

Verve Market - Privacy Policy

Effective Date: November 15, 2024

Please read this “Privacy Policy” carefully. This Privacy Policy describes the data collection, use, protection, and privacy practices of Verve Market, Inc. (hereinafter, “**Verve Market**”, “**we**”, “**our**” or “**us**”) in connection with our products, services, and business. If you have any questions regarding this Privacy Policy, please email us at hi@vervemarket.com.

By visiting, accessing, or using any of our Services (as defined in Section 1 below – [Scope of Privacy Policy](#)) you acknowledge and agree that you have received and reviewed this Privacy Policy. We may update this Privacy Policy as described in Section 2 below - [Changes to this Privacy Policy](#).

If you're a resident of California or Nevada, you should read the applicable sections below for specific rights applicable to residents of [California](#) and [Nevada](#).

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1. SCOPE OF PRIVACY POLICY

This Privacy Note applies to personal information that we may collect or process in connection with our business, products and services, including, through our “**Websites**” located at www.vervemarket.com, its subdomains, and any other websites that include an authorized link to this Privacy Policy following (collectively, “**Services**”).

The term “personal data” means any information about an individual from which that person may be identified. For example, it may include a person’s name, telephone number, email address, IP Address, or other unique identifiers. It does not include data from which the identity of an individual has been definitively removed along with any identifiers connected to such individual (also known as anonymous or anonymized data).

2. CHANGES TO THIS PRIVACY POLICY

Verve Market reserves the right to update or modify this Privacy Policy at any time. Except for material changes as described below in this Section, all updates and modifications to this Privacy Policy will be effective from the day they are posted online at vervemarket.com/legal/privacy-policy. If we make any material changes to this Privacy Policy, we will provide you with reasonable notice prior to such change taking effect by sending a notification to the email address we have on file for you and may also post a prominent notice of any such changes on our Websites. Material changes to this Privacy Policy will become effective on the date set forth in the notice, and all other changes will become effective from the day they are posted on our Websites. It is your responsibility to regularly visit and review this Privacy Policy.

If you do not agree to any updates or modifications to the Privacy Policy, cease all use of our Services. Continued use of our Services by you after the applicable effective date of the revised Privacy Policy signifies to us that you acknowledge and agree to be bound by the revised Privacy Policy.

3. INFORMATION WE COLLECT

We collect information provided directly by visitors to our Websites and/or Social Media Platforms (as defined below), purchasers of our Services, and any other users of our Services. In certain circumstances, we automatically collect certain information from you when you access or use our Services as explained in the Section [Information Collected Automatically](#). In addition, we may receive personal data from third party sources as described in the Section [Information Collected from Third Party Sources](#).

a. Information Provided Directly by You

The personal data we collect in connection with the use of our Services depends on how and why you use our Services. For example, the information that we may process about you if you visit our Websites is more limited than the information we may process if you submit information to our web form to request our services. Note that you may choose not to provide personal data directly to us or to not use our Services. However, some personal data is necessary so that we can provide you with our Services you have requested. Failure to provide this information may prevent us from providing you with access to our Services.

- **Contact Information:** We may collect contact information, such as, your first and last name, company name, and/or email address, when you sign-up to receive our marketing communications and/or newsletters or request our services or information related to our services.
- **Zip Code:** If you sign up for early access to our Services, we collect your Zip Code so we can provide you relevant information regarding the timing of launch in your particular area.
- **Forms, Communications & Support.** We collect the data, information, text, and/or any other content or materials that you submit when you fill out forms or contact us (such as your feedback, requests for support, or other communications (whether by email, or phone).
- **Usage Data:** We collect Usage Data as described below in the Section titled [Information Collected Automatically](#).

b. Information Collected Automatically

When you visit, use, or interact with our Websites, we may receive the following information about your visit, use, or interactions (collectively, “**Usage Data**”). Typically, this data is transmitted and collected automatically (without action by you) using cookies and similar technologies as described in Section 8 below.

- **Log Data:** Information that your browser or device automatically sends when you use our Websites. Log data includes your Internet Protocol address, browser type and settings, the date and time of your request, and how you interact with the Websites.
- **Usage and Analytics:** Information and analytics about your use of the Websites, such as the types of content that you view or engage with, the features you use and the actions you take, non-identifiable request IDs, statistics associated with the interaction between your device or browser and the Websites, as well as your time zone, country, the dates, and times of access, user agent and version, type of computer or mobile device, your computer connection, searches, and other actions you take, websites, apps, and/or ads that referred you to the Websites, advertising, and language preferences.

a. Information Collected from Third Party Sources

In some instances, we process personal data from third parties, which consists of:

- **Service Providers:** We receive information from third party service providers as described in Section 7.a below (“**Service Providers**”), that help us in the operation, provision, administration, and management of our Services, such as our cloud or hosting service providers, marketing agencies, and support providers.
- **Other Third Parties & Sources:** We may receive data and information from third party partners, and/or other data licensors and/or providers that we have a relationship with, such as any third party advertising networks, and/or information collected from publicly available sources, such as online business profiles, social media accounts, and/or webpages, which may include your name, or a publicly available business address, and related activity on such profiles, social media accounts, and/or webpages.
- **Social Media Networks:** If you interact with us through any pages or feeds of our accounts on any social media sites or platforms, such as through LinkedIn, X (formerly, Twitter), and/or any Meta platforms (“**Social Media Platforms**”), we may collect information such as your name, username, demographic information, contact information such as email address, location, interests, and publicly posted data such as your social media activity.

b. Aggregated or De-Identified Data

With the personal information and other data (including Usage Data) collected by us, we may aggregate or de-identify such data and information so that it can no longer be used to identify you. We use this information to analyze the effectiveness of our Services, to improve and add features to our Services, to conduct research, and for other similar purposes. In addition, from time to time, we may share or publish aggregated information like general user statistics with third parties. We collect this information through our Services, through cookies, and through other means described in this Privacy Policy. We will maintain and use de-identified information in anonymous or de-identified form, and we will not attempt to re-identify the information, unless required by law.

4. CHILDREN'S PRIVACY

Verve Market does not target our Services to persons under the age of 18, nor does Verve Market knowingly collect personal data of persons under the age of 18. Therefore, we ask you not to provide us with personal data of persons under the age of 18. If we learn that personal data of persons under the age of 18 has been collected on or through our Services, then we may terminate access to our Services and/or make the information inaccessible.

5. SENSITIVE DATA

Verve Market does not require you to provide any sensitive data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health and genetics, or biometric data to use our Services.

6. PURPOSES FOR PROCESSING

Depending on how you use or interact with our Services, Verve Market processes personal data for the following purposes:

Providing, Customizing and Improving our Services

- To host the Websites and the online aspects of our Services.
- To perform and provide our Services to our users and related support and assistance.
- To maintain, debug, enable, upgrade, update, improve, and/or enhance our Services, and develop new features, functionality, and/or other products and services.
- To conduct analytics related to our Services, such as understanding how they are being used and where improvements may be needed.
- To detect any fraudulent or illegal activity against Verve Market, you, and our other users and for security purposes.

Marketing our Services

- To provide advertisements, content, and information regarding our Services, where and as permitted under applicable law.
- Deliver direct marketing communications to you regarding our products and services that we may think are of interest to you.

Communicating with Users

- Respond to your queries and requests, or otherwise communicate directly with you.
- To keep you updated about changes to policies related to our Services (including this Privacy Policy).

Meeting Legal Requirements and Enforcing Legal Terms (as further described below in [Legal Obligations and Security](#))

- To comply with a legal or regulatory obligation (for example, keeping records of our sales for tax compliance) and investigating security incidents.
- Protecting the rights, property, or safety of you, Verve Market, or another party.
- To respond to regulatory bodies when legally required (for example, responding to a valid court order).
- To enforce our rights under our contracts and agreements.

7. SHARING PERSONAL DATA

Aside from disclosing your information to those of our employees, contractors, and agents who are authorized to process the information in order to provide our Services and who are committed to confidentiality, we disclose your personal data only to the third parties as described below.

a. Service Providers

We share personal data with our Service Providers that help us in the operation, provision, administration, and management of our Services, and to otherwise operate our business. Depending on how you use our Services, the following categories of third parties collect or receive personal data on our behalf as our Service Providers:

- Hosting and technology providers;
- Internet Service providers;
- Analytics providers;
- Advertising and marketing agencies;
- Providers of business operations and communication tools;
- Other third-party service providers that help us provide features and functions for our Services (e.g., customer support providers); and
- Professional service providers, such as auditors, lawyers, consultants, accountants, and insurers.

b. Business Transfers

We may also share data with third parties to whom we 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 Policy.

c. Affiliates and Subsidiaries

Personal data that we collect about you may be shared with the employees, contractors, and agents of Verve Market and our affiliated and subsidiary entities (“**Affiliates**”) who are involved in providing or improving our Services that we offer to you. We obligate the employees, contractors, and agents of Verve Market and our Affiliates to ensure the security and confidentiality of your personal data and to act on that personal data only in a manner consistent with this Privacy Policy.

d. Legal Obligations and Security

Regulatory and Government Bodies – Compliance with Law

We may disclose your information to regulatory agencies and official government bodies, as required to comply with or satisfy any laws, rules, or regulations applicable to Verve Market.

Required Disclosures – Responding to Legal Orders

If we are required to disclose personal data by law, such as pursuant to a subpoena, warrant, or other judicial or administrative order, our policy is to respond to requests that are properly issued by law enforcement within the United States. Under such circumstances, unless prohibited by applicable law, we will attempt to provide you with prior notice that a request for your personal data has been made in order to give you an opportunity to object to the disclosure. We will attempt to provide this notice by email, if you have given us an email address. However, government requests may include a court-granted non-disclosure order, which prohibits us from giving notice to the affected individual. In cases where we receive a non-disclosure order, we will notify you when it has expired or once we are authorized to do so.

Exigent Circumstances & Enforcement/Protection of Our Rights

Your information, including the contents of all of your online communications in our Services and between you and Verve Market may be accessed and monitored as needed to provide our Service and may be disclosed to law enforcement, regulatory agencies, official government bodies, and other third parties, as we, in our sole discretion, believe necessary or appropriate:

- To enforce our rights under our terms of use, terms of service, customer agreements and/or any other terms and conditions applicable to the use of our Services;

- In connection with an investigation of fraud, intellectual property infringement, piracy or other unlawful activity or activity that may expose us or our affiliates, partners, and/or agents to legal liability; and/or
- If we receive information that provides us with a good faith belief that there is an exigent emergency involving the danger of death or serious physical injury to a person.

e. With Your Consent

There may be situations where you are asked to consent to share personal data with third parties for additional reasons not included in this Privacy Policy. In such event, we will only share such personal data if we have received your prior consent and only for the purposes listed in the request to share such information.

Except where otherwise required by applicable law, your consent for the use and/or disclosure of your personal data in specific situations will continue in full force and effect until you revoke that consent, which you may do by contacting us via email at hi@vervemarket.com. For the avoidance of doubt, the revocation of consent shall only apply to the use the information after our receipt and processing of such request (which we shall process promptly and in accordance with applicable law), and not to any use or disclosure prior to such revocation in compliance with your consent.

8. COOKIES & RELATED TECHNOLOGIES; THIRD PARTY AD NETWORKS

Cookies

We or authorized third parties may collect certain information by automated means using cookies (which are small data files that are placed on your computer or mobile device that are set by us or by third parties when you visit a website or other online service) and a range of technologies similar in function to the traditional cookies described above, such as pixel tags, also called web beacons or single-pixel tags/gifs, local or web storage, and embedded scripts (all such technologies described above, collectively, “**Cookies**”). Cookies collect information such as Usage Data, and are designed to that gather information about your interaction with a website or email, such as, the pages visited, links you clicked and/or whether or not an email was opened. Verve Market uses Cookies for purposes such as to provide content or features on our Services, to help us remember you and your preferences, and improve your user experience by making our Services more efficient and relevant to you. You can find more information about Cookies at: www.allaboutcookies.org.

Where required by applicable law, we will obtain your consent prior to setting Cookies (except for strictly necessary Cookies). Most web and mobile device browsers automatically accept Cookies, but if you prefer, you can change your browser to prevent that or to notify you each time a Cookie is set.

Advertising our Services on Third Party Ad Networks

We may place advertisements on third party advertising networks (such as Facebook and/or Instagram). In such instances, if you click on any such advertisement, Cookies are used by the third party advertising partners to gather analytics and information about interactions with, and/or the performance of, the advertisements placed by such third party advertising partners. These Cookies are used to help measure the effectiveness of our advertising campaigns, for example, by identifying the number of unique views or interactions with an advertisement, or to identify if a visitor to the Website was referred by our advertisement. Verve Market and/or the third party ad networks may use these Cookies for purposes of:

- Tracking the performance and efficacy of our advertisement campaigns;
- Keeping track of how many visitors click on the advertisement; and
- Keeping track of the advertisements you have already been shown so that you are not always shown the same ones.

If you are shown an advertisement for our Services on a third party ad network and/or website, you should review the applicable privacy policies for such third party ad networks and/or sites before interacting or clicking on the advertisement to understand the data collection and privacy practices of such third party.

Managing Cookie Preferences: To learn more about Cookies, including how to manage Cookies and opt-out of Cookies being placed on your device, please visit <http://www.allaboutcookies.org/manage-cookies/index.html>.

Browser Settings & Do Not Track Preferences

- ***Browser Settings:*** You may alter the Cookie settings in your browser settings at any time. Some browser providers offer comprehensive help relating to cookie management in their products. You may elect to accept all

or only certain Cookies. If you disable Cookies in your browser settings, however, you may find that certain portions or functionality of our Services will not work.

- **Do Not Track Preferences:** You may turn on the Do Not Track (“DNT”) setting in your browser, which will enable your browser to send a special signal to websites, analytics companies, plug in providers, and other web services you encounter while browsing to stop tracking your activity. To turn on your DNT signal, please visit <https://allaboutdnt.com/#adjust-settings>. Please note that not all companies will respond to or honor DNT signals and we do not process or respond to web browsers' "do not track" signals or other similar transmissions that indicate a request to disable online tracking of users who use our Services.

Web Beacons and Pixels: You may avoid web beacons and pixels by disabling the functionality that allows remote images to load in your email account and refraining from clicking on any links in email messages.

Third Party Ad Networks: You should review the applicable privacy policies for any third party ad networks and/or sites before interacting or clicking on the advertisement to understand the data collection and privacy practices of such third party and how you can manage your preferences with respect to advertisements from the ad provider.

9. MARKETING COMMUNICATIONS

If you have not otherwise opted out (or with your consent where required by applicable law), or if you have opted in to receive direct marketing emails from us, we may use your personal data to send you marketing information about the Verve Market business, our Services, new product releases, new feature releases of our Services, and/or other products and services, that we think may interest you. We carry out direct marketing by email.

If you no longer wish to receive marketing communications, you have the right at any time to opt out by clicking on the “unsubscribe” link located on the bottom of any of our marketing e-mails. We will use commercially reasonable efforts to process such requests in a timely manner.

Please note that you cannot opt out of receiving transactional e-mails or communications related to our Services (e.g., requests for support), which, for clarification, are not marketing communications.

10. DATA RETENTION

Personal data is processed for the period necessary to fulfill the purposes for which it is collected, to comply with legal and regulatory obligations and for the duration of any period necessary to establish, exercise or defend any legal rights.

Typically, we retain personal data about you for as long as necessary to provide you with our Services. In some cases, we retain personal data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. We retain user device and IP address data for as long as we need to ensure that our systems are working appropriately, effectively, and efficiently.

In order to determine the most appropriate retention periods for your personal data, we consider the amount, nature and sensitivity of your information, the reasons for which we collect and process your personal data, and applicable legal requirements.

In some instances, we may choose to anonymize personal data instead of deleting it. When we choose to anonymize, we make sure that there is no way that the personal data can be linked back to any specific individual.

11. DATA SECURITY AND PROTECTION

We have put in place reasonable and appropriate security measures designed to prevent your personal data from being accidentally lost, altered, disclosed, used, or accessed in an unauthorized way. For example, we may use encryption, firewalls, and password protection. In addition, we limit access to personal data to those employees, agents, contractors, and the third parties who have a business need-to-know. We also have procedures in place to deal with any suspected data security breach.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure, and while we take reasonable steps to provide secure services, by using our Services, you understand and assume the risks associated with your activities on the internet.

Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on our Services is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on our Services. To the

fullest extent permitted under applicable law, we cannot and do not guarantee that information you post on or transmit to our Services will not be viewed by unauthorized persons.

12. THIRD PARTY SOCIAL MEDIA PLUG-INS

On or through our Services we may provide third-party “share” buttons which enable you to share certain content via social media sites (e.g., Facebook, X (formerly, Twitter), Instagram, YouTube, and LinkedIn). These “share” buttons may function as web beacons when you interact with the button. Please note that when you “share” using the buttons, you may send to the third party provider of the “share” button the information that you are viewing. If you are not logged into your account with the third party provider, then the third party may not know your identity. If you are logged in to your account with the third party, then the third party may be able to link information or actions about your interactions with our Services to your account with the applicable third party provider. Please refer to each third party’s privacy policies to learn more about its data practices.

13. EXTERNAL WEBSITES

On or through our Services we may provide or make available, for informational purposes only, links to other websites or resources with which we do not have a contractual relationship and over which we do not have control (“**External Websites**”). Such links do not constitute an endorsement by Verve Market of those External Websites and are provided to you only as a convenience. By clicking on links to External Websites, the operators of the External Websites may collect your personal data. We are not responsible for the content or data collection practices of those External Websites, and your use of External Websites is subject to their respective terms of use and privacy policies.

14. NOTICE TO CALIFORNIA RESIDENTS - SHINE THE LIGHT DISCLOSURE

The California “Shine the Light” law gives residents of California the right under certain circumstances to opt-out of the sharing of certain categories of personal information with third parties for their direct marketing purposes. We do not currently share personal information with third parties for their own direct marketing purposes.

15. NOTICE TO NEVADA RESIDENTS

Under Nevada law, Nevada “consumers” (individuals who are seeking or acquiring goods/services for personal, family, or household purposes) may opt out of the sale of covered personal information. Verve Market does not currently sell covered information of Nevada consumers as defined under applicable Nevada law.

You may submit an opt-out request by sending your request to hi@vervemarket.com, along with your full name, complete mailing address (including street address, city, state, and zip code), email address (so that we can contact you, if needed, in connection with the request) and confirmation that you are a Nevada resident.

16. INTERNATIONAL TRANSFERS

The personal data that we process is stored, hosted, and processed on servers located in the United States. Additionally, Verve Market may transfer the personal information that we process to our other offices and to the third parties described above. These recipients may be situated outside of your country or regional area of residence and may process personal information outside of your country or regional area. Information provided to us or collected by us will be transferred to and processed in the United States by us or our Affiliates and our respective agents and contractors. The data protection laws of the United States or other countries may not be as comprehensive or equivalent to those in your country of residence.

17. HOW TO CONTACT US

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please email us at: hi@vervemarket.com; *Subject Line*: Privacy Request.