

ANCHOR PRIVACY POLICY

Last Updated: June, 2023

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, **Anchor Group, Inc.** (together, “**Anchor**” “**we**”, “**our**” or “**us**”) use, collect, disclosure, sale, and store personal data we collect or receive from or about you (“**you**”) such as in the following use cases:

- (i) When you browse or visit our website <https://www.sayanchor.com/>, and all of our subdomains, e.g. my.anchor.sh (“**Website**”);
- (ii) When you make use of, or interact with, our Website
 - a. When you request a free trial or a demo
 - b. When you create an account and when you log in
 - c. When you contact us (e.g. customer support, need help, submit a request)
- (iii) When we process your job application
- (iv) When you attend a marketing event and provide us with your personal data or exchange business cards with us
- (v) When we use the personal data of our resellers, distributors, agents and/or finders (e.g. contact details)
- (vi) When we use the personal data of our service providers (e.g. contact details)
- (vii) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

When you use our scratch cards and want to claim your ticket We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. “**Personal data**” or “**personal information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals. individuals and the "Do Not Sell My Personal Information" mechanism(s) below are only relevant for CCPA-protected individuals.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your personal data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific personal data we collect	Sources - where we obtain the personal data from (CCPA only, if applicable)	Why is the personal data collected and for what purposes?	Legal basis (GDPR only, if applicable)	Third parties with whom we share your personal data	Retention period	Consequences of not providing the personal data
<i>When you browse or visit our Website</i>						

<p>Cookies, analytic tools and log files</p> <p>For additional information, please read our cookies policy</p>	<p>We collect this information from you</p>	<p>When you make use of our Website, we will collect information from cookies implemented by third parties, in order to improve our Website and enhance your user experience.</p>	<p>Consent</p> <p>Legitimate interest (e.g., essential cookies)</p>	<p>3rd party platforms such as:</p> <p>Google Cloud Platform</p> <p>RenderFore st.</p>	<p>For more information, please read our cookies policy</p>	<p>Certain Website features may not be available</p> <p>Cannot improve our Website and your user experience.</p>
<p>When you make use of, or interact with, our Website</p>						
<p>When you request a free trial or a demo</p>						
<ul style="list-style-type: none"> • Full name • Phone number • Business name • Email address • Business address • Any other information that you decide to provide us 	<p>We collect this information from you</p>	<ul style="list-style-type: none"> • To provide you a free demo • To communicate with you in the context of the demo 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to provide a demo)</p>	<p>3rd party platforms such as:</p> <p>Stripe</p> <p>Plaid</p> <p>Intercom</p>	<p>Until we no longer need the information or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot provide you with a demo</p> <p>Cannot communicate with you in the context of the demo</p>
<p>When you create an account and when you log in</p>						
<ul style="list-style-type: none"> • Business name • Business address • Any other information that you decide to provide us • Phone number 	<p>We collect this information from you</p>	<ul style="list-style-type: none"> • To be able to create an account • To be able to log in • To be able to enjoy features available to registered users only • To provide our services • To perform the applicable agreement To communicate with our customers 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to create an account)</p>	<p>3rd party platforms such as:</p> <p>Stripe</p> <p>Plaid</p> <p>Intercom</p>	<p>Until we no longer need the information or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot create an account</p> <p>Cannot log in</p> <p>Cannot enjoy all the features</p> <p>Cannot provide the services</p> <p>Cannot perform the agreement</p> <p>Cannot communicate with you</p>
<p>When you contact us (e.g. customer support, need help, submit a request)</p>						
<ul style="list-style-type: none"> • Full name • Phone number • Business name • Email address • Any other information 	<p>We collect this information from you</p>	<p>To assist you with your query</p>	<p>Processing is necessary for the performance of a contract to which the data subject</p>	<p>3rd party platforms such as:</p> <p>Stripe</p> <p>Plaid</p>	<p>Until we no longer need the information or you send a valid deletion</p>	<p>Cannot assist you and respond to your query</p>

<p>that you decide to provide us</p>			<p>is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. respond to a query sent by you)</p>	<p>Intercom</p> <p>Google Cloud Platform</p> <p>Gsuite</p> <p>And other 3rd party platforms as may be updated by Anchor from time to time</p>	<p>request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	
<p><i>When we process your job application</i></p>						
<ul style="list-style-type: none"> • Full name • Email address • Telephone number • CV – resume • Cover letter • Any other information that you decide to provide us 	<p>We collect this information from you</p>	<ul style="list-style-type: none"> • To assess you as a candidate • To analyze your application 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. to assess you as a candidate)</p>	<p>3rd party platforms such as:</p> <p>Gsuite</p>	<p>Until we no longer need the information or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot assess you as a candidate</p> <p>Cannot analyze your application</p>
<p><i>When you attend a marketing event and provide us with your personal data or exchange business cards with us</i></p>						
<ul style="list-style-type: none"> • First name • Last name • Job title • Business name • Email address • Phone number • Any other information that you decide to provide us 	<p>We collect this information from you</p>	<ul style="list-style-type: none"> • To establish a business connection 	<p>Consent</p> <p>Legitimate interest (e.g., to establish a business connection)</p>		<p>Until we no longer need the information or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot establish a business connection</p>

When we use the personal data of our resellers, distributors, agents and/or finders

<ul style="list-style-type: none"> • Full name • Job title • Business name • Email address • Phone number • Any other data you decide to provide 	<p>We collect this information from you</p>	<ul style="list-style-type: none"> • To contact our resellers, distributors, agents and/or finder • To perform/execute the applicable agreement 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. perform the contract, send contract-related communications)</p>		<p>Until we no longer need the information or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot contact our resellers, distributors, agents and/or finder</p> <p>Cannot perform/execute the applicable agreement</p>
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When we use the personal data of our service providers

<ul style="list-style-type: none"> • Full name • Business name • Email address • Phone number • Any other data you decide to provide 	<p>We collect this information from you</p>	<ul style="list-style-type: none"> • To contact our service providers and suppliers • To perform the applicable agreement 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. perform the contract, send contract-related communications)</p>	<p>3rd party platforms such as:</p> <p>Google Cloud Platform</p>	<p>Until we no longer need the information or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot contact our service providers and suppliers</p> <p>Cannot perform the applicable agreement</p>
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When you interact with us on our social media profiles (e.g., Facebook, Twitter, LinkedIn)

<ul style="list-style-type: none"> • Full name • Email • Phone number • Business name • Job title • Social media profiles 	<p>We collect this information from you</p>	<p>To reply and/or respond to your request or question</p>	<p>Processing is necessary for the performance of a contract to which the data subject</p>	<p>3rd party platforms such as:</p> <p>Facebook</p> <p>LinkedIn</p>	<p>Until we no longer need the information or you send a valid deletion</p>	<p>Cannot reply or respond to your request</p>
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<ul style="list-style-type: none"> Any other information you choose to share with us 			<p>is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. perform the contract, send contract-related communications)</p>		<p>request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	
<i>When you use our scratch cards and want to claim your ticket</i>						
<ul style="list-style-type: none"> Full name Email address Phone number Address Any other information you choose to share with us 	<p>We collect this information from you</p>	<p>To notify you with the scratch cards outcomes (for example, whether you won a prize, the value or type of prize won, or if the scratch card was a non-winning card)</p> <p>To send you marketing communications.</p>	<p>Consent</p> <p>Legitimate interest (e.g. to handle your claim for the ticket)</p>	<p>3rd party platforms such as:</p> <p>Typeform</p> <p>HubSpot</p> <p>Google Cloud Platform</p>	<p>A period of 5 years.</p> <p>Please note that we may retain it for a longer or shorter period in accordance with data retention laws.</p>	<p>Cannot notify you with the scratch cards outcomes (for example, whether you won a prize, the value or type of prize won, or if the scratch card was a non-winning card).</p> <p>Cannot send you marketing communications.</p>

Finally, please note that some of the abovementioned personal data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your personal data. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

2. HOW WE PROTECT AND RETAIN YOUR INFORMATION

- 2.1. Security. We have implemented appropriate technical, organizational and security measures designed to protect your personal data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. Retention of your personal data. In addition to the retention periods mentioned above, in some circumstances we may store your personal data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. We have an internal data retention policy to ensure that we do not retain your personal data perpetually.

3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your personal data as follows:

- 3.1. With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies.
- 3.2. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.3. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.4. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal data in connection with the foregoing events; and/or
- 3.5. Where you have provided your consent to us sharing or transferring your personal data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

- 4.1. Storage: Google Cloud Platform – US.
- 4.2. Access from Israel: Access from Israel is covered by the European Commission’s Adequacy Decision regarding Israel. You can read more here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.
- 4.3. Internal transfers: Transfers within the Anchor group will be covered by an internal processing agreement entered into by members of the Anchor group (an intra-group agreement) which contractually obliges each member to ensure that personal data receives an adequate and consistent level of protection wherever it is transferred to.
- 4.4. External transfers: Where we transfer your personal data outside of EU/EEA (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your personal data. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States.

5. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT

- 5.1. Rights: The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):
 - You have a right to access personal data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
 - You have the right to request that we rectify any personal data we hold that is inaccurate or misleading;
 - You have the right to request the erasure/deletion of your personal data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;
 - You have the right to object, to or to request restriction, of the processing;
 - You have the right to data portability. This means that you may have the right to receive your personal data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
 - You have the right to object to profiling;
 - You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
 - You also have a right to request certain details of the basis on which your personal data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
 - You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
- 5.2. The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the CCPA):
 - You have the right to know what personal information is being collected about you;

- You have the right to request the erasure/deletion of your personal data (e.g. from our records and the records of our service providers). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;
- You have the right to know whether your personal information is sold or disclosed and to whom;
- Restriction of, or object to, processing of your Personal Information, including the right to opt in or opt out of sale of your Personal Information to third parties, if applicable, where such requests are permitted by law;
- You have the right to equal service and price, even if you exercise your privacy rights;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence (e.g. the Attorney General in your State). We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

5.3. You can exercise your rights by contacting us at office@sayanchor.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

5.4. Deleting your account: Should you ever decide to delete your account, you may do so by emailing office@sayanchor.com. If you terminate your account, any association between your account and personal data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

6. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any personal data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. In the event that we become aware that you provide personal data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at office@sayanchor.com.

7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. LOG FILES

We use log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

9. ANALYTIC TOOLS

- **Google Analytics**. The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personal information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Firebase Analytics**. We also use “**Google Analytics for Firebase**”. By enabling this tool, we enable the collection of data about App Users, including via identifiers for mobile devices (including Android Advertising ID and Advertising

Identifier for iOS), cookies and similar technologies. We use the information we get from Google Analytics for Firebase to maintain and improve our App(s). We do not facilitate the merging of personally-identifiable information with non-personally identifiable information unless we have robust notice of, and your prior affirmative (i.e., opt-in) consent to, that merger. Finally, please note that Google Analytics for Firebase's terms (available at <https://firebase.google.com/terms/>) shall also apply.

- **Hotjar.** We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. For further details, please see the 'about Hotjar' section of [Hotjar's support site](#).
- **Heap.** We use the information that we collect on or through our Website to:
 - operate, maintain, enhance and provide all features of our Website,
 - provide services and information that you request,
 - respond to comments and questions and otherwise to provide support to users,
 - to process and deliver entries and rewards in connection with promotions that we may offer from time to time,
 - understand and analyze the usage trends and preferences of our users, to improve our Website, and to develop new products, services, features, and functionality, and
 - contact you for administrative purposes such as customer service or to send communications, including updates on promotions and events, relating to products and services offered by us and by third parties.
- We reserve the right to remove or add new analytic tools.

10. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- 10.1. **Our California Do Not Track Notice:** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers
- 10.2. **Deletion of Content from California Residents:** If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or personal information you have publicly posted. If you wish to remove such content or personal information and you specify which content or personal information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you may not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

10.3. SALE OF PERSONAL INFORMATION. DISCLOSURE OF PERSONAL INFORMATION FOR BUSINESS PURPOSES. FINANCIAL INCENTIVES FOR COLLECTION OF PERSONAL INFORMATION

We do not sell any personal information and we do not disclose any personal information for any business purpose. Therefore, we have not sold or disclosed consumers' personal information for a business purpose in the preceding 12 months.

10.4. **Your Choices**

You have certain choices about your Personal Information. Where you have consented to the processing of your Personal Information, you may withdraw that consent at any time and prevent further processing by contacting us as described in this Privacy Policy. Even if you opt out, we may still collect and use non-Personal Information regarding your activities on our services and for other legal purposes as described above. While we cannot guarantee privacy perfection, we will address any issue to the best of our ability as soon as possible. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

- 10.5. Information collected in the last 12 months it is described above in Section 1. If you have further questions with respect to the collection, use, disclosure or sale of your personal information, please make your request by contacting us to [*].
- 10.6. **Your privacy rights:** Please see Section 5 above.
- 10.7. **Marketing emails – opt-out:** You may choose not to receive marketing email of this type by sending a single email with the subject "BLOCK" to office@sayanchor.com. Please note that the email must come from the email account you wish to block.

10.8. Non-Discrimination

If you decide to exercise your rights, you will not receive any discriminatory treatment by us for the exercise of the privacy rights conferred by the CCPA. However, note that some features of our website, our products and/or our services will not function without your Personal Information. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

11. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at office@sayanchor.com.
