

## Privacy and Cookie Statement

*This Privacy and Cookie Statement was last updated in October 2023*

Otrium LLC (“**Otrium**”) offers a shop-in-shop outlet platform via the website [www.otrium.com](http://www.otrium.com). With an influx of online orders from customers on a daily basis, we constantly process personal data.

If you are a California resident, please also review our dedicated [California resident privacy notice](#) below for more information about the types of personal information we collect and disclose, as well as how to exercise your rights under California law.

### Our Privacy and Cookie Statement at a glance

We treat your personal data securely and carefully. This means that we:

- **Define our purposes** before we process your personal data, as set out in this statement.
- **Store as little personal data as possible** and only the personal data necessary for our purposes.
- **Ask for explicit consent** for the processing of your personal data, should consent be required.
- **Take the necessary security measures** to protect your personal data. We also impose these obligations on parties who process personal data on our behalf.
- **Respect your rights**, such as the right of access, rectification or erasure of your personal data processed by us.

### For what purposes do we process your personal data?

When you use our platform, via the browser and via our application, we obtain various personal data from you. In this statement we specify for each purpose what data we obtain from you, for what purpose we process these data and for how long these data are stored. If you have any questions or would like to know exactly what we store about you, please contact Otrium. Our contact information is provided at the bottom of this statement.

Our website may contain links to other websites not operated or controlled by Otrium (“**Third Party Sites**”). The information that you share with Third Party Sites will be governed by the specific privacy statements and terms of service of those Third Party Sites and not by this statement. By providing these links we do not imply that we endorse or have reviewed these websites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

### Downloading our application

You can also use our platform via our application. In order to do so, you need to download our application first. You can do this via the App Store or via Google Play. We have no influence on which personal data is processed by the provider (Apple and Google) and for what purpose they use your information. We recommend that you read the relevant privacy statement of the provider in question. All the purposes set out below reflect upon the data processing when using the platform in your web browser as well as via the mobile application.

### Creating an account

You can create an account on our website or application, after which you can place an order. You can also choose to log in using your Facebook or Google account. If you want to know how these parties process your personal data, please read the relevant privacy statement of [Facebook](#) or [Google](#). By creating your account we conclude an agreement to provide your account. The execution of your account is therefore the legal basis for processing of your personal data.

For this purpose we process the following personal data:

- Gender
- Name
- E-mail address
- Login credentials
- IP address

We store this personal data until you cancel your account or up to 2 years after you last logged in to your account. We then assume that you no longer wish to use our services and delete your account.

### **Managing an account**

Once you have created an account or logged in with your Facebook or Google account, you can decide which information you add to your account (for which execution of the agreement is also the legal basis of processing). You can create your personal profile within your account. The account also includes an overview of your orders, as well as the option to indicate your preferences and save your favorite brands.

For this purpose we process the following personal data:

- Name
- Address details
- Contact details (email address and telephone number)
- Country
- Date of birth
- Gender
- Login credentials
- Personal interests
- IP address

We store your personal data until you cancel your account or up to 2 years after you last logged in to your account. We then assume that you no longer wish to use our services [and delete your account]. Some data is stored longer if we are legally obligated to do so (e.g., because of the 7 years tax retention obligation).

### **Contact**

When you send us an email, use our contact form, contact us by telephone or in any other way, we will process the personal data necessary to support you, and to enable us to answer your query. The legal basis for this processing of personal data is the execution of the agreement with you.

For this purpose we process the following personal data:

- Name
- Email address
- Any information you provide as part of the content of a message

We store your data for as long as this contact requires it or up to a maximum of 2 years after we last had contact with you; we want to make sure we have dealt with your query or complaint properly.

### **Placing and handling orders**

When you place an order on our website, you enter certain information. This data is necessary for the purchase agreement between you and Otrium (execution of the agreement) to enable us to carry out your order.

For this purpose we process the following personal data:

- Name and address details
- Contact details (email address and telephone number)
- Order confirmation
- Billing address
- Shipping address
- Payment method
- IP address

We store this information for up to 2 years after the purchase was made. Some data are stored longer if we are legally obligated to do so (e.g., because of the 7 years tax retention obligation).

### **Commercial messages**

Otrium sends out commercial messages. This could be a digital newsletter, but also push notifications or text messages. The messages contain promotions, tips and information about our products and services. For example, to remind you of items that you have left in your shopping cart.

You can subscribe to our commercial messages via the website and our application. These messages we send out with your consent.

We could also send out such messages with regard to similar products and/or services to the ones we have already provided you with. The legal basis for such use of your personal data is our legitimate interest in providing the best services to you.

For this purpose we process the following personal data:

- Name
- Contact details (email address and telephone number)

Your personal data is stored until you unsubscribe from the commercial messages. You can unsubscribe from these messages at any time. There is an unsubscribe link in every newsletter, and you can also change the settings in your account in order to unsubscribe from receiving the commercial messages.

### **Third-party shop credit**

You can share the email addresses of your friends on our website. In exchange, both you and your friends will receive a discount code from us. We process the data on a legitimate interest basis, our commercial interest. In doing so, we have weighed the privacy interests of your friends. The email addresses of your friends are only used once to offer the shop credit and then we delete the data.

We process the following personal data for this purpose:

- Name
- Email addresses

We store their email addresses for as long as is necessary to send the shop credit by email.

### **Reviews**

You have the option to review our services via our website, which sends you through to the review platform. We use third parties to host these reviews, such as Kiyoh, Trustpilot, Facebook and Google. The reviews can be read on the websites of these parties. The parties themselves are responsible for data processing. If you want to know what they do with your personal data, please read the privacy statement on their respective websites.

We have a legitimate, commercial interest in improving our services which we can do based on the input from reviews. We process your personal data based on this commercial interest. Our commercial interest takes precedence over your privacy interest, given that you have control over what information you leave behind in the customer review.

For this purpose we process the following personal data:

- Name as stated in the customer review
- Place of residence
- Message content

We store your personal data for a maximum of 2 years after the review was posted.

### **Job applications**

If you apply for one of our job openings or submit an open application, we process your personal data for the purpose of handling your application and in preparation for a possible employment contract.

We process the following personal data for this purpose:

- Name and address details
- Contact details (email address and telephone number)
- Curriculum Vitae
- Cover letter
- Salary requirements
- References
- Any other information you provide in your application

Your application details are stored for a maximum of 4 weeks after the position has been filled. We store this information so that we can contact you should the position become vacant again within the probationary period. If we are unable to offer you a position at this time, we may – with your consent – keep the application data for one more year. You can revoke your consent at any time by sending us an email. Should you decide to work for us, we will store your application data in your personnel file. This file will be stored for as long as necessary, and the application data will be kept for a maximum of 1 year after entering into employment.

Social media and internet screening can be part of the application procedure. This is necessary for us to preserve our image when hiring new staff, which is why we have a legitimate interest to process these personal data. We will do a search of your name on Google and any profile you may have on various social media. This applies, of course, insofar as these profiles are public. We will not ask you to grant us access to a private social media page or to accept a request from us. The results of the screening will be discussed with you. Should you have any objections to this, you can inform us by email at the time of your application.

For the application process we work with a third party. They provide us with an applicant tracking system, to keep track of your application. When you apply for a position through this third party platform, we will always draw your attention to the fact that we work with this third party.

### **Otrium's B2B platform**

If you are working at one of the companies that Otrium has a partnership with, we might process your personal data in order for you to have access to our B2B platform. On the B2B platform we

provide insights into, among other things, the numbers with regard to the sales of products on our platforms.

Your employer might request us to provide a personal email address for you to gain access to our B2B platform. Your employer is the controller of the personal data we process from you. They are in charge of the why and the how of the processing of your personal data and are also in charge of creating and deleting your user profile.

Nevertheless, we would like you to know that we process the following personal data in our B2B platform:

- First name
- Role in the company
- Credentials for log-in
- Metadata about the usage of the platform

If your employer for whatever reason deletes your account, we will not retain any personal data about you. In order to ensure safe log-in and to avoid unauthorized access to our platform, we work with a third party who specializes in identity and access management.

#### **When can we share your personal data with third parties?**

Otrium will only share your information with third parties to the extent permitted by applicable law.

We may disclose your personal data to third parties in the following situations:

- we have contracted them to process certain data;
- it is necessary to fulfil our agreement with you;
- you provided your consent;
- we have a legitimate interest in doing so;
- we are legally obligated to do so (e.g., if the police demands it in case of a suspicion of a crime).

Categories of third parties processing personal data on our behalf or yours:

- mail-order companies;
- distribution centers;
- payment service providers;
- cookie service providers;
- IT suppliers and service providers (including software for processing applications and identity and access management);
- marketing companies;
- review companies.

Otrium may disclose your personal data to parties located outside the European Economic Area (EEA) to provide those services. Otrium will only do so if there is an appropriate level of protection for the processing of personal data. If there is no adequacy decision from the European Commission for that specific third country, Otrium will conclude the Standard Contractual Clauses (“**SCC’s**”) with said third party.

#### *Legal obligation*

We may also share your personal data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of visitors to our platform, or the public, or (v)

protect against legal liability.

### *Corporate*

We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company, or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this privacy statement in effect at the time the applicable information was collected.

### **Securing your personal data**

Otrium takes appropriate technical and organizational measures for the processing of personal data to prevent loss or any form of unlawful processing (e.g., unauthorized access, tampering, modification, or disclosure of personal data).

However, no Internet or email transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us via our platform or email. Please keep this in mind when disclosing any personal data to Otrium via the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on our platform, or third party websites.

### **Creating profiles**

We compile and combine your personal data from various sources. This is done to provide you with the best online shopping experience. We do this by linking various data about you, such as your account details, order history, your preferences and favorite brands, but also your browsing behavior on our or external websites. We collect your location information, for example by using internet protocol (IP) address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens and the pages or other content viewed, the searches conducted, and the dates and times of visits.

By combining your data, we can publish personalized promotions and content on the website or social media channels that match your interests and purchase history. It also allows us to personalize our newsletter for you. This will help us improve our targeted promotions, both on our website and through external advertisements.

We only create profiles with your consent. We use cookies on the website to collect and combine your data. Cookies allow us to see, for example, which pages on our website you have visited, which advertisements on external websites have been shown to you and whether you have viewed them or not, whether you are interested in discounts, and which items you have clicked on. The cookie overview below lists the cookies we use. For example, we use cookies from analytics services such as Google Analytics to collect and process certain analytics data. You can learn more about Google's practices by visiting <https://www.google.com/policies/privacy/partners/>.

### *Advertising*

We work with third-party advertising partners to show you ads that we think may interest you. Some of our advertising partners are members of the Network Advertising Initiative (<https://optout.networkadvertising.org>) or the Digital Advertising Alliance (<https://optout.aboutads.info>).

If you do not wish to receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt out of personalized ads in mobile apps.

### Enhancing our services, compliance, and fraud detection

Otrium might use your personal data in order to improve and enhance our services provided, and to understand and analyze how users use the service and to develop new services. This concerns metadata about how you use our platforms. Additionally, we might use such personal data in order to find and prevent fraud, respond to trust and safety issues that may arise and for compliance purposes, including enforcing your legal rights.

### Social media buttons

We use social media buttons on our website that redirect you to the relevant social media platforms. This gives you the option to follow us and share content. You will also see advertisements on your social media page. The buttons operate through bits of code provided by the social media networks. If you want to know what the social media platforms do with your personal data, please read the relevant privacy statement of [Facebook](#) or [Instagram](#).

These social media companies are located in the United States. Facebook and Instagram adhere to the SCC's. For more information check out [Facebook's page on the SCC's](#) and [Instagram's page on the SCC's](#).

### Cookies

Our website uses first party and third party cookies. Cookies are small data files that can be automatically stored on or read from the visitor's device (such as PC, tablet, or smartphone) when visiting a website. This is done via the web browser on the device.

These cookies may collect the following data from you:

- IP address
- Cookie ID
- Website and click behavior
- Referrer URL

On your first visit to our website, we will display a message explaining how cookies are used. We will ask for your consent for the use of cookies to the extent we are required to do so.

Want to know more? The list of the cookies we use is shown in the overview below.

[INSERT DROP DOWN OTRIUM]

Cookie; entity; safeguards*	Type	Purpose	Retention period
*to safeguard international data transfer Otrium concludes the standard contractual clauses and takes additional mitigating measures			

<b>Google Tag Manager</b> <b>Google LLC, United States</b> <a href="#">Privacy statement</a>	Functional	Google Tag Manager cookies enable scripts from other cookies to be loaded. Google Tag Manager is purely functional and is not used for the collection of personal data.	Session
<b>Google Analytics</b> <b>Google LLC, United States</b> <a href="#">Privacy statement</a>	Analytical	These cookies are placed to gain insight into visitor behavior and to improve the user experience. We have configured these cookies to be privacy-friendly.	Maximum of 2 years
<b>GA Audiences</b> <b>Google LLC, United States</b> <a href="#">Privacy statement</a>	Marketing	The GA Audiences cookies are used to get website visitors to return based on their online website behavior. This means that click behavior (among other things) is recorded for the purpose of measuring effectiveness and to show website visitors personalized content.	Maximum of 6 months
<b>Google DoubleClick and DoubleClick Ad Exchange</b> <b>Google LLC, United States</b> <a href="#">Privacy statement</a>	Marketing	These cookies are used to register the website visitor's actions on the website after viewing or clicking on advertisements. The purpose of this is to measure the effectiveness and to show personalized advertisements.	Maximum of 6 months
<b>Google Dynamic Remarketing</b> <b>Google LLC, United States</b> <a href="#">Privacy statement</a>	Marketing	These cookies are placed so we can show relevant advertisements to people who have previously visited our website. They record click behavior and website visits.	Maximum of 1 year
<b>Facebook Connect</b> <b>Meta, United States</b> <a href="#">Privacy statement</a>	Social Media	These cookies are used to enable Facebook advert options. They record click behavior and website visits. These cookies record a unique ID to recognize recurring devices. The aim is to advertise in a targeted and personalized way.	Maximum of 3 months



<p><b>Facebook Custom Audience</b>  <b>Meta, United States</b>  <a href="#">Privacy statement</a></p>	<p>Marketing</p>	<p>These cookies are used to enable Facebook advert options. They record click behavior and website visits. These cookies record a unique ID to recognize recurring devices. The aim is to advertise in a targeted and personalized way.</p>	<p>Maximum of 3 months</p>
<p><b>Facebook Pixel</b>  <b>Meta, United States</b>  <a href="#">Privacy statement</a></p>	<p>Marketing</p>	<p>These cookies are used to enable the Facebook advertising option. They collect click behavior and website visits. These cookies collect a unique ID to recognize returning devices. The purpose of this is to be able to advertise in a personalized and targeted way.</p>	<p>Maximum of 2 years</p>
<p><b>Cloudflare</b>  <b>Cloudflare, United States</b>  <a href="#">Privacy statement</a></p>	<p>Functional</p>	<p>Cloudflare is a content delivery network that identifies familiar web traffic.</p>	<p>Maximum of 1 year</p>
<p><b>Pingdom</b>  <b>SolarWinds Worldwide LLC, United States</b>  <a href="#">Privacy statement</a></p>	<p>Analytical</p>	<p>Pingdom is a technological service that helps Otrium to improve and understand the experience of users, e.g., if the website is to be approached globally, does it work as it is supposed to, what is the upload speed and so on. The aim is to improve the website with the feedback of users. Pingdom uses cookies and other technologies to collect data of the behavior of the users and their devices.</p>	<p>Permanent</p>
<p><b>Pinterest Conversion Tracker</b>  <b>Pinterest, Inc., United States</b>  <a href="#">Privacy statement</a></p>	<p>Analytical</p>	<p>Pinterest is a social media website and app that places cookies on our website to gain more insight into the way visitors use our website (what is searched for, how often an account is created, which pages are visited and how often, etc.). This enables us to improve our website with feedback from users. Pinterest uses cookies and other technologies to collect</p>	<p>Maximum of 6 months</p>

		data about the behavior of our users and their devices (browser information, IP addresses, hardware/software type, etc.).	
<b>Pinterest</b> <b>Pinterest, Inc., United States</b> <a href="#">Privacy statement</a>	Social Media	These cookies are used to display photos on Pinterest of the products we offer.	Maximum of 3 months
<b>Criteo</b> <b>Criteo S.A., France</b> <a href="#">Privacy statement</a>	Marketing	Criteo is a retargeting platform that allows to retarget users with relevant advertisements based on their website behavior.	Maximum of 13 months
<b>Segment</b> <b>Segment.io, Inc., United States</b> <a href="#">Privacy statement</a>	Analytical	Segment.io, Inc. offers application programming interface solutions. The company collects, cleans, and controls customer data with segments, as well as provides data integration, governance, and audience management services.	Expires after 7 days of user inactivity
<b>Hotjar</b> <b>Hotjar Ltd., Malta</b> <a href="#">Privacy statement</a>	Analytical	Hotjar collects qualitative data which provides insights into user behavior on a website. These cookies are responsible for displaying the correct content to Otrium's visitors. In this way, we track how users are engaging with our platform.	Maximum of 1 year
<b>New Relic</b> <b>New Relic, United States</b> <a href="#">Privacy statement</a>	Analytical	New Relic provides cookies that enable Otrium to monitor the use of our website.	Session
<b>Fit Analytics</b> <b>Fit Analytics GmbH, Germany</b> <a href="#">Privacy statement</a>	Marketing	Fit Analytics cookies ensure that we personalize our offering of products with the right size to our customers. Furthermore, by using the cookies they resolve sizing for shoppers by explaining different sizing measures per country.	Maximum of 4 weeks

<b>TrustPilot</b> <b>TrustPilot A/S, Denmark</b> <a href="#">Privacy statement</a>	Functional	These cookies allow the display of TrustPilot score per country.	Maximum of 1 year
<b>WooCommerce,</b> <b>WooCommerce, United States</b> <a href="#">Privacy statement</a>	Functional	These cookies are used to monitor and store data about the adjustments of the shopping cart of the visitor.	Session
<b>UserMatchHistory</b> <b>LinkedIn, United States</b> <a href="#">Privacy statement</a>	Marketing	LinkedIn sets this cookie to provide advertisements and retargeting on LinkedIn.	Maximum of 30 days
<b>Lidc</b> <b>LinkedIn, United States</b> <a href="#">Privacy statement</a>	Marketing	LinkedIn sets the lidc cookie to store performed actions on the website and to facilitate data center selection.	Maximum of 24 hours
<b>Lang</b> <b>LinkedIn, United States</b> <a href="#">Privacy statement</a>	Functional	LinkedIn sets this cookie to show the language that a user has selected in their settings.	Session
<b>Bcookie</b> <b>LinkedIn, United States</b> <a href="#">Privacy statement</a>	Functional	LinkedIn sets this cookie with browser-ID with which devices for access are uniquely identified in order to detect misuse on the platform.	Maximum of 2 years
<b>Salesfeed</b> <b>SalesFeed Nederland B.V., Netherlands</b> <a href="#">Privacy statement</a>	Marketing	These cookies make it possible to adapt the content of our website to the website visitor on the basis of certain data, which are made known to us by means of these cookies. This could be information about the number of times you visit our website, and which pages you visited.	Session
<b>Partnerize</b> <b>Partnerize, United Kingdom</b> <a href="#">Privacy statement</a>	Marketing	Partnerize is an affiliate partner, and this concerns first party cookies. These are used to recognize the origin of a customer proceeding with a transaction in order to provide fees.	Maximum of 30 days

<b>Token_v2 and several others</b> <b>Reddit, United States</b> <a href="#">Privacy statement</a>	Marketing	The use of these Reddit cookies is to enable to track if the visitor comes from the Reddit webpage and which actions are taken after being redirected. Also, they might retain the credentials.	Maximum of 30 days
<b>Reddit Pixel.js</b> <b>Reddit, United States</b> <a href="#">Privacy statement</a>	Marketing	The Reddit pixel is used to enable advertising on their website and to track behavior of the visitor after selecting the advertisement.	Session
<b>Snapchat</b> <b>Snap Inc., United States</b> <a href="#">Privacy statement</a>	Marketing	Snapchat uses cookies to improve their advertising service by measuring your behavior on our website to provide more relevant advertisements.	30 days
<b>Algolia Insights</b> <b>Algolia recommend, United States</b> <a href="#">Privacy statement</a>	Functional	Algolia provides a first party cookie to us. These cookies communicate with Segment and provide product recommendations to visitors. It measures the behavior of visitors with regards to the products on the website.	30 days
<b>Gstatic</b> <b>Google LLC, United States</b> <a href="#">Privacy statement</a>	Functional	Gstatic is Google's content delivery service which caches all static or unchanging files, in order to reduce load times.	Maximum of 6 months
<b>Miscellaneous:</b> <b>First-party cookies with strictly functional purposes</b>	Functional	These cookies enable the necessary functionalities of the website, such as remembering the selected language and whether consent is given for cookies, displaying the cookie banner, etc.	Maximum of 2 years

### Enabling and disabling cookies

You can set your web browser to only accept cookies with your consent. Consult your browser guide for more information. Please note that many websites will not function optimally when cookies are disabled.

### Deleting cookies

Most cookies have an expiry date. When an expiry date is set, the cookie is automatically deleted once that date passes. You can also choose to delete the cookies manually before the expiry date. Please consult your browser guide for more information.

## What are your rights if Otrium processes personal data about you as a data subject residing in the European Economic Area?

Where provided for by law and subject to any applicable exceptions, residents in the European Economic Area may have the following rights:

- **Right of access:** you have the right of access the personal data we process about you.
- **Right to rectification:** you have the right to correct or supplement the personal data we process about you, e.g., if they are incorrect or incomplete.
- **Right to object:** you have the right to object to the processing of your personal data and to direct marketing.
- **Right to erasure:** you may request us to erase your personal data.
- **Right to withdraw your consent:** if you have consented to us processing personal data, you can withdraw your consent at any time.
- **Right to data portability:** if it is technologically possible, you have the right to have the personal data we process about you transferred to a third party.
- **Right to restrict processing:** in some cases, you can request that we restrict the processing of your personal data (temporarily or otherwise).

We may ask you for identification to fulfil your request. We need this information to ensure that the person requesting a certain data subject's right with regard to the personal data concerning a specific person, is verifiably the person whom the personal data concerns.

We will generally reply to your request within one month. However, this period may be extended by two months depending on the specific privacy rights or the complexity of the request. If we extend this period, we will inform you within a month. Please ensure that your requests meet the exceptions and/or requirements for us to live up to these rights of data subjects (see chapter 3 of the GDPR).

If you wish to exercise any of your rights or otherwise have any questions, you can do so by sending an email to [privacy@otrium.com](mailto:privacy@otrium.com).

## What are your privacy rights as a California resident?

Where provided for by law and subject to any applicable exceptions, California residents may have the right:

- To know the categories of personal data that Otrium has collected about you, the business purpose for collecting your personal data, and the categories of sources from which the personal data was collected;
- To access the specific pieces of personal data that Otrium has collected about you;
- To know whether Otrium has disclosed your personal data for business purposes, the categories of personal data so disclosed, and the categories of third parties to whom we have disclosed your personal data;
- To request information once per calendar year about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. Such requests must be submitted to us in writing at the following mailing address: [privacy@otrium.com](mailto:privacy@otrium.com);
- To have Otrium, under certain circumstances, delete your personal data;
- To instruct businesses that sell personal data to stop doing so – Otrium, however, does not sell personal data; and
- To be free from discrimination related to the exercise of these rights.

If you've sent a request to exercise your rights, we may request additional information from you to verify your identity. Your authorized agent may submit requests in the same manner, although we may require the agent to present signed written permission to act on your behalf, and you may also be required to independently verify your identity with us and confirm that you have provided the agent permission to submit the request.

If you wish to exercise any of your rights or otherwise have any questions, you can do so by sending an e-mail to [privacy@otrium.com](mailto:privacy@otrium.com).

### **Children**

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our service is directed to children. If you learn that a child has provided us with personal information in violation of this privacy statement, then you may alert us at [privacy@otrium.com](mailto:privacy@otrium.com).

### **Changes to this privacy statement**

When there is a change in our services which relates to personal data, we adjust our privacy statement accordingly. Please consult this privacy statement regularly for the most up-to-date information.

If we materially change the ways in which we use or share personal information previously collected from you through the services, we will notify you through the services, by email, or other communication.

### **Filing a complaint**

Should you feel we have not been able to help you properly with any questions about your privacy, you have the right to file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or other similar regulatory authority depending on where you are located.

### **Contact details**

For questions about our privacy statement or your rights, you can always contact us using the information below (email is preferred):

Otrium LLC  
3500 South DuPont Highway  
Dover, DE 19901  
United States of America  
Email address: [privacy@otrium.com](mailto:privacy@otrium.com)

Company registration no.: 5968468