

Pennypost Privacy Policy
Last Update: August 2024

At Pennypost, we value and respect your privacy. As used herein, “us”, “we” and “our” means 1000710770 Ontario Inc., dba Code, dba Pennypost. We have prepared this privacy policy to explain the manner in which we collect, use, disclose, and otherwise process personal information when you access or use the Pennypost platform (“**Pennypost**”) through our website located at www.pennypost.co (“**Website**”), or when you otherwise interact with us outside of the Code App.

Pennypost facilitates the creation, publication and monetization of content by writers, and consumption of, and payment for, such content by readers. Payment for content on Pennypost must be made in Kin and sent and received through our mobile application, the [Code Wallet App](#) (the “**Code App**”). The Code App is a self-custodial wallet that allows users to access their Kin currency, and send and receive Kin. You must use the Code App to make use of the full functionality of Pennypost. See the Code App Privacy Policy available at: <https://getcode.com/privacy> for the manner in which we collect, use and disclose personal information when you download and use the Code App.

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COLLECTION AND USE OF PERSONAL INFORMATION

Categories of Personal Information Collected

We collect contact information, content you upload to Pennypost, records of your other interactions with Pennypost and our Website, and technical data about your browser or device, such as its IP address and unique identifiers stored through cookies and other technologies.

Means of Collection

We collect personal information that you provide directly to us (through Pennypost, the Website or through other communication channels) as well as information your devices provide to us automatically.

How we collect and use personal information through Pennypost

Logging Into Pennypost: If you wish to access and use the full functionality of Pennypost, you will need to create a Code App account (“**Account**”) or use your existing Account to log into Pennypost. You can create an Account by clicking the “Download It Now” link on our Website or by downloading the Code App directly from the App Store on your device. When you access Pennypost using your Account, we collect your Code Wallet address to facilitate payment for content on Pennypost. The creation and use of your Account is governed only by the Code App Privacy Policy, not this Privacy Policy.

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Using Pennypost: As a writer, you will be able to use Pennypost to create, publish and monetize articles, images, and other content that you post or otherwise make available on Pennypost. As a reader, you will be able to use Pennypost to access articles, images, and other content posted or otherwise made available by writers on Pennypost. Please note that any content you post or otherwise make available on Pennypost will be publicly viewable to anyone who uses Pennypost. Pennypost is not intended to process personal information, and we ask that you not share any personal information (e.g., in an article or picture) through Pennypost.

Publishing Content: In order to publish content, we may require that you link your social media account (such as X, formerly known as Twitter) by clicking a widget or pixel embedded on our Website that allows you to post a link to your Pennypost content to your social media account. When you link your social media account, we will collect certain personal information that you have authorized the social media platform to share with us, such as your social media username. Please note that anyone who views your content will be able to associate your social media username with such content. Your use of the social media platform is governed by the terms and conditions and privacy policy of that social media platform. We do not have any control over such social media platforms, and therefore we have no responsibility or liability for the manner in which the social media platforms may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of the social media platform.

Purchasing Content: When you purchase content on Pennypost, we will collect and use your Code Wallet address to facilitate the payment. For more information about the manner in which we collect, use and disclose personal information when you access and use the App visit: <https://getcode.com/privacy>.

How we collect and use personal information through our Website and in our other interactions with you

Visiting the Website: You do not have to register to visit or use our Website. However, we do collect some personal information when you visit our Website. Please see “Information about our Website” below for detailed information regarding the personal information we collect when you visit and use our Website, and the choices you have with regards to that collection.

Marketing Communications: You may sign up to receive email marketing communications, such as newsletters and information about Pennypost. We will collect your email address in order to send you such communications. You can unsubscribe to certain types of emails at any time by clicking the “unsubscribe” link included at the bottom of each email. Alternatively, you can opt out of receiving email marketing communications by contacting us at the contact information provided in the “Contact Us” section below. Please note that you may continue to receive transactional or account-related communications from us.

Surveys: From time to time, we may offer you the opportunity to participate in one of our surveys. The information obtained through our surveys is used in an aggregated, de-identified form. We use this information to help us understand our users and to enhance our Website.

Contact Us: When you contact us with a comment, question or complaint through privacy@getcode.com, you may be asked for information that identifies you, such as your name

and telephone number, along with additional information such as an email address or other Account information we may need to help us promptly answer your question or respond to your comment. We may retain this information to assist you in the future and to improve our customer service and service offerings.

TRANSFERS AND DISCLOSURES OF PERSONAL INFORMATION

We do not disclose your personal information to third parties without your consent, except as set forth below or as required or permitted by law.

Vendors: Your personal information will be transferred (or otherwise made available) to certain third parties that provide services to us or on our behalf. We use vendors to provide or receive services, such as hosting the Website. We and our vendors may access, store and otherwise process personal information outside of the jurisdiction in which you are located, including in other provinces in Canada, the United States and other foreign jurisdictions.

Legal and Compliance: We and our Canadian, U.S. and other foreign vendors may provide your personal information in response to a search warrant to other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise may be required or permitted by applicable Canadian, U.S. or other law or legal process, which may include lawful access by U.S. or foreign courts, law enforcement or other government authorities. Your personal information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

Sale of Business: We may transfer any information we have about you as an asset in connection with a proposed or completed merger, acquisition or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Pennypost or as part of a corporate reorganization or other change in corporate control.

INFORMATION ABOUT OUR WEBSITE

Visiting our Website: In general, you can visit our Website without telling us who you are or submitting any personal information. However, we collect the IP (Internet protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity and to monitor and improve our Website.

Cookies: Our Website uses a technology called “cookies”. A cookie is a tiny element of data that our Website sends to a user’s browser, which may then be stored on the user’s hard drive or other local storage so that we or third parties (such as our vendors) can recognize the user’s computer or device when they return. The data may contain a unique identifier or other information. Our vendors may use cookies or other technology to collect personal information about a user’s online activities over time and across different Web sites, including when using our Website. We do not respond to browser-based “Do Not Track” signals. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Website, you may not be able to take advantage of all of the Website features.

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Analytics: We may use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the Website (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the Website. These third parties may use cookies and other tracking technologies. For more information about Google Analytics or to prevent the storage and processing of this data (including your IP address) by Google through Google Analytics in an eligible browser, you can download and install the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. You can also obtain additional information on Google Analytics' data privacy and security at the following links:

- <https://policies.google.com/technologies/partner-sites>; and
- <https://support.google.com/analytics/topic/2919631>

Third Party Links: Our Website may contain links to other websites that Pennypost does not own or operate. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of every website you visit.

SAFEGUARDS AND RETENTION

We have implemented administrative, technical and physical measures in an effort to safeguard the personal information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. However, no security measure is perfect, and we cannot promise that your data will never will be subject to a security breach.

We have record retention processes designed to retain personal information for no longer than we determine necessary for the purposes set out herein or as otherwise required to meet legal or business requirements.

YOUR CHOICES

Marketing Communications

As indicated above, if you have signed up to receive our email communications, you can unsubscribe from certain types of emails any time by clicking the “unsubscribe” link included at the bottom of the email. Alternatively, you can opt out of receiving our marketing communications by contacting us using the contact information under “Contact Us” below and informing us of the contact information to which your opt-out request applies. Please allow a reasonable time for us to process your request.

Exercising Your Privacy Rights

Subject to applicable law, and depending on where you are located, you have the right to access, update, confirm, rectify and correct inaccuracies in, delete, and withdraw consent to the processing of, your personal information in our custody or control. You may make such a request or withdraw consent by emailing or writing to us using the contact information set out below. We may request

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certain personal information for the purpose of verifying your identity when you seek access to your personal information.

We will consider all requests and provide our response within the time period required by applicable law. Please note, however, that certain information may be exempt from such requests. If we deny your request in whole or in part, you may have the right to appeal the decision. In such circumstances, we will provide you with information regarding the appeals process.

PRIVACY GOVERNANCE POLICIES AND PRACTICES

We have implemented measures to help protect your personal information and have policies and practices that govern our treatment of personal information, including:

- a privacy framework that defines the roles and responsibilities of our employees with respect to the treatment of personal information in our custody and control;
- processes for responding to data subject requests and complaints concerning the handling of personal information in a timely and effective manner; and
- a framework governing the retention and destruction of personal information that is designed to ensure compliance with our legal obligations.

UPDATES TO THE PRIVACY POLICY

We may update this privacy policy periodically to reflect changes to our privacy practices. We encourage you to periodically review this page to ensure you are familiar with those changes. We will indicate at the top of this privacy policy when it was most recently updated.

CONTACT US

If you have any questions or comments about this privacy policy or the manner in which we or our vendors (including our vendors outside Canada) treat your personal information, or to request access to our collection of your personal information, or to otherwise exercise any personal information rights you may have, please contact us at:

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