

Privacy Policy

Please read the Privacy Policy which will become effective on February 13, 2023 (“Effective Date”).

After the Effective Date, you agree to the updated Privacy Policy by continuing to use the Ace Services.

Introduction

Yoda Coach Inc., dba Ace (“Ace” and also referred to as “our”, “us” and “we”) understands the importance of user privacy and takes privacy matters very seriously.

By visiting Ace’s existing and future website(s), application(s) and/or domain name(s) at <https://getace.io>, including its sub-domains and mobile optimized version (collectively, the “Site”), or otherwise accessing any linked pages, features, content, products, services, mobile properties and mobile device applications for iPhone, iPad, Android or other smartphone or tablet device (each, a "Service") owned or operated by Ace, you acknowledge and accept terms in this Privacy Policy (“Policy”).

This Policy is a legally binding agreement between Ace and, you, a user of our Services and/or visitor of our Site; and your acceptance of this Policy arises upon your simple use of the Services, your use of the Site, or when you otherwise click on the “I accept” checkbox on our registration page (or similar box or means). If you do not agree to the terms of this Policy, please close this web tab and immediately stop browsing our Site and/or using the Services.

This Privacy Policy does not apply to any third party applications or software that integrate with the Services (“Third Party Services”), or any other third party products, services or businesses.

Information We Collect

We collect a variety of personally identifiable information ("PII") about users of our Services in order to ensure quality user experience. "PII" means information that we can use to identify or contact you, such as your name, address, telephone number, email address or other contact information. You are responsible for ensuring the accuracy of all PII that you submit to us. Inaccurate information may affect your

experience when using the Services and/or our ability to contact you as described in this Policy. PII collected by us is protected as personal data under applicable data protection law.

PII does not include "Aggregated Information" which is information or data we collect where individual user identities have been removed, including metadata on your use of the Services, IP address logs, device and location information. Aggregated Information helps us understand trends, user needs and other information to provide improved Services and may be used by us for any purpose.

We may also collect other non-personally identifiable information about your use and interaction with our Services. "Non-personally identifiable information" means information where we cannot determine the identity of a natural person.

Non-personally identifiable information is not treated as PII unless we combine it with or link it to PII that you give to us.

If you do not wish to disclose any required information, then your sole remedies shall be to close this web tab, delete your Ace account and/or exit the Site.

How We Collect Information

Information You Give Us

We collect information that you give to us when you register or use our Services. When you register for an Ace user account ("Account") on the website, you will be assigned a unique account identifier which will be associated with any information you give to us under your Account. You may also give us information to allow us to contact you or use certain features available through our Services without signing up for an Account, such as when you fill out a request form, provide feedback, email us, or engage in communications with our team. While you may use some functionality of the Services and/or Site without registering for an Account, most functionality and services will require that you register for an Account.

Customer Support Information

Your emails, calls and other correspondence to and from us may be recorded for various purposes including: monitoring customer service quality or compliance, checking accuracy of information you provide us, preventing fraud or providing training for our staff or customer service representatives. Any information obtained

from you through Customer support will be treated in accordance with the provisions of this Policy.

Information We Collect Automatically

Even if you do not provide information to us, we automatically collect certain information about your use and interaction with our Site and/or Services. For example, when you visit our website, our systems automatically maintain web logs to record data about all visitors who use our website and stores this information in our database. These web logs may contain information about you including the following: IP address, type(s) of operating system you use, type of device you use, date and time you visited the website, your activity and/or referring websites. We use your log information to troubleshoot problems, gather demographic information, customize your experience when accessing our Site, Services and other business purposes.

Information Collected From Other Sources

We may receive information about you from outside sources, such as commercially available demographic or marketing information, and add or combine it with your information to provide better service to you and inform you of Services or other information that may be of interest to you. Our Site offers you the functionality of using your social media credentials (e.g. Facebook, Google, Ace, etc.) to use single-sign-on to enter our Site, and in that manner we may also collect certain information from you as you log on. We will not collect more information from you when using your social media credentials beyond the information such third parties disclose to us.

How We Use Information

In order for us to provide and maintain our Site and Services, and to improve your user experience, we will use your information in accordance with your instructions, including any applicable terms in your Customer Agreement and applicable law. Ace uses your information in furtherance of our legitimate interests in operating our Site, Services and business. Additionally, Ace uses your information:

1. Develop, research, process, safeguard, modify and improve our communications, the Site and Services.
2. Send correspondence to your email address, including sending password verification and retrieval links, billing, account management information, newsletters, answers to queries/suggestions and other notices related to the Site and Services.

3. Improve your user experience and provide you with customer support.
4. Investigate and help prevent security issues, abuse and breaches.

With Whom We Share Information

Disclosure With Your Consent

Customers determine their own policies and practices for the sharing and disclosure of information, and Ace does not control how a Customer or any other third parties choose to share or disclose information. We may disclose your information with your consent, which we may obtain in a number of ways, including:

In writing;

1. Verbally;
2. Online, by clicking on a link or button; or
3. Other mechanism.
4. Our Services permit you to submit information which may be displayed to other authorized users in the same or different Customer Account. The sharing and other controls applied to such information may be determined by you, other users and/or an administrator of your Account.

We may share your information with third parties as necessary to provide Services to you or to support the technical operation and/or maintenance of our Services, including third party application that you may engage within the Services. We may also share information with our affiliates, agents, outside vendors or service providers to perform functions on our behalf. When a third party acts solely on our behalf and otherwise as applicable, we use reasonable commercial efforts to require that party to follow the privacy practices stated in this Policy or have complementary privacy protections to protect your information. We do not share your information with unaffiliated third parties except as permitted to do so in this Policy.

Disclosure Without Your Consent

In general, we may disclose your information without your consent to disclosure when we reasonably believe disclosure is appropriate in order to:

1. Comply with the law (e.g., lawful subpoena or court order);
2. Cooperate with or report to law enforcement agencies in investigations that involve users who use our Service Offerings for activities that are or seem illegal or illegitimate activities;
3. Enforce or apply agreements for our Service Offerings; or

4. Protect our rights or property or that of our affiliates, including respective officers, directors, employees, agents, third-party content providers, suppliers, sponsors, or licensors (e.g., to address allegations about fraudulent or unlawful activity related to a Ace account).
5. In connection with a merger, acquisition, public offering, sale of company assets, insolvency, bankruptcy, or receivership, subject to standard confidentiality requirements.
6. To defend Ace and our affiliates, licensors, officers, agents and representatives from legal claims and processes brought to us by third parties (including takedown notices);
7. Use or disclose aggregated or de-identified data in our sole discretion.

How We Protect Information

We use industry standard protocols and technology to protect your registered user information and personal data in order to guard and encrypt data for transmission in a format that prevents data theft by unauthorized third parties, including internal reviews of our data collection, storage and processing practices, security measures, and physical security measures. However, please take into account that the Internet and e-mail transmissions are not secure or error free communication means. We also urge you to take additional steps on your own to safeguard and maintain the integrity of your information. For example, you should never share your Account or login information with other people and be sure to sign off when finished using a shared or public computer. We urge you to be aware that if you use or access our Services through a third-party computer network (e.g., internet café, library) or other potentially non-secure internet connection, such use is not recommended and solely at your own risk. It is your responsibility to check beforehand on the privacy and/or security policy of your network prior to accessing the Services. We are not responsible for your handling, sharing, re-sharing and/or distribution of your information except as set forth in the Policy.

Control of your information

Customers will generally be able to edit, select or delete the amount and type of personal data they disclose to us when using our Site and services. This will be managed through your Account with us, the settings section of your account, the Site, and through the means mentioned in this Policy.

Personal data owners' rights and revocation of consent

Any user of our Site shall have the right to make a request to us in order to enforce such user's rights to:

1. Access the user's personal data;
2. Rectify the user's personal data, when inaccurate or incomplete;
3. Cancel the process of the user's personal data;
4. Object —with legitimate reasons— the process of the user's personal data; and/or
5. Revoke the user's consent for the use, storage, treatment, process and/or, disclosure of the user's personal data.
6. The enforcement and upholding of your privacy rights should be requested to us in writing and must include, at a minimum, the following information: (i) your complete name, address and/or e-mail address in order for us to notify you the response to your privacy request; (ii) attached documents establishing your identity; and (iii) a clear and concise description of the personal data with regard to which you seek to enforce any of your privacy rights. If you request rectification, please indicate amendments to be made and attach documentation to back up your request.

Upon receipt of your privacy request, and after due review of its merit, we may then edit, deactivate and/or delete your personal data from our Site or services. We may not be able to delete all of your data from some our databases and that, if such is the case, we will then mark such data as permanently inaccessible.

Cookies and Beacons

We may place 'cookies' and similar technologies in your computer or mobile device in order to track and collect data regarding your use of our Site and Services. Cookies are small text files that our Site transfers to you and that allow us permit us to recognize you and obtain data such as how, when and how long you browse pages in our Site. Either we or our affiliates and authorized service providers may also use 'beacons', which are small files, sometimes only a pixel in size, embedded onto the pages of our Site. Beacons are used to identify each of our pages in order to be analyzed by our system tools.

Generally

Our Site and services may also implement hyperlinks to the websites of our commercial partners and other third parties. If you click on such links, you are

choosing to visit such websites, and will be redirected thereto. If you click on a third-party link, our Policy and Service terms are no longer applicable and your browsing is at your own risk. We are not responsible for the privacy and personal data practices used by such third parties (including any tools, cookies, information or content contained therein), and we do not have control over the manner in which such third-parties may collect, process, treat or use your personal data. You are strongly advised to check the privacy settings, policies and/or notices applicable to such third-party sites and services prior to browsing or using such third-party websites and/or services.

In addition, any banner or ad that we may have on our Site does not constitute any endorsement of any third party thereof.

Financial data and information

We use third party payment processing platforms. These platforms will request you to disclose them sensitive personal data (e.g. credit card number, account username and password) in order to complete purchases and operations related to our services. Such third-party payment processing platforms are governed by their own safety standards, policies and terms of use. We shall not be liable for their operation, safety or otherwise their functioning. We strongly advise our users to engage in online safety measures in order to protect their financial information, here in the Site and elsewhere. We will not collect or store any sensitive financial data of yours.

Advertising, opt-out

From time to time, we may use Google Analytics, AdWords and/or AdSense tracking codes, along with other third-party software tools (such as remarketing codes) in order to collect marketing analytics about the pages you browse on our Site or when you undertake specific actions through our services. These platforms may also use cookies, codes and other technologies to help us analyze our users' patterns.

For example, third party vendors may show you ads on certain websites across the Internet, even after you leave our Site. The collected information is anonymized, meaning it cannot be tracked back to individuals. Using Google and other analytics tools, we learn how to optimize, and serve ads based on a user's past visits, giving you a better experience.

Our third-party vendors may also use cookies and beacons to track your Internet browsing in order to serve you ads based on what they or us believe to be of your

interest. Such information will be processed for purposes of evaluating your browsing activities and consumer preferences. Henceforth, by using this Site, you consent to such disclosure, treatment and storage of data and/or personal data about you, either by us or by such third parties.

In order to enforce and uphold your right to privacy, you have the option to elect not to receive this type of advertising from us or third parties, now or in the future. You can learn more about how to opt-out by browsing Google's opting-out and privacy pages located at www.google.com, or the Network Advertising Initiative website located at www.networkadvertising.org. In addition, you may set browser and system preferences for how other third parties serve ads to you.

Your Rights

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to your information, as well as to seek to update, delete or correct this information.

To the extent that Ace's processing of your personal data is subject to the General Data Protection Regulation (GDPR), Ace relies on its legitimate interests, described above, to process your data. Ace may also process information that constitutes your personal data for direct marketing purposes, provided, that you have a right to object to Ace's use of your personal data for this purpose at any time.

Age Restriction

Ace does not knowingly collect any kind of information from persons under the age of thirteen (13). By using our Services and/or browsing the Site, you hereby represent and warrant that (i) you are at least thirteen (13) years of age — or older — as of the date of first access to the Site; and, (ii) if you are a minor (which may differ depending on the jurisdiction where you reside), you are accessing the Site under the direct supervision of your parent or legal guardian.

Amendments

Ace may change this Policy from time to time as laws, regulations, industry standards and/or our business evolves. We will post the changes to this page and encourage you to review our Policy periodically to stay informed. If we make changes that materially alter your privacy rights, Ace will provide additional notice, such as via email

or through the Services. If you disagree with the changes to this Policy, you should deactivate your Services Account. Contact your Account administrator if you wish to request the removal of your personal data under their control.

Contact

If you have any questions about us, our Site, our Service or this Privacy Policy, please contact us:

Email: support@getface.io