

NIGHTFLY PRIVACY POLICY

Last Updated: August 2020

1. Who We Are

Welcome to Nightfly! We are a social nightlife platform whose mission is to build a community that connects people to people and people to experiences. Our mobile app allows people to create, share, discover, and promote events amongst friends and others who love to have a good time. Nightfly's products and offerings are available online through the website www.nightfly.com and through our mobile application, Nightfly, which is available on the App Store. These are collectively referred to as our "Services."

Nightfly was created by SlydeLyfe, LLC ("Slyde," "Nightfly," "us," "we" or "our"). SlydeLyfe, LLC is a New York limited liability company with its principal place of business at 620 Park Ave, Rochester, NY.

When this Privacy Policy uses the term "Promoter" we mean event creators using the Services to create events. When this Privacy Policy uses the term "Consumer" we mean people using the Services (a) to consume information about events, attend events, or for any other reason. In this Privacy Policy, Promoters, Consumers and third parties using our Services are all collectively referred to as "Users," "you" or "your."

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, it is your decision not to use our application and/or our website. By accessing or using the application and/or website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this application and/or website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

If you have any questions or concerns at any time, please do not hesitate to contact us by emailing support@nightfly.com.

2. Personal Data We Collect.

This Privacy Policy describes our policies regarding information associated with or relating to a person and/or could be used to identify a person ("Personal Data") that is collected from Users on or through the Services. Personal Data includes both "Voluntary Personal Data" and "Automatic Data." When you use or interact with us through the Services, we may collect Personal Data. Sometimes this will be on our own behalf and other times this will be on behalf of a Promoter using our Services to run an event.

2.1 "Voluntary Personal Data" is information you provide to us. We collect Voluntary Personal Data from all users when you voluntarily provide such information to us, like when you register for access to the Services, contact us with inquiries, respond to one of our surveys, or browse or use certain parts of the Services. The Voluntary Personal Data we may collect includes without limitation your name, address, email address and any other information that you choose to provide and/or that enables Users to be personally identified.

2.2 “Automatic Data” is information we automatically collect. We automatically collect certain technical data that is sent to us from the computer, mobile device, and/or browser through which you access the Services. Automatic Data includes, without limitation, a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol address), characteristics about your access device and/or browser, statistics on your activities on the Services, information about how you came to the Services, and data collected through Cookies, Pixel Tags, Local Shared Objects, Web Storage and other similar technologies.

a. *Cookies (or browser cookies)*. A cookie is a small file placed on the hard drive of your computer used to determine whether you have visited the Site recently. To improve the user experience on our website and app and enable you to use certain features, some pages of the website and app use cookies. Some of the cookies we use are deleted after you close the browser session, i.e. when you close the browser (session cookies). Other cookies are stored in your end-user device and enable us to recognize your browser when you visit us again (persistent cookies). To check the cookie storage period, you can use the Overview function in the cookie settings of your web browser. You can configure your browser for it to inform you whenever a page uses cookies and decide on a case-by-case basis whether to accept or reject the cookies on a given website or generally. Every browser has a different policy for managing the cookie settings. The browser’s policy is described in the Help menu of every browser and explains how you can change your cookie settings. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website and/or app. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website and/or app.

2.3 “Non-Personal Data” means any information that does not relate to a person and/or cannot be used to identify a person. When you register for the Services or otherwise submit Personal Data to us, we may associate other Non-Personal Data (including Non-Personal Data we collect from third parties) with your Personal Data. In such an instance, we will treat any such combined data as your Personal Data until it can no longer be associated with you or used to identify you. Additionally, when you interact with the Services, we may collect Non-Personal Data. The limitations and requirements in this Privacy Policy on our collection, use, disclosure, transfer, and storage/retention of Personal Data do not apply to Non-Personal Data.

We take the privacy of your Personal Data seriously. Because of that, we have created this Privacy Policy. Please read this Privacy Policy because it includes important information regarding your Personal Data and other information.

3. Information Collected from Promoters.

If you are a Promoter, we will collect additional Personal Data from you.

3.1 *Information you may be required to provide.* In some cases, we may collect Promoters’ credit card information (e.g., your credit card number and expiration date, billing address, etc.) to secure payments, some of which may constitute Personal Data.

3.2 *Information we obtain from other sources.* We may also collect or receive Personal Data

including your name, email address and other contact information from third party sources, such as third-party websites and marketing partners, your bank, our payment processing partners and credit reporting agencies. We are not liable for third-party use of your Personal Data.

4. Information Collected from Consumers.

If you are a Consumer, we will collect additional Personal Data from you, sometimes for our own purposes and other times on behalf of a Promoter.

4.1 Information you provide via Nightflyy: If you register for a paid event, you may be required to provide financial information (e.g., your credit card number and expiration date, billing address, etc.) some of which may constitute Personal Data. In addition, Promoters can set up event registration pages to collect virtually any information from Consumers in connection with registration for a Promoter's event listed on the Services. Nightflyy **does not** control a Promoter's registration process nor the Personal Data that the Promoter collects. When you register for, or otherwise provide information to Nightflyy in conjunction with a Promoter's event or activity, whether that information is yours or a third party's, in connection with a purchase, registration, or transfer, that Promoter will receive and may use the information you provide. We are not liable for a Promoter's use of your Personal Data, nor a third party's use.

4.2 Information we obtain from other sources: We may also collect or receive Personal Data from third party sources, such as Promoters, other Consumers, social media, third party integrations, your credit card issuing bank, our payment processing partners, or other third parties. We are not liable for any third party's use of your Personal Data.

5. How We Use Your Personal Data.

We collect and use the Personal Data collected in a manner that is consistent with this Privacy Policy, and applicable privacy laws. We may use the Personal Data as follows:

5.1 Specific Reason. If you provide Personal Data for a specific reason, we may use the Personal Data in connection with the purpose for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem and will respond to the email address from which the contact came.

5.2 Access and Use. If you provide Personal Data in order to access or use the Services or any functionality thereof, we will use your Personal Data to provide you with access the Services or functionality and to analyze your use of such Services or functionality. For example, if you supply Personal Data relating to your identity or qualifications to use certain portions of the Services, we will use that information to make a decision as to granting you access to use such Services and to assess your ongoing qualification to use such Services.

5.3 Internal Business Purposes. We may use your Personal Data for internal business purposes, including without limitation, to help us improve the content and functionality of the Services, to better understand our Users, to improve the Services, to protect against, identify or address wrongdoing, to enforce our Terms of Service, to manage your account and provide you with customer service, and to generally manage the Services and our business.

5.4 Our Marketing. We may use your Personal Data for our marketing and advertising purposes, including without limitation, by email, SMS marketing, display media, and targeting other devices (such as tablets, mobile devices and televisions). We do this in order to inform you about services or events we believe might be of interest to you, develop promotional or marketing materials, and display Nightflyy or event-related content and advertising on or off the Services that we believe might be of interest to you. We may also do this on behalf of a Promoter, for example, where your prior interactions with a Promoter suggest you may be interested in a particular type of event. See "Opt Out from Electronic Communications" below on how to opt out of various Nightflyy marketing communications.

You may see advertisements for our Services (or our Promoter's events) on third party websites, including on social media platforms. Where you see an advertisement on a third-party website or social media platform, this may be because we engaged the third party or social media platform to show this advertisement to our Users, or to others who have similar attributes to our Users. In some cases, this involves sharing your email address or other contact details with the third party or social media platform so that they can identify you as one of our Users, or identify other individuals with similar attributes to you in order to show them advertisements for our Services (or for our Promoter's events). If you no longer want your Personal Data to be used for these purposes, please contact us at support@nightflyy.com.

5.6 Use of Interest-Based Data. We sometimes make inferences about the type of events you may be interested in. We may use these inferences to help target advertising or customize recommendations to you, including on behalf of Promoters. We may do this on an aggregated or generalized basis. For instance, we may determine that our users who attend many hip-hop events also often attend or show interest in R&B events. We may direct (or assist in directing) content or recommendations related to both hip-hop and R&B to those Users.

5.7 Other Purposes. If we intend to use any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time the Personal Data is collected or we will obtain your consent subsequent to such collection but prior to such use.

5.8 Aggregated Personal Data. In an ongoing effort to understand and serve our Users better, we often conduct research on our customer demographics, interests and behavior based on Personal Data and other information that we have collected. This research is typically conducted on an aggregate basis only that does not identify you. Once Personal Data is in an aggregated form, for purposes of this Privacy Policy, it becomes Non-Personal Data.

6. How We Disclose and Transfer Your Personal Data.

We are not in the business of selling your Personal Data. We consider this information to be a vital part of our relationship with you. As a result, we will not sell your Personal Data to third parties, including third party advertisers. There are certain circumstances in which we may disclose, transfer, or share your Personal Data with certain third parties without further notice to you, as set forth in this Privacy Policy.

6.1 Business Transfers. As we develop our business, we might sell or buy businesses or assets. In

the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets. We may also disclose your Personal Data in the course of due diligence for such an event. You acknowledge and agree that any successor to or acquirer of Nightflyy (or its assets) will continue to have the right to use your Personal Data and other information in accordance with the terms of this Privacy Policy.

6.2 Parent Companies, Subsidiaries and Affiliates. In the event of a sale, merger, reorganization, dissolution, or other similar event, we may share your Personal Data with our newly determined parent companies, subsidiaries and/or affiliates for purposes consistent with this Privacy Policy. The aforementioned parent companies, subsidiaries, and affiliates will be bound to maintain that Personal Data in accordance with this Privacy Policy.

6.3 Agents, Consultants and Service Providers. We may share your Personal Data with our contractors and service providers who process Personal Data on behalf of Nightflyy to perform certain business-related functions. These companies could include marketing agencies, online advertising providers, data enhancement and data services providers, database service providers, backup and disaster recovery service providers, email service providers, payment processing partners, customer support, tech support, hosting companies and others. When we engage another company to perform such functions, we may provide them with information, including Personal Data, in connection with their performance of such functions.

6.4 Promoters. When you register for an event, sign up for communications, or otherwise input your Personal Data (such as through a web form) to communicate with a Promoter or participate in a Promoter event, that Promoter will receive that information. For instance, if you input your name and email address into a web form for a Promoter offer, activity or event, the Promoter will receive that information. The Promoter may then send you marketing or other communications, which may be subject to its own, separate privacy policy. Likewise, if you provide your mobile phone number, you may receive information messages related to the service, event, activity, or information in which you've expressed interest.

When you purchase tickets to, register for an event, or otherwise input your Personal Data (such as through a web form), or otherwise communicate with a Promoter, or participate in or express interest in a Promoter or Promoter event or activity, that Promoter will receive the information you provide, including your Personal Data. Other third parties that are involved in or on whose behalf an event or activity is promoted, may receive that Personal Data as well.

We are not responsible for the actions of these Promoters, or their Third-Party Promoters (or other downstream recipients of your Personal Data), with respect to your Personal Data. It is important that you review the applicable policies of the Promoters, and if applicable and available, their appointed Third-Party Promoters, of an event (and the related fundraising page, if applicable) before providing Personal Data or other information in connection with that event or related fundraising page.

Similarly, if you are a member of a Promoter's organization within Nightflyy, your Personal Data will be available to the Promoter and shared with those Third-Party Promoters granted permission by the Promoter to view all members of the Promoter's organization.

6.5 Facebook, Social Media and Other Third-Party Connections.

a. Connecting Your Nightflyy Account to Social Media Services: You may be able to connect your Nightflyy account to your accounts on third party services like Facebook. When you connect your Nightflyy account to social media services, we may collect, use, disclose, transfer and store/retain information relating to your account with such third-party services in accordance with this Privacy Policy. For example, if you connect with Facebook, we store your Facebook ID, first name, last name, email, location, friends list and profile picture and use them to connect with your Facebook account to provide certain functionality on the Services, like recommending events that your Facebook friends are interested in and sharing the events you are interested in, or attending, with certain groups of people like your Facebook friends.

b. “Liking” or “Following” Nightflyy on Social Media: When you “like” or “follow” us on Facebook, Instagram, Twitter or other social media sites (to the extent we provide that capability), we may collect some information from you including your name, email address, and any comments or content you post relevant to us. We likewise may collect your information if you sign up for one of our promotions or submit information to us through social media sites.

c. Facebook Plug-Ins and Links on Our Pages: Nightflyy’s own website may contain links to Facebook as well, such as through the Facebook “Like” or “Share” button or other social plug-ins. When you interact with these features and links, your browser will establish a direct link with the Facebook servers, and Facebook will receive information about your browser and activity, and may link it to your Facebook user account. For more information about how Facebook uses data, please see Facebook’s own policies.

d. Additional Facebook Marketing and Connectivity: In addition, if you are a member of Facebook (or another social media platform), and you provide Personal Data to a Promoter (such as in the ways described in Section 5.5), the Promoter may use that Personal Data to send you advertising and offers through Facebook (or another social media) platform. This includes when you are on Facebook or another social media platform. The Promoter may work with us and with third parties to enable this data integration and advertising. Facebook and other social media platforms may provide a way to opt out of this type of advertising. Please review their user settings and support pages to learn more about how they help you to manage privacy and marketing choices.

e. Third party services and integrations: Nightflyy may provide you with opportunities to contract directly with third parties, and/or to integrate with third party services or applications, through our platform. In such instances, we will disclose your Personal Data to other entities in order to fulfill a request by you, or to provide services you have requested.

6.7 Legal Requirements. We may disclose your Personal Data if required to do so by law. For example, we may disclose your Personal Data in order to respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights,

interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in connection with the Services, (d) act in urgent circumstances to protect the personal safety of Users of the Services or the public, or (e) protect against legal liability.

7. How We Store Your Personal Data.

We may store Personal Data itself or such information may be stored by third parties to whom we have transferred it in accordance with this Privacy Policy. We take what we believe to be reasonable steps to protect the Personal Data collected via the Services from loss, misuse, unauthorized use, access, inadvertent disclosure, alteration and destruction. However, no network, server, database or 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 electronically. Please keep this in mind when disclosing any Personal Data.

8. Third-Party Use of Cookies and Other Tracking Technologies.

Some content or applications, including advertisements, on the Website and/or app are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

9. How You Can Access, Update, Correct or Delete Your Personal Data.

You can request access to some of your Personal Data that is being stored by us. You can also ask us to correct, update or delete any inaccurate Personal Data that we process about them.

Users may exercise these rights by contacting us directly by email or at the address specified below.

If a Consumer initiates a data deletion request, Nightflyy is authorized to delete or anonymize Personal Data of the requesting Consumer from the Services even if that means removing its availability to the Promoter through the Services. However, if you are a Consumer, you understand that even if Nightflyy deletes or anonymizes your Personal Data upon your request or pursuant to this Policy, your Personal Data may still be available in the Promoter's own databases if transmitted to the Promoter prior to Nightflyy receiving or taking action on any deletion or anonymization activity.

We will consider and respond to all requests in accordance with applicable law.

10. How Long We Retain Your Personal Data.

We may retain your Personal Data as long as you are registered to use the Services. You may delete your account by contacting us. However, we may retain Personal Data for an additional

period as is permitted or required under applicable laws. Even if we delete your Personal Data it may persist on backup or archival media for an additional period of time for legal, tax or regulatory reasons or for legitimate and lawful business purposes.

11. Your Choices.

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

11.1 Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site and/or app may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

11.2 Opt Out from Electronic Communications.

a. Nightflyy Marketing Communications. Where applicable, and in accordance with your marketing preferences, Nightflyy may send you electronic communications marketing or advertising the Services themselves or events on the Services. You may also "opt out" of receiving these electronic communications by clicking on the "Unsubscribe" link at the bottom of any such electronic communication you receive. In addition, you may also manage your email preferences at any time by logging in (or signing up and then logging in), clicking on "Account" and then "Email Preferences," where applicable.

b. Promoter-initiated Communications. Promoters may use our email tools to send electronic communications to those on their email subscription lists, including Consumers who have registered for their events on our Services in the past. Although these electronic communications are sent through our system, Nightflyy does not determine the content or the recipients of these electronic communications. Promoters are required to use our email tools only in accordance with all applicable laws. Nightflyy provides an "Unsubscribe" link on each of these emails, which allows recipients to "opt out" of electronic communications from the particular Promoter.

c. Social Notifications. In the event that you connect your Facebook account or sign up for other social media integrations whose product features include social notifications (i.e., updates on what your friends are doing on the Services), you will receive these social notifications. You can manage these social notifications by toggling your social settings to private or disconnecting such integration.

d. Transactional or Responsive Communications. Certain electronic communications from Nightflyy are responsive to your requests. For example, if you email our customer support department, we will return your email. Notwithstanding any unsubscribe election that you have

made, you will still receive these transactional or responsive emails. You can stop receiving these types of emails only by contacting us. By electing to stop receiving all electronic communications from us or through our system, you will no longer receive any updates on events you have created (including payout issues) or on events you are registered to attend (including emails with your tickets). We do not recommend that you do this unless you plan to no longer use the Services, are not currently registered for an event, are not currently organizing an event, and will have no need to receive further communications from us or through our system.

e. Retention. It may take up to ten (10) business days for us to process an unsubscribe request. Even after you opt out of all electronic communications, we will retain your Personal Data in accordance with this Privacy Policy, however, we will no longer use it to contact you. However, Promoters who have received your Personal Data in accordance with this Privacy Policy may still use that Personal Data to contact you in accordance with their own privacy policies, but they may not use our system to do so.

11.3 Do Not Track. We currently do not participate in any "Do Not Track" frameworks that would allow us to respond to signals or other mechanisms from you regarding the collection of your Personal Data.

12. Exclusions.

12.1 Personal Data Provided to Others. This Privacy Policy does not apply to any Personal Data that you provide to another User through the Services or through any other means, including to Promoters on event pages or information posted by you to any public areas of the Services.

12.2 Third-Party Links. This Privacy Policy applies only to the Services. The Services may contain links to other websites not operated or controlled by us (the "Third-Party Sites"). The policies and procedures we described here do not apply to the Third-Party Sites. The links from the Services do not imply that we endorse or have reviewed the Third-Party Sites. We suggest contacting those sites directly for information on their privacy policies.

13. Children's Information Under the Age of 13

The Services are not intended for use by children, especially those under the age of thirteen. We will not knowingly allow anyone under the age of thirteen register for any of our Services or provide any personally identifying information.

If a child's parent or guardian believes we might have any information from or about their child, please contact us at support@nightflyy.com. Following such contact, we will delete any information concerning the child from our records.

If we become aware through other methods that we have inadvertently received personally identifiable information from a user under the age of 13 as part of the Services, we will delete such information from our records.

14. International Privacy Laws.

If you are visiting the Services from outside the United States, please be aware that you are sending information (including Personal Data) to the United States where our servers are located. That information may then be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information and how it is stored by us. These countries (including the United States) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, storage and use of your Personal Data will at all times continue to be governed by this Privacy Policy.

15. Changes to This Privacy Policy.

The Services and our business may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. We reserve the right, in our sole discretion, to update or modify this Privacy Policy at any time (collectively, "Modifications"). Modifications to this Privacy Policy will be posted to the Site with a change to the "Updated" date at the top of this Privacy Policy. In certain circumstances Nightfly may, but need not, provide you with additional notice of such Modifications, such as via email or with in-Service notifications. Modifications will be effective thirty (30) days following the "Updated" date or such other date as communicated in any other notice to you.

Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was updated on the date indicated above. Your continued use of the Services following the effectiveness of any Modifications to this Privacy Policy constitutes acceptance of those Modifications. If any Modification to this Privacy Policy is not acceptable to you, you should cease accessing, browsing and otherwise using the Services.

16. Dispute Resolution

If you have a complaint about Nightfly's privacy practices, email us at: support@nightfly.com. We will take reasonable steps to attempt to resolve your complaint.

17. Your California Privacy Rights

Under the California "Shine Your Light" law (California Civil Code Section § 1798.83), California residents are permitted to request certain information regarding Company's disclosure of personal information to third parties for their direct marketing purposes. California residents may choose to opt out of the sharing of personal information with third parties for marketing purposes at any time. To make such a request, please see the "Questions/Contact Us" section below.

It is important to note that this opt-out does not prohibit disclosures made for non-marketing purposes.

18. Your Nevada Privacy Rights

If you are a Nevada resident, you may have certain rights with respect to your information. Under Nevada law, certain Nevada Consumers may opt-out of the sale of "personally identifiable information" for monetary consideration to a person for that person to license or sell such information to additional persons. "Personally identifiable information" includes: first and last

name, email address, phone number, Social Security number, or an identifier that allows a specific person to be contacted either physically or online.

We do not engage in such activity.

19. Your European Economic Area User Privacy Rights

We comply with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union (EU) to the United States or from Switzerland to the United States (as the case may be).

19.1 Scope. Our commitment to the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework covers personal data collected from the EU or Switzerland and transferred to the U.S., including customer and vendor data, and other personal data. In this Privacy Policy, we refer to “personal information” which is information about an identified or identifiable individual that is received by us from the EU or Switzerland and recorded in any form.

19.2 Right of Access. You have the right to access the personal information we hold about you. If such information is inaccurate or processed in violation of the Privacy Shield Principles, you may also request that such information be corrected, amended, or deleted. For additional information on the right to access and other rights available to you under the General Data Protection Regulation (GDPR), including how to exercise such rights, please email us at support@nightflyy.com.

19.3 Choice. You also have the right to opt out of (i) disclosures of your personal information to third parties not identified at the time of collection or subsequently authorized and (ii) uses of personal information for purposes materially different from those disclosed at the time of collection or subsequently authorized. To exercise this right, please email us at support@nightflyy.com.

19.4 Onward Transfers. If we receive personal information subject to our certification under the Privacy Shield and then transfer such information to a third-party service provider acting as an agent on our behalf, we have certain liability under the Privacy Shield if the agent processes such information in a manner inconsistent with the Privacy Shield except when we are not responsible for the event giving rise to the damage.

19.5 Our Internal Recourse Mechanism. In compliance with the Privacy Shield Principles, we commit to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints should first email us at support@nightflyy.com. We will respond to your request within a reasonable timeframe, but in no event less than 45 days after receipt of your complaint.

19.6 Independent Recourse Mechanism. If a complaint cannot be resolved through our internal process, we commit to cooperate with the panel established by the EU data protection authorities (DPAs) or the Swiss Federal Data Protection and Information Commissioner (FDPIC) and will comply with the advice given by the DPAs with regard to personal information transferred from

the EU and with the advice given by the FDPIC with regard to personal information transferred from Switzerland. Such individuals may direct complaints about their personal information to their respective DPA or the FDPIC (as applicable).

19.7 Binding Arbitration. You have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms pursuant to the Privacy Shield's Recourse, Enforcement and Liability Principle and Annex I of the Privacy Shield.

19.8 Regulatory Oversight. The Federal Trade Commission has jurisdiction over our compliance with the Privacy Shield.

19.9 Cookies. For more information on our use of cookies, please see the Cookies Sections above.