

# DELUXE PRIVACY POLICY

## Introduction

This Privacy Policy applies to information collection and use by Deluxe Media Inc. and its affiliates (“Deluxe,” “we,” “us,” “our”) including while you are visiting and using our website located at [www.bydeluxe.com](http://www.bydeluxe.com) or any other Deluxe owned or operated website or mobile application, including those operated under our Sfera Studios brand (the “Sites”). For the purposes of EU data protection laws Deluxe is also the data controller (i.e. the company responsible for, and which controls the processing of your personal information).

This Privacy Policy is also a part of our Terms of Use (the “Terms”) for the Sites, which is available at <https://www.bydeluxe.com/terms-of-use>.

If you do not agree with the use of your information as set out in this Privacy Policy, or the Terms, please do not use the Sites.

## The Information We Collect

Deluxe collects the following types of information from and about the users of our Sites:

1. Personally identifiable information (or personal data). This is information that identifies you as an individual or that can be reasonably linked to you. The provision of personally identifiable information by you is necessary in order for us to provide you with certain services, to process your application to perform freelance work for us, and where in our legitimate interests for the performance of a contractual relationship with you. You are under no obligation to provide any such information. However, if you should choose to withhold requested information, we may not be able to provide you with certain services. You may elect to electronically provide certain personally identifiable information such as your name, the company you represent, physical address, and email address, other contact information, account name and password, citizenship information, tax forms such as a US W-9 form, taxpayer identification number, social security number, language skill information and professional information to us through means described on the Sites from time to time. We use such personally identifiable information to respond to your inquiries, set up and manage your account with us, assign and manage freelance projects. Subject to obtaining your consent where required by applicable data privacy laws, we may also use such personally identifiable information to notify you of events that we think may be of interest to you. If you decide at any time that you no longer wish to receive notifications from us, please refer to the paragraph below captioned “Your Rights.”

If you contact us by email through the Sites, we may keep a record of your contact information and correspondence. We reserve the right to use your email address and any information that you provide to us in your message to respond to you. In addition, we may send by email important administrative information regarding either the Sites or services to users who have provided us with their email addresses. Because this information may be important to your use of the Sites, it is generally not possible to “opt out” of receiving these email communications. The Sites are not intended for or directed to children under eighteen (18) years of age, and Deluxe does not knowingly collect personally identifiable information from such individuals. If you are younger than eighteen, do not provide any personally identifiable information while using the Sites.

2. Automatically-collected information: we may use cookies to collect non-personally identifiable information in connection with the Sites. Our web pages may incorporate “pixel tags”, “web beacons”, or other similar tracking technologies (collectively, “pixel tags”) that allow us or our agents to track the actions of users of our Sites. Pixel tags collect information, such as the identity of your internet service provider, the IP address of the computer you are using, the type of operating system and browser software that you use, the date and time of your access to



our Sites, the website address, if any, from which you linked directly to our Sites, the website address, if any, to which you then travel from our Sites, and any similar traffic-related information. We may also aggregate your information with similar data collected from other users in order to help us improve our Sites and the services we provide through our Sites. We do not use this data in any way to create or maintain a personal profile of you.

### **How We Use the Information We Collect**

Deluxe may use personally identifiable information about you for the following purposes: (i) to establish or maintain our relationship with you; (ii) to contact you and respond to your requests and inquiries; (iii) to provide you with services you have requested; (iv) to keep you informed of products and services we think may be of interest to you; (v) to personalize your experience with us and to assist you while you use the Sites; (vi) for business administration, including to operate our Sites and for statistical analysis; (vii) to assign and manage our freelance projects and for associated payment processing activities; (viii) to improve the Sites by helping us understand who uses the Sites; and (ix) for fraud prevention and detection and to comply with applicable laws, regulations or codes of practice.

We may disclose your personally identifiable information to our affiliates and subsidiaries and to our service providers to the extent necessary to enable them to perform certain Site-related services (for example, web hosting, to improve Site-related services and features, or for maintenance services) on our behalf. All service providers are required to comply with the privacy practices and policies of Deluxe and are permitted to use data only for the purpose of performing services on our behalf. We also reserve the right to disclose such information to any third party if we believe that we are required to do so for any or all of the following reasons: (i) by law; (ii) to comply with certain legal processes or governmental requests; (iii) to prevent, investigate, detect, or prosecute criminal offenses or attacks on the technical integrity of the Sites or our network; (iv) when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others; (v) to protect the rights, property, or safety of Deluxe and its affiliates, their partners, and employees, the users of the Sites, or the public; and/or (vi) to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

### **Data Transfers**

Where you are located in the European Economic Area (“EEA”), personally identifiable information collected from you, including via the Sites, may be transferred to recipients in countries located outside the EEA which do not provide a similar or adequate level of protection to that provided by countries in the EEA. We will take appropriate steps to ensure that any personally identifiable information is treated securely and in accordance with this Privacy Policy. For additional information, see our [Europe Privacy Policy](#).

### **Cookies**

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user’s device. You can find more information about cookies at <http://www.allaboutcookies.org>.

Cookies perform different functions such as letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. A list of the cookies that may be used on the Sites is set out below:



- **Strictly necessary cookies** are essential in order to enable you to move around the Sites and use its features, such as accessing secure areas of the Sites. Without these cookies, certain services you have asked for cannot be provided.
- **Performance cookies** collect information about how you use the Sites, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information that these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.
- **Functionality cookies** allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They may also be used to provide services you have asked for. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

### **Your Rights – Residents of the EU and UK**

Individuals in the EU and the UK have certain data subject rights which may be subject to limitations and/or restrictions. These rights may include the right to: (i) request access to and rectification or erasure of their personal information; (ii) obtain restriction of processing or to object to processing of their personal information; and (iii) the right to data portability. For more information, please see our Europe Privacy Policy.

### **Security**

Deluxe seeks to adopt appropriate physical, technological and organizational security measures that are consistent with industry practice in order to assist with protection against the loss, misuse, and alteration of personally identifiable information that is under our control. Unfortunately, no security system or system of transmitting data over the Internet is guaranteed to be 100% secure. As a result of the foregoing, while we do undertake commercially reasonable efforts to protect your personally identifiable information, we cannot guarantee the security of our servers, the means by which information is transmitted between your computer and Deluxe's servers, or any information shared with us or with any third party through or in connection with the Sites. You provide all such information entirely AT YOUR OWN RISK. Deluxe retains personally identifiable information for as long as necessary to fulfil the purposes for which such personally identifiable information was collected and in compliance with applicable laws.

### **Marketing**

We may contact you periodically by e-mail to provide information regarding events, products, services and content that may be of interest to you, unless you advise us that you do not wish to receive marketing or market research communications from us. If applicable law requires that we receive your explicit consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your explicit consent.

If you wish to stop receiving marketing or market research communications from us, or would like to stop processing your personal information in any other way, you can contact us as described below to let us know what types of communications you wish to stop receiving.

### **Revisions to Our Privacy Policy**

The Internet and its benefits are evolving rapidly, as are the ways people use the Internet and also the laws surrounding such use. Deluxe therefore reserves the right to update and revise this Privacy Policy at any time and from time to time, as it deems necessary or appropriate. You may determine if this Privacy Policy has been revised



since your last visit by referring to the “Effective Date of Current Policy” date noted at the top of this page. Your use of our Sites constitutes your acceptance of the terms of this Privacy Policy as amended or revised by us, and you should therefore review this Privacy Policy regularly in order to ensure your awareness of its terms. If we make material changes to this Privacy

Policy we will notify you by means of prominent notices on the Sites prior to the change becoming effective.

### **Business Transfers and Other Events**

Deluxe reserves the right to transfer any and all information, including personal information, that we collect from users, or that we otherwise collect in connection with the Sites, including, without limitation, to third parties, in the event of any liquidation or dissolution, or a sale or transfer of assets or of any portion of, our business. We may also be required to disclose personal information to potential purchasers or investors during due diligence conducted in advance of any sale or transfer of our assets.

### **Links to Other Sites and Social Media Buttons**

Our Sites may contain links to other websites or social media buttons, all operated by third parties. Please be aware that we are not and cannot be responsible for the content and privacy practices of other websites or social media platforms, and that this Privacy Policy applies only to the information that we collect through the Sites. Thus, we encourage you to read the privacy statements of all of the destination websites or platforms which you visit

### **Contact Us**

If you have any questions or concerns regarding this Privacy Policy please email the applicable Deluxe contact listed on the applicable Site or contact us either by email at [privacy@bydeluxe.com](mailto:privacy@bydeluxe.com), or by regular mail at Legal Department, 2130 N. Hollywood Way, Burbank, CA 91505.

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