



October 23, 2020

GRAVY ANALYTICS, INC. (“GRAVY”) RESPONSE TO ACCESS AND PORTABILITY REQUEST

Dear Mr. Gundersen:

On September 25, 2020, Gravy received your portability and access request under the EU General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”). On October 2, 2020, we followed up with your request by indicating that we were unable to sufficiently verify your identity with the information you provided and requested you provide us with additional data points for verification purposes. You made such additional data points available to us on October 2, 2020. Following our receipt and review of such additional information, we can reasonably conclude we process your personal data.

Attached please find a copy of the personal data we process about you in a commonly used electronic format. Please let us know if you would like us to deliver the data to a third party, along with such party’s contact information. Below, we have outlined the information Article 15 of the GDPR requires us to provide in response to your access request, along with the rights available to you under the GDPR.

A. Disclosures Required Under Article 15 of the GDPR:

- 1) Categories of Personal Data Processed:** Our records indicate Gravy processes the categories of personal data about you listed below:
 - The following information about your mobile device:
 - Operating system
 - Browser type, and browser plug-in types and versions
 - Location and time zone setting
 - Mobile Advertiser Id (“MAID”)
 - Timestamp
 - IP address
 - Location data, which includes latitude and longitude, and, where available for a particular signal, horizontal accuracy
 - Mobile applications from which your personal data has been collected (to the extent available). Gravy does not typically receive this type information; however, it is, on occasion, inadvertently provided by a supplier, in which case, the information is ingested into our system.

- 2) Categories of Recipients:** Gravy has provided your personal data to its commercial customers who, in turn, use the data to provide their data analytics services to their customers. To date, the only Gravy customer who has received your personal data is Venntel, Inc.

Please note that the recipient is located outside of the country where you live, including countries that are deemed as not having adequate protections under the GDPR, such as the United States (a “**Restricted Jurisdiction**”). We have implemented measures and safeguards to protect your personal data when we transfer it to such a Restricted Jurisdiction, including entering into standard data protection contractual clauses (“**SCCs**”) adopted by the European Commission (for more information on the SCCs visit the EU Commission Website [Here](#)), and previously, prior to its invalidation, the Privacy Shield Framework.

- 3) Sources of Personal Data:** We collect the personal data categories about you described above from the following third party-suppliers: Predicio SAS, and eContext.ai Limited dba Complementics. It is Gravy’s understanding that these third-party suppliers collect information through software development kits (“**SDKs**”) in mobile applications (SDKs allow developers to embed certain third-party functionality into their own software applications).

As indicated above, we do not collect any of your personal data directly from you. However, we inform and notify the public and our suppliers of our specific data use cases in our [Privacy Policy](#) and also describe those uses in our contracts with our third party suppliers. Additionally, we require our third-party suppliers to contractually represent and warrant to Gravy that they have the appropriate legal basis and rights under applicable data protection laws to collect your personal data and transfer it to Gravy for the purposes described in our agreement.

- 4) Purpose of Processing:** The purpose for which we process the personal data we have referenced above is to provide our data analytics services to our customers and partners.

If you would like more information about our services, how we use your information, how we share your information, and our privacy practices, please visit our [Privacy Policy](#). You may also visit our [EEA Privacy Notice](#), which describes our practices and your rights related to data we receive that was collected in Europe or the EEA.

- 5) Storage Period:** Gravy stores the categories of personal data described above for a period of 3 years. In determining this retention period, we consider a variety of factors including, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and applicable legal requirements.

- 6) Automated Decision Making.** We do not use your personal data for solely automated decision-making or profiling.

The GDPR requires us to remind you of the rights you may exercise under the GDPR. Below, please find a summary of such rights.

B. Data Subject Rights Under the GDPR

- Obtain confirmation that Gravy processes your personal data
- Receive a copy of the personal data Gravy’s process
- Receive certain information about Gravy’s processing

- Restrict or object to certain types of data processing
- Request correction or erasure of your personal data
- Make a complaint with the local data protection authority

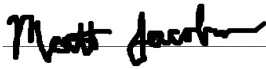
If you would like Gravy to remove and delete your device (MAID) from our systems, you may do so by submitting an [Opt-Out Request](#).

If in your opinion we did not take appropriate action in response to your request, you have the right to lodge a complaint with the relevant supervisory authority and seek a judicial remedy.

For any additional information regarding Gravy and the services we provide, please visit our [Website](#).

If you have any additional questions, please contact us at privacy@gravyanalytics.com

Sincerely,



Matthew Jacobson
CFO & COO
Gravy Analytics, Inc.