (i.e., to give you access to the service our website provides).</p>

Cookies Data	Like many websites, we use "cookies" to enhance your experience and gather information about visitors and visits to our website. Please refer to the "Information on cookies" section below for information about cookies and how we use them and what kind.	<p>Cookies are small text files placed on your device when you visit our website and are used to make the users' experience more efficient.</p> <p>The lawful basis is this is necessary for us to perform our contract with you (i.e., to give you access to the service our website provides).</p> <p>We also need this information to study how you use our website, in order to improve and develop the services we provide, and better inform our marketing strategies.</p>
Marketing and Communications Data	Includes your preferences in receiving marketing from us and our third parties and your communication preferences.	<p>The purpose is to enable direct marketing.</p> <p>The lawful basis is that it is necessary for our legitimate interest to present relevant content, products, and services to you (only where you have provided your consent that we do so).</p>

### When you interact with our website - Information on cookies

We use cookies in accordance with the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and the Data Protection Legislation 2018.

Cookies are small text files placed on your device when you visit our website and are used to make the users' experience more efficient. We are able to store cookies on your computer where they are necessary for the operation of our website however, for non-essential cookies we need your permission.

We use cookies to distinguish users and to improve our website. We analyse how you use our website, and we look at aggregate statistics about your usage, and how others use our website. We collect certain information from these cookies, and this includes information about your IP address, your location when you access our website, the date and time you access our website, the language you use and the type of browser you use.

We do not track individual users or use cookies to identify individuals. We use cookies to recognise you and your preferences, improve our website's performance and collect analytical information for ourselves and our business partners. Without the knowledge gained we would not be able to provide the service we do.

These are the types of cookies we use:

- **'Session cookies'** allow us to track your actions during a single browsing session, but they do not remain on your device afterwards; and
- **'Persistent cookies'** remain on your device between sessions. We use them to authenticate you and to remember your preferences. We can also use them to balance the load on our servers and improve your experience on our website.

Session and Persistent cookies can be either first or third party cookies. A first-party cookie is set by the website being visited; a third-party cookie is set by a different website. Both types of cookies may be used by us or our business partners.

All of our cookies are categorised by the role they fulfil on our website:

- a) **Strictly Necessary:** these are essential to enable you to move around our website and use features such as secure services. Without these cookies such services could not be provided;
- b) **Functionality:** allow our website to remember your choices and to personalise certain features. These cookies may be anonymised and cannot track your browsing activity on other websites; and
- c) **Performance:** collect information as to how users use our website. These cookies do not collect information that identifies a visitor. The information collected is aggregated and used to improve our website.
- d) None of the cookies employed are classified as Behavioural Targeting.

We will always ask for your consent to use non-essential cookies. You are free to withhold consent to this, but it means that we might not be able to provide the full website experience to you, including some elements of video advertising. If at any time you wish to disable cookies, you may do so through the settings on your browser, or whenever the pop-up appears on our website (each time you access our website).

We may process your data for compliance with a regulatory requirement or legal obligation to which we are subject to. Your data will only be processed if processing the data to comply with such obligation is a reasonable and appropriate way of achieving compliance.

We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

### **How we store your personal data**

We store all of your personal data on Amazon AWS servers.

We may transfer your collected data to storage outside the European Economic Area (EEA) or the United Kingdom. It may be processed outside the EEA or the United Kingdom so that you may receive the services our website provides. If we do store or transfer data outside the EEA or the United Kingdom, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA or the United Kingdom. This means that sometimes we may need to use legally binding contractual terms between us and any third parties we engage with and the use of the EU-approved Model Contractual Arrangements.

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected through our website. For more information on the security of Amazon AWS, please refer to: <https://docs.aws.amazon.com/whitepapers/latest/aws-overview/security-and-compliance.html>

It is important to note that personal data is encrypted between your device and any external host storage we use.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We will still be responsible for protection of your personal data, even where we have transferred it outside the EEA or the United Kingdom. We regularly review our data retention obligations to ensure we are not retaining data for longer than we are legally obliged to.

### **How we disclose your information**

We may disclose your information in the following cases:

- If we want to sell our business, or our company, we can disclose it to the potential buyer;
- We can disclose it to other businesses in our group, as defined in the UK Companies Act 2006;
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety, or rights; or
- We can exchange information with others to protect against fraud or credit risks.

We may contract with third parties/subcontractors to supply our services to you on our behalf. These include cloud services used to send emails, technology providers that assist in providing our services to you and our accountants.

### **Your rights**

When you provide us with personal data, you have certain legal rights, and these include:

- To request access to, deletion of or correction of your personal data held by us at no cost to you;
- To request that your personal data be transferred to another person (data portability);
- To be informed of what data processing is taking place;
- To restrict processing;
- To object to processing of your personal data; and
- To complain to a supervisory authority.

If you wish to access, rectify, erase, or transfer your personal data, please contact us [info@neoc.io](mailto:info@neoc.io).

### **Notice for California residents of privacy practices and rights**

If you are a California resident, California law may provide you with additional rights regarding your personal data.

#### *Your rights*

The California Consumer Privacy Act of 2020 (“**CCPA**”) gives you the following rights:

- Right to know about the personal information we collect and share:

- The CCPA gives you the right to request that we disclose the specific pieces of personal information we have collected about you;
- Please see above for information on the data we collect on you, and how we process it; and
- We do not sell your personal information. However, we do disclose your personal data to limited third parties, as described above
- Right of deletion:
  - You have the right to request that we delete your personal information, subject to certain exceptions
- If you wish to delete your personal data, please contact us at [info@neoc.io](mailto:info@neoc.io). Please note that we may require certain information from you in order to verify your identity before proceeding with your request.

#### *Disclosures about your personal information*

We collect the categories of personal information from you in connection with your use of our Website as described above.

#### *Non-discrimination*

We will not discriminate against you for exercising any of your CCPA rights.

#### **What happens when we link to other websites?**

This policy only relates to our website and our coaching. We might have links on/within our website to other websites, and these websites will have their own terms and conditions and privacy policies. You should check those privacy policies before providing your personal data to those websites.

Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our website. We have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

#### **The changes we may make to this policy**

We can update this policy from time to time as laws change or as our website changes. If we make material changes to this policy, and we need your consent to those changes, we will contact you by email to do so.