

PRIVACY POLICY

Effective Date: September 1st, 2020

Spark XR, Inc. ("SparkXR"), collects and uses your Personal Data (as defined below) when you make use of our sensory virtual reality booths ("Pods") which contain software ("Experiences") designed for use in the Pods and certain post-experience interactions such as links to websites (collectively, the "Content Platform" or the "Service").

This Privacy Policy explains how we use Personal Data and your rights in relation to your Personal Data collected and under the control of SparkXR.

Please be aware that:

- At any time, **you may request a copy of your Personal Data** or if applicable that of your child by emailing us from the email address you used to register and requesting same to: datarequest@alulaadventures.com. For full details please see 6.a. Right of Access, below.
- At any time, **you may instruct us to delete your Personal Data** or if applicable that of your child by sending us an email from the email address you used to register and requesting same to: deletemydata@alulaadventures.com. For full details please see 6.c. Right to Erasure, below.
- By visiting, accessing or using the Service, **you expressly consent to our collection, storage, use and disclosure of your Personal Data** as described in this Privacy Policy.
- If you disagree with anything in this Privacy Policy, you must not use the Service.
- **Data that you may separately provide to third-parties**, such as the locations and operators of our Experiences, **are not covered by this Privacy Policy**. Please refer to such third-party for details of their Privacy Policies if you provided them with information.

This Privacy Policy is part of, and is governed by, the terms and conditions set forth in our Terms of Service located here: <https://www.alulaadventures.com/aua-legal>.

SparkXR respects the privacy of the users and customers of its products and services and complies with applicable laws for the protection of your privacy, including, without limitation, the European Union General Data Protection Regulation ("GDPR").

1. Definitions

Wherever we talk about Personal Data, we mean any information that can either itself identify you as an individual ("Personally Identifying Information") or that can be connected to you indirectly by linking it to Personally Identifying Information ("Personal Data"). SparkXR also processes anonymous data, aggregated or not, to analyze and produce statistics related to the habits, usage patterns, and demographics of customers as a group or as individuals. Such anonymous data does not allow the identification of the customers to which it relates. SparkXR may share anonymous data, aggregated or not, with third parties.

2. Why SparkXR Collects and Processes Data

SparkXR collects and processes Personal Data for the following reasons:

- where it is necessary for delivery and successful operation of our Content Platform and fulfilment to you of the features offered and on-going improvements to such a Service;

- where it is necessary for compliance with legal obligations that we are subject to (e.g. our obligations to keep certain information under tax laws);
- where it is necessary for the purposes of the legitimate and legal interests of SparkXR or a third party (e.g. the interests of our other customers), except where such interests are overridden by your prevailing legitimate interests and rights; or
- where you have given consent to it.

These reasons for collecting and processing Personal Data determine and limit what Personal Data we collect and how we use it (section 3. below), how long we store it (section 4. below), who has access to it (section 5. below) and what rights and other control mechanisms are available to you as a user (section 6. below).

3. What Data We Collect and Process

a. Basic Account Data

When registering to use the Experience, SparkXR will collect your email address, full-name, preferred language and whether you are 13 years old or over. This information is necessary in order to validate that you are an eligible user of the Experience and to allow us to send you follow-up information, including a copy of the Waiver you signed during registration and in some instances, a digital journal of your Experience. During setup of your account, the account is automatically assigned a number (the "Session ID") that is later used to reference your user account without directly exposing Personally Identifying Information about you.

We do not require you to provide or use your real name for registration, however a valid email address will be necessary for us to send you a copy of the Waiver.

b. Transaction and Payment Data

At this time, we do not collect or handle any payments from you. This may change in future so please check back periodically to review any changes to this Privacy Policy, which you can find here: <https://www.alulaadventures.com/aua-legal>.

c. Other Data You Explicitly Submit

We will collect and process Personal Data whenever you explicitly provide it to us through registration or other forms of communication. This data includes:

- Information you provide when you request information or support from us
- Information you provide to us when participating in competitions, contests and tournaments or responding to surveys, e.g. your contact details.

d. Your Use of SparkXR Websites

We collect a variety of information through your general interaction with SparkXR websites. Personal Data we collect may include, but is not limited to, browser and device information, data collected through automated electronic interactions and application usage data. Likewise, we may track your process across our websites and applications to verify that you are not a bot and to optimize our services.

The Service may include links to third party websites and/or social media services where you will be able to post comments, stories, reviews or other information. Your use of these third-party websites and social media services may result in the collection or sharing of information about you by these third-party websites and social media services. We encourage you to review the privacy policies and settings on the third-party websites and social media services with which you interact to make sure you understand the information that may be collected, used, and shared by those third-party websites and social media services.

e. Your Use of Experiences

In order to provide you with services, we need to collect, store and use various information about your activity in our Content Platform. "Content-Related Information" includes your Session ID, as well as telemetry, or data we gather while you are using the Experience, including but not limited to your progress, use time, choices and error data.

f. Tracking Data and Cookies

When you visit a website of SparkXR or associated webpage link we may direct you to following one of our experiences, our servers log your global IP address, which is a number that is automatically assigned to the network your computer is part of. On our websites and webpages, we use "Cookies", which are text files placed on your computer, to help us analyze how users use our services, and similar technologies (e.g. web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across different devices and our services, as well as to improve the services we are offering, to improve marketing, analytics or website functionality. The use of Cookies is standard on the internet. Although most web browsers automatically accept cookies, the decision of whether to accept or not is yours. You may adjust your browser settings to prevent the reception of cookies, or to provide notification whenever a cookie is sent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser. To find out more about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org. The management of the use of cookies for each major browser is further detailed on the following help page: <https://www.whatismybrowser.com/guides/how-to-enable-cookies/>. However, please note that if you do disable Cookies, you may not be able to access the full functionality of our websites.

g. Analytics

Our websites may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on visitors' computers, to help the website operators analyze how visitors use the site. The information generated by the cookie about the visitors' use of the website will generally be transmitted to and stored by Google on servers in the United States.

On this website, IP anonymization has been activated. The IP addresses of users visiting Steam will be shortened. Only in exceptional cases will a complete IP address be transferred to a Google server in the United States and shortened there. On behalf of the website operator, Google will use this information for the purpose of evaluating the website for its users, in order to compile reports on website activity, and to provide other services relating to website activity and internet usage for website operators.

Google will not associate the IP address transferred in the context of Google Analytics with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that in this case you may not be able to use the full functionality of this website.

Furthermore, users can prevent the collection of data about their use of the website (including their IP address) generated by the cookie, and the processing of data by Google, by downloading and installing the browser plug-in through the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

h. Content Recommendations

Subject to your consent by signing the Waiver during registration or where explicitly permitted under applicable laws on email marketing, SparkXR may send you marketing messages about products and services offered by SparkXR or our clients or partners to your email address. In such a case we may also use your collected information to customize such marketing messages as well as collect information on whether you opened such messages and which links in their text you followed. . For information about how tracking works for online advertising purposes, and what happens when you elect a do-not-track option, visit <http://www.aboutads.info/choices>. In addition, some third-party businesses may provide a mechanism to opt-out of their technology. For more information about the opt-out process, you may visit the Network Advertising Initiative website, available at: http://www.networkadvertising.org/managing/opt_out.asp.

You can opt out or withdraw your consent to receive marketing emails at any time by clicking the "unsubscribe" link provided in such marketing email, or if not included, by sending an email from the email address to be unsubscribed to unsubscribe@alulaadventures.com. This will stop any marketing emails being sent but will not delete your Personal Data. You may instruct us to request the deletion of your Personal data under the control of SparkXR or the Personal Data of your child at any time by sending us an email from the email address you used to register, to deletemydata@alulaadventures.com. As a result of deleting your Personal Data, you will need to re-register in order to use the Content Platform in future.

4. How Long We Store Data

We will only store your information as long as necessary to fulfil the purposes for which the information is collected and processed or — where the applicable law provides for longer storage and retention period — for the storage and retention period required by law. After that your Personal Data will be deleted, blocked or anonymized, as provided by applicable law.

Please note that where applicable SparkXR may be required to retain certain transactional data under statutory commercial and tax law for a period of up to ten (10) years.

5. Who Has Access to Data

a. Service Providers

SparkXR may disclose your Personal Data to our employees, contractors, customers, vendors, suppliers and licensors who provide certain services or content to us or on our behalf, such as operating and supporting the Service, customer support, analyzing data, or performing marketing or consulting services. These service providers will only have access to the information to perform these limited

functions. In the event of a reorganization, sale or merger we may transfer Personal Data to the relevant third party subject to applicable laws.

b. Relevant Authorities

To the extent permitted by law, we will disclose your Personal Data to government authorities or third parties if: (i) required to do so by law, or in response to a subpoena or court order; (ii) we believe, in our sole discretion, that disclosure is reasonably necessary to protect against fraud, to protect the property or other rights of SparkXR, other users, customers, third parties and/or the public at large; or (iii) we believe that you have abused the Service by attacking it, using it to attack other systems or to gain unauthorized access to any other system, to engage in spamming or otherwise to violate applicable laws. You should be aware that, following disclosure to any third party, your information may be accessible by others to the extent permitted or required by applicable law.

c. Partners

We may share some or all of your Personal Data with operators of our Experiences, business partners, content providers, subsidiaries and corporate affiliates, joint venturers, or other companies under common control with us. If you opt-in to receive marketing communications from SparkXR, we may also permit these entities to use your information for their own marketing purposes. If you would like us to stop providing your information to our Affiliates for their own marketing purposes, you may opt-out by emailing us at unsubscribe@alulaadventures.com.

6. Your Rights and Control Mechanisms

The data protection laws of the European Economic Area and other territories grant their citizens certain rights in relation to their Personal Data. While other jurisdictions may provide fewer statutory rights to their citizens, we make the tools designed to exercise such rights available to our customers worldwide.

a. Right of Access

You have the right to access your Personal Data that we hold about you and under our control, i.e. the right to require free of charge:

- (i) information whether your Personal Data is retained;
- (ii) duplicates of the Personal Data retained. You can request this information at any time by emailing us and requesting same to: datarequest@alulaadventures.com. If such a request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee (taking into account the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request.

b. Right to Rectification.

If we process your Personal Data, we shall endeavor to ensure by implementing suitable measures that your Personal Data is accurate and up-to-date for the purposes for which it was collected. If your Personal Data is inaccurate or incomplete, you can email us with your updated information at: support@alulaadventures.com.

c. Right to Erasure

You have the right to obtain deletion of Personal Data concerning you if the reason why we could collect it (see section 2. above) does not exist anymore or if there is another legal ground for its deletion. You may instruct us to delete the Personal data or the Personal Data of your child under the control of SparkXR at any time by sending us an email from the email address you used to register, to deletemydata@alulaadventures.com, following which such Personal Data will be marked for deletion except to the degree legal requirements or other prevailing legitimate purposes dictate a longer storage. As a result of deleting your Personal Data, you will need to re-register in order to use the Content Platform in future.

d. Right to Object

When our processing of your Personal Data is based on legitimate interests according to Article 6(1)(f) of the GDPR or section 2 of this Privacy Policy, you have the right to object to this processing. If you object we will no longer process your Personal Data and delete your account (per 6.c, above) unless there are compelling and prevailing legitimate grounds for the processing as described in Article 21 of the GDPR; in particular if the data is necessary for the establishment, exercise or defense of legal claims. As a result of deleting your Personal Data, you will need to re-register in order to use the Content Platform in future.

You also have the right to lodge a complaint at a supervisory authority.

e. Right to Restriction of Processing of Your Personal Data

You have the right to obtain restriction of processing of your Personal Data under the conditions set out in article 18 of the GDPR. If you do we will no longer process your Personal Data and delete your account (per 6.c, above). As a result of deleting your Personal Data, you will need to re-register in order to use the Content Platform in future.

f. Right to Personal Data Portability

You have the right to receive your Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller under the conditions set out in article 20 of the GDPR. You can request this information at any time by emailing us at: datarequest@alulaadventures.com.

g. Right to Post-Mortem Control of Your Personal Data

If French data protection legislation is applicable to you, you have the right to establish guidelines for the preservation, the deletion and the transmission of Personal Data after your death in accordance with article 40-1 of the Act No 78-17 of 6 January 1978 on Information, Technology, Data Files and Civil Liberties.

7. Children

The minimum age to register for a SparkXR Experience is 13. SparkXR will not knowingly collect Personal Data from children under this age. A parent or guardian of a child may sign an Agreement to Participate, Liability Waiver, Assumption of Risk and Release Agreement (“Waiver”) on their behalf allowing them to use an Experience, and under these circumstances, a name for the child is registered with SparkXR and

associated with the email address provided by the parent or guardian. You can request this information at any time by emailing us from the email address you used to register at: datarequest@alulaadventures.com and/or may instruct us to delete your Personal Data or the Personal Data of your child under the control of SparkXR at any time by sending us an email from the email address you used to register, to deletemydata@alulaadventures.com.

8. Security

SparkXR uses commercially reasonable efforts to implement industry standard security measures intended to protect against the loss, misuse and alteration of the Personal Data under our control. Please be aware that no data transmission over an Internet connected network or stored on any system can be guaranteed to be 100% secure. As a result, we cannot guarantee or warrant the security of any Personal Data that we have collected, and you provide such data to us at your own risk.

9. Changes to this Privacy Policy

SparkXR reserves the right to update and/or change the terms of this Privacy Policy. You can review the Privacy Policy currently in effect at <https://www.alulaadventures.com/aua-legal>. You are encouraged to periodically review the Privacy Policy so that you are informed about the type of information we collect, how it will be used, and under what circumstances, if any, we may disclose your information. If you do not agree to the Privacy Policy, either now or in future, you should discontinue your use of the Service by requesting the deletion of your Personal Data as provided in section 6.c, above.

10. Disputes

You can contact SparkXR customer support at the address below.

Spark XR Inc., 175W 200S, Ste.#100, Salt Lake City, Utah 84101, USA.

We are also available by email at support@alulaadventures.com to address any concerns you may have regarding your use of the Service. Most concerns may be quickly resolved in this manner.

11. Contact Info

You can contact SparkXR data protection officer at the address below.

Spark XR Inc., 175W 200S, Ste.#100, Salt Lake City, Utah 84101, USA.

We are also available by email at legal@alulaadventures.com to address any concerns you may have regarding your Personal Data. Most concerns may be quickly resolved in this manner.