

VYRENT PRIVACY POLICY

1. INTRODUCTION

- (a) Maintaining the privacy of your information is of paramount importance to us as it helps foster confidence, goodwill and stronger relationships with you, our customers. If, at any time, you have questions or concerns about our privacy practices, please feel free contact us at support@vyrent.com
- (b) Vyrent Inc., a Delaware Corporation, (henceforth, "Vyrent," "we," "us," "our") is the owner of the Vyrent website and related technology (collectively, the "Platform"). The Platform facilitates payments in a marketplace fashion, introduces customers (henceforth, "Subscribers", "you," "your") to products, and offers a way to rent luxury goods, including high-end watches and jewelry (the "Service").
- (c) When you access the Application and any other linked pages, features, content, or applications offered in connection with our Service, you acknowledge and accept the practices and policies outlined in this Privacy Policy.
- (d) The Privacy Policy goes hand-in-hand with our Terms of Use, which govern all use of the Service and can be found at www.vyrent.com/terms-of-use . Please read them together.
- (e) Vyrent Inc. is the responsible party or data controller regarding Personal Information collected through our Service. If you have any questions or concerns at any time about your data, privacy, or our terms of use, please email us at support@vyrent.com

2. PRIVACY STATEMENT

- 1.1. This Privacy Policy explains how we collect, use, maintain and disclose your Information. This includes personally identifiable information that could be used to identify a specific User ("Personal Information"), and other information that does not constitute Personal Information ("Non-Personal Information") that is collected from you while using our Service. We take the privacy of your Personal Information seriously. All individuals with access to your Personal Information are required to follow this policy, effective October 27, 2016.

2. PURPOSE OF OUR POLICY

- 2.1. We adopted this Privacy Policy to ensure that we have standards in place to protect the Personal Information that we collect from you. Collecting your Personal Information is necessary for providing our Service, and is a consequence of the normal operations of our business. We published this Privacy Policy to make it easy for you to understand what Personal Information we collect and store, why we do so, how we receive and/or obtain that information, and the rights you have over your Personal Information in our possession.
- 2.2. This Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third party websites, services and

applications ("Third Party Services") that you elect to access through the Service or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

3. CONSENT

- 3.1. When you use our Service or allow someone to use our Service on your behalf, you consent to our collection, use, disclosure, transfer and storage/retention of any Personal Information or other information received by us as a result of your use, all in accordance with this Privacy Policy.

4. THE INFORMATION WE COLLECT

- 4.1. In the course of business it is necessary for us to collect Personal Information. This information allows us to identify who an individual is for the purposes of our business, contact the individual in the ordinary course of business and transact with the individual. We require this information in order to verify the identity of our Users, to protect our customers, and to ensure the integrity of the Service.
- 4.2. Some parts of the Platform are public and you may visit these anonymously. We will collect personal identification information from you only if you, or an authorized individual, such as an employer, agent, or another individual whom you have authorized to share data about you (collective, the "Authorized Agents") voluntarily submit such information to us. You and/or the Authorized Agent can refuse to supply Personal Information, except that it may prevent you from engaging in certain website related activities or accessing parts of the Platform.
- 4.3. Without limitation, the types of information we may collect are:
 - (a) **Aggregated Data.** So that we can continually improve our Service, we often conduct research on user demographics, interests, and behavior. This is based on Personal Information and other information that we have collected, and may be compiled and analyzed on an aggregate basis. Since this aggregate information does not identify you personally, it is considered and treated as Non-Personal Information under this Privacy Policy;
 - (b) **Authentication Information.** In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with Vyrent. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.
 - (c) **Communications and Workflow.** We may collect information about a User's work habits, activity and communications when the User uses the Service. This includes, without limitation, messages and communications within the platform between Users, User's activities such as task lists, service audits, incident reports, timekeeping information, and other communications, such as notifications, alerts and text.
 - (d) **Contact Information.** We may collect information like your email address, telephone, and other information that allows us to contact you and is also considered Personally Identifiable Information under California Law;

- (e) **Financial Information.** We may collect financial information related to an individual such as any bank or credit card details used to transact with us and other information that allows us to transact with the individual and/or provide them with our Service;
- (f) **Personal Information.** We may collect personal details such as your name, location, and other information defined as “Personally Identifiable Information” that allows us to identify who you are. We may utilize this information in order to adapt our Service to Users’ needs or to develop new tools for the community;
- (g) **Social Media Information.** We may collect twitter, Facebook or other social media Usernames if you connect to these social networks through the Service;
- (h) **Statistical Information.** We may collect information about an individual’s online and offline preferences, habits, movements, trends, decisions, associations, memberships, finances, purchases and other information for statistical purposes;
- (i) **Other Information.** We may collect other Personal Information about you, which we will maintain according to this Privacy Policy. We may also collect non-Personally Identifiable Information about you such as information about your network, device, or operating system. Finally, we may collect any personal correspondence that you send us, or that is sent to us by others about an individual’s activities.

4.4. Children

- (a) If you are under the age of 13, you may not use the Service. We do not knowingly collect Personal Information from children under the age of 13. If you have reason to believe that a child under the age of 13 has used our Service and provided Personal Information to us, please contact us, and we will work to delete that information from our databases.

5. HOW INFORMATION IS COLLECTED

5.1. Most information is collected in association with your use of the Service. In particular, information is likely to be collected as follows:

- (a) **Account.** When you open an account on the application and submit your personal details, or when you enter Personal Information details through another process in order to receive or access something;
- (b) **Contact.** When you contact us in any way.
- (c) **Cookies & Similar Technologies.** When you use the Application, we may use cookies and similar technologies like pixels, web beacons, and local storage to collect information about how you use our Service, and to provide features to you. You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites and mobile applications we control. However, declining our Cookies may interfere with your use of the Service.

- (d) **Payment.** When an individual submits their details to open a payment account or make a payment;
- (e) **Uploads.** When you upload or generate User Content, such as photos, videos, text, comments, using our Service.
- (f) **Social Media Features.** Our Web site may include social media features, such as the Facebook Like button. These features may collect your IP address and which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing them.
- (g) **Phishing.** It has become increasingly common for unauthorized individuals to send e-mail messages to consumers, purporting to represent a legitimate company such as a bank or on-line merchant, requesting that the consumer provide personal, often sensitive information. Sometimes, the domain name of the e-mail address from which the e-mail appears to have been sent, and the domain name of the web site requesting such information, appears to be the domain name of a legitimate, trusted company. In reality, such sensitive information is received by an unauthorized individual to be used for purposes of identity theft. This illegal activity is known as "phishing". If you receive an e-mail or other correspondence requesting that you provide any sensitive information (including your password or credit card information) via e-mail or to a Web site that does not seem to be affiliated with us, or that otherwise seems suspicious to you, please do not provide such information, and report such request to us at support@vyrent.com
- (h) **Third Party Links.** Our Service may contain links to third party websites. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personally identifiable information from you. If you submit personal information to any of those sites, your information is governed by their privacy policies. Other sites follow different rules regarding the use or disclosure of the personally identifiable information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

5.2. We understand that there are many circumstances in which we may collect information, and we work hard to ensure that you are always aware when your Personal Information is being collected.

6. THE SAFETY & SECURITY OF PERSONAL INFORMATION

6.1. **Password Protection.** Your Account information will be protected by a password for your privacy and security. You need to prevent unauthorized access to your Account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have finished accessing your Account. We seek to protect Account information to ensure that it is kept private; however, we cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

- 6.2. **Data Hosting.** We take all reasonable precautions to protect your Personal Information from unauthorized access. We store all of our information using industry-standard techniques. However, no network, server, database or Internet or e-mail transmission is ever fully secure or error free. We encourage you to take special care in choosing what information you send to us electronically. Please keep this in mind when disclosing any Personal Information.
- 6.3. **Public Information.** Some of your activity on and through the Services is public by default. This may include, but is not limited to, content you have posted publicly on the Site or otherwise through the Services. Please also remember that if you choose to provide Personal Information using certain public features of the Services, then that information is governed by the privacy settings of those particular features and may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Services.
- 6.4. **Third Party Use.** We are not responsible for the privacy or security practices of any third party; this includes third parties to whom we are permitted to disclose your Personal Information in accordance with this policy or any applicable laws. The collection and use of your information by these third parties may be subject to separate privacy and security policies.
- 6.5. **Unauthorized Access.** If you suspect any misuse, loss of, or unauthorized access to your Personal Information, you should let us know immediately at support@vyrent.com.
- 6.6. **Authorized Use.** We are not liable for any loss, damage, or claim arising out of another person's use of the Personal Information where we were authorized to provide that person with the Personal Information.
7. **WHEN WE CONTACT USERS**
 - 7.1. **Special Offers and Updates.** We send all new users a welcoming email to verify their new account and confirm their password and username. Established users will occasionally receive information on products, service, special deals, and a newsletter. Out of respect for the privacy of our users we present the option to not receive these types of communications. Customers can unsubscribe via the unsubscribe mechanism at the bottom of each email.
 - 7.2. **Service Announcements.** On rare occasions it is necessary to send out a strictly Service related announcement. For instance, if our Service is temporarily suspended for maintenance we might send users an email. Generally, users may not opt-out of these communications, though they can deactivate their account. However, these communications are not promotional in nature.
 - 7.3. **Customer Service.** We communicate with users on a regular basis to provide requested Service and in regards to issues relating to their account we reply via email or phone, in accordance with the user's wishes.
 - 7.4. **By Telephone.** We may contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our User Agreement. When contacting you via phone, in order to reach you as efficiently as possible, we may use,

and you consent to receive, autodialed or prerecorded calls and text messages. Where applicable and permitted by law, you may decline to receive certain communications.

8. WHEN INFORMATION IS USED & DISCLOSED

- 8.1. **Time Period.** We may retain your Personal Information as long as you continue to use our Service. You may close your account by contacting us, but we may retain Personal Information for an additional period as is permitted or required under applicable laws. Even after we delete your Personal Information, it may persist on backup or archival media for an additional period of time.
- 8.2. **Agents, Consultants, and Related Third Parties.** Like many businesses, we sometimes have companies perform certain business-related functions for us. These companies include our marketing agencies, database service providers, backup and disaster recovery service providers, email service providers, and others. When we engage another company, we may provide them with information including Personal Information, so they can perform their designated functions.
- 8.3. **Advertising and Web Beacons.** To support and enhance the Services, we may serve advertisements, and also allow third parties advertisements, through the Services. These advertisements are sometimes targeted and served to particular users and may come from third party companies called "ad networks." Ad networks include third party ad servers, ad agencies, ad technology vendors and research firms. Advertisements served through the Services may be targeted to users who fit a certain general profile category may be based on anonymized information inferred from information provided to us by a user, including Personal Information (e.g., gender or age), may be based on the Services usage patterns of particular users, or may be based on your activity on Third Party Services. We do not provide Personal Information to any ad networks for use outside of the Services.
- 8.4. **Business Operations.** Your Information is used to operate our business. These business operations may include:
 - (a) The provision of Service between you and us;
 - (b) Verifying your identity;
 - (c) Communicating with you about:
 - i. Your relationship with us;
 - ii. Our goods and services;
 - iii. Our own marketing and promotions to users and prospects;
 - iv. Competitions, surveys and questionnaires;
- 8.5. **Business Transfers.** In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

- 8.6. **Credit Checks.** We may use your Information to perform creditworthiness and solvency checks, and compare information for accuracy and verify it with third parties.
- 8.7. **IP Address.** We use your IP address to help diagnose problems with our server, and to administer our website. We do not link your IP address which accesses our website to any personal information. We use tracking information to determine which areas our site users visit based on traffic to those areas. Vyrent does not track what individual users read, but rather how often each page is visited. This helps us maintain a superior and informative website for you.
- 8.8. **Improve Customer Service.** Information you provide helps us respond to your customer service requests and to support your needs more efficiently.
- 8.9. **Payments.** We may use the information Users provide about themselves when placing an order only to provide service to that order. We do not share this information with outside parties except to the extent necessary to provide the service.
- 8.10. **Personalize Your Experience.** We may use information in the aggregate to understand how our Users as a group use the Service.
- 8.11. **Site Improvement.** We may use feedback you provide to improve our products and Service.
- 8.12. **Transactions.** When you transact with other parties, we may provide those parties with information about you necessary to complete the transaction, such as your name, account ID, contact details, shipping and billing address, or other information needed to promote the reliability and security of the transaction. If a transaction is held, fails, or is later invalidated, we may also provide details of the unsuccessful transaction. The receiving party is not allowed to use this information for unrelated purposes, such as to directly market to you, unless you have agreed to it. Contacting users with unwanted or threatening messages is against our policies and constitutes a violation of our User Agreement.
- 8.13. **Disclosure.** There are a few circumstances where we must disclose an individual's information:
 - (a) Where we reasonably believe that an individual may be engaged in fraudulent, deceptive, or unlawful activity that a governmental authority should know about;
 - (b) To protect the rights, property, or personal safety of another user or any member of the public;
 - (c) As required by any law; or,
 - (d) In the event we sell our business and may need to transfer Personal Information to a new owner.
- 8.14. **Non-Disclosure.** We promise not to disclose or sell your Personal Information to unrelated third parties under any circumstances, ever We do not sell, trade, or rent your personal identification information to others.

9. YOUR CALIFORNIA PRIVACY RIGHTS

- 9.1. California Civil Code Section § 1798.83 permits users of our software and Service that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send e-mail to support@vyrent.com.

10. HOW TO UPDATE INFORMATION

- 10.1. Your information can be updated by you on the platform. For any question on how to do it or if you have issues in doing so, please contact us at support@vyrent.com. It is your responsibility to provide us with accurate and truthful Personal Information. We cannot be liable for any information that is provided to us that is incorrect.

11. COMPLAINTS AND DISPUTES

- 11.1. If you have a complaint about our handling of your Personal Information, address your complaint in writing to support@vyrent.com
- 11.2. If we have a dispute over handling of your Personal Information, we will first attempt to resolve the issue directly between us.
- 11.3. If we become aware of any unauthorized access to your Personal Information we will inform you at the earliest practical opportunity, once we have established what was accessed and how it was accessed.

12. INTERNATIONAL PRIVACY LAWS

- 12.1. If you are visiting the Service from outside the United States, please be aware that you may be sending information (including Personal Information) to the United States, where some of our servers are located. That information may then be transferred within the United States or back out of the United States, depending on the type of information and how it is stored by us. We hold and process your Personal Information in accordance with privacy laws in the United States and this Privacy Policy. Please note that privacy laws in the United States may not be the same as, and in some cases may be less protective than, the privacy laws in your country, and while in the United States Personal Information may be subject to lawful access requests by government agencies.

13. ADDITIONS TO THIS POLICY

- 13.1. If we change this Privacy Policy, we will post updates on our website (the "Modifications"). Modifications are effective thirty (30) days following the "Updated" date, or the date communicated in any other notice to you. Please review this policy periodically for changes, and especially before you provide any Personal Information. By continuing to use our Service after the effective date of any Modifications to this Privacy Policy, you accept those Modifications. If any Modification to this Privacy Policy is not acceptable to you, you should cease accessing, browsing, and otherwise using the Service.

14. CONTACTING US

14.1. If you have any questions about this Privacy Policy or your dealings with the Application, please contact us at:

support@vyrent.com

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