

## **BOKA Group Privacy Policy**

BOKA Group respects your privacy. This Privacy Policy (“Policy”) has two sections. The first section is our Global Website Privacy Notice which outlines how BOKA Group Holdings I LP and BOKA Group Holdings GP LLC (collectively, “BOKA Group”, “we”, “us” or “our”) collect personal identifiable information (PII) from visitors to our websites in an effort to support and further our relationship with you, including providing you with requested information and/or products or services. The second section is our California Consumer Privacy Policy which describes our practices in relation to certain personal information of California residents subject to the California Consumer Privacy Act of 2018 (“CCPA”).

You may contact BOKA Group at any time with any privacy questions or concerns you may have by sending us an email at [info@boka-group.com](mailto:info@boka-group.com).

## **Changes to Policy**

As we continue to develop our websites and take advantage of new technologies to improve the sites, this Policy will likely change. BOKA Group reserves the right to change, modify, or amend this Policy at any time without prior notice to you. We therefore encourage you to refer to this Policy on an ongoing basis so that you understand its current terms. Information on material changes to this Policy will be posted on BOKA Groups’ websites for thirty (30) days. BOKA Group may also let you know of the Policy change by communicating directly with you. If you do not accept a changed version of this Policy (for example, if you do not approve of a different way that we intend to use personal information), you may let us know by letter or email. If you do not send us any objections, we will assume that you consent to changes in the Policy. Changes will not apply retroactively to personal information that was collected before the changes to the Policy, except as may be required by law. If you have any questions about this Policy, you may contact us by mail at 667 Madison Ave, 5th Floor, New York, NY 10065 or by email at [info@boka-group.com](mailto:info@boka-group.com).

## **Third-Party Sites**

BOKA Groups’ websites may contain links to other sites that are not operated by BOKA Group. Please be aware that these sites may collect information about you. BOKA Group is not responsible for the privacy practices or the content on any websites that it does not operate. To ensure protection of your privacy, always review the privacy policies of those sites you visit.

## **Global Website Privacy Notice**

This Global Website Privacy Notice outlines how we collect personal identifiable information (as defined below) from visitors to our websites in an effort to support and further our relationship with you, including providing you with requested information and/or products or services.

BOKA Group encourages you to read this Global Website Privacy Notice before using any of our websites or submitting any information. If you decide to provide us with information about yourself while using our website, you consent to the collection, use, and sharing of that information in accordance with this Global Website Privacy Notice and subject to applicable laws.

## **What kind of information does BOKA Group collect?**

Technical Information: BOKA Group utilizes third-party tracking applications to measure and analyze site traffic. These applications may collect information such as your computer’s operating system and browser type, IP address, address of a referring website, if any, etc. and may track a user’s path through our websites.

Personal Identifiable Information (PII): “Personal identifiable information” (PII) means individually identifiable information about an individual collected through our website or online services by us from you and maintained by us in an accessible form. It may include identifiers (such as your name, title, company, email address, mailing address, and phone numbers) and other information that is maintained by BOKA Group in combination with any of the identifiers (such as preferences and requirements.)

#### **How does BOKA Group use PII?**

When you request information from BOKA Group, the information you provide will be kept confidential and will be used to contact you or fulfill your request. We may also send you an email to confirm your request and may need to contact you via phone, postal mail, or email if we have other questions regarding your request.

When you submit information on BOKA Groups’ website you may receive emails from us regarding our products and/or services. From time to time, we may also send you emails to help us learn more about your preferences. In addition, we may use information about your interests and usage of the site to help us improve our website design and your user experience. BOKA Group will also disclose PII if required by law, including compliance with warrants, subpoenas, or other legal process.

#### **Does BOKA Group share my information with third parties?**

We do not sell, rent, trade, or otherwise disclose PII to any unaffiliated third-party except:

We may contract with third parties to assist us in collecting, maintaining and managing our website visitor information, other requests, and/or to communicate with website visitors. We also may share PII with service providers who perform services on our behalf and with our professional advisors. BOKA Group requires third parties to which it discloses PII to restrict their use of such information to the purposes for which it has been provided by BOKA Group and not to disclose that information to others. BOKA Group cannot be responsible, however, for any damages caused by the failure of unaffiliated third parties to honor their privacy obligations to BOKA Group.

In the event, we agree to sell, transfer or merge all or a portion of our business or assets, or in preparation for such operation under a non-disclosure agreement, in which case we will endeavor to ensure that the transferee agrees to use the PII in a manner consistent with this Global Website Privacy Notice.

We may share PII with other companies, lawyers, agents, or government agencies in the following cases: (1) when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) the rights of BOKA Group or to anyone that could be harmed by such activities; (2) when we believe in good faith that the law requires it; and (3) in situations involving threats to the physical safety of any person.

#### **How do I access and update my information?**

You can contact BOKA Group at [info@boka-group.com](mailto:info@boka-group.com) to determine if we are keeping PII about you. If we do have PII about you, we will provide you with a readable copy of such PII at no charge. Factual errors in your PII, including information that is out of date, can be corrected by sending us a

request that sufficiently details how your PII should be corrected. We encourage you to promptly update your PII if it changes.

#### **How do I remove my information from email and postal mailing lists?**

If at any time you would like us to update your PII or remove you from our email or postal mailing lists, feel free to contact us by sending an email to [info@boka-group.com](mailto:info@boka-group.com). Please be sure to include your email address and full name.

We want to communicate with you only if you want to hear from us. You may at any time opt-out of receiving communications from us. If you prefer not to receive information from us, either through email or regular mail, please let us know by sending an email to [info@boka-group.com](mailto:info@boka-group.com), responding directly to an email you have received, or by clicking an opt-out link. Please note that such requests may take up to 2 to 3 weeks to become effective. If you request that we not include you on our email or postal mailing lists, we will use reasonable efforts to ensure that we honor your request.

#### **What is a “cookie” and does BOKA Group place it on my computer?**

When you access many websites, information may be stored on your computer in the form of a “cookie” or similar file that is saved in your computer’s browser. BOKA Group does not store any PII in cookies. All PII is stored separately on its secured servers.

#### **How does BOKA Group protect my PII?**

You can be assured that PII collected through the website is secure and is maintained in a manner consistent with current industry standards. The importance of security for all PII is of utmost concern to us. Your PII is protected in several ways. Your PII resides on a secure server that only BOKA Group staff and contractors have access to via password. In order to most efficiently serve you, credit card transactions and order fulfillments are handled by established third-party banking, processing agents, and distribution institutions. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. Therefore, despite the security procedures we employ, you should be aware that it is impossible to guarantee the security of any information that you transmit to us via the Internet.

#### **How long do we keep your PII?**

We will keep PII for as long as is reasonably necessary to achieve the purpose for which you provided it, or to the extent necessary for us to protect our rights or the rights of third parties, or as required by applicable laws.

#### **Do we respond to “Do Not Track” signals?**

Certain browsers may provide individuals with the ability to communicate that they wish not to be tracked while browsing on the Internet. We currently do not have the ability to respond to such “Do Not Track” signals.

Additionally, we do not currently enable third parties to collect PII about an individual consumer’s online activities over time and across different websites when a consumer uses this website.

#### **BOKA Groups’ Commitment to Children’s Privacy**

BOKA Group takes children’s privacy seriously. We never collect or maintain information at our websites from persons we know to be under age 13, and no part of our websites are designed to attract anyone under age 13. Please do not communicate with or contact us if you are under age.

### **California Consumer Privacy Policy**

This California Consumer Privacy Policy describes how we collect and handle the personal information of California residents to the extent that (1) we collect and process such information in the context of the provision of services related to the ownership and management of businesses (“personal information”) and (2) the obligations imposed by the California Consumer Privacy Act of 2018 (“CCPA”) apply to such data. This section also notifies California residents of our collection practices regarding personal information and describes their rights under the CCPA.

The terms used in this California Consumer Privacy Policy are as defined in the CCPA unless otherwise indicated.

### **Collection and sharing practices regarding personal information during the past twelve (12) months.**

We do not sell your personal information to third parties, nor do we share it with them for their marketing purposes without your consent.

Depending on the nature of our relationship with you, in the past 12 months we may have collected personal information concerning you in the following categories:

- a) Identifiers (e.g., real name, postal address, email address, government ID, financial information);
- b) Categories of personal information described under Cal. Civ. Code 1798.80(e);
- c) Characteristics of protected classifications under California or federal law (e.g., age, race, citizenship, gender);
- d) Commercial information (e.g., products or services purchased, obtained, or considered, personal information disclosed in a sale or acquisition process);
- e) Internet or other network activity (e.g. browsing or search history, information regarding interaction with an internet website, application, or advertisement);
- f) Geolocation data (e.g. physical location);
- g) Audio, electronic, visual, thermal, olfactory, or similar information.
- h) Professional or employment-related information;
- i) Non-public education information (e.g. education records); and
- j) Inferences drawn from other personal information (e.g. profiles reflecting preferences and trends).

In the preceding 12 months, we have used and disclosed personal information listed in any of the categories above for business purposes as described in our Global Website Privacy Notice above.

We obtain personal information from the following sources:

- Directly from an individual (e.g., when individuals provide their information to register for email alerts or filling in forms)
- Service providers (e.g. information provided and used to prepare shareholder tax documents)

- Partners (e.g. organizations we have a business relationship may give us information about their representatives, such as contact details or details of an individual's role in the relationship)
- Third-party data providers or publicly available sources (e.g. information collected for anti-money laundering, background checking and similar purposes to protect our business and comply with legal and regulatory obligations).
- Our website (including IP addresses, network location, browser characteristics, device characteristics, operating system, referring URLs, information on actions taken on our sites, and dates and times of website visits.)
- Directly from an individual (e.g., when individuals provide their information to register for email alerts or filling in forms)
- Service providers (e.g. information provided and used to prepare shareholder tax documents)
- Partners (e.g. organizations we have a business relationship may give us information about their representatives, such as contact details or details of an individual's role in the relationship)
- Third-party data providers or publicly available sources (e.g. information collected for anti-money laundering, background checking and similar purposes to protect our business and comply with legal and regulatory obligations).
- Our website (including IP addresses, network location, browser characteristics, device characteristics, operating system, referring URLs, information on actions taken on our sites, and dates and times of website visits.)

### **Your California Privacy Rights**

If you are a resident of the State of California, you have the following rights in relation to the personal information described above, as provided under California law:

*Right to know:* You have the right to request that we disclose to you: (1) the specific pieces of personal information we have collected about you; (2) the categories of personal information collected or shared; (3) the purposes for which we collected or shared your personal information; and (4) the categories of third parties to whom we have disclosed personal information about you. Prior to disclosing the information, we are required to verify that the individual making the request is indeed the individual to whom the information relates. Once we receive a verifiable request, we must disclose to you the information requested for the twelve (12) months preceding your request. The law gives us forty-five (45) days to provide the information to you. Information on how to submit a request to us is provided below. Please note that if the information you are requesting reveals details directly or indirectly about another person, we will need to seek consent of that person before we can disclose that information to you. In certain circumstances, where disclosure of part or all of the information you have requested would adversely affect the rights of others, we may not be able to disclose the information to you, in which case we will inform you promptly and give you the reasons for our decision. Please further note that information covered by an evidentiary privilege recognized under California Law (including attorney-client communications privilege and work product privilege) cannot be disclosed.

*Right to delete:* You have the right to request deletion of the personal information about you that we have received from you. Prior to deleting the information, we are required to verify that the individual making the request is indeed the individual to whom the information relates. Once we

receive a verifiable request, the law gives us forty-five (45) days to respond. As a general rule, we must delete the information at your request and require our vendors to do so as well. However, CCPA provides certain exceptions that allow us to retain the information even if you have requested that it be deleted. If we do not erase the information pursuant to one of those exceptions, we must inform you of that fact and of any rights you may have to appeal our decision. Information on how to submit a request to us is provided below.

*Right to opt-out of sales (opt-in for minors):* Not applicable since, as indicated above, we do not sell your personal information.

*Right against discrimination:* California residents have the right to not be discriminated against for exercising their rights under the CCPA.

***Please note that your CCPA rights are subject to certain conditions and exceptions, such as limitations on your right to know based on our compliance with evidentiary privileges recognized under California Law (including attorney-client privilege) and exceptions to your right to erase under Cal. Civ. Code Sec. 1798.105(d). Please also know that information received in the context of business to business communications is partially excluded from CCPA.***

#### **How to submit a request**

In order to exercise your right to know or your right to delete, please email us at info@boka-group.com and include "Request under CCPA" in the subject line.

Please include in your request:

- Your full name and address
- Former names (if applicable)
- Former addresses (including dates of change) (if applicable)
- Date of birth
- Contact information (phone number or email address)
- Your relationship to us (e.g., former, existing, or potential business partner)

Please indicate if you are acting as a representative of another individual. If that is the case, include the identification information both for yourself and for the individual you represent and a copy of the written authorization you have received.

To ensure that we are releasing data to the right person, please provide sufficient proof of identity to confirm that you are entitled to the information requested. The nature of the identification required will depend on the nature of your request and your relationship to us. Any identification documents transmitted to us should be transmitted through secure means of communication and should be photocopies or scanned images (do not send the originals).

To help us respond to your request, please identify your relationship to us in your request.

We will endeavor to respond promptly, and in any event, within the period permitted by law described above.

As a general rule, we are not allowed to charge you a fee when you exercise your rights, but if your requests are manifestly unfounded or excessive, we are allowed to charge a reasonable fee or refuse to act on the request.

**How can individuals with disabilities access these disclosures?**

Individuals who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this notice.

*Effective Date: April 18, 2023*