



Privacy Notice

INTRODUCTION

This privacy notice aims to give you information on how we collect and process the following categories of personal data about you and/or your child or children (as applicable):

- Any photographs, video footage, audiotapes, digital images, testimonials, interviews, quotes and the like, and the contents of any message, post, comment or feedback shared through the GoHenry Insiders program (collectively, the "Materials"); and related contact details (specifically, your name, email address, general location, children's names and children's date of birth) (the "Related Personal Data").

This privacy notice only relates to how we will process the Materials and the Related Personal Data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, for example, if you are using our website, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

A. United Kingdom

1. IMPORTANT INFORMATION AND WHO WE ARE

CONTROLLER

GoHenry Limited (collectively referred to as "the Company", "we", "us" or "our" in this privacy notice) is the controller of and is responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS:

- Full name of legal entity: GoHenry Ltd
- Name or title of DPO: Chris Field
- Email address: help@gohenry.co.uk
- Postal address: Stirley House, Ampress Lane, Lymington, SO41 8LW
- Telephone number: 0330 100 7676

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3. HOW WE WILL USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

- On the basis of your consent
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. (For more information on the meaning of legitimate interests, see Paragraph 9 below); or
- Where we need to comply with a legal or regulatory obligation.



PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table above.

Purpose of processing your data	Data	Lawful basis for processing including basis of legitimate interest (if applicable)
-Activities for the Purpose. Managing our relationship with you, including:	Materials	-Consent
-Notifying you of changes to our privacy policy. -Storing your contact details so that we can contact you. -Keeping a record of your consent. -Keeping in contact with you for further marketing or advertising proposals.	Materials, Name, Related Personal Data	-Necessary for our legitimate interests ([to maintain a record of your contact details in case we need to contact you regarding the Materials; to keep our records updated OR it is necessary for entering into or performing a contract with the individual).
-Subpoenas, court orders or other legal processes.	Materials, Related Personal Data	-Where we need to comply with a legal or regulatory obligation.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below (as well as their affiliates, directors, subsidiaries, contractors, licensors, officers, agents, and employees) for the purposes set out in the table in paragraph 4 above.

- 3Q Digital Incorporated.
- Journey Further Limited.
- Service providers acting as processors based in the US and the UK who provide advertising and marketing services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the UK who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.



- Service providers acting as processors based in the US and the UK who provide advertising and marketing services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the UK who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

We share your personal data with our group companies. This will involve transferring your data outside of the UK and the European Economic Area.

Many of our external third parties are based outside the UK and the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the UK and EEA..

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Where we use certain service providers, we may use specific contracts approved by the Information Commission which give personal data the same protection it has in the UK.

Please contact our Data Protection Officer (whose details are in paragraph 2 above) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

We will only retain the Materials and Related Personal Data for as long as necessary to fulfil 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 data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at help@gohenry.co.uk.

8. YOUR LEGAL RIGHTS

You have, in connection with your personal data, under certain circumstances, the right to:

- **Request access to your personal information (commonly known as a "data subject access request").** This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.** You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information. This** enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party.**
- **Withdraw consent at any time in relation to our use of the Materials for the Purpose, in relation to which are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact help@gohenry.co.uk in writing. If we receive notification that you have withdrawn your consent to the use of the Materials for the Purpose, we will no longer process the Materials for the Purpose and, subject to our retention policy, we will dispose of the Materials securely. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. GLOSSARY

LAWFUL BASIS

- Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before
- We process your personal data for our legitimate interests. We do not use your personal data 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us using at help@gohenry.co.uk.
- Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.



B. United States of America

1. IMPORTANT INFORMATION AND WHO WE ARE

GoHenry Inc. (collectively referred to as "the Company", "we", "us" or "our" in this privacy notice) is the service provider and is responsible for your personal identifiable information.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (section ...), please contact the DPO using the details set out below.

CONTACT DETAILS:

- Full name of legal entity: GoHenry Inc
- Name or title of DPO: Chris Field
- Email address: help@gohenrycard.com
- Postal address: WeWork, 54 W. 40th St., New York, NY 10018, USA
- Telephone number: (877) 372-6466

2. HOW WE WILL USE YOUR PERSONAL IDENTIFIABLE INFORMATION

We will only use your personal identifiable information (PII) in accordance with the applicable laws. We will use your PII in the following circumstances:

- **To provide you with the GoHenry Insider program:** we use your information to process your membership to the GoHenry Insiders program, process any activities you make towards the Purpose of the program and provide you with any additional services.
- **To communicate with you:** we use your information to share important news relating to the program or the services we provide you, to notify you of changes to our privacy notice and keep in contact for further marketing or advertising proposals etc.
- **To conduct research:** we use your information to conduct research for the further development and improvement of our services.
- **To help you:** we use your information to investigate and resolve complaints and services issues;
- **To improve the services offered on our website and make them more secure:** we use your information so we can provide you with the most user-friendly navigation experience we can, and if we think it's necessary, for security purposes or to investigate possible fraud;
- **To comply with legal and/or regulatory requirements;** and

HOW WE WILL USE YOUR PERSONAL IDENTIFIABLE INFORMATION

Purpose	Personal Identifiable Information
To provide you with the GoHenry Insider program	Materials, Name
To communicate with you	Materials, Name, Related Personal Data
To conduct research	Materials
To help you	Materials, Name
To improve the services offered on our website and make them more secure	Materials
To comply with legal/ and/or regulatory requirements	Materials, Name, Related Personal Data

We will not collect any additional categories of PII or use the PII we collected for materially different, unrelated purposes without providing you notice.

3. DISCLOSURES OF YOUR PERSONAL IDENTIFIABLE INFORMATION

First of all please rest assured that WE DO NOT SELL YOUR PERSONAL INFORMATION TO THIRD PARTIES. We also do not pass your or your family's personal information to third parties for marketing purposes without your permission.

We may have to share your PII with the parties set out below (as well as their affiliates, directors, subsidiaries, contractors, licensors, officers, agents, and employees) for the puposes set out in the table in paragraph 12 above.

- 3Q Digital Incorporated.



- Journey Further Limited.
- Service providers acting as processors based in the US and the UK who provide advertising and marketing services.
- Regulators and other authorities acting as processors based in the US who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We may also disclose your personal information in the following circumstances:

- When required by law, subpoenas, court orders, or other legal process;
- When we have a good faith belief that such disclosure is reasonably necessary to:
 - Investigate, prevent, or take action regarding suspected or actual illegal activities;
 - Enforce our agreement with you;
 - Investigate and defend ourselves against any third-party claims or allegations;
 - Maintain the security and integrity of our Services;
 - Protect the rights and security of gohenry user's, personnel, or others.
- When we are under a legal duty to disclose or share your personal information in order to comply with any legal or regulatory obligation or request such as subpoenas and court orders. We will use our best efforts to notify you about such legal demands when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency.

4. INTERNATIONAL TRANSFERS

We share your personal data with our group companies. This will involve transferring your data outside of the US.

Many of our external third parties are based outside the US so their processing of your PII will involve a transfer of data outside the US.

Whenever we transfer your personal data out of the US we ensure a similar degree of protection is afforded to it as apply to personal information held and processed in the US and to use your information only for the purpose of providing the service to us. Please know however that although we do our best to protect your PII, we cannot guarantee the security of your information during transmission of information via the internet, as any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to do our best to prevent unauthorised access to your information.

5. DATA SECURITY

We know that security is a major concern for many of our customers, and to give you peace of mind we have the most advanced security systems in place as required under both US and the very stringent EU data protection laws.

We have put in place appropriate security measures to prevent your PII from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your PII to those employees, agents, contractors and other third parties who have a business need to know. They will only process your PII on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected PII breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. DATA RETENTION

We will only retain the Materials and Related Personal Data for as long as necessary to fulfil 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 data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at help@gohenrycard.com.



7. YOUR LEGAL RIGHTS

Right to be informed. You can ask us what type of personal information we collect about you, the sources from which we collect it, the commercial purpose of the collection, and with whom we share it. You can find answers to these questions in section 2 and 3 of this privacy notice.

Right to Access. You can ask us to view your personal information. You can contact us at any time to ask us to provide you with a copy of the information we hold about you. We will be happy to share it with you free of charge by mail or electronically, unless we are prohibited by law from doing so.

Right to Rectify. You can ask us to rectify the personal information we hold about you. You can also request us at any time to amend your details if they are deemed to be incorrect i.e. your email addresses, home address etc.

Right to Delete. You can ask us to delete your personal information. Finally, you can always ask us to delete your personal information. Please note however that we may be required, as a company providing financial services, to retain some of your personal to comply with our legal obligations such as AML or KYC laws, the Patriot Act or the Bank Secrecy Act.

If you are a California resident you are also afforded additional rights, pursuant to the California Consumer Privacy Act, as summarised below:

Right to opt out of Sale. As stated in section 3, we do not sell your information to third parties. However, we may share your personal information with third parties in a manner that could be considered a sale under Californian law. You have the right to opt out of a "sale" of personal information.

Right to non-Discrimination. You have the right to not receive discriminatory treatment from us for the exercise of any of your CCPA rights.

For all these requests please do not hesitate to write us on help@gohenrycard.com or call us on (877) 372-6466.