

Covenantz, Inc.

Privacy Notice

racetoverify.com | Effective: March 2026 | v1 | Global

1. About This Notice

This Privacy Notice applies solely to www.racetoverify.com (the "Site"), a static informational and promotional microsite operated by Covenantz, Inc. ("Covenantz," "we," "us," or "the Company"), a Delaware corporation.

This Notice is directed at a global audience including visitors from the United States, the European Union and European Economic Area ("EU/EEA"), the United Kingdom ("UK"), and other jurisdictions. It explains what personal data, if any, is collected in connection with the Site, by whom, and how visitors can exercise their rights. It should be read together with the Website Terms of Use and the Cookie Notice published at this Site.

For EU/EEA and UK visitors, this Notice is provided in satisfaction of the transparency obligations under GDPR Articles 13 and 14 (and their UK GDPR equivalents) to the extent applicable to the limited processing activities described herein.

2. Identity and Contact Details of the Data Controller

To the extent Covenantz, Inc. acts as a data controller in connection with this Site (including in its capacity as the operator of the Site and as a downstream recipient of event registration data from Luma for the US and Tito or other for EU/UK), the controller is:

Covenantz, Inc.

The Corporation Trust Company, Corporation Trust Center 1209 Orange St, Wilmington, De 19801
legal@covenantz.com

Covenantz, Inc. has not yet designated an EU/EEA Representative or UK Representative under GDPR Article 27 and UK GDPR Article 27 respectively. See Section 9.

3. What Covenantz Does Not Collect

Covenantz, Inc. does not operate any data collection mechanism on this Site. Specifically:

- There are no registration forms, contact forms, newsletter signups, or any other input fields on the Site through which Covenantz directly collects personal data.
- Covenantz does not directly collect your name, email address, phone number, or any other personal identifier through this Site.
- Covenantz does not operate its own first-party analytics platform, advertising pixels, or tracking technologies on this Site.

Covenantz, Inc. is not the data controller for personal data collected by the Site's hosting infrastructure (Wix) or by any third-party platform you access through links on this Site (including Luma). Those parties process data under their own terms and privacy policies as independent data controllers.

4. Wix Hosting Platform

This Site is hosted on the Wix platform, operated by Wix.com Ltd. ("Wix"), incorporated in Israel with operations in the United States and EU. As part of normal website hosting operations, Wix automatically collects certain technical data when you visit the Site, including:

- Internet Protocol (IP) address and approximate geolocation derived from IP
- Browser type and version; operating system
- Referring URL; pages visited; time and duration of visit
- Session identifiers and cookies set by the Wix infrastructure (see Cookie Notice)

Wix processes this data as an independent controller under its own privacy policy. For information about Wix's data practices, including its GDPR compliance measures and international transfer mechanisms, please refer to Wix's Privacy Policy at www.wix.com/about/privacy and Wix's GDPR documentation at support.wix.com/en/article/gdpr.

5. Luma Event Registration (US only)

This Site provides links to event registration pages hosted on the Luma platform (lu.ma), operated by Luma Labs, Inc. or its affiliates ("Luma"). When you click through to Luma:

- You leave this Site and enter a separate, independent platform operated by Luma as an independent data controller.
- Any personal data you provide on Luma — including name, email address, and event registration information — is collected by and subject to Luma's privacy policy, not this Notice.
- Covenantz, Inc. is not a data controller or data processor for personal data you provide directly to Luma.

Covenantz, Inc. may receive attendee information from Luma for purposes of event logistics and follow-up communications. Any personal data received by Covenantz, Inc. from Luma in this capacity is handled in accordance with the Covenantz Privacy Agreement available at covenantz.com/legal/privacy, and is subject to the legal bases and rights described in this Notice.

6. Legal Bases for Processing (EU/EEA and UK Visitors)

To the extent Covenantz, Inc. processes personal data in connection with this Site, the following legal bases under GDPR Article 6 (and UK GDPR Article 6) apply:

Processing Activity	Legal Basis	Notes
Site hosting and technical operation by Wix	Wix Legitimate Interests (Wix is controller)	Not Covenantz processing; Wix policy governs
Receipt of event attendee data from TITO for logistics	Legitimate Interests (Art. 6(1)(f)) — event management	Not Covenantz processing: Luma (U.S.) or TITO (UK/EU) or similar policy governs
Follow-up communications with event attendees	Legitimate Interests or Consent (Art. 6(1)(a) or (f))	Basis to be confirmed by GRSM based on communication type

7. International Data Transfers

Covenantz, Inc. is incorporated and based in the United States. To the extent that personal data relating to EU/EEA or UK individuals is received by Covenantz (e.g., Tito or UK/EU based attendee data), that data will be transferred to and processed in the United States.

The United States does not benefit from an EU adequacy decision under GDPR Article 45 at this time. For EU/EEA-to-US transfers, Covenantz intends to rely on the EU-US Data Privacy Framework (where applicable) or Standard Contractual Clauses (SCCs) approved by the European Commission under GDPR Article 46(2)(c). For UK-to-US transfers, Covenantz intends to rely on the UK International Data Transfer Agreement (IDTA) or UK Addendum to the EU SCCs.

8. Your Rights

8.1 EU/EEA and UK Residents (GDPR and UK GDPR)

To the extent Covenantz, Inc. processes your personal data as a data controller, EU/EEA residents (under GDPR) and UK residents (under UK GDPR) have the following rights:

- Right of access (Art. 15): to obtain confirmation of whether and how your data is processed, and a copy of your personal data.
- Right to rectification (Art. 16): to have inaccurate personal data corrected.
- Right to erasure (Art. 17): to request deletion of your personal data in certain circumstances.
- Right to restriction of processing (Art. 18): to restrict how your data is processed in certain circumstances.
- Right to data portability (Art. 20): to receive your data in a machine-readable format where processing is based on consent or contract.
- Right to object (Art. 21): to object to processing based on Legitimate Interests at any time on grounds relating to your particular situation.
- Right to withdraw consent: where processing is based on consent, to withdraw that consent at any time without affecting the lawfulness of prior processing.
- Right to lodge a complaint: with your national supervisory authority (EU/EEA) or the Information Commissioner's Office (UK ICO) if you believe your rights have been violated.

To exercise any of these rights, please contact Covenantz, Inc. at legal@covenantz.com. We will respond within the timeframes required by applicable law (generally 30 days, extendable by a further 60 days in complex cases).

8.2 California Residents (CCPA/CPRA)

California residents have the following rights under the California Consumer Privacy Act (Cal. Civ. Code §§ 1798.100 et seq., as amended by the California Privacy Rights Act of 2020 ("CPRA"), effective January 1, 2023):

8.2.1 Categories of Personal Information Collected

Covenantz, Inc. does not directly collect personal information through this Site. However, personal information may be collected by Wix (the Site's hosting platform) as described in Section 4. The categories of personal information that may be collected by Wix in connection with your visit to this Site include:

- Identifiers: IP address, browser identifiers, session identifiers (Cal. Civ. Code § 1798.140(v)(1)(A))
- Internet or other electronic network activity: browsing behavior on this Site, pages visited, time of visit (Cal. Civ. Code § 1798.140(v)(1)(F))
- Geolocation data (approximate, derived from IP address): see Section 8.2.3 below (Cal. Civ. Code § 1798.140(v)(1)(G))

The source of this information is your browser and device as you interact with the Site. The business purpose for collection is site hosting, security, and performance analytics, as described in Wix's privacy policy. Covenantz, Inc. does not sell or share this information. This disclosure covers the twelve (12) month period preceding the effective date of this Notice.

8.2.2 Your CCPA/CPRA Rights

To the extent Covenantz, Inc. processes personal information subject to CCPA/CPRA, California residents have the following rights:

- Right to Know (Cal. Civ. Code § 1798.100, § 1798.110, § 1798.115): to request disclosure of the categories and specific pieces of personal information collected about you, the sources, the business or commercial purposes for collection, and the categories of third parties with whom it is disclosed. Requests cover the 12-month period preceding the request date.
- Right to Delete (Cal. Civ. Code § 1798.105): to request deletion of your personal information, subject to exceptions including where retention is necessary for security, legal compliance, or completing a transaction.
- Right to Correct (Cal. Civ. Code § 1798.106): to request correction of inaccurate personal information maintained by Covenantz, taking into account the nature of the information and purposes of processing.
- Right to Opt-Out of Sale or Sharing (Cal. Civ. Code § 1798.120): see Section 8.2.4 below.
- Right to Limit Use of Sensitive Personal Information (Cal. Civ. Code § 1798.121): see Section 8.2.3 below.
- Right to Non-Discrimination (Cal. Civ. Code § 1798.125): you will not receive discriminatory treatment for exercising any of your CCPA/CPRA rights.

To submit a CCPA/CPRA rights request, please contact Covenantz, Inc. at legal@covenantz.com. We will verify your identity and respond within 45 days of receipt, extendable by a further 45 days where reasonably necessary. We will not charge a fee for processing your request unless it is excessive, repetitive, or manifestly unfounded.

8.2.3 Sensitive Personal Information — Precise Geolocation

CPRA created a distinct category of "Sensitive Personal Information" (SPI) with heightened protections (Cal. Civ. Code § 1798.140(ae)). Among the categories of SPI is "precise geolocation" — defined as a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet (Cal. Civ. Code § 1798.140(ae)(1)).

IP-address-derived geolocation data, as collected by Wix's hosting infrastructure, typically yields city- or region-level precision and generally does not meet the statutory threshold for "precise geolocation" under CPRA. Accordingly, Covenantz does not at this time classify IP-derived geolocation collected by Wix as SPI.

Covenantz, Inc. does not itself collect precise geolocation data through this Site, does not use any device GPS or fine-grained location signals, and does not use geolocation data for any purpose beyond aggregate site analytics conducted by Wix under its own terms.

California residents have the right to direct Covenantz to limit its use and disclosure of SPI to what is necessary to perform the services requested (Cal. Civ. Code § 1798.121). As Covenantz does not collect SPI through this Site, no "Limit the Use of My Sensitive Personal Information" link is required at this time.

8.2.4 No Sale or Sharing of Personal Information

Covenantz, Inc. does not sell personal information as defined under CCPA/CPRA (Cal. Civ. Code § 1798.140(ad)).

Covenantz, Inc. also does not "share" personal information for cross-context behavioral advertising as defined under CPRA (Cal. Civ. Code § 1798.140(ah)). Covenantz does not operate any advertising network, retargeting pixel, or programmatic advertising infrastructure on this Site.

The Wix hosting platform may collect analytics data in connection with your visit to this Site. Covenantz does not direct, authorize, or receive benefit from any disclosure of that data by Wix for cross-context behavioral advertising purposes. Wix's own data practices are governed by Wix's privacy policy.

Because Covenantz does not sell or share personal information, no "Do Not Sell or Share My Personal Information" opt-out link is required on this Site at this time (Cal. Civ. Code § 1798.135). This determination will be reassessed upon Didomi deployment and at each material change to the Site's technology stack.

8.2.5 Global Privacy Control (GPC)

The California Privacy Protection Agency (CPPA) has confirmed through regulation (11 CCR § 7025) and enforcement guidance that the Global Privacy Control (GPC) browser signal must be treated as a valid opt-out of sale and sharing of personal information where a business sells or shares personal information.

As Covenantz, Inc. does not sell or share personal information through this Site (see Section 8.2.4), GPC signals from California visitors do not trigger an affirmative opt-out obligation for Covenantz at this time.

Notwithstanding the above, Covenantz intends to configure Didomi, upon deployment, to detect and honor GPC signals from California visitors as a best practice and in anticipation of any future activities that could constitute sharing. In the interim period prior to Didomi deployment, GPC signals cannot be technically honored on this Site.

8.2.6 No Financial Incentive Programs

Covenantz, Inc. does not offer any financial incentive, price difference, service difference, or other benefit in exchange for the collection, retention, or sale of personal information in connection with this Site (Cal. Civ. Code § 1798.125(b)). Accordingly, no Financial Incentive Notice is required at this time. This determination will be reassessed if any incentive, discount, or preferential access program is offered in connection with this Site or the Race to Verify roadshow.

8.2.7 Notice at Point of Collection

CCPA/CPRA requires that businesses provide notice of their data collection practices "at or before the point of collection" (Cal. Civ. Code § 1798.100(b)). As Covenantz, Inc. does not directly collect personal information through this Site, the primary point-of-collection notice obligation rests with Wix (as the hosting-layer collector) under Wix's own privacy policy.

To ensure transparency for California visitors, this Privacy Notice is accessible via a link in the footer of the Site on every page. The footer link is labeled "Privacy Notice" and appears on each

page of the Site. This placement is intended to satisfy the CCPA notice-at-collection requirement to the extent Covenantz has any independent disclosure obligation for Wix-collected data associated with this Site.

8.3 Other Jurisdictions

Visitors from other jurisdictions with applicable data protection rights may also have rights to access, correct, or delete their personal data under applicable law. Please contact legal@covenantz.com to submit any such request. Covenantz, Inc. will evaluate requests in good faith under applicable law.

9. EU/EEA and UK Representative

Covenantz, Inc. does not have an establishment in the EU/EEA or UK. Under GDPR Article 27 and UK GDPR Article 27, organizations established outside the EU/EEA or UK that offer goods or services to, or monitor the behavior of, individuals in those territories are required to designate a representative in the relevant territory.

Covenantz, Inc. is in the process of evaluating and designating EU/EEA and UK Representatives. Representative designations will be published in this Notice and in the Covenantz Privacy Agreement prior to the Site being actively promoted to EU/EEA or UK audiences.

EU/EEA Representative: [To be designated — pending GRSM advice]

UK Representative: [To be designated — pending GRSM advice]

10. Children's Privacy

This Site is not directed to individuals under the age of 18 (or the applicable age of digital consent in your jurisdiction). Covenantz, Inc. does not knowingly collect personal data from minors. If you believe a minor has provided personal data in connection with this Site or any linked platform, please contact us at legal@covenantz.com.

11. Retention

Covenantz, Inc. retains personal data received in connection with this Site (including any event attendee data received from Luma for the US or Tito for UK/EU) only for as long as necessary for the purposes described in this Notice, or as required by applicable law. Event logistics data is generally retained for the duration of the roadshow series plus a reasonable administrative period thereafter, unless a longer retention period is required by applicable law or regulation.

12. Changes to This Notice

Covenantz, Inc. may update this Privacy Notice from time to time. The effective date above will reflect the date of any material revision. Material changes will be noted in an amendment notice on this Site. We encourage you to review this Notice periodically. This Notice will be updated prior to the Porto event to reflect any additional compliance measures, including EU/UK Representative designation and international transfer mechanism confirmations.

13. Contact and Complaints

For questions or concerns regarding this Privacy Notice or to exercise your data protection rights, please contact:

Covenantz, Inc. — Privacy Matters

legal@covenantz.com

EU/EEA residents who are unsatisfied with our response may lodge a complaint with their national data protection authority. UK residents may lodge a complaint with the Information Commissioner's Office (ico.org.uk).