

EU-US Privacy Shield Policy

Last updated: April 6, 2022

Kristalic, Inc. (“Remio”, “we”, “our” or “us”) has subscribed to the EU-U.S. Privacy Shield Framework (collectively, “Privacy Shield”). Remio adheres to the Privacy Shield Principles including the Supplemental Principles, (collectively, the “Privacy Shield Principles”) for Personal Data received from entities in the European Economic Area (the “EEA”), and the United Kingdom (“UK”).

This Remio Privacy Shield Policy (“Privacy Shield Policy”) and the Remio Privacy Policy (“Privacy Policy”) describe the privacy practices that we implement for Personal Data received from the EEA or UK in reliance on the Privacy Shield. This Privacy Shield Policy uses terms that are defined in the Privacy Policy.

If there is any conflict between the terms in this Privacy Shield Policy and the Privacy Shield Principles as concerns the Personal Data received under the Privacy Shield, the Privacy Shield Principles shall govern to the extent of the conflict. To learn more about the Privacy Shield program visit www.privacyshield.gov, and to view our certification, please visit <https://www.privacyshield.gov/list>.

Privacy Shield Principles

1. and 2. Notice and Choice

Our Privacy Policy describes how we use Personal Data we receive from different sources. This Privacy Shield Policy describes how we process Personal Data covered by the Privacy Shield.

If you are a User, Remio may act as an agent for you in relation to the Personal Data that you provide or make available to Remio.

In its role as a controller and as required by applicable law, Remio generally offers individuals in the EU and UK (together: “EEA/UK Consumers”) the opportunity to choose whether their Personal Data may be (i) disclosed to third-party controllers or (ii) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant EEA/UK Consumer. To the extent required by the Privacy Shield Principles, Remio obtains opt-in consent for certain uses and disclosures of sensitive data. EEA/UK Consumers may contact Remio as indicated below regarding Remio’s use or disclosure of their Personal Data. Unless Remio offers EEA/UK Consumers an appropriate choice, Remio uses Personal Data only for purposes that are materially the same as those indicated in this Policy.

3. Data Integrity and Purpose Limitation

We only collect Personal Data that is relevant to providing our Services. We process Personal Data compatible with us providing the Services or as otherwise notified to you. We take reasonable steps to ensure that the Personal Data received under the Privacy Shield is needed for Remio’s Services, accurate, complete, and current.

4. Accountability for Onward Transfers

This Policy and the Privacy Policy describe how Remio shares Personal Data. Except as permitted or required by applicable law and in accordance with Remio’s role as a controller or processor, Remio provides EEA/UK Consumers with an opportunity to opt-out of sharing their Personal Data with third-party controllers. Remio requires third-party controllers to whom it discloses the

Personal Data of EEA/UK Consumers to contractually agree to (a) only process the Personal Data for limited and specified purposes consistent with the consent provided by the relevant EEA/UK Consumer, (b) provide the same level of protection for Personal Data as is required by the Privacy Shield Principles, and (c) notify Remio and cease processing Personal Data (or take other reasonable and appropriate remedial steps) if the third-party controller determines that it cannot meet its obligation to provide the same level of protection for Personal Data as is required by the Privacy Shield Principles. Remio may disclose Personal Data to trusted third parties as indicated in the Privacy Policy without offering an opportunity to opt-out. Remio requires that its agents and service providers that have access to Personal Data within the scope of this Privacy Shield Policy provide the same level of protection as required by the Privacy Shield Principles. We ensure that our agents process Personal Data received under the Privacy Shield in a manner consistent with our obligations under the Privacy Shield Principles unless we prove that we are not responsible for the event giving rise to the damage.

We may also need to disclose Personal Data in response to lawful requests by public authorities, for law enforcement or national security reasons, or when such action is necessary to comply with a judicial proceeding or court order, or when otherwise required by law. We do not offer an opportunity to opt-out from this category of disclosure.

5. Data Security

We use reasonable and appropriate physical, electronic, and administrative safeguards to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the nature of the Personal Data and the risks involved in processing that information.

6. Access to Personal Data

Our Privacy Policy explains how you may access and/or submit requests to review, correct, update, suppress, or delete Personal Data. You can ask to review and correct Personal Data that we maintain about you by sending a written request to support@remiovr.com. We may limit or deny access to Personal Data where providing such access is unreasonably burdensome, expensive under the circumstances, or as otherwise permitted by the Privacy Shield Principles.

When Remio acts on behalf of its Users, Remio will assist Users in responding to individuals exercising their rights under the Privacy Shield Principles.

If you are a Customer of a User, please contact the User directly with your request to access or limit the use or disclosure of your Personal Data. If you contact us with the name of the User to which you provided your Personal Data, we will refer your request to that User and support them in responding to your access request.

7. Recourse, Enforcement and Dispute Resolution

If you have any questions or concerns, please write to us at the address listed below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data in accordance with the Privacy Shield Principles.

In the event we are unable to resolve your concern, you may contact [JAMS](#), which provides an independent third-party dispute resolution body based in the United States, and they will investigate and assist you free of charge. A binding arbitration option may also be available to you in order to address residual complaints not resolved by any other means. Remio is subject to the

investigatory and enforcement powers of the U.S. Federal Trade Commission (“FTC”).

Contact Information

If you have any questions regarding this Privacy Shield Policy, please contact us by email at support@remiovr.com, or please write to the following address:

Kristalic Inc. (Remio)
185 Clara Street, Suite 102D
San Francisco, California, 94107
Attention: Remio Legal

Changes to this Privacy Shield Policy

This Privacy Shield Policy may be changed from time to time, consistent with the requirements of the Privacy Shield and in accordance with the process described in the Privacy Policy. You can determine when this Privacy Shield Policy was last revised by referring to the “LAST UPDATED” date at the top of this page.