

PRIVACY POLICY

Last revised on 03/11/2021

Introduction

Thank you for accessing (the "**Website**"). This Website is operated by Finnovate Acquisition Corp. ("**we**", "**us**", "**our**", or "**Company**"). This privacy policy sets out the basis on which any Personal Information we collect from you ("**you**", "**your**", or "**User**"), or that you provide to us, will be processed by us, through the use of the Website.

We encourage you to read this privacy policy carefully and use it to make informed decisions.

Collection and Storage of Your Personal Information

We collect and use the following types of information about you:

Personal Information

Personal Information is information that identifies an individual or that may, with reasonable effort, identify an individual. We gather the following types of Personal Information:

- **Name, email address, and other contact information:** We ask for and—at your option—collect your contact data (such as name and email address) from you when you submit web forms on our Website. We will send such communications in accordance with applicable law.
- **Device information:** We collect from our Users specific types of connection details and information with regard to their device, software or hardware that may identify them, such as online identifiers, device unique identifiers (e.g. UDID, MAC address), IP address and geolocation.
- **Analytics data:** Our servers automatically record certain information regarding the use of our Website, using third-party analytics providers such as Google Analytics. Such data may include information such as the website that you were visiting before accessing our Website and other statistics related to our Website. We also perform statistical analysis on all of the data and metadata which is collected through our Website. We use this information to administer the Website and analyze this information to improve and enhance the Website by expanding their features and functionality. Such data is also used for troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Website.

Non-personal Information

Non-personal Information is non-identifiable information that, when taken alone, cannot be used to identify you. As such, we are not aware of the identity of the user from which the Non-personal Information was collected.

We may anonymize or de-identify the information collected by the Website or via other means so that the information cannot, on its own, personally identify you. We also collect aggregate user data regarding your use and activity on our Website. Our use and disclosure of

such aggregated or de-identified information is not subject to any restrictions under this privacy policy, and we may disclose it to others without limitation and for any purpose.

For the avoidance of doubt, if we combine Personal Information with Non-personal Information (e.g. analytics data), the combined information will be treated as Personal Information as long as it remains combined.

How we Use Personal Information

In addition to the purposes listed herein, the Personal Information we collect is used for the following purposes:

- Provide, operate, maintain, improve, and promote the Website;
- Enable you to access and use the Website and respond to your queries;
- Comply with legal obligations;
- To enforce our terms and policies;
- Process for other purposes for which we obtain your consent.

With whom do we share the Personal Information we collect?

We work with other companies who help us run our business (“**Service Providers**”). These companies provide services to help us store information (such as cloud storage companies) and otherwise operate and improve our Website. These Service Providers may only process Personal Information pursuant to our instructions and in compliance both with this privacy policy and other applicable confidentiality and security measures and regulations.

Specifically, we do not permit our Service Providers to use any Personal Information we share with them for their own marketing purposes or for any other purpose than in connection with the services they provide to us.

In addition to sharing with Service Providers as described above, we may also share your Personal Information with others in the following circumstances:

- With other subsidiaries or affiliate companies;
- With our resellers and other sales partners who may help us distribute the Website;
- In the event of a merger, sale, change in control, or reorganization of all or part of our business;
- When we are required to disclose Personal Information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- Where we have a good-faith belief sharing is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies, or as otherwise required to comply with our legal obligations; or
- As you may otherwise consent from time to time.

Third-parties who we may share your Personal Information with will be required to meet our standards on processing information and security. The Personal Information we provide them will only be provided in connection with the performance of their function.

Why we use your Personal Information

Our legal basis for collecting and using your Personal Information will depend on the Personal Information collected and the specific context in which we collect it. We normally collect Personal Information from you only where: (a) we have your consent to do so, (b) where we need your Personal Information to perform a contract with you (e.g. to deliver the service you have requested), (c) where the processing is in our legitimate interests; or (d) where we are required to collect, retain or share such Personal Information under applicable laws.

In some cases, we may need the Personal Information to protect your vital interests or those of another person.

Where we rely on your consent to process your Personal Information, you have the right to withdraw or decline consent at any time. Where we rely on our legitimate interests to process your Personal Information, you have the right to object.

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us through the contact details available below.

Cookies

When you visit or access our Website we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies (collectively, "**Tracking Technologies**"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our Website, improve our Website's performance, perform analytics and customize your experience. In addition, we may merge data we have with data collected through these tracking technologies and data we may obtain from other sources and, as a result, such data may become Personal Information.

Types of Tracking Technologies

There are three types of Tracking Technologies we use on the Website:

- **Strictly necessary Tracking Technologies** - These Tracking Technologies are essential to enable you to login, navigate around and use the features of our Website, or to provide a service requested by you. We do not need to obtain your consent in order to use these Tracking Technologies. These Tracking Technologies can be used for security and integrity reasons - for example to detect violation of our policies and for support or security features.
- **Functionality Tracking Technologies** - These Tracking Technologies allow our Website to remember choices you make and provide enhanced and personalized features.
- **Performance Tracking Technologies** - These Tracking Technologies collect information about your online activity (for example the duration of your visit our Website), including behavioral data and content engagement metrics. These Tracking Technologies are used for analytics, research and to perform statistics (based on aggregated information).

Tracking technologies used on the Website

Tracking Technologies	Type	Purpose
Analytics Cookies	First party Tracking Technology	Performance Tracking Technologies These Tracking Technologies are used to collect information regarding how you interact with the content on our Website, attribution purposes (for example, the referral URL), etc. We use the information to compile reports, calculate the revenues due to us and, help us improve the Website.
Google Analytics	Third party Tracking Technology	Performance Tracking Technologies This cookie is used to collect information about how visitors use our Website. We use the information to compile reports and to help us improve the Website. The cookies collect the number of visitors to the Website, where visitors have come to the Website from and the pages they visited, and other data. Google Privacy Policy
New Relic	Third party Tracking Technology	Functional Tracking Technologies This cookie is used to store a session identifier so that New Relic can monitor session counts for our Website New Relic's Privacy Policy .
Other cookies	First and Third party Tracking Technology	Strictly necessary Tracking Technologies - these unlisted cookies might be in use on internal sections of the Website, in order to customize and simplify the user experience on the site by remembering choices you made and your log in credentials.

Storing Tracking Technologies

We store Tracking Technologies when you visit or access our Website (typically, when you are access our Application). These are called "First Party Tracking Technologies". In addition, Tracking Technologies are stored by other third parties (for example our analytics service providers, business partners and advertisers) – these are called "Third Party Tracking Technologies".

Both types of Tracking Technologies may be stored either for the duration of your visit on our Website or for repeat visits.

How to Manage Your Tracking Technologies Settings

There are various ways in which you can manage and control your Tracking Technologies settings. Please remember that, by deleting or blocking Tracking Technologies, some of the features of the Website may not work properly or as effectively.

You may remove the cookies by following the instructions of your device preferences. However, if you choose to disable cookies, some features of the Website may not operate properly and your online experience may be limited.

We also use a tool called “**Google Analytics**” to collect information about your use of the Website. Google Analytics collects information such as how often users access the Website, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Website. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to the Website is restricted by the Google Analytics [Terms of Use](#) and the [Google Privacy Policy](#).

Your Rights

Certain jurisdictions provide Users with certain statutory rights to their Personal Information. You may have the right to certain actions to your Personal Information such as:

- To receive confirmation as to whether or not Personal Information concerning you is being processed, and access your stored Personal Information, together with certain supplementary information.
- To receive Personal Information you directly volunteer to us in a structured, commonly used and machine-readable format.
- To request rectification of your Personal Information that is in our control.
- To request erasure of your Personal Information.
- To object to the processing of Personal Information by us.
- To request to restrict processing of your Personal Information by us.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

If you wish to raise a complaint on how we have handled your Personal Information, you can contact us at the contact details available below.

If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you can file a complaint to the applicable data protection authority.

For how long do we retain the Personal Information that we collect?

We retain the Personal Information that we collect from Users for as long as needed to provide our service in relation to the Website and to comply with our legal obligations, resolve disputes and enforce our agreements (unless we are instructed otherwise). Retention periods will be determined taking into account the type of the Personal Information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused Personal Information at the earliest reasonable time. Under applicable regulations, we will keep records containing your Personal

Information, account opening documents, communications and anything else as required by applicable laws and regulations.

International Transfer (for EEA residents)

Since we operate globally, it may be necessary to transfer data, including Personal Information, to countries outside the EEA. In these instances, we will transfer your Personal Information only to such countries as approved by the European Commission as providing adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

How do we safeguard your Personal Information?

We take great care in implementing and maintaining the security of the Website and your Personal Information. We employ industry standard procedures to ensure the confidentiality, integrity, and availability of our Users' data, safety of your Personal Information, and prevent unauthorized use of any such information.

However, we cannot guarantee that hackers or unauthorized personnel will not gain access to Personal Information despite our efforts. You should note that by using our Website, your Personal Information will be transferred through third party infrastructures which are not under our control. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

If you feel that your privacy was treated not in accordance with this privacy policy, please contact us directly at the contact details available below.

Minors

We do not knowingly collect or solicit personal information from anyone under the age of consent (as determined under the applicable laws where the individual resides; “**Age of Consent**”). By accessing, using or interacting with our Website you certify to us that you are not under the Age of Consent. In the event that we learn that we have collected personal information from an individual under the Age of Consent without verification of parental consent, we will delete that information upon discovery. If you believe that we might have any information from or about an individual under the Age of Consent, then please contact us through the contact details available below.

Changes to the policy

We reserve the right to change this privacy policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this privacy policy through our Website or we will send you an e-mail regarding such changes to the e-mail address that you volunteered (if you have volunteered it). Such substantial changes will take effect seven (7) days after such notice was provided on any of the above mentioned methods. Otherwise, all other changes to this Policy are effective as of the stated “Last Revised” date, and your continued use of the Website after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

How to contact us

If you have any questions about this policy, please contact us at:
info@FinnovateAcquisition.com or by post to:

The White House, 20 Genesis Close, George Town, Grand Cayman KY1 1208, Cayman Islands