

Privacy Notice for Audience and other participants

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INTRODUCTION

Thank you for choosing Kampfire to receive your personalized photo collection. Kampfire is operated by Obrecsys LLC. ("Kampfire", "We", "Us", or "Our"). We are committed to protecting your Personal Information and your right to privacy.

When this privacy notice uses the term "Audience" We refer to participants of events or in marketing campaigns of Managers or campaign managers which are using our Services (as defined below) to create events or marketing campaigns, or for any other reason.

When this privacy notice uses the terms "**Managers**" and "**Team Members**" - We refer to event managers or campaign managers using the Services, to create events or marketing campaigns and Managers' service providers, such as hosts, co-hosts, co-managers, respectively.

Audience and other participants using Our Services are all referred to in these Terms collectively as "you" or "your".

We process your Information on your behalf, and on behalf and under Managers' and Team Members' instructions, in accordance with Our data processing agreement. To learn about the privacy policy and practices of Managers and Team Members, please contact them directly.

"Audience Information" means personal information that we collect, process, and manage on behalf of Managers and Team Members, or directly from you, as part of rendering Our Services through Our Platforms.

This privacy notice applies to all information collected through Our platforms, and/or any related services, sales, marketing or campaigns (We refer to them collectively in this privacy notice as the "Platforms" or "Services").

We take your privacy very seriously, in this privacy notice, We seek to explain to you in the clearest way possible what information We collect, how We use it and what rights you have in relation to it.

Please read this privacy notice carefully as it will help you make informed decisions about sharing your Personal Information with Us.

If there are any terms in this privacy notice that you do not agree with, please discontinue use of Our Platforms and Our Services.

WHAT INFORMATION DO WE COLLECT?

When We talk about "Personal Information" in this privacy notice, We mean all of the information collected by Us as detailed below, as long as this information is by itself or with other data or information, We possess identify you or any other individual.

Specifically, We collect the following information by the following means:

***Personal information you disclose to Us: ***

The Short Story: We collect Personal Information that you provide to Us such as name, email address, and a Self-Portrait ("selfie").

We collect Personal Information that you voluntarily provide to Us:

- When you sign in to Our Platforms;
- When you download photos that Manager shared with you;
- When you upload your photos to the Platforms (Selfies) –We use facial recognition algorithms to identify and group all the photos taken of you at the event to a unique online album;
- When you interact with Our customer support (including when you share with Us text and documents);
- When you submit a request to exercise a right identified in this policy, in order to fulfill your request, We may collect your email address, contact information, photo, or an image of your government-issued ID.
- When you interact with landing pages generated in Our Platforms such as clicks on CTAs, logos, images, photos, functions, forms, icons etc.

Personal information you disclose to Us include the following:

Credentials and Account Data. When you interact with Our Platforms, We may collect your first and last name, title, email address, postal address, phone number, company name, and other similar contact data.

Your Selfie that you share with Us to be processed for the provisions of Our Services. This information is collected to deliver a personalized experience, as further detailed below, and other times on behalf of the Managers and Team Members.

Biometric data and other metadata information derived from photos: As part of Our normal business operations, We process photos through Our Services. Such photos are uploaded to Our Platforms by Managers, Team Members, the Audience, or someone on their behalf. From these photos, We may derive limited biometric data consisting of a digital representation of facial features solely for the purpose of matching Audience members to photos and videos in which they appear, as initiated by the Audience or the event organizer.

We do not perform biometric identification of individuals against external databases, nor do We conduct behavioral analysis, profiling, or automated decision-making based on such data.

Biometric templates are processed solely within Kampfire's controlled environment and are not used to infer personal characteristics, emotions, intent, or behavior.

All Personal Information that you provide to Us must be true, complete and accurate, and you must notify Us of any changes to such Personal Information.

Information automatically collected:

The Short Story: Some information – such as IP address and/or browser and device characteristics – are collected automatically when you log into Our Platforms and use Our Services. This information is primarily needed to maintain the security and operation of Our Platforms, the provisions of Our Services and for Our internal analytics and reporting purposes.

Personal Information We automatically collect does not reveal your specific identity (like your name or contact information) but may include the following:

- Device and usage activity, such as your IP address, browser and device characteristics, mobile network information (including, internet browsing speed), and login history;
- Country, location, information about how and when you use Our Platforms and other technical information.
- The Platforms also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, and video clips.

Information collected from other Sources:

The Short Story: We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook, Instagram, Google, Twitter and LinkedIn), as well as from other third parties.

Examples of the information We receive from other sources include:

Your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public.

PERSONAL INFORMATION COLLECTED BY MANAGERS, MANAGERS' TEAM MEMBERS AND OTHER USERS

When Managers or Team Members are adding you to an event's list or campaign contact list, when you register for an event, sign up for communications, enter a contest, or otherwise input your Personal Information (such as through a web form) to communicate with a Manager or participate in a Manager's event or campaign, whether that information is yours or a third party's, that Manager and in many cases its Team Members will receive that information.

****PLEASE BE AWARE THAT BY ENTERING THE EVENT PREMISES, YOU MAY ENTER AN AREA WHERE PHOTOGRAPHY AND VIDEO RECORDING TAKE PLACE.**

THE EVENT OFFERS AN OPTIONAL PHOTO-MATCHING EXPERIENCE THAT ALLOWS ATTENDEES TO RECEIVE PHOTOS AND VIDEOS IN WHICH THEY APPEAR. IF YOU CHOOSE TO PARTICIPATE, YOUR IMAGE MAY BE PROCESSED USING AUTOMATED FACIAL-FEATURE MATCHING TECHNOLOGY SOLELY TO GROUP PHOTOS AND VIDEOS FROM THE EVENT IN WHICH YOU APPEAR.

THIS PROCESSING DOES NOT INVOLVE BIOMETRIC IDENTIFICATION AGAINST EXTERNAL DATABASES, BEHAVIORAL ANALYSIS, PROFILING, OR AUTOMATED DECISION-MAKING. PARTICIPATION IS VOLUNTARY, AND YOU MAY CHOOSE NOT TO PARTICIPATE WITHOUT AFFECTING YOUR ABILITY TO ATTEND THE EVENT. ADDITIONAL INFORMATION IS AVAILABLE IN THE EVENT'S PRIVACY NOTICE.**.

We do not control the 'Manager's registration process nor the Personal Information that they collect, and Managers can set up campaign registration pages to collect virtually any information from consumers in connection with registration for a Managers' event or campaign listed on the Services. Such collection of Personal Information by Managers may be subject to their own, separate privacy policy.

Nonetheless, Managers may share such information with Us, including your first and last name, email address, and other similar contact data and we may use this information as to pair it with the Biometric Data and other metadata information derived from photos, as part of Our core Services.

In addition, other third parties that are involved in or on whose behalf an event or campaign or activity is promoted, may receive that Personal Information as well. For example, and without limitation, a concert venue (the host, in this case) may allow third party promoters or production companies (the "Third Party Managers") to create event that will be hosted at the Managers' venue using its Kampfire account. In that case, We may provide your Personal Information to the Third Party Managers on behalf of the Managers.

You release Kampfire, its officers and employees, and each and all persons involved from any liability connected with the taking, recording, digitizing, or publication and use of photographs, computer images, video and/or sound recordings. We are not responsible for the actions of these Managers, or their Third Party Managers, Team Members (or other downstream recipients of your Personal Information), with respect to your Personal Information. It is important that you review the applicable policies of the Managers, and if applicable and available, their appointed Third Party Managers, of an event before providing Personal Information or other information in connection with that event.

HOW DO WE USE YOUR INFORMATION?

We use information that We collect about you or that you provide to us, including any Personal Information such as your first and last name, your image and photos, email address, and other similar contact data, to:

- Provide you with the access to the Platforms, its contents and Our Services, and any other information, products or services that you request from Us.
- Pair your Personal Information with the biometric data and other metadata information derived from photos, as part of Our core Services.
- Identify you in photos taken on events and uploaded to Our Services, using facial recognition software, which is provided by AWS, in order to create grouped personalized albums.
- Facial recognition is used by Us to analyze photos uploaded to the Platforms and to identify if a user appears in any of such uploaded photos. The Managers, then have the option to group such photos and send to Audience the specific photos in which they appear.

The facial recognition is governed by AWS's privacy policy.

- Fulfil any other purpose for which you provide it.
- If you register to Our newsletter or otherwise approve communications with us.
- Notify you when updates to Our Platforms are available, and of changes to any products or services We offer or provide through it.
- Request feedback and to contact you about your use of Our Platforms and Services.
- Keep Our Platforms and users safe and secure (for example, for fraud monitoring and prevention).

The usage information We collect helps Us to improve Our Platforms and to deliver a better and more personalized experience by enabling Us to:

- Estimate Our audience size and usage patterns.

- Store information about your preferences, allowing Us to customize Our Platforms and Services according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Platforms.

**LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (FOR RESIDENTS OF THE EEA OR UK ONLY) **

The basis for collecting and utilizing your Personal Information will depend on the specific information and the context in which we obtain it. Generally, we will collect your Personal Information only if you consent to it, if it is necessary to fulfill a contractual obligation with you, or if the processing aligns with our legitimate interests without infringing on your data protection rights and fundamental freedoms. In some instances, We may also have a legal obligation to collect certain Personal Information from you.

If We request you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will clearly communicate this at the appropriate time and inform you whether providing the information is mandatory or optional (and the potential consequences of not providing it). Similarly, if we collect and use your Personal Information based on our legitimate interests (or those of any third party), we will transparently explain those legitimate interests to you at the relevant time.

HOW WE SHARE YOUR INFORMATION?

The short story: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill Our contract and legal obligation to you or other business obligations.

We only share and disclose your information in the following situations:

- **With your Consent.** We may disclose your Personal Information for any other purpose with your consent.
- **Compliance with Laws.** We may disclose your information where We are legally required to do so in order to comply with applicable

law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- **Vital Interests and Legal Rights.** We may disclose your information where We believe it is necessary to investigate, prevent, or take action regarding potential violations of Our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which We are involved.
- **Affiliates.** We may share your information with Our affiliates, in which case We will require those affiliates to honor this privacy notice. Affiliates include Our parent company and any subsidiaries, joint venture partners or other companies that We control or that are under common control with us.
- **Business Partners, Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for Us or on Our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Platforms, which will enable them to collect data about how you interact with the Platforms over time. These service providers may have access to your Personal Information, depending on each of their specific roles and purposes, and may only use it for such limited purposes as determined in Our agreements with them.

For a list of Our current list of affiliates, Business Partners, Vendors, Consultants and Other Third-Party service providers, please contact Us at contact@kampfire.events.

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of Our business to another company.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you logged into the Platforms. These companies may use information about your connecting to Our Platforms and other tracking technologies in order to provide advertisements about goods and services of interest to you. Please see their Cookie Policy for further information.
- Kampfire's use and transfer of information received from Google APIs to any other app will adhere to [Google API Services user Data Policy](#), including the Limited Use requirements.

DIRECT COMMUNICATION FROM MANAGERS

We allow Managers to use Our email tools or Platforms push notifications to contact consumers for their current and past events, and campaigns so you may receive emails or push notifications from Our system that originate with such Managers and that We send on their behalf. If you registered for an event through Our Platforms, your email address is available to that Manager. However, Managers may also import the email addresses they have from external sources and send communications through the Services to those email addresses, and We will deliver those communications to those email addresses on the Managers' behalf. The Manager, and not Kampfire, is responsible for sending these emails.

INTERNATIONAL TRANSFERS

Our servers are located in the USA. Please be aware that your information may be transferred to, stored, and processed by us in Our facilities and by those third parties with whom we may share your Personal Information in the USA.

If you are a resident of the European Economic Area, please be advised that all transfers to the USA are based on the European Commission's Standard Contractual Clauses.

European Commission's Standard Contractual Clauses - The European Commission has determined that the Standard Contractual Clauses provide sufficient safeguards to protect the personal data transferred outside the EU or EEA.

For more information, please visit at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

All such transfers based on Standard Contractual Clauses require all such recipients to protect the personal information that they process from the EEA in accordance with European data protection laws.

If you are a resident of the United Kingdom, we rely on the UK Addendum to the Standard Contractual Clauses (approved by the UK authorities).

For all such transfers based on Standard Contractual Clauses or the UK Addendum to the Standard Contractual Clauses, We also whenever necessary, have implemented similar appropriate safeguards with Our third-party service providers and partners. These safeguards may include commercially accepted, industry-standard secure encryption methods to protect customer data both at rest and during transmission, web application firewall protection, and other suitable contractual and organizational measures.

SOCIAL MEDIA FEATURES, AD NETWORKS AND DO NOT TRACK

The Short Story: *Our Platforms may include certain Social Media features. These Social Media Features may collect certain Personal Information, your interactions with these third parties' social media Features are governed by their policies and not Ours.*

Due to lack of standardization, currently, Our systems do not recognize browser "do-not-track" requests.

Our Services may include certain Social Media features, widgets, such as the, "Facebook Like", or "Share this" button or other interactive mini-programs ("Social Media Features"). These Social Media Features may collect certain Personal Information such as your IP address and may set a cookie to enable them to function properly. Social Media Features are either hosted by a third party or hosted directly on Our Platforms and Services. Your interactions with these third parties' Social Media Features are governed by their policies and not Ours.

THIRD-PARTY WEBSITES AND CONTENT

The Short Story: *We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, Our Platforms.*

The Platforms may contain advertisements from third parties that are not affiliated with Us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Platforms. You should review the policies of such third parties and contact them directly to respond to your questions.

HOW LONG DO WE KEEP YOUR INFORMATION?

The Short Story: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your Personal Information for as long as it is necessary for the purposes set out in this *privacy notice*, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

Specific retention periods for photos and biometric data. Photos, selfies, derived metadata and biometric templates associated with an event are retained for the period configured by the relevant Manager, subject to a maximum of three (3) years from the date the event was created in Our Platforms. Following deletion (whether by automatic expiration, Manager action, or your erasure request), residual copies may persist in encrypted backups for up to thirty-five (35) days before being permanently destroyed.

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.

KEEPING YOUR INFORMATION SAFE

The Short Story: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to Us is stored on Our secure servers according to industry standards.

Unfortunately, the transmission of information via the internet is not completely secure. Although We do Our best to protect your Personal Information, We cannot guarantee the security of your Personal Information transmitted to Our Platforms. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Platforms.

YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM?

The Short Story: In some regions, you have rights that allow you greater access to and control over your Personal Information. You may review, change, unsubscribe or terminate your account at any time.

Subscription and Account Information

You may at any time review, unsubscribe from Our mailing list, change the information in your account or terminate your account by:

- Logging into your account settings and updating your account.
- Adjusting your device or Platforms permissions.
- Contacting Us using the contact information provided below.

Upon your request to unsubscribe or terminate your account, We will deactivate or delete your account and information from Our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce Our Terms and Conditions and/or comply with legal requirements.

Self-service erasure ("Forget Me"). You may, at any time, permanently delete your selfie, the photos and videos We have associated with you, the biometric templates derived from them, and your contact data, directly from the guest panel within Our Platforms. The Manager of an event you participated in, and Kampfire administrators, may also action this erasure on your behalf or on their own initiative. Once an erasure is completed, your data is removed from Our active systems immediately; residual copies in encrypted backups are permanently destroyed within thirty-five (35) days. Limited anonymous engagement statistics, with all identifiers removed, may be retained for analytical purposes.

Opting Out - If you do not want Us to collect your information do not use the Platforms or delete it from your device and do not use Our Services. In addition, you may opt-out at any time by contact Us at contact@kampfire.events.

Children Under the Age of 16

The Services are not intended for children under 16 years of age, and We do not knowingly collect personal information from children under 16. If We learn We have collected or received personal information from a child under 16 without verification of parental consent, We will delete that information. If you believe We might have any information from or about a child under 16, please contact Us at contact@kampfire.events. California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights below for more information.

Use of Artificial Intelligence Systems — Notice Under Regulation (EU) 2024/1689 ("EU AI Act")

This section applies to all natural persons located in the European Union and supplements the rest of this Privacy Notice. It is provided in fulfilment of Our transparency obligations under Article 50 of the EU AI Act.

1. AI system in operation. When you opt into Our optional photo-matching experience, an AI system performs automated facial-feature matching to compare the digital template derived from your selfie with face crops detected in event photos and videos. This system is a "biometric categorisation system" within the meaning of Article 3 of the EU AI Act, deployed for the sole purpose of grouping with you the photos and videos in which you appear.

2. Provider of the AI system. The underlying facial-feature matching is performed using **Amazon Rekognition**, provided by Amazon Web Services, Inc. ("AWS"), acting as Our service provider under contractual confidentiality and processing-restriction obligations. Kampfire configures and deploys this system within Our Platforms.

3. What the AI system does, and what it does not do. The system performs comparison of biometric templates **only within the photo set of the specific event(s) you participated in**. It does **not**:

- identify you against any external database, or against any database other than the event photo set;
- assign you to categories based on protected characteristics such as race, ethnicity, political opinion, religious or philosophical belief, sex life, sexual orientation, trade-union membership or health (such categorisation would be prohibited under Article 5(1)(g) of the EU AI Act);
- perform behavioural analysis, profiling, or automated decision-making producing legal or similarly significant effects within the meaning of Article 22 GDPR;
- perform emotion recognition.

We also do not engage in any of the practices prohibited by Article 5 of the EU AI Act, including untargeted scraping of facial images from the internet or CCTV footage to create or expand facial recognition databases.

4. Voluntary participation and lawful basis. Participation is entirely voluntary. We process biometric data only on the basis of your **explicit consent** under Article 9(2)(a) of the GDPR. Declining to participate does not affect your ability to attend the event or to use any other Service.

5. Withdrawal of consent. You may withdraw your consent at any time by using the in-product "Forget Me" tooling, by contacting Us, or by contacting the relevant event Manager. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

6. Human oversight and your GDPR rights. Decisions about which photos to share with you are made by event Managers, not by the AI system. You retain the rights set out in the section "Rights of The European Economic Area Residents" below, including the rights of access, rectification, erasure, restriction, objection, and portability under Articles 15–22 of the GDPR.

7. Contact. For questions regarding Our use of AI systems or to exercise your rights, contact contact@kampfire.events.

Rights of The European Economic Area Residents

If you are a resident of the European Economic Area, according to the General Data Protection Regulation (GDPR) provides you have the following rights:

- The right to access – access and receive confirmation of the existence of your Personal Information, access its content and obtain a copy.
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- The right to rectification – to update, rectify and/or correct your Personal Information.
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- The right to erasure and the right to be forgotten - to request the erasure of your data. where We have made your Personal Information public, you have also the right to request the erasure of your Personal Information and to take reasonable steps, including technical measures, to inform other data controllers which are processing the Personal Information that you have requested the erasure by such controllers of any links to, or copy or replication of, those Personal Information.
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- The right to restriction – to request to restrict your data that has been processed in violation of the law, including whose storage is not necessary for the purposes for which the data was collected or otherwise processed.
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- Right to data portability - to receive a copy of your Personal Information you provided to Us for a contract or with your consent in a structured, commonly used and machine-readable format, and to ask Us to transfer that Personal Information to another data controller.
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- Right to Object – you have the right to object to the processing of your Personal Information. To make such a request, please use the contact details provided below. We will consider and act upon any

request in accordance with applicable data protection laws.

Right to withdraw your consent - If We are relying on your consent to process your Personal Information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you believe we are unlawfully processing your Personal Information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Data Controller/Processor and Data Processing Agreements

The short story: *We are the controller of your Personal Information.*

In some incidents We may be the "Data Controller" of Personal Information not specifically excluded above. In such instances, our service providers processing such data will assume the role of "Data Processor".

Rights of California Residents

If you are a California resident, California law may provide you with additional rights regarding Our use of your Personal Information*. To learn more about your California privacy rights, please visit at*

https://docs.kampfire.events/ccpa_cpri_Au.pdf.*

Rights of Nevada Residents

As a Nevada resident you have the right to request to opt-out of the sale of your Personal Information, by contacting Us*. * please contact Us using the contact information provided below and include the email address associated with your account and a statement that you reside in Nevada.

Rights of Illinois Residents — Notice Under the Biometric Information Privacy Act ("BIPA")

If you are a resident of Illinois, the Illinois Biometric Information Privacy Act, 740 ILCS 14 ("**BIPA**"), applies to certain information We process about you. This section is Kampfire's publicly-available written policy under BIPA Section 15(a) and supplements the rest of this Privacy Notice.

1. Information covered. This section covers "biometric identifiers" and "biometric information" as defined in BIPA — namely, the digital templates We derive from your selfie and from photos and videos uploaded to Our Platforms, used solely to identify the photos and videos in which you appear.

2. Specific purpose and length of term (BIPA §15(b)(1)–(2)). We collect, store and use biometric identifiers and biometric information for one purpose only: to match you with the photos and videos taken at events you attended and to deliver to you a personalized photo collection. We retain such data only for as long as that purpose is being served, subject to the destruction schedule in paragraph 4 below.

3. Written release / opt-in (BIPA §15(b)(3)). We do not collect, capture, purchase, receive through trade, or otherwise obtain biometric identifiers or biometric information from Illinois residents without first providing the written notice in paragraphs 1 and 2 above and obtaining the individual's affirmative written release. If you are an Illinois resident and you have not provided such a release, do not upload a selfie and do not enable photo-matching for any event.

4. Retention schedule and destruction guidelines (BIPA §15(a)). We will permanently destroy your biometric identifiers and biometric information at the **earliest** of the following events:

- (a) When the initial purpose for which We collected the data has been satisfied — namely, when the relevant event has concluded and you have received (or have ceased to access) your personalized photo collection;
- (b) Three (3) years after your last interaction with Kampfire's Platforms; or
- (c) Promptly following your erasure request submitted via the in-product "Forget Me" tooling, by writing to contact@kampfire.events, or via the relevant event Manager.

Destruction is effected immediately in Our active systems. Residual copies in encrypted backups are permanently destroyed within thirty-five (35) days. We will not retain Illinois biometric identifiers or biometric information beyond the foregoing schedule absent a valid warrant or subpoena issued by a court of competent jurisdiction.

5. No sale or profit (BIPA §15(c)). We do not sell, lease, trade, or otherwise profit from your biometric identifiers or biometric information.

6. Disclosure restrictions (BIPA §15(d)). We do not disclose, redisclose, or otherwise disseminate your biometric identifiers or biometric information unless: (i) you consent to the disclosure; (ii) the disclosure completes a financial transaction You requested or authorized; (iii) the disclosure is required by federal, state, or municipal law; or (iv) the disclosure is required pursuant to a valid warrant or subpoena. Our facial-feature matching is performed using AWS Rekognition acting solely as Our service provider, under contractual confidentiality and processing-restriction obligations; this engagement is not, in Our view, a "disclosure" within the meaning of BIPA §15(d), but We disclose it here for transparency.

7. Standard of care (BIPA §15(e)). We store, transmit and protect your biometric identifiers and biometric information using a reasonable standard of care within Our industry, and in a manner that is the same as or more protective than the manner in which We store, transmit and protect other confidential and sensitive information.

8. Exercising your BIPA rights. You may at any time request information about the categories of biometric data We hold about you, request its destruction, or revoke your release, by emailing contact@kampfire.events or by using the in-product "Forget Me" tooling within the guest panel. Complaints may also be directed to the Illinois Attorney General.

Rights of Virginia, Colorado and Connecticut Residents

As a resident of Virginia, Colorado or Connecticut you have the following rights:

- The right to request information about Personal Information that We have collected about you in the 12 months preceding the yours request (including the categories of information collected, the source of that information, the business purpose of that collection, the categories of third parties with whom that information is shared, and the specific pieces of Personal Information collected about that particular customer);
- The right to receive requested information in a readily-usable format if provided electronically;
- The right to request that We delete any Personal Information about you that We have collected (although We may be entitled to retain some information for certain purposes);
- The right to opt-out of "sales" of Personal Information to third parties, the sharing of Personal Information with third parties for targeted advertising purposes, and/or the processing of Personal Information for targeted advertising purposes;
- The right to update or correct any Personal Information which is out of date or incorrect; and
- The right to be free from discrimination based on your exercise of your privacy rights.

To exercise your rights as a resident of Virginia, Colorado or Connecticut, please email Us at contact@kampfire.events.

Rights of South African Residents — Notice Under the Protection of Personal Information Act, 4 of 2013 ("POPIA")

If you are a resident of the Republic of South Africa, the Protection of Personal Information Act, 4 of 2013 ("POPIA") applies to Our processing of your Personal Information. This section supplements the rest of this Privacy Notice and, in respect of South African data subjects, controls in case of conflict.

1. Responsible Party. The "Responsible Party" within the meaning of POPIA is Obrecsys LLC. (operating as "Kampfire"), at the postal address set out at the end of this Notice.

2. Information Officer. Our Information Officer can be contacted at contact@kampfire.events.

3. Special Personal Information (POPIA §26 and §27). "Biometric information" is "special personal information" within the meaning of POPIA §26. We process biometric information only on the basis of your

explicit consent under POPIA §27(1)(a), given freely, specifically and on an informed basis when you choose to participate in Our optional photo-matching experience. You may withdraw your consent at any time by using the in-product "Forget Me" tooling, by contacting Us, or by contacting the relevant event Manager. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

4. Purpose specification and minimality (POPIA §10 and §13). We collect and process the minimum Personal Information necessary to deliver to you a personalized photo collection from events you attended, and We do not further process your Personal Information in a manner incompatible with that purpose.

5. Retention and destruction (POPIA §14). We do not retain records of your Personal Information for longer than is necessary to achieve the purpose for which it was collected, except where (i) retention is required or authorised by law, (ii) retention is required by Our contract with the relevant event Manager, or (iii) you have consented to longer retention. Photos, videos, derived metadata and biometric templates are subject to the maximum 3-year per-event retention cap and 35-day backup-purge window described in the section "How Long Do We Keep Your Information?" above. Once We are no longer authorised to retain a record, We destroy or de-identify it in a manner that prevents its reconstruction in an intelligible form.

6. Your rights as a South African data subject (POPIA §23–25). You have the right to:

- Confirm, free of charge, whether We hold Personal Information about you, and to access a copy;
- Request that We correct, destroy or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;
- Object, on reasonable grounds, to the processing of your Personal Information;
- Object to processing for direct marketing purposes (We will not process your Personal Information for direct marketing without your consent);
- Withdraw consent at any time, where We rely on consent.

You may exercise these rights via the in-product "Forget Me" tooling for erasure, or by emailing contact@kampfire.events. The Form 1 / Form 2 procedures under the POPIA Regulations apply to formal requests.

7. Children (POPIA §35). For South African data subjects, "children" means persons under the age of 18 years. We do not knowingly process the Personal Information of South African children without the prior consent of a competent person (parent or legal guardian). If We learn that We have processed such information without that consent, We will delete it.

8. Cross-border transfer (POPIA §72). Our Platforms and certain sub-processors are located in the United States and Israel. When We transfer Personal Information of South African data subjects outside South Africa, We do so on the basis that one or more of the conditions in POPIA §72 is met, including (i) you have consented to the transfer, (ii) the transfer is necessary for the performance of a contract between you and Us, or (iii) the recipient is bound by contractual obligations (such as the Standard Contractual Clauses available at https://docs.kampfire.events/SCC_TOMS_Au.pdf) that uphold principles for reasonable processing of the information substantially similar to the conditions in POPIA.

9. Security compromise notification (POPIA §22). If there are reasonable grounds to believe that your Personal Information has been accessed or acquired by an unauthorised person, We will notify the Information Regulator (South Africa) and, where required, the affected data subjects, as soon as reasonably possible.

10. Complaints. You have the right to lodge a complaint with the Information Regulator (South Africa) at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001; PO Box 31533, Braamfontein, Johannesburg,

2017; complaints email POPIAComplaints@inforegulator.org.za; website <https://inforegulator.org.za>.

UPDATES TO THIS NOTICE

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If We make material changes to this privacy notice, We may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how We are protecting your information.

HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, email Us at contact@kampfire.events or by post to:

Obrecsys LLC.

Attn: Legal Department

Bldg C, Ste C

3349 Hwy138

Wall, NJ 07119

US