

# PRIVACY NOTICE

**Last Updated:** January 25, 2023

Welcome! This Privacy Notice explains how Nokto, Inc. (“**Artifact**”, “**Company**”, “**we**”, “**us**”, or “**our**”) collects, uses, discloses, and otherwise processes personal information (as defined below) in connection with our websites we own and operate that link to this Privacy Notice (the “**Sites**”), our mobile application (the “**App**”) and the related content, platform, services, products, and other functionality offered on or through our online services (collectively, the “**Services**”). It does not address our privacy practices relating to Artifact employees and other personnel.

## Our Collection of Personal Information

Sometimes we collect personal information automatically when an individual interacts with our Services and sometimes, we collect personal information directly from an individual. At times, we may collect personal information about an individual from other sources and third parties, even before our first direct interaction.

If you choose not to share certain information with us, we may not be able to serve you as effectively or offer you our Services.

### Personal Information Collected from Individuals

We may collect the following personal information submitted to us by individuals through the Services:

- **Account Registration and Profile Information.** We may collect personal and/or business information that you provide when you register for an account to use our Services. This may include your name, email, and phone number. Once you create an account, you may also be able to create a profile that may be visible to other users on the Services. You may personalize your profile by including additional information about yourself and uploading a profile picture. We use this information to administer your account, provide you with the relevant services and information, communicate with you regarding your account, the Services, and for customer support purposes.
- **Inquiries and Other Communications.** If you communicate with us through any form, we may collect your name, email address, mailing address, phone number, or any other personal information you choose to provide to us. We use this information to investigate and respond to your inquiries, and to communicate with you, to enhance the services we offer to our users and to manage and grow our organization.
- **Messages and User Content.** You may upload or transmit data or information through your communications with us, your communications with other users, or your use of the Services (collectively, “User Content”). For instance, you may post comments about articles that are shown publicly, or send messages or links to other users privately. User Content and any information contained in the User Content, including personal information you may have included, is stored and collected as part of the Services. We use the User Content to fulfill the reason why it was provided (i.e., post your comments or send your messages), and to operate, improve, personalize, and optimize the Services, including to manage and deliver advertising.
- **Survey Information** includes information submitted through surveys or from the content of any testimonials.
- **Your phone and social network contacts, with your permission.** We may access your phone contacts – with your permission – to allow you to invite your friends to join the Services. You may also choose to find other users through your phone contacts, in which case we will access and collect the names and phone numbers, and match that information against existing users of the App. If you choose to find other users through your social network contacts, we will collect your public profile information as well as names and profiles of your social network contacts.
- **Employment Application Information**, including your contact and demographic information, educational and work history, employment interests, information obtained during interviews and any other information you choose to provide, if you apply for employment.

- **Other Data You Share.** We also collect personal information at such other points on our Services so that we may provide the features or functionality of the Services and for other purposes described in this Privacy Notice. We may also collect your personal information or data if you submit it to us in other contexts.

### **Personal Information Automatically Collected**

As is true of most digital platforms, we and our third-party providers may also collect personal information from your device, browsing actions and website or app usage patterns automatically when visiting or interacting with our Services, which may include **log data** (such as internet protocol (IP) address, operating system, browser type, browser ID, the URL entered and the referring page/campaign, date/time of visit, the time spent on our Services and any errors that may occur during the visit to our Services), **analytics data** (such as the electronic path taken to our Services, through our Services and when exiting our Services, as well as usage and activity on our Services such as reading an article or performing a search) and **location data** (such as general geographic location based on the log data we or our third-party providers collect).

We and our third-party providers may use (i) cookies or small data files that are stored on your computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, “**cookies**”) to automatically collect this personal information.

We may also use cookies to remember your log in credentials to subscription services.

For more information on our and third-party partners’ data collection and online advertising practices, please see the [Third Party Data Collection and Online Advertising](#) section of this Privacy Notice.

### **Personal Information from Third Parties**

We may receive personal information about you from the following third parties and combine this information with other information we have:

- **Business Partners:** We may receive your information from our business partners, such as companies that offer their products and/or services on our Services.
- **Social Media.** When an individual interacts with our Services through various social media networks, such as when someone “Likes” us on Facebook or follows us or shares our content on Google, Facebook, Twitter, or other social networks, we may receive some information about individuals that they permit the social network to share with third parties. The data we receive is dependent upon an individual’s privacy settings with the social network, and may include [your profile information, profile picture, gender, username, user ID associated with your social media account, age range, language, country, and any other information you permit the social network to share with third parties]. Individuals should always review and, if necessary, adjust their privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information to operate, maintain, and provide to you the features and functionality of the Services, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.
- **Service Providers.** We may receive personal information with third-party service providers that perform services on our behalf, as needed to carry out their work for us, which may include identifying and serving targeted advertisements, providing email marketing services, web hosting, or providing analytic services.
- **Third Parties Related to Employment Applications:** If you apply for a job with Artifact, we may receive information from your current or past employers, recruiters, third-party social media platforms and other third parties we use to obtain information about job applicants.
- **Information from Other Sources:** We may also collect personal information about individuals that we do not otherwise have from, for example, publicly available sources, third-party data providers, or through transactions such as mergers and acquisitions. Such information may include contact information, employment-related information, and interest-in-services information. We may combine this information with the information we collect from an individual directly. We use this information to provide, personalize and improve the Services, contact individuals, to process employment applications and job applicant screening, to send advertising or promotional materials or to personalize our Services and to better understand the demographics of the individuals with whom we interact.

## Our Use of Personal Information

We use personal information we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to deliver the Services;
- Manage our business and its day-to-day operations;
- To provide you with the Services, including by creating a personalized content feed that is unique and relevant to you;
- Communicate with you, including via email, text message and social media;
- Request you to complete surveys about our company, companies we partner with, and the Services;
- For marketing and advertising purposes, including to market to you or offer you through email, direct mail, and updates on products or services we think that you may be interested in;
- Test, enhance, update and monitor the Services, or diagnose or fix technology problems;
- Facilitate customer benefits and services, including customer support through our command center services;
- Identify and analyze how individuals use our Services;
- Conduct research and analytics on our customer and user base and our Services;
- Improve and customize our Services to address the needs and interests of our user base and other individuals we interact with;
- Help maintain the safety, security and integrity of our property and Services, technology assets and business;
- Evaluate your candidacy for employment, to communicate with you during the application process and to facilitate the onboarding process, if you are applying for employment.
- To fulfill or enforce our legal or contractual obligations and requirements (including in relation to our [Terms of Service](#)), to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Prevent, investigate or provide notice of fraud or unlawful or criminal activity;
- For any other lawful purpose, or other purpose that you consent to or for which you provide your information.

Where you choose to contact us, we may need additional information to fulfill the request or respond to inquiries. We may provide you with additional privacy-related information where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Privacy Notice. In that case, the additional privacy notice will govern how we may process the information provided at that time.

## Our Disclosure of Personal Information

We may share your personal information in the instances described below. For further information on your choices regarding your information, see the “Control Over Your Information” section below.

Our Services may allow you to connect and interact with others. **Your profile information, including your name, and other personal information and/or information about your business, will be available publicly to other members of the Services by default when you create a profile and interact with others on the Service.**

We disclose personal information in the following ways:

- **Affiliates.** We may share personal information with other companies owned or controlled by Artifact, and other companies owned by or under common ownership as Artifact, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns, particularly when we collaborate in providing the Services.

- **Marketing Providers:** We coordinate and share personal information with our marketing providers in order to communicate with individuals about the Services we make available.
- **Other Service Providers:** In addition to the third parties identified above, we engage other third-party service providers that perform business or operational services for us or on our behalf, such as website hosting, infrastructure provisioning, IT services, analytics services, employment application-related services, payment processing services, and administrative services.
- **Ad Networks and Advertising Partners:** We may work with third-party ad networks and advertising partners to deliver advertising and personalized content on our Services, on other websites and services, and across other devices. These parties may collect information directly from a browser or device when an individual visits our Services through cookies or other data collection technologies. This information is used to provide and inform targeted advertising, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. Please see the section [Third Party Data Collection and Online Advertising](#) for more information.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy or receivership.
- **Legal Obligations and Rights:** We may disclose personal information to third parties, such as legal advisors and law enforcement:
  - o in connection with the establishment, exercise, or defense of legal claims;
  - o to comply with laws or to respond to lawful requests and legal process;
  - o to protect our rights and property and the rights and property of others, including to enforce our agreements and policies;
  - o to detect, suppress, or prevent fraud;
  - o to protect the health and safety of us and others; or
  - o as otherwise required by applicable law.
- **With Your Consent:** We may disclose personal information about an individual to certain other third parties or publicly with their consent or direction.

## Third-Party Data Collection and Online Advertising

We may participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your browsing history. We may permit third party online advertising networks, social media companies and other third-party services, to collect information about your use of our online services over time so that they may play or display ads on our Services, on other websites or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through tracking technologies, such as cookies, web beacons, embedded scripts, location-identifying technologies, and similar technology, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the Sites, AdID, general location, and other information. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising partners to help identify you across devices. We and our third-party partners may use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms. We may do this by providing a hashed version of your email address or other information to the platform provider.

Please see [Online Ads](#) of the [Control Over Your Information](#) section below, to learn how you can opt out of interest-based advertising.

**Social Media Widgets and Advertising.** Our Services may include social media features, such as the Facebook “Like” button, Pinterest, Instagram, Twitter or other widgets. These social media companies may recognize you and collect information about your visit to our Services, and they may set a cookie or employ other tracking technologies. Your interactions with those features are governed by the privacy policies of those companies.

We display targeted advertising to you through social media platforms, such as Facebook, Twitter, Instagram, LinkedIn and other social media forums. These companies have interest-based advertising programs that allow us to direct advertisements to users who have shown interest in our services while those users are on the social media platform, or to groups of other users who share similar traits, such as likely commercial interests and demographics. We may share a unique identifier, such as a user ID or hashed email address, with these platform providers or they may collect information from our website visitors through a first-party pixel, in order to direct targeted advertising to you or to a custom audience on the social media platform. These advertisements are governed by the privacy policies of those social media companies that provide them. If you do not want to receive targeted ads on your social networks, you may be able to adjust your advertising preferences through your settings on those networks.

**Third Party Partners.** We may work with a variety of third-party partners to provide advertising services. If we do, we may share a unique identifier, like a user ID or hashed email address, with the third party to facilitate the service. The third party will allow us to better understand how our users interact with our Services and to tailor our advertisements and content to you.

## Control Over Your Information

You may control your information in the following ways:

- **Access to Your Device Information.** You may control the Services’ access to your device information through your “Settings” app on your device. For instance, you can withdraw permission for the Services to access your network devices and geolocation.
- **Emails and Notifications.** You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in such communications. You may not opt-out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Services, technical and security notices). We make every effort to promptly process all unsubscribe requests.
- **Push Notifications.** You can stop receiving push notifications from us by changing your preferences in the iOS or Android notifications settings menu.
- **Modifying or Deleting Your Information.** If you have any questions about reviewing, modifying, or deleting your information, you can contact us directly at support@artifact.news
- **Cookies:** For information about our and our third-party partners’ use of cookies and related technologies to collect information automatically, and any choices you may have in relation to cookies, please see the [Information We Collect Automatically](#) section above.
- **Online Ads:** To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Digital Advertising Alliance’s (DAA) resources and/or the Network Advertising Initiative’s (NAI) online resources, at [www.aboutads.info/choices](http://www.aboutads.info/choices) or <http://www.networkadvertising.org/choices/>. You may also be able to limit interest-based advertising through the settings menu on your mobile device by selecting “limit ad tracking” (iOS) or “opt-out of interest-based ads” (Android). You may also be able to opt-out of some — but not all — interest-based advertising served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app.

Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on our online services. It means that the online ads that you do see from DAA program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third-parties’ opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our online services, including for analytics and fraud prevention as well as any other purpose permitted under the DAA’s Principles.

## **Children’s Personal Information**

Our Services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13. If an individual is under the age of 13, they should not use our Services or otherwise provide us with any personal information either directly or by other means. If a child under the age of 13 has provided personal information to us, we encourage the child’s parent or guardian to contact us to request that we remove the personal information from our systems. If we learn that any personal information we collect has been provided by a child under the age of 13, we will promptly delete that personal information.

## **Links to Third-Party Websites or Services**

Our Services may include links to third-party websites, plug-ins and applications. Except where we post, link to or expressly adopt or refer to this Privacy Notice, this Privacy Notice does not apply to, and we are not responsible for, any personal information practices of third-party websites and online services or the practices of other third parties. To learn about the personal information practices of third parties, please visit their respective privacy notices.

## **Region-Specific Disclosures**

- **Nevada:** If you are a resident of the State of Nevada, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. Although we do not currently sell covered information, please contact us at [legal@artifact.news](mailto:legal@artifact.news) with the subject line “Nevada Opt Out Request” to submit such a request.

## **Updates to This Privacy Notice**

We will update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the date at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify individuals by email to their registered email address, by prominent posting on our Services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

## **Contact Us**

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to [support@artifact.news](mailto:support@artifact.news).