Proaction.
Intelligent customer acquisition

Proaction Data Limited

Data Privacy & Data Privacy Framework Policy

Effective as of January 24, 2025

Summary

At **Proaction Data Limited**, privacy, data security and compliance with relevant legislation matters to us.

We help brands connect with customers, working with trusted partners ("Partners") to deliver offers, promotions, and recommendations. To do this, we sometimes, and only with explicit advertiser approval, process personal information — like name, contact details, or preferences — so we can match customers with relevant deals and improve our services.

We take your privacy seriously, and we follow strict rules set out in:

- The **EU-U.S. Data Privacy Framework (DPF)** and its UK and Swiss extensions
- The **UK GDPR** and **EU GDPR** privacy laws

In simple terms:

- We only collect the data we need.
- We use it for clear, specific purposes.
- You can ask us to stop, delete, or correct your information at any time.
- We protect your data with strong security measures.
- We do not sell your personal data.
- If we share it with Partners, they must meet the same high standards we do.

If you ever have a question or complaint, email us at info@proaction.ai

Full Policy

Policy Purpose

Proaction Data Limited ("Proaction," "us," "our," and "we") is committed to protecting the privacy of individuals whose data we process. We comply with:

- The **EU-U.S. Data Privacy Framework (DPF)**
- The **UK Extension to the EU-U.S. DPF**
- The **Swiss-U.S. DPF**
- The **UK General Data Protection Regulation (UK GDPR)** and **Data Protection Act 2018**
- The **EU General Data Protection Regulation (EU GDPR)**

Proaction and our Partners adhere to the **EU-U.S. DPF Principles** with regard to processing Personal Data received from the EU in reliance on the EU-U.S. DPF and from the UK (including Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. We also adhere to the **Swiss-U.S. DPF Principles** for Personal Data received from Switzerland.

If there is any conflict between the terms in this Privacy Statement and the DPF Principles, the Principles shall govern.

Scope

Proaction provides data services, marketing technology, and consumer engagement solutions to help brands connect with relevant audiences. We also work with a network of trusted partners ("Partners"), including Nift Networks Inc, Rokt Inc and Vinted Platform Limited, to deliver offers, promotions, and brand discovery opportunities to consumers.

Our services may include online platforms, APIs, data integrations, analytics, and communications via email, SMS, mobile applications, and other channels. We collaborate with ecommerce companies, retailers, restaurants, and other businesses (Partners) to match users with promotional offers and discounts for goods or services from third-party advertisers ("Advertisers").

This Policy applies to Personal Data transferred from the EU, UK, or Switzerland to Proaction in the U.S. and processed in relation to:

1. End users of Proaction and/or Partner platforms that link to or reference this Policy or our Privacy Policy;
2. End users whose data is processed via Partner technology integrated into Partner websites, apps, or campaigns;
3. Contact information relating to our Advertisers or Partners.

Definitions

"Data Subject" – An individual to whom any given Personal Data covered by this Policy refers.

"Personal Data" – Any information relating to an identified or identifiable natural person residing in the EU, EEA, UK (including Gibraltar), or Switzerland.

"Sensitive Personal Data" – Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, or information concerning the sex life or sexual orientation of an individual.

Compliance Under the Data Privacy Framework (DPF) and GDPR

1. Lawful Basis for Processing (GDPR Requirement)

Under GDPR, Proaction processes Personal Data based on one or more of the following lawful bases:

- **Consent** – where you have given clear consent for us to process your data for a specific purpose;
- **Contract** – where processing is necessary to perform a contract or take steps before entering into one;
- **Legal Obligation** – where processing is necessary for us to comply with the law;
- **Legitimate Interests** – where processing is necessary for our legitimate business interests or those of a third party, provided your rights do not override those interests.

2. Notice (DPF Principle)

We or our Partners inform Data Subjects of the types of data collected, purposes of processing, categories of recipients, and how to contact us with any inquiries or complaints.

3. Choice / Opt-Out Rights (DPF Principle)

Data Subjects have the right to opt out of:

- Disclosures to third parties not identified at the time of collection;
- Uses for materially different purposes than originally disclosed.

4. Data Subject Rights (GDPR Requirement)

Under GDPR, individuals have the following rights:

- Access to their Personal Data;
- Rectification of inaccurate or incomplete data;
- Erasure ("Right to be Forgotten");
- Restriction of processing;
- Data portability;

- Objection to processing based on legitimate interests;
- Withdrawal of consent where processing is based on consent.

5. Accountability for Onward Transfer (DPF Principle)

Where we transfer Personal to third parties (including our Partners), we ensure they:

- Process only for specified purposes;
- Provide equivalent levels of protection;
- Notify us if they can no longer meet DPF standards.

We remain liable under the DPF unless we prove we are not responsible for the event giving rise to the damage.

6. Security (DPF Principle)

We take reasonable and appropriate measures to protect Personal from loss, misuse, unauthorised access, disclosure, alteration, and destruction.

7. Data Integrity & Purpose Limitation (DPF Principle)

We limit collection to relevant data, process only for compatible purposes, ensure data is accurate and up to date, and retain it only as long as necessary for business, legal, or compliance purposes.

8. Recourse, Enforcement & Liability (DPF Principle)

Complaints should first be sent to: **info@proaction.ai**. Thereafter complaints can be made to the relevant authority in each country.

Contact Information

For all privacy inquiries:

Data Protection Officer
Proaction Data Limited
Email: **info@proaction.ai**