

Privacy Policy

Last Updated: May 1, 2020

This Privacy Policy (“**Policy**”) explains how Pica Trebax Inc., a New Hampshire corporation (“**Engre**”, “**we**”, “**us**” or “**our**”) applies privacy practices to those who visit the website located at <https://engre.co> (the “**Website**”) and any content or service provided through the website (the “**Services**”). For purposes of this Policy, personal data shall mean any information relating to an identified or identifiable natural person. This might be by reference to an identifier such as a name, ID number, location data or online identifier, or by factors specific to them, such as their physical, genetic, economic or social identity.

This Policy describes how we collect, use, share and secure the personal data of the users of our Services (the “**User(s)**” or “**you**” or “**yours**”, as applicable). It also describes the User’s choices regarding use, access and correction of the User’s personal data. The capitalized terms used in this Policy but not defined herein shall have the same meaning assigned to them in our Terms of Services: [https://engre.co/static/Terms_of_Services_\(Engre\).pdf](https://engre.co/static/Terms_of_Services_(Engre).pdf) (the “**Terms**”).

By using our Services, you express your unconditional agreement with this Policy and the conditions of processing the personal data contained herein. If you do not accept this Policy, do not use our Services or provide any Personal Information to us.

1. Information We Collect

Engre gathers the following categories of information: (1) personally identifiable information that is supplied voluntarily upon registration for Services; (2) aggregate tracking and site usage information that is gathered automatically when you use the Services; or (3) information obtained from third-parties.

A. Information You Provided to Us

Personal Information

When you register for an account to access or utilize Services (an “**Account**”), we ask for and may collect Personal Information that can be used to identify you (“**Personal Information**”), such as your name, e-mail address, billing address and phone number.

Payment Information

If you use the Services to make or receive payments, we ask you to provide us certain payment information such as credit card or other financial account information, and billing address.

We use third party payment processors (“**3rd Party Payment Processor**”) to assist in securely processing your personally identifiable payment information, including recurring charges (if any). The credit card information or other financial information that you provide is encrypted and transmitted directly to the 3rd Party Payment Processor. We do not store your credit card information and do not control and are not responsible for 3rd Party Payment Processor or its collection or use of your information. Currently, we will use either Stripe or PayPal as our 3rd Party Payment Processors. You can find out more about how your credit card or other financial information is collected and used by accessing such 3rd Party Payment Processor’s privacy policies.

B. Information Collected Automatically

We and our third-party service providers, including analytics and third-party content providers, may automatically collect certain information from you whenever you access or interact with the Services. This information may include, among other information, the browser and operating system you are using, the URL or advertisement that referred you to the Services, the search terms you entered into a search engine that led you to the Services, areas within the Services that you visited, which links you clicked on, which pages or content you viewed and for how long, other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

The information we collect include your IP address, which is a number assigned to your computer or internet-enabled device whenever you access the internet. It allows computers and servers to recognize and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to maintain and improve Services and to generate and analyze statistics about Services and your use of Services.

We may use the following technology to automatically collect information from you:

Cookies

Cookies are text files put on your computer to collect standard internet log information and visitor behavior information. This information is then used to track visitor use of the website and to create statistical reports on website activity. A cookie may also convey anonymous information about how you browse the Website to us. A cookie does not collect Personal Information about you.

You can set your web browser or device to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Services may not function properly if the ability to accept cookies is disabled.

Beacons

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. We only use web beacons in accordance with applicable laws. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our Services, to monitor how our Users navigate the Services, or to count how many particular articles or links were actually viewed

C. Third Party Services

We may provide an option to access or register for Services through the use of your user name and passwords for certain services provided by third parties (each, an “**Third Party Services**”), such as through the use of your Facebook, LinkedIn, or Google account. By authorizing us to connect with a Third-Party Services, you authorize us to access and store the information that the Third-Party Services makes available to us, and to use and disclose it in accordance with this Policy. It is your responsibility to check your privacy settings for such Third-Party Services (please review the terms of use and privacy policy of such Third-Party Services) to control what information is available to us.

2. How We Use Information

Permitted Purposes

We may use the information we collect about you (including Personal Information, to the extent applicable) for a variety of purposes, including to (a) provide, operate, maintain, improve, and promote our Services; (b) enable you to access and use Services; (c) process and complete transactions; (d) provide customer service and support and send you related notices; (e) send promotional communications; (f) monitor and analyze trends, usage, and activities in connection with Services and for marketing or advertising purposes; and (g) monitor and assess compliance with our policies and standards.

We may also use your information with your consent: (h) to serve advertising tailored to your interests on our Website and third-party services; (i) to send you newsletter and other promotional communications about our and third-party products, offers, rewards and services; and (j) for other purposes for which we obtain your consent.

3. How We Share the Information

Information about Services Contracts

We share information regarding Providers who have entered into a Services Contract with a Client. If you choose to post your information as a Services Provider via the Services, we may share relevant information with the applicable Client(s), including, but not limited to, the information contained in your Profile.

Third-Party Services Providers

We share information, including Personal Information, with our third-party service providers that we use to provide hosting for and maintenance of Services. These third-party service providers may have access to or process your Personal Information for the purpose of providing these services for us. We do not permit our third-party service providers to use the Personal Information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

We may also instruct the third-party service providers to process personal data for the permitted purposes set forth in Section 2 above on our behalf and in accordance with our instructions only. We will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.

Analytic Providers and/or Advertising Partners

We may in the future work with network advertisers, ad agencies, analytics service providers and other vendors to provide us with information regarding traffic on the Services ("**Advertisers**"), including pages viewed and the actions taken when visiting the Services; to serve our advertisements on other website, within mobile apps and elsewhere online; and to provide us with information regarding the use of the Services and the effectiveness of our advertisements. Our service providers may collect information about your visits to and activity on the Services as well as other websites or services, they may set and access their own tracking technologies on your device, and may use that information to show you targeted advertisements. We will provide you the option to opt out of interest-based advertising if we decide to work with Advertisers in the future.

Compliance with Law

We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process. We may also share such information if we believe it is necessary in order 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 terms and conditions, or as otherwise required by law.

Organizational Changes

We may share your personal data with any third party to whom we assign or novate any of our rights or obligations, or that acquires all or substantially all of our business, stock or assets, or with whom we merge.

Aggregate Data

We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop and improve our Services.

With your Consent

We will otherwise only disclose your personal data when you direct us or give us permission to do so, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

Where we rely on your consent to process the Personal Information, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible consequences if you do not provide your Personal Information). Similarly, if we collect and use your Personal Information in reliance on our (or a third party's) legitimate interests which are not already described in this Notice, we will make clear to you at the relevant time what those legitimate interests are.

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 at support@engre.co.

4. How Long We Retain Your Personal Information

We will retain your Personal Information for as long as is needed to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it, or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. For Personal Information that we process on behalf of our Registered Users, we will retain such Personal Information in accordance with the terms of our agreement with them, subject to applicable law.

5. Your Privacy Rights

Upon request we will provide you with information about whether we hold, or process on behalf of a third party, any of your Personal Information. To request this information please contact us at support@engre.co. Subscribers may update or change their Account Information by editing their profile within Services. To make a request to have Personal Information maintained by us returned to you or removed, please email support@engre.co. Requests to access, change, or remove your

information will be handled within thirty (30) days; provided that, notwithstanding such request, this information may be retained for as long as you maintain an account for Services, or as needed to provide you with Services, comply with our legal obligations, resolve disputes and enforce our agreements.

Objections to Processing of Personal Information

It is your right to lodge an objection to the processing of your personal data if you feel the “ground relating to your particular situation” apply. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defense of a legal claims. To invoke this right, please contact us at support@engre.co. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

California Privacy Rights

We will not share any Personal Information with third-parties for their direct marketing purposes to the extent prohibited by California law. If our practices change, we will do so in accordance with applicable laws and will notify you in advance.

Policy Regarding Children

Services is not directed to children under the age of thirteen and we do not knowingly collect personally identifiable information from children under the age of thirteen (13) as part of Services. If we become aware that we have inadvertently received personally identifiable information from a User under the age of thirteen as part of Services, we will delete such information from our records. If we change our practices in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from children under the age of thirteen as part of Services.

Online Advertising

We may use in the future platforms (“**Platforms**”) to promote our Services through interest-based ads. We do not, however, share your Personal Information with the Platforms for the promotion of our Services through interest-based ads.

If you do not want to receive interest-based ads on the Platforms, you can adjust your ad preference in accordance with the instructions provided by such Platform.

6. Public Profiles

The profile you create on the Website will be publicly accessible unless otherwise indicated.

7. Changes to our Privacy Policy

If we change the Policy, we will post the revised Policy here with an updated revision date. Please check frequently the Site to see if the Policy is changed. If we make significant changes to our statement, we also may, but are not obliged to, notify all members whose Personal Information we have retained by means such as sending an email or posting a notice on our Site. Your continued use of Services constitutes your acceptance of all such changes and amendments. Your sole remedy is to cease using Services.

8. Contacting Us

If you have any questions regarding this Policy or information we hold about you, you may contact us at support@engre.co. In order for us to take the appropriate action, please describe in reasonable detail the nature of your request or inquiry.

9. Privacy Notice for California Residents.

This Privacy Notice for California Residents (this “**CCPA Notice**”) supplements the information contained in the Policy and except as provided herein, applies solely to California residents. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this CCPA Notice.

This CCPA Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. Where noted in this CCPA Notice, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication (“**B2B personal information**”) from some its requirements.

A. Information We Collect

We or our service providers may collect the below categories of information for the following business or commercial purposes (as those terms are defined in applicable law):

- Providing the Services (e.g., account servicing and maintenance, matching freelancer talent with client needs, customer service, advertising and marketing, analytics, and communication about the Services);
- Our or our service providers' operational purposes;
- Auditing consumer interactions on our site (e.g., measuring ad impressions);
- Detecting, protecting against, and prosecuting privacy and security incidents and fraudulent or illegal activity;
- Bug detection, error reporting, and activities to maintain the quality or safety of our Services;
- Investigating compliance with, enforcing, and/or complying with the law;
- Short-term, transient use, such as customizing content that we or our service providers display on the Services;
- Improving our existing Services and developing new services (e.g., by conducting research to develop new products or features);
- Other uses that advance our commercial or economic interests, such as third-party advertising and communicating with you about relevant offers from us or third-party partners;
- Other uses about which we notify you.

Examples of these types of uses are identified below. We may also use the below categories of personal information for compliance with applicable laws and regulations, and we may combine the information we collect (“aggregate”) or remove pieces of information (“de-identify”) to limit or prevent identification of any particular user or device.

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information	A name, signature, Social Security number,	YES

categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO

I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

B. Your Rights

The CCPA provides California residents with specific rights to request information about our collection, use and disclosure of your personal information over the prior twelve (12) months, and ask that we provide you with the following information:

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources from which we collect personal information.
- Purpose for collecting, using or selling personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (known as “data portability request”).
- If applicable, categories of personal information sold about you and the categories of third parties to which the personal information was sold.

We do not provide these access and data portability rights for B2B personal information.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

We do not provide these deletion rights for B2B personal information.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at: support@engre.co. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include: First Name, Last Name, Email used to register with Engre, and Phone Number
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

10. Privacy Notice for Data Subjects in the European Economic Area (EEA) and Switzerland.

This Privacy Notice for Data Subject in the EEA and Switzerland (this “**EEA Notice**”) supplements the information contained in the Policy and discloses information about the privacy practice with respect to personal data protected under the General Data Protection Regulation (“GDPR”) for the EEA. Your personal information would constitute EEA Personal Data if: (i) it is “personal data” as defined in the GDPR; and (ii) the GDPR includes protection of the personal data in its scope.

A. What is Personal Data and the Scope of the GDPR?

The GDPR defines “personal data” broadly. It includes “any information relating to an identified or identifiable natural person.” Examples of personal data include your “name, an identification number, location data, an online identifier [and] factors specific to [your] physical, physiological, genetic, mental, economic, cultural or social identity.” GDPR. Article 4(1).

The GDPR generally applies to collecting, using or other “processing” (please see below) of personal data (as provided in Article 3):

1. When the processing is part of the activities of an organization that acts in an established way in the EEA. It's not required that the processing take place in the EEA.
2. When the processing is by an organization that is not established in the EEA and the organization offers goods or services to persons who are physically in the EEA. A payment for the goods or services is not required.
3. When the processing is by an organization that is not established in the EEA and the processing activities are related to the monitoring of the behavior of a person who is physically in the EEA, as far as their behavior takes place within the EEA.

For example, if you provide personal information to Engre when you are physically present in the EEA or while you use the Services occurring in the EEA, that personal information may be EEA Personal Data.

“Processing” is a term used by the GDPR to cover any way of working with personal data, from collecting to using to sharing to destroying. GDPR Article 4 (2).

B. Transfer of Data.

Engre is a global company, based in the United States. As such, we may transfer and access such personal data from around the world, including from other countries. In transferring your personal data, we will rely on lawful measures to transfer your personal data outside the EEA and Switzerland. If you are visiting our Services from the EEA or other regions with laws governing data collection and use, please note that by providing this personal data, you acknowledge that your personal data may be transferred to the United States and other jurisdictions in which we operate.

C. Legal Basis of Processing your personal data.

If you are an individual from the European Economic Area (EEA), we may process your personal data on one or more of the following legal grounds: (i) because processing is necessary to perform a contract with you, such as to deliver Services; (ii) to comply with our legal obligations; (iii) because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms. We may also process your data based on your consent where you have expressly given that to us.

D. Your Rights.

If you are from certain territories (such as the EEA), you may have the right to exercise additional rights available to you under applicable laws, as follows:

- A right of access: you have the right to obtain confirmation as to whether personal data concerning you are processed or not and, if processed, to obtain access to such data and a copy thereof;
- A right to rectification: you have the right to obtain the rectification of any inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement;
- A right to erasure: in some cases, you have the right to obtain the erasure of personal data concerning you. However, this is not an absolute right and Engre may have legal or legitimate grounds for keeping such data;
- A right to restriction of processing: in some cases, you have the right to obtain restriction of processing of your personal data;
- A right to data portability: you have the right to receive the personal data concerning you which you have provided to Engre, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance

from Engre. This right only applies when the processing of your personal data is based on your consent or on a contract and such processing is carried out by automated means.

- A right to object to processing: you have the right to object at any time, on grounds relating to your particular situation, to processing of personal data concerning you when such processing is based on the legitimate interest of Engre. We may, however, invoke compelling legitimate grounds for continued processing. When your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of such data.
- A right to lodge a complaint with the supervisory authority: if your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority.

You can exercise your rights by contacting us at support@engre.co. We will respond to your request within thirty (30) days of receipt of the request.