

# **PRIVACY POLICY**

**Created 10/26/2020**

## **Introduction**

Kiwii's products include, but are not limited to, the Kiwii extension for web browsers (the "Extension"), the Kiwii mobile application (the "Mobile App"), and the website located at [www.addkiwii.com](http://www.addkiwii.com) (the "Website", and together with the Extension and Mobile App, "Kiwii's products"). This privacy policy ("Privacy Policy") explains how Kiwii collects and processes information from users of Kiwii's products.

Please note that Kiwii does not own, operate, or control any other websites, regardless of whether those sites are accessed while using Kiwii products, and they have their own controlling privacy policies that Kiwii users should review.

## **What Information We Collect**

When a user utilizes Kiwii's products, its server automatically collects certain browser or device generated information, which may in some cases constitute Personal Data, including but not limited to:

- user domain;
- user IP address;
- the date, time and duration of user visit;
- user browser type;
- user operating system;
- user page visits;
- information from third parties;
- other information about user computer or device; or
- Internet traffic.

In addition, Kiwii collects information that is shared by using the Website, Extension, or Mobile App. While not required, users can choose to provide an email address to set up an account with Kiwii, which enables the comparison of credit card points offerings and rewards at various retailers, a personalized recommendation feed, and more. Users can also set up a profile with name and other information for a more personalized experience.

Kiwii also collects technical information about users' devices and use of Kiwii's products to ensure those products are working properly and to facilitate Kiwii's ability to develop, improve, and market its products.

To help users choose which credit card to utilize when making purchases on select retail sites, Kiwii will collect information about retailers. In some circumstances, Kiwii also collects information about users from publicly accessible sources. Kiwii may also collect information about users from trusted partners, including marketing partners, who provide us with information about

potential users, and security partners, who provide us with information to protect against abuse. Kiwii also receives information from advertisers to provide advertising and research services.

### **Use of Personal Data**

The following describes Kiwii's purposes for processing its users' information. Additional details on how Kiwii processes user's personal data may be provided to users in a separate notice or contract.

Kiwii's processing (i.e. use) of users' information is justified on the following legal bases:

- Performance of Contract: the processing is necessary to perform a contract with a user or take steps to enter into a contract at a user's request;
- Compliance with Law: the processing is necessary for Kiwii to comply with all relevant legal obligations or requests from public authorities or regulators;
- Kiwii Legitimate Interests: the processing is in its legitimate interests, subject to users' interests and fundamental rights, and notably its legitimate interest in using applicable data to conduct and develop our business activities, such as developing and maintaining relationships with Kiwii customers (the majority of the processing covered by this Privacy Notice is legitimate interest based);<sup>i</sup>
- Defend Kiwii's Rights: where the processing is necessary to the establishment, exercise or defense of legal claims; or
- With User's Consent: User has consented to the processing (for example, where Kiwii is required by local law to rely upon user's prior consent for the purposes of direct marketing).

### **How We Share Your Data**

The information collected about a specific user is tied to a "Wallet ID," meaning the user's personal information is anonymous (i.e. name, phone number, email address). Kiwii does not track an individual's personal information. Rather, it monitors the Wallet ID of its users to tailor its services to provide a more robust and optimal shopping experience. It does this by aggregating information (i.e. retailers used and sites visited) to make recommendations about what credit card will provide the highest return.

Kiwii reserves the right to share information that is not deemed personal data or subject to contractual restrictions, including sharing anonymized data with advertising partners. Additionally, some sites may use framing techniques to serve content from parties not affiliated with Kiwii, while preserving the look and feel of Kiwii's products; please be aware that users may be providing personal data to these third parties, not to Kiwii.

Kiwii may appoint third party service providers (who will operate under its instructions) to assist it in providing information, products or services to users, in conducting and managing the business, or in managing and improving Kiwii's products. Kiwii may share its users' information with these affiliates and third parties to perform services on Kiwii's behalf, subject to appropriate contractual restrictions and security measures.

Additional Disclosures. Kiwii may share users' Personal Data if it believes it is reasonably necessary to prevent harm or loss or pursuant to users' consent. In accordance with Kiwii's legal obligations, it may transfer Customer Data to relevant authorities for law enforcement or security purposes. Kiwii may disclose Customer Data (including any Personal Data), if required by law.

### **How We Protect Your Data**

The security of users' information is important to Kiwii. Kiwii has implemented physical, electronic, and procedural safeguards.

Kiwii's servers are hosted using Google Cloud Services. Any data collected by Kiwii is protected using Google's recommendations and best practices. Kiwii uses information it collects to help improve the safety and reliability of its services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Kiwii, its users, or the public.

Kiwii has implemented measures to prohibit unauthorized access, alteration, disclosure, or destruction of information it collects, including: [is the stuff below true?]

- Use of encryption to keep users' data private while in transit.
- Offering a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help user protect his or her account.
- Kiwii reviews its information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to its systems.

Kiwii will ask for users' consent before using information for a purpose that is not covered in this Privacy Policy.

### **How We Use Cookies And Similar Technologies**

Like most other online services, Kiwii uses cookies, pixel tags, web beacons, and other markers (together, "cookies") to collect some of the data discussed in this Privacy Policy. Cookies help Kiwii operate its products, analyze engagement and usage, and provide relevant and personalized experiences.

Kiwii is designed to make it easy to opt out of Kiwii's products at any time.

### **Additional Rights Regarding Data**

Depending on where users live, they may have additional rights as to the personal information that is shared and Kiwii collects. Residents of the EU, UK, Canada, Australia, New Zealand, and California [what about these residents?]. Data protection laws vary among countries, with some providing more protection than others. Regardless of where users' information is processed, Kiwii applies the same protections described in this policy. Kiwii also complies with certain legal

frameworks relating to the transfer of data. To learn more, please consult local rules and regulations.

### **Data Transfers and the EU-US Privacy Shield**

If Kiwii transfers users' data outside of the European Economic Area, it will do so within the safeguards of Model Contract Clauses and the EU-US Privacy Shield framework. To learn more, follow the link below:

[https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

### **Minors**

Kiwii was created for the exclusive use of individuals over the age of 16. Kiwii does not knowingly collect or solicit information from children. Kiwii reserves the right withhold services from children and requests that they do not attempt to register for Kiwii's products or send any personal information to Kiwii.

### **Changes To This Policy**

Kiwii will continue to update its policies and practices as needed. Kiwii will notify users of any changes to its Privacy Policy by posting any changes here. If it does, users will see that the date at the top of this Privacy Policy has changed.

If you have any questions about our privacy policies and practice, please contact us at [support@addkiwii.com](mailto:support@addkiwii.com).

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<sup>i</sup> In all cases where legitimate interests is relied upon as a lawful basis, Kiwii takes steps to ensure that its legitimate interests are not outweighed by any prejudice to users' rights and freedoms. This is achieved in a number of ways, including the application of principles of data minimization and security, and by taking steps to ensure that Personal Data is collected where it is relevant to the lawful business activities, and, where using Personal Data, is reasonably necessary for those activities.