

Explore Loop Privacy Policy

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LOOP (together with our affiliates, “**LOOP**”, “**Company**” “**we**”, or “**us**”) respect your privacy. LOOP offers a service distribution solution, that facilitates the sale, purchase, and delivery of consumer product goods (“**Goods**”) that are packaged in durable and refillable packaging and the return and processing of the durable and refillable packaging, once used, for re-use with additional purchases of the same Goods, which includes the tracking required to ensure the quality assurance of such cleaned and refilled packaging (together with the LOOP Platform, the “**Services**”).

In connection with our Services, this Privacy Policy describes the types of personal information we collect on www.exploreloop.com (the “**Site**”), (the “**Personal Information**”) the purposes for which we collect that Personal Information, the other parties with whom we may share it and the measures we take to protect the security of your Personal Information. It also tells you about your rights and choices with respect to your Personal Information, and how you can contact us about our privacy practices.

Our privacy practices may vary among the countries and regions in which we operate to reflect local practices and legal requirements as described below. Please refer to Section 12 below for more information regarding any specificities applicable to your Personal Information and rights regarding your Personal Information in these countries or regions.

1. Personal Information We Collect

Information you give us

Personal information that you may provide through the Site or otherwise communicate with us includes:

Account information, we collect information from you when you sign up to register for an account subsequently (“**Account**”) via Loop, such as your first name, last name, email address, postcode, city, state and/or country of residence ;

Marketing information, such your preferences for receiving marketing communications and details about how you engage with them;

2. How We Use Your Personal Information

To provide our Services

If you use our Services, we use your personal information to inform you in regions not yet serviced by Loop to be informed once a Loop service is launched in your region.

To communicate with you

If you request information from us, register online, or participate in our surveys, promotions or events, we may send you Loop-related marketing communications as permitted by law. You will have the ability to opt out of such communications as described below.

To comply with law

We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent

We may request your consent to use your personal information to support@loopmobileapp.com

To create anonymous data

We may create anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by excluding information that makes the data personally identifiable to you, and use that anonymous data for our lawful business purposes.

For compliance, fraud prevention and safety

We use your personal information as we believe necessary or appropriate to

- a) enforce the terms and conditions that govern the Service;
- b) protect our rights, privacy, safety or property, and/or that of you or others; and
- c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

3. Cookies and Similar Technologies

What are cookies?

We may collect information using “cookies” or similar technologies (altogether, “Cookies”). Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both

session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of Cookies:

(1) first party Cookies, served directly by us to your computer or mobile device, which we use to recognise your computer or mobile device when it revisits our Site; and

(2) third party Cookies, which are served by service providers on our Site, and can be used by such service providers to recognise your computer or mobile device when it visits other websites.

Cookies we use

Our Site uses the following types of Cookies for the purposes set out below:

- **Local Storage:** This technology allows our Site to remember choices you make when you use our Site. The purpose of this is to provide you with a more personal experience and to avoid you having to re-select your preferences every time you visit our Site.
- **Analytics and Performance Cookies:** These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered may include the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information, monitor the level of activity on our Site, and improve the Site.

Disabling Cookies

You can typically remove or reject Cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept Cookies until you change your settings.

Further information about Cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

If you do not accept our Cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

4. How We Share Your Personal Information

Service Providers

We may employ third party companies and individuals to administer and provide the Services on our behalf (such as customer support, hosting and storage, analytics, email delivery, marketing/advertising and database management services). These third parties may use your information only as directed by the Company and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

Compliance with Laws and Law Enforcement; Protection and Safety

Company may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to

- a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
- b) enforce the terms and conditions that govern the Service; c) protect our rights, privacy, safety or property, and/or that of you or others; and
- d) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Business Transfers

Company may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

Social Networking Services (SNSs)

The Services may enable you to post content to SNSs. If you choose to do this, we will provide information to such SNSs in accordance with your elections. You acknowledge and agree that you are solely responsible for your use of those websites, such as Facebook or App, such as WhatsApp and that it is your responsibility to review the terms of use and privacy policy of the applicable website or service. We will not be responsible or liable for:

- 1) the availability or accuracy of such website, App or service;
- 2) the content, products or services on or availability of such website, App or service;
- 3) the data shared by other users of the websites, App or service; or (iv) your use of any such website, App or service.

5. Your Choices

Access, update, correct or delete your information

You may review, update, correct or delete the personal information by contacting us at support@loopmobileapp.com or if you have additional requests or questions.

Choosing not to share your personal information

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

Additional information for certain jurisdictions

Loop is committed to respecting the privacy rights of individuals under all privacy laws applicable to us. Some privacy laws require that we provide specific information about individual rights, which we have set forth at the end of this Privacy Policy:

- **California:** if you are a California resident, you have certain rights under California privacy laws regarding your personal information as set forth below in Section 12 Additional Information for Residents in Certain Jurisdictions.
- **EU/EEA/UK:** if you are in the European Union / European Economic Area/United Kingdom, please go to Section 12 Additional Information for Residents in Certain Jurisdictions below for details about your rights under the GDPR.
- **Brazil/LGPD:** if you are in Brazil and subject to the Brazilian General Data Protection Law (LGPD), please go to Section 12 Additional Information for Residents in Certain Jurisdictions below for details about your rights under the LGPD.

6. Security

We take a number of organizational, technical and physical measures designed to protect the Personal Information we collect, both during transmission and once received. These include but are not limited to:

- Forcing APIs (REST and Pub/Sub) to operate over encrypted ports (HTTPS and TLS).
- Data encryption between services within the cloud based systems used by Loop.
- File encryption over file servers.
- Highly restricted access to Production Environments.

However, no security safeguards are 100% secure and we cannot guarantee the security of your Personal Information. We will comply with applicable laws and regulations requiring that

we notify you in the event your Personal Information is compromised as a result of a breach of our security measures.

7. Children

Our Services are not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. If we learn that we have collected personal information from a child under age 16, we will delete such information from our files as soon as reasonably practicable.

8. Sensitive personal data (Special category data)

We ask that you not send us, and you not disclose, any sensitive personal data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Site or otherwise to us.

If you send or disclose any sensitive personal data to us when you use the Site, you must consent to our processing and use of such sensitive personal data in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such sensitive personal data to our Site.

9. Other Important Privacy Information

Third party websites sites, Apps and services

The Services may contain links to other websites and services. These links are not an endorsement, authorisation or representation that we are affiliated with that third party. We do not exercise control over third party

websites or services, and are not responsible for their actions. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

User generated content

We may make available on our Site, or link to, features that allow you to share information online (e.g., on message boards, in chat areas, in file uploads, through events, etc.). Please be aware that whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage or dissemination of such publicly-disclosed personal information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make changes to this Privacy Policy we will post them on the Site and update the Last Updated date above. If we make material changes to this Privacy Policy you will be notified via email (if you have an Account where we have your contact information) or another manner through the Services that we believe reasonably likely to reach you. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

10. Legal basis for processing

We only use your personal information as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us at support@loopmobileapp.com

- Contract: Processing is necessary to take steps that you request prior to signing up for the Services or to perform the Services.
- Consent: We rely on your consent to provide you with advertising and to send out marketing communications. If we want to send you marketing communication, you will need to first provide an expressed interest in “opting in” to communications. For example when you are filling out a contact or other form, if you click on the option to Sign up for newsletters & participate in research, you are opting in to marketing communications emails. You can later opt in or out by contacting us. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us.
- Legitimate Interest: We rely on our Legitimate Interest to carry out the following:
 - To communicate service and support related information with you especially when LOOP launches in your region
 - To carry out analytical reports using anonymised data
 - For compliance, fraud prevention and safety
 - Records of communications sent to you or that we receive from you in relation to an event you will attend/have attended.
 - Records of events, including photography and video recordings of events
 - To send out service related communications that we believe will be of benefit to you because of a product or service that you have expressed interest in (not requiring consent).

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are

overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Where we rely on legitimate interest for marketing you have the right to object.

- Legal obligation: We rely on this basis when the processing is necessary for you to comply with the law (not including contractual obligations). For example, for processing financial data.
- Use for new purposes: We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

11. Retention

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Information) for legal or regulatory requirements, this can include but is not limited to tax and audit purposes.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

12. Additional Information for Residents in Certain Jurisdictions

In this section, we set forth additional information as required under applicable privacy laws in certain jurisdictions.

A. European Union / European Economic Area / United Kingdom

Loop is headquartered in the United States and has affiliates and service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

Whenever we transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on one of the following safeguards recognized by the European Commission as providing adequate protection for personal information, where required by EU data protection legislation:

- the country to which we send the Personal Information may be approved by the European Commission or
- the recipient may have signed a contract based on “standard contractual clauses” approved by the European Commission, obliging them to protect your Personal Information,
- there is the lawful use of an appropriate cross-border transfer safeguard or applicable derogations.

As a resident of the European Union (EU) and the European Economic Area (EEA), you have the following rights, under the GDPR, regarding your Personal Information:

Right to access: You have the right to obtain from us confirmation as to whether or not personal data concerning you are processed, and, where that is the case, you have the right to request and get access to that personal data.

Right to withdraw consent: Where we have asked for your consent to process your Personal Information, you can withdraw this consent at any time by contacting us at support@loopmobileapp.com. If you wish to opt out of receiving our commercial messages, you can also do so by at any time using the "unsubscribe" link at the bottom of such e-mail. Withdrawing a consent may lead to fewer possibilities to use our Services.

Right to rectification: You have the right to obtain from us the rectification of inaccurate personal data and you have the right to provide additional personal data to complete any incomplete personal data.

Right to object: In certain cases, you have the right to object to processing of your personal data, including data relating to profiling. You have the right to object at further processing of your personal data insofar as such data have been collected for direct marketing purposes. We shall then no longer process your personal data unless we demonstrate other compelling legitimate grounds for our processing that override your interests, rights and freedoms or for legal claims.

Right to restriction of processing: You have the right to request from us restriction of processing, applicable for a certain period and/or for certain situations e.g. to allow our verification of accuracy of personal data after your contesting of accuracy or to prevent us from erasing personal data when personal data are no longer necessary for the purposes but still required for your legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use our Services.

Right to data portability: You have the right to receive from us in a structured format your personal data and you have the right to (let) transmit such personal data to another controller.

Right to erasure: You have the right to have personal data we process about you erased from our systems if the personal data are no longer necessary for the related purposes, if we have unlawfully processed the personal data or if you object to processing for direct marketing. Furthermore, you have the right to erase if you withdraw consent or object to our processing as meant above, unless we have a legitimate ground to not erase the data. We may not immediately be able to erase all

residual copies from our servers and backup systems after the active data have been erased. Such copies shall be erased as soon as reasonably possible.

Right to be Not Subject to Automated Individual Decision-Making: You have the right to not be subject to a decision based solely on automated processing.

Right to Filing Complaints: We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch with us, using the details below. In the event you have unresolved concerns, you also have the right to contact your local data protection authority. We hope this will not be necessary and would like to assure you we will do our best to resolve any dissatisfaction you may have.

B. California

In this section, we provide information for California residents as required under California privacy laws, including the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), which requires that we provide California residents certain specific information about how to handle their personal information. This section does not address or apply to our handling of:

- publicly available information made lawfully available by state or federal governments
- personal information that is subject to an exemption under Section 1798.145(c) – (f) of the CCPA (such as protected health information that is subject to HIPAA or the California Medical Information Act, and non-public information subject to the Gramm-Leach Bliley Act or the California Financial Information Privacy Act)
- personal information we collect about job applicants, independent contractors, or current or former full-time, part-time and temporary employees and staff, officers, directors or owners of Willis Towers Watson
- personal information about individuals acting for or on behalf of another company, to the extent the information relates to our transactions with such company, products or services that we receive from or provide to such company, or associated communications or transactions (except that such individuals have the right to opt-out of any sale of their personal information and to not be subject to any discrimination for exercising such right)

Rights of California residents

California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below.

- **Do-Not-Sell or Share:** California residents have the right to opt-out of our sale or sharing of their personal information. Such can be exercised by filling out the following form at: <https://exploreloop.com/dsar/>
We do not sell personal information about residents who we know are younger than 16 years old without opt-in consent.
- **Initial Notice:** We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

- **Request to Delete:** California residents have the right to request deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exemption applies. We will respond to verifiable requests received from California residents as required by law.
- **Request to Correct:** California residents have the right to request that we rectify inaccurate information about them. We will respond to verifiable requests received from California residents as required by law.
- **Request to Know:** California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected, used, disclosed and sold about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:
 - categories of personal information collected;
 - categories of sources of personal information;
 - business and/or commercial purposes for collecting and selling their personal information;
 - categories of third parties with whom we have shared their personal information;
 - categories of personal information that we have sold in the preceding 12 months, and for each category identified, the categories of third parties to which we sold that particular category of information; and
 - categories of personal information disclosed for a business purpose in the preceding 12 months, and for each category identified, the categories of third parties to which we disclosed that particular category of personal information.

California residents may make a request to know up to twice every 12 months. We will respond to verifiable requests received from California residents as required by law.

- **How to submit requests:** Requests to know, and requests to delete may be submitted by contacting us at support@loopmobileapp.com. An authorized agent can make a request on a California residents' behalf by providing a power of attorney valid under California law, or providing:
 - (1) proof that the consumer authorized the agent to do so;
 - (2) verification of their own identity with respect to a right to know categories, right to know specific pieces of personal information, or requests to delete which are outlined above; and
 - (3) direct confirmation that the consumer provided the authorized agent permission to submit the request.

We will respond to requests received from California residents as required by law.

- **Right to non-discrimination:** The CCPA and CPRA prohibits discrimination against California residents for exercising their rights under the CCPA and CPRA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices, rates, or penalties on residents who exercise their CCPA and CPRA rights,

unless doing so is reasonably related to the value provided to the business by the residents' data.

- **Financial incentives:** A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, where the incentive is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentives offered and their material terms, the right to opt-out of such incentives at any time, and may not be included in such incentives without their prior informed opt-in consent. We do not offer any such incentives at this time.

C. Brazil/LGPD

The following information applies to personal data which we process from any individuals that is related to Brazil's territory under the National Data Protection Law (LGPD):

- **Scope:** In addition to the circumstances set forth above, the LGPD applies when we process personal data subject to protect your fundamental rights of freedom, privacy and the free development of your personality.
- **Sensitive Personal Data under the LGPD:** Sensitive personal data under the LGPD includes Personal Information (as defined above) about racial or ethnic origin, religious belief, political opinion, union membership or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data, when linked to a natural person. Please see the sections above for more information on how we treat sensitive personal data.
- **Individual rights:** Under the LGPD, you have certain rights related to your Personal Information, subject to other limitations in this law, as follows:
 - Confirmation of the existence of data processing;
 - Access to your Personal Information;
 - Correction of incomplete, inaccurate, or out-of-date Personal Information;
 - Anonymization, blocking, or deletion of unnecessary or excessive Personal Information, or data processed in non compliance with LGPD;
 - Portability of Personal Information to another service or product provider, subject to the LGPD;
 - Deletion of Personal Information, to the extent permitted by the LGPD;
 - Information about the entities with whom we have shared Personal Information;
 - Information about the possibility of denying consent and consequences of such denial;
 - Revocation of consent.
- **Contacting Us in Brazil:** If you have any questions or comments about this Privacy Policy as it relates to the LGPD or our processing activities in Brazil, please support@loopmobileapp.com

13. Contact Us

If you have any questions or concerns at all about our Privacy Policy, please feel free to contact us at support@loopmobileapp.com