

MOSEY WORKS, INC.

PRIVACY POLICY

EFFECTIVE DATE: July 7, 2023

1. PURPOSE OF POLICY

We are committed to protecting your privacy as you use our Service! We created this Privacy Policy (“Policy”) to give you confidence as you use our website, mosey.com (the “Website”), our software (“Software”), as well as any other related services provided by us (collectively, the “Service”). This Policy covers how we collect, use, store, and share various information that, on its own or in combination with other information, may be used to identify individuals (“Personal Data”). All references to “we”, “us”, “our”, or “Mosey” refer to Mosey Works, Inc., a Delaware corporation. All references to “Company” refer to your employer in such cases where Mosey has entered into a contract with such Company to provide the Service to the Company’s employees and other personnel. All references to “you”, “your”, or “Authorized User” refer to the individual agreeing to this Policy and, if applicable, to whom the Company has granted administrative access to the Service. In situations where you are engaging the Service in your individual capacity and not through your employer (an “Individual Customer”), responsibilities of the Customer described herein are your responsibilities. Individual Customers and Company are each referred to as “Customer.” Do not hesitate to contact us at privacy@mosey.com if you have any questions or want to discuss this Policy.

This Policy also describes our practices related to information of individuals with whom we communicate for marketing or promotional purposes but who may not otherwise be users of the Software (“Marketing Recipients”). By using the Software and agreeing to this Policy, or by agreeing to this Policy as a Marketing Recipient, you consent to the privacy practices described in this Policy.

2. SOFTWARE

The Software is a proprietary software to assist users in managing employment and tax compliance in various jurisdictions.

3. INFORMATION WE COLLECT AND HOW WE USE IT

Required Information You Voluntarily Provide Us.

When you begin using the Software, you will be required to provide us with various information that, on its own or in combination with other information, can be used to identify you as an individual (“Personal Data”) for the purposes of creating an account on the Software (your “Account”). Such Personal Data includes your first and last name, your email address and phone number, and your physical address.

Personal Data We Collect from Marketing Recipients.

In addition to the Personal Data we collect from users of the Service, we collect Personal Data from Marketing Recipients who are interested in learning more about our products and services. This Personal Data consists of basic contact information such as the Marketing Recipient's name and email address. This Personal Data is collected by us when Marketing Recipients sign up for commercial emails from us via online or offline sign-up forms, and through other means such as email. For Marketing Recipients who are not otherwise users of the Service, we only use your Personal Data to send communications, including updates on promotions and events, relating to products and services offered by us and by third parties we work with that are related to the Service.

Optional Information You Voluntarily Provide Us.

In addition to the required information that you provide to us in order to use the Service, there are various pieces of information you can, or may in the future be able to, choose to provide as part of your use of the Service. Further, now or in the future, we may allow you to provide us with access to additional information and data through integrations with third party goods and services. The various categories of information in this subsection is, or may be, considered Personal Data, and is used for the purpose of providing you with the Service's functionality. While all of the information described here may not be required to use the Service, some aspects of the Service may not be available if you choose not to provide us with such information.

Special Information.

Although you, as an Authorized User, will not be required to submit Special Information to us, you may, from time to time, submit Special Information of members of the Customer's workforce ("Employees") or your own, if you are an Individual Customer, as part of your use of the Services. "Special Information" means your Personal Data, if you are an Individual Customer, or the Personal Data of Employees, including, without limitation, Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, or data concerning a natural person's sex life or sexual orientation. The Customer responsible for obtaining all legally required consent to collect, input, and transmit such Special Information into and through the Software.

Information Collected Automatically As You Use The Service.

In addition to the information that you provide to us voluntarily, Mosey may, now or in the future automatically collect information through the Service about how you use and interact with the Service and other similar activities in order to better understand our users and how they use the Service, and to improve the Service.

Other Anonymous Data We Collect.

When you use and visit the Service, we may also use third-party services, such as Plausible.io and others, which use cookies to collect generic, anonymous information that does not identify you (see above for more information on cookies). We use this information to better understand how users interact with the Service and to improve your user experience while using the Service.

Do Not Track Signals.

We do not track you or collect your information across third-party websites or online services. Thus, we do not receive Do-Not-Track signals, or other similar signals. To the extent that we do receive any such signals, we will not comply with them as it is not an aspect of the functionality of our Service.

4. PURPOSES OF COLLECTION AND LEGAL BASES FOR USE

We use the Personal Data described above primarily for providing you with the core aspects of the Service, namely to provide you with the Software and its functionality.

However, we may also use your Personal Data, or aggregated and/or anonymized Personal Data (but not Personal Data that can be used to identify users), for our own purposes of understanding our users and how they use the Service, as well as improving the Service over time. We may also use your Personal Data to better understand how you and users like you may be better served by Mosey, and to offer you opportunities to try out various aspects of the Service, including new features that we may from time to time introduce. By using the Service, you consent to these additional uses.

The legal grounds for our processing your Personal Data for the purposes above are:

- first and foremost, you provided your consent by agreeing to this Policy, which you may withdraw at any time by emailing us at privacy@mosey.com;
- it is necessary for our contractual relationship;
- the processing is necessary for us to comply with our legal or regulatory obligations; and/or
- the processing is in our legitimate interest as a provider of the Service (for example, to protect the security and integrity of our systems and to provide you with customer service and the core functionality of the Service).

5. HOW WE SHARE YOUR INFORMATION

We do not sell or share your Personal Data with advertisers. We also do not share your Personal Data with other third parties except to the extent that it is in furtherance of the Service or as otherwise set forth in this Policy.

Information Shared By You Through The Service.

You may, now or in the future, be able to choose to voluntarily share information collected through the Service through email, or other means of communication.

Unless you are an Individual Customer, your Company may have access to your Personal Data. Mosey acts at the direction of your Company (if applicable) with regard to sharing your Personal Data with your Company.

Our Personnel and Vendors.

To be able to effectively provide you with the Service, and to improve the functionality of the Service, we may disclose your Personal Data to our employees, contractors, agents, vendors, and other similar persons or entities to the extent that such persons or entities have a need-to-know such Personal Data in furtherance of the Service. Our third-party vendors (“Third-Party Vendors”) provide us with various types of services, including without limitation, hosting services, payment services, marketing software services, and customer relationship management software services to name a few. We may share your Personal Data, including Employees’ Special Information, with our Third-Party Vendors.

Sale of Company or Assets.

In the event that we sell all or substantially all of our company or its assets, including the Personal Data collected through the Service, we may transfer your information, upon reasonable notice to you, to the acquiring company.

Third Party Applications.

If you use third party applications, websites, application program interface mechanisms or other platforms (collectively, “Third Party Apps”) that integrate with, or otherwise provide you services by interacting with, our Service, we will allow the providers of those Third Party Apps (the “Third Party Providers”) to access or use your Personal Data, including Employees’ Special Information, as required for the interoperation of the Third Party Apps and our Service. Any Third Party Provider’s use of your Personal Data, including Employees’ Special Information, is not controlled by Mosey, and this Policy does not cover such use of your Personal Data. You should review the terms and conditions of any Third Party Providers’ use of your Personal Data before providing any Personal Data in connection with your use of Third Party Apps. You understand and agree that use of your Personal Data by Third Party Providers will be subject to the applicable terms and conditions between you and the Third Party Provider.

Other Third Parties.

In addition to our practices described above, we may share your Personal Data if we have a good-faith belief that such action is necessary to (1) comply with the law (see the section below on “Government Requests”), (2) protect and defend the rights or property of Mosey, or (3) prevent an emergency involving danger of death or serious physical injury to any person. We will only share your Personal Data for the foregoing reasons to the extent permitted by EU General Data Protection Regulation (“GDPR”).

6. STORING YOUR INFORMATION

Duration of Storage of Personal Data.

We will store your Personal Data for as long as it is needed to provide the Service, however, we may not know if you have stopped using the Service so we encourage you to contact us if you are no longer using the Service. However, if required by applicable law, we may retain your Personal Data for such period as may be required by such law. To continue to provide an

effective service, we may store non-Personal Data perpetually and may anonymize your Personal Data and store that anonymized information perpetually.

Additionally, as described in this Policy, we use third parties to provide the Service and do not have full control over their practices related to storage and retention of your Personal Data. However, we will work with such third parties to delete or modify your Personal Data to the extent required by GDPR and the European Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses pursuant to Decision 2010/87/EU) (the "SCCs").

Security.

We use reasonable efforts to secure your Personal Data and to attempt to prevent the loss, misuse, and alteration of the information that we obtain from you. For example, we require our personnel to sign confidentiality agreements that extend to your Personal Data; we informally review the privacy practices of new products and services that we integrate into our Service; and we restrict access to your Personal Data to individuals within and outside of Mosey who need access to such information to provide the Service. The Service is hosted on a private subnetwork with ingress and egress controls. We maintain access logs that we periodically review, and we also use TLS protocol technology to encrypt user connections to our systems. Your Personal Data is encrypted while stored within our databases. We conduct privacy reviews for new features in the Service and we train our employees on privacy issues. In addition, we rely on the technical safeguards provided by the Third-Party Vendors we use to host, store, and process your Personal Data. However, you acknowledge and agree that loss, misuse, and alteration may occur despite our efforts to protect your Personal Data. We are not responsible to our users or to any third party due to any such loss, misuse, or alteration, except to the extent required by GDPR, the SCCs, or other applicable law.

7. CALIFORNIA USERS

For purposes of this Section 7 only, the terms "personal information," "collection," "sell," "business purpose" and "commercial purpose" have the meaning given to them under the California Consumer Privacy Act of 2018 (the "CCPA").

If you reside in California, may you have certain rights as set forth below. These rights are in addition to any other rights you may have under this Policy. If you have any questions about these rights or how to exercise them, please contact us as described below. Please note that we may disclose your personal information for business or commercial purposes as described in this Policy. For more information about the categories of personal information we collect, the sources from which we collect personal information and how use, disclose and share such information, please see Sections 3, 4, 5 and 6 of this Policy.

Disclosure and deletion requests.

You may have the right to request that we disclose to you what personal information about you we collect, use, disclose and sell. Subject to certain limitations in the CCPA, you also may have the right to request that we delete your personal information. You may submit such a request by

contacting us as described below. If you submit a request by email, your email must include “California Request” in the subject line. We will not discriminate against you for exercising your rights under the CCPA.

In addition, you may have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. Please note that we do not disclose your personal information to any third parties for their direct marketing purposes. To make a request, please send us an email at privacy@mosey.com, or write to us at the address listed below. Indicate in your letter that you are a California resident making a “Shine the Light” inquiry.

Right to opt out.

The CCPA also provides California consumers the right to opt out of the sale of their personal information. As explained in this Policy, we do not sell the personal information of our users.

Verification.

We reserve the right to verify any request made under the CCPA by asking you to provide supporting documentation that the request is submitted by you, although we are not obligated to verify a request. You may also choose to have an agent submit a request on your behalf, in which case we may, but are not obligated to, verify that the agent is authorized to act on your behalf. We assume no responsibility for responding to any consumer requests.

8. YOUR CHOICES

You can change some of your Personal Data through the account settings provided on the Service. In addition, if you wish to access, receive a copy of, change or delete the Personal Data we hold about you, you may contact us as described at the end of this Policy.

You may withdraw the consent granted in this Policy for us to use the Personal Data described in this Policy by contacting us as described at the end of this Policy. Please note that if you do so, it will not affect the lawfulness of the use of your Personal Data based on your prior consent.

In addition, you may contact us as described at the end of this Policy to request that we do not disclose your Personal Data to third parties (other than those that are acting as our agent to perform tasks on our behalf, such as data processors) or to request that your Personal Data not be used for a purpose that is materially different from the purposes for which it was originally collected or for purposes subsequently authorized by you.

Upon receipt of any of the above request(s), we will use reasonable efforts to reflect any changes you request in our databases to the full extent required by GDPR, the SCCs, the CCPA (if applicable), or other applicable law.

If you are not happy with how we have attempted to resolve your complaint, you may contact the relevant data protection authority.

9. INTERNATIONAL VISITORS AND DATA TRANSFERS

The Service is hosted in the United States and is intended for visitors located within the United States as well as users located outside of the United States. If you choose to use the Service from the European Economic Area (“EEA”), Switzerland, or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your Personal Data outside of those regions to the United States for storage and processing. By providing any information, including Personal Data, on or to the Service, you consent to such transfer, storage, and processing.

Information collected in the EEA may be transferred, stored and processed by us or third parties (as provided in this Policy) in the United States and other countries whose data protection laws may be different than the laws of your country. Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by entering into SCCs with the relevant third party.

As described in this Policy, we may share Personal Data with third parties and may be required to disclose information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

10. GOVERNMENT REQUESTS

From time to time, we may receive requests from government agencies to obtain information about our users. In handling such government requests, we greatly value the privacy of Personal Data.

11. THIRD-PARTY SERVICES AND PRACTICES ARE BEYOND OUR CONTROL

The Service may utilize numerous third-party services as part of the functionality of the Service, such as hosting services, analytics providers, communications services, and other vendors; and we may share your Personal Data with third parties to the extent explained in this Policy. We have no control over such third parties, except to the extent required by GDPR and the SCCs. Thus, we make no guarantees about, and assume no responsibility for the information, services, or data/privacy practices of third parties, except to the extent required by GDPR and the SCCs. We encourage you to review the privacy practices of such third parties.

12. CHANGES TO THIS POLICY

Mosey reserves the right to change this Policy from time to time without notice. Any changes to this Privacy Policy will become effective on the “Effective Date” indicated above. If you continue to use the Service after the Effective Date, you consent to the new Policy. Mosey will always have the latest Policy posted on the Service.

13. PLEASE REACH OUT TO US WITH ANY QUESTIONS OR FEEDBACK

If you have any questions about this Policy or our Service, please feel free to contact us by email at privacy@mosey.com or by mailing us at the following address:

Mosey Works, Inc.
548 Market St
PMB 29059
San Francisco, California 94104-5401

14. DATA PROTECTION OFFICER

In addition, we have appointed a Data Protection Officer (“DPO”). Our DPO can be contacted directly by email at DPO@mosey.com or by mail at:

Mosey Works, Inc.
ATTN: Data Protection Officer
548 Market St
PMB 29059
San Francisco, California 94104-5401