



In the course of our business activities, Serving Score, Inc. (“Serving Score,” the “Company,” “we,” “us,” or “our”) receives personal information regarding persons with whom we interact, including candidates and applicants for employment or engagement, employees, individual (and representatives of our) customers and prospective customers, individual (and representatives of our) vendors and suppliers and prospective vendors and suppliers of goods and services to the Company, visitors to our website (servingscore.com) and users of our ServingScore App, individual shareholders and directors who may not be our employees, and any other individuals about whom the Company obtains personal information (each, “you”). Out of respect for your privacy interests in your personal information, we have adopted this Privacy Policy. This Privacy Policy describes (a) the principles governing our privacy practices, (b) how we collect, use, and otherwise process your personal information, and (c) our good faith understanding of the rights that you have in relation to our processing of your personal information. Our personnel are required to comply with the Company’s data privacy practices as set out in this Privacy Policy and other data privacy-related Company policies.

Where We Operate and Applicable Law

Serving Score is a Wyoming corporation, and to date our operations have been substantially virtual. The laws of the jurisdictions where we operate may have specific application to the personal information that we receive regarding you if you reside in those areas.

We endeavor to make our Privacy Policy consistent with applicable laws, including, in particular and as applicable, the European Union General Data Protection Regulation (the “GDPR”) with regard to any personal information that we might receive concerning persons who are residents of the European Union (although we are not presently actively seeking to promote our mobile application in the EU) and the California Consumer Privacy Act (the “CCPA”) with regard to personal information that we receive concerning persons who are residents of the State of California. The EU and the State of California impose special requirements on businesses like ours that receive personal information regarding their residents, and some of the provisions of this Privacy Policy are specifically provided in compliance with those requirements.

Personal Information Defined

In this Privacy Policy, “personal information” means information that (either in isolation or in combination with other information that we have or receive) enables you to be identified or recognized. With respect to California residents, “personal information” in this Privacy Policy

more particularly means information that “identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with” you or your household, subject to certain exceptions set forth in the CCPA.

Collection of Personal Information through Our Website and Mobile Application

By accessing and communicating with us through our website and mobile application, you consent to our collection and use of your personal information as described in the table and information below. If you do NOT agree with our collection and use of your personal information as described below, please do not visit our website or use our mobile application or otherwise communicate with us through our website or mobile application, in each instance as applicable.

Your Consent

If required by applicable law, we will seek your explicit consent to our processing of your personal information as detailed in this Privacy Policy. Any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your personal information, the use of this website or our mobile application or our provision of products and services or our securing of products and services from you, in each instance as applicable, may not be possible.

The Information that We Collect and How We Use and Share the Information

The information that we collect regarding you and the purposes for which we use and share the information depend substantially on the nature of the relationship that we have with you and how you interact with us. The following table provides details regarding our collection, use and sharing of personal information (we note that we are a start-up company, and have not yet received a significant amount of personal information, but as we anticipate growth and the implementation of our mission, we intend to proceed with the following design):

Relationship to Us	The Information We Collect about You	Our Use of the Information	Our Sharing of the Information
Passive User of Our Website	Using analytics services, we collect information regarding your visit(s) to our website, such as browser type and version, operating system and network, location and time zone setting, browsing preferences, and duration of visit to particular pages of our website. The information is aggregated and not tied to a particular user. In some instances, such as if you were	We use analytics data to assist persons in accessing our website, to collect information that will help us to improve the quality of our visitors’ browsing experience, for our own analysis of how visitors use our website, and to improve the functionality and user-friendliness of our website.	We share this information only with our staff and vendors who assist us with analytics evaluation of our website. More details regarding our use of Google Analytics is provided below.

	<p>to download our mobile application, we may also receive cookie and device information such as IP address or device identifier that may enable us to identify a particular system or user.</p>		
<p>Active User of Our Website or Downloader or User of Our Mobile Application</p>	<p>In addition to the above analytics information, we collect information about you when you communicate with us through our website using “Contact Us,” or you may transmit an email to us or chat with us on our website or through our mobile application. Should you so communicate with us, we may, for example, keep a record of your name, entity that you represent, country, phone, fax, email, job title, nature of business, product interests and preferences, industry, registration requests, downloads, username/passwords, and any other information you voluntarily provide to us. If you use our mobile application, we will also collect information regarding your use of our mobile application.</p>	<p>We use this information for login authentication and to enable customers and prospective customers and other parties interested in our products and services to communicate with us so that we can respond with requested information and/or assistance as determined appropriate, and to send you marketing messages and customer oriented information items. We will use information regarding your use of our mobile application on an aggregated basis as a means to make, as necessary, adjustments to our mobile application or its software or our business model.</p>	<p>This information is shared amongst our staff who need the information to provide responses to inquiries and to facilitate the provision of our products and services as necessary, and may be provided to or secured from vendors that will process your personal information on our behalf and under our written instructions to carry out their services during the course of our business, such as IT service providers, financial institutions, customer relationship management databases and other cloud-based solutions, and third party companies providing us with business analytics and statistics to assist with our marketing campaigns (we endeavor to ensure when we contract with such vendors that they only process your personal information under our instructions and maintain the security and confidentiality of your personal information by implementing appropriate technical</p>
<p>Customer or Representative of Our Customer or Prospective Customer</p>	<p>We collect or receive, principally from you, (a) identification information, such as name, gender, title, job title, or address, (b) contact information, including your phone number(s), your email address and social media account or handle where appropriate, and information regarding the company for which you are serving as a representative, if applicable, (c) financial information, such as payment source information and invoicing details, (d)</p>	<p>We use this information to communicate with our customers and prospective customers as necessary to respond to inquiries regarding and otherwise provide our products and services, conduct our business, perform our contracts, ship our products, maintain our relationship with you, and send you marketing messages, customer newsletters,</p>	

	<p>information regarding the products or services that you purchase from us or about which you inquire, and (e) information regarding our relationship with you and the performance of any contract that we may have with you.</p>	<p>and invitations to relevant events.</p>	<p>and organizational measures for such processing). We may sell statistical or aggregated data regarding your use of our mobile application, that does not identify you or your personal information, to various organizations that seek such data as a means to improve the quality of their products or to make changes in their sales or organizational models.</p>
<p>Representative of Our Vendor or Supplier or Prospective Vendor or Supplier</p>	<p>We collect or receive, principally from you, (a) identification information, such as name, gender, title, job title, or address, (b) contact information, including your phone number(s), your email address and social media account or handle where appropriate, and information regarding the company for which you are serving as a representative, if applicable, (c) financial information, such as payment source or destination information, (d) information regarding the products or services that we may purchase from you or about which we inquire, and (e) information regarding our relationship with you and the performance of any contract that we may have with you.</p>	<p>We use this information to communicate with our vendors and suppliers as well as our prospective vendors and suppliers as necessary to present and respond to inquiries regarding and otherwise secure and receive your products and services, conduct our business, perform our contracts, and maintain our relationship with you.</p>	<p>This information is shared amongst our staff who need the information to make inquiries and to facilitate the securing of your products and services as necessary, and may be provided to vendors that will process your personal information on our behalf and under our written instructions to carry out their services during the course of our business, such as IT service providers, shipping vendors, financial institutions, vendor relationship management databases and other cloud-based solutions (we endeavor to ensure when we contract with such vendors that they only process your personal information under our instructions and maintain the security</p>
<p>Individual Vendor or Supplier</p>	<p>We collect or receive, principally from you, (a) identification information, such as name, gender, title, job title, or address, (b) contact information, including your phone number(s), your email</p>	<p>We use this information to communicate with our vendors and suppliers and prospective vendors and suppliers as necessary to present and respond to inquiries</p>	<p>and maintain the security</p>

	<p>address and social media account or handle where appropriate, and information regarding the company for which you are serving as a representative, if applicable, (c) financial information, such as payment source or destination information, and (d) tax ID information.</p>	<p>regarding and otherwise secure and receive your products and services, conduct our business, perform our contracts, and maintain our relationship with you, and to fulfill legal obligations imposed on us.</p>	<p>and confidentiality of your personal information by implementing appropriate technical and organizational measures for such processing).</p>
<p>Job Applicant</p>	<p>When you apply for a position with us, you may provide us with your full name, email, education and qualification details, skills, compensation expectations, any disabilities that require accommodation, your entitlement to work in the country wherein you seek to be employed, resume, CV, home address, home telephone number, mobile telephone number, reference information, and other details set out in your application. Recruiters, references, former employers, and background screening agencies may also provide us with comparable information or confirmation of such information about you. Background screening agencies may provide us with information regarding your criminal history or other significant background information, as applicable. We may be required under applicable law to obtain information that you voluntarily provide regarding your race/ethnicity and gender.</p>	<p>We use this information to comply with employment law requirements, to conduct background checks, and otherwise to assess the qualifications of candidates for employment with our company.</p>	<p>This information is shared with (a) our HR Department, (b) government agencies that may require the information, (c) internal staff who are assessing the candidate for purposes of employment with our company, (d) recruiting and background screening agencies with whom we contract to assess candidate qualifications and background, (e) former employers and references as necessary to confirm information about you, and (f) possibly with other vendors that will process your personal information on our behalf and under our written instructions to carry out their services during the course of our business, such as IT service providers and certain cloud-based solutions (we endeavor to ensure when we contract with such vendors that they only process your personal information under our</p>

			<p>instructions and maintain the security and confidentiality of your personal information by implementing appropriate technical and organizational measures for such processing).</p>
<p>Employee</p>	<p>We collect or receive, principally from you, but also on occasion from your supervisor and your colleagues, as applicable, in addition to the job applicant information noted above, passport details or other immigration related information, social security number, driver’s license information, bank account details, marital status, photograph, emergency contact information, benefit plan enrollment information, dependent information, employment tax related information, payroll related information, employment program participation information, records of time taken for various leaves, training records, performance appraisals, disciplinary and grievance records, information regarding your use of our computer network and phone and timekeeping systems, and information regarding your job performance and your activities as an employee.</p>	<p>We use this information to comply with employment law and occupational safety requirements, to engage with you as an employee of the company, to process your payroll and payroll related taxes, to enable you to enroll in employee benefit plans sponsored by the company, to respond to inquiries from your lenders, and to manage your performance as an employee.</p>	<p>The data is transmitted as necessary to (a) appropriate government agencies that require reports of such information, (b) our payroll processing vendor to enable processing of payroll and payroll taxes, (c) our benefits vendors to enable them to process benefits for you, (d) recruiting and background screening agencies with whom we contract to assess candidate qualifications and background, (e) companies requesting such information as a consequence of your applying for loans, (f) former employers and references as necessary to confirm information about you, and (g) possibly with other vendors that will process your personal information on our behalf and under our written instructions to carry out their services during the course of our business, such as IT service providers and certain cloud-based solutions</p>

			<p>(we endeavor to ensure when we contract with such vendors that they only process your personal information under our instructions and maintain the security and confidentiality of your personal information by implementing appropriate technical and organizational measures for such processing).</p>
<p>Individual Shareholder (or Representative thereof) or Director</p>	<p>We collect or receive, principally from you, (a) identification information, such as name, gender, title, job title, or address, (b) contact information, including your phone number(s), your address, your email address, (c) information regarding businesses with which you may be affiliated, (d) financial information, such as payment source or destination information, (e) information regarding your voting and other actions taken in connection with your role(s), and possibly, (f) tax ID information.</p>	<p>We use this information to communicate with our shareholders and directors as necessary to provide information and respond to inquiries regarding meetings and actions, stock transactions, the state of the company and its operations, maintain our relationship with you, and to fulfill legal obligations imposed on us.</p>	<p>This information is shared amongst our staff who need the information to communicate with you and share information with you, as necessary, and may be provided to vendors that will process your personal information on our behalf and under our written instructions to carry out their services during the course of our business, such as law firms, auditors, IT service providers, financial institutions, vendor relationship management databases and other cloud-based solutions (we endeavor to ensure when we contract with such vendors that they only process your personal information under our instructions and maintain the security and confidentiality of your personal information by</p>

			implementing appropriate technical and organizational measures for such processing).
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We may consolidate the information as detailed above with information that we receive or obtain from other sources, such as from our staff or personnel, customers, professional advisers, partners, and agents of Serving Score, third parties with whom we interact, regulators and authorities, and publicly available sources.

Under GDPR, “sensitive personal information” includes data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. We do not actively seek sensitive personal information; however, we may, in the future, collect (a) racial or ethnic origin information that you as an employee voluntarily provide to us in order for us to comply with applicable employment laws; (b) and potentially fingerprint or facial recognition data as a means for employees to use the company’s timekeeping system for employees or to access our offices or centers within our offices; and (c) health information in connection with the securing and provision of health and related benefits programs for our employees.

In addition to the specific uses noted above, we also note that we may use information that we receive in all categories, as necessary (a) for our legitimate interests to prevent illegal activities, including fraud, and to keep our website, mobile application and IT systems and processes safe, (b) to debug and audit our systems and data, (c) to comply with legal or regulatory inquiries/requests, (d) for quality assurance purposes, and (e) to comply with corporate governance requirements.

In this regard, we note that we may be required to share information that we receive in the following situations generally:

- with law enforcement, regulatory, or government agencies requesting personal information in connection with any inquiry, subpoena, court order, or other legal or regulatory procedures, with which we would need to comply;
- to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others;
- to defend against legal claims;
- in connection with a reorganization, restructuring, merger, acquisition, or transfer of assets of our Company, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Policy.

The Systems We Use to Collect and Process the Information

We may collect information directly from you, as detailed above, and we may also gather information about you as we conduct our business such as through our website, our mobile application and other systems, including, for example, our:

- email system
- instant messaging systems
- mobile and office phone systems, including voicemail and related software and also the records relating to such use
- intranet and Internet systems
- computer network
- other relevant systems and other hardware and software owned, used or provided by or on behalf of us.

We are not responsible for the data policies or procedures or content of any linked websites. We recommend that you check the privacy and security policies of each website you visit.

We Offer Marketing Choices

We may send you direct marketing messages including by way of email alerts, text messages and postal services provided that we have a lawful ground to do so. If you no longer wish to receive our email alerts or text messages, to be part of a mailing list, or to receive any marketing communications, you can opt-out of such communications at any time by clicking on the unsubscribe link in the relevant communication or contacting us at mark.absher@servingsscore.com.

Special Rights Regarding Personal Information

1. Residents of the EU (please note that we do not currently actively market our products or services in the EU, so we are not currently actively collecting any personal information from persons in the EU; however, to the extent that that changes, we are guided by the following considerations):

If you are in the European Economic Area (the “EEA”), you have the following rights under the GDPR:

- Access - to request a copy of the personal information that we are processing about you;
- Rectification - to require the correction of any mistake in the personal information, whether incomplete or inaccurate, that we have regarding you;
- Erasure - to require the erasure of personal information concerning you in certain situations, such as where we no longer need it or if you withdraw your consent (where applicable);
- Portability - to receive the personal information concerning you that you have provided to us, in a structured, commonly used, and machine-readable format and have the right to transmit that data to a third party in certain situations;
- Objection - to (i) object at any time to the processing of your personal information for direct marketing purposes and (ii) object to our processing of your personal information where the legal ground of such processing is necessary for legitimate interests pursued by us or by a third party, in which case we will comply with your request unless we can demonstrate compelling legitimate grounds for the processing;

- Restriction - to request that we restrict our processing of your personal information in certain circumstances, such as when you contest the accuracy of that personal information, we no longer need the information, or if our processing is unlawful;
- Withdrawal of consent – to withdraw your consent to our processing of your information if we have relied on your consent (or explicit consent) as our legal basis for processing your personal information (“Explicit consent” being required if we have relied on consent as the condition to lawfully process “special categories of personal data,” as defined in the GDPR);
- Notification of data breach – to receive notice in certain instances of data breaches that involve your personal information; and
- Complain - to lodge a complaint with the local data protection authority, such as the Information Commissioner's Office (“ICO”) in the UK, if you believe that we have not complied with applicable data protection laws, including the GDPR (please follow this link for a list of local data protection authorities in the EEA countries: https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the personal information or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

If you are in the EEA and would like to exercise any of those rights, please:

- Email our Data Protection Officer at mark.absher@servingscore.com;
- Provide enough information to identify yourself (e.g., name, email address, etc.);
- Provide proof of your identity and address (a copy of your driver’s license or passport and a recent utility or credit card bill); and
- Provide the information to which your request relates.

2. Residents of California

The CCPA does not currently apply to us, because we have not come within the scope of any of its applicable standards; however, in the event that the CCPA becomes applicable to us, we will be guided by the following considerations:

We do not sell or lease personal information to any party, and we do not provide personal information to any parties except as specifically detailed in this Privacy Policy. If you are a California resident, you have the following rights, subject to certain exceptions as set forth in the CCPA:

- Access - to receive the specific pieces of your Personal Information we have collected about you in the 12 months preceding your request;
- Portability - to receive a copy of your electronic personal information in a readily-usable format;
- Information Regarding Sources and Purposes - to receive information from us regarding the categories of personal information we collected, the sources from which we collect personal information, the purposes for which we collected and shared personal information, the categories of any personal information we sold as well as the categories of third parties to whom such personal information was sold, and the categories of

personal information that we disclosed for a business purpose in the 12 months preceding your “right to know” request;

- Deletion - to request the deletion of the personal information that you provided to us. Please note that in certain instances we may not be able to process your request, such as (i) due to the existence of a legal obligation, (ii) to detect security incidents, (iii) to protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities, or (iv) in order to complete a transaction for which your personal information was collected; and
- Non-Discrimination - to be free from discrimination by us with regard to pricing or performance as a result of you exercising your rights under the CCPA.

If you wish to exercise these rights, you must submit a request by emailing our Data Protection Officer at mark.absher@servingscore.com. The CCPA requires us to verify requests we receive when one is seeking to exercise certain of the rights listed above. We may ask you to provide certain information in order for us to verify your request.

Note that certain of the rights set forth above do not apply until January 1, 2021, for job applicants, employees, partners, and contractors, and when personal information is transmitted in business-to-business written or verbal communications or transactions relating to due diligence, or providing or receiving a product or service to or from another business, and the personal information concerns an employee, owner, director, officer or contractor of that business.

With regard to your rights under the CCPA, we note in the table above we detail the personal information that we have collected about California residents in the last 12 months, as well as the sources from which we obtain the listed categories of personal information and the parties with whom such information has been shared.

In the preceding 12 months, we have not sold any personal information.

3. Minors and Children

We do not seek to collect or maintain information on our website or through our mobile application from those we know are under 18, and no part of our website or mobile application is structured to attract anyone under 13. If you are the parent or legal guardian of a child under 13 who uses our website or mobile application, then please contact our Data Protection Officer at mark.absher@servingscore.com to have that child’s information deleted. “OnGuard Online,” maintained by the Federal Trade Commission of the United States of America, provides a resource that may help parents and legal guardians in monitoring and limiting their children’s access to certain types of material on the Internet.

Our Security Measures to Safeguard the Information

Consistent with our operational maturity as a start-up organization with a virtual presence, we have implemented technical and organizational security measures in an effort to safeguard the personal information in our custody and control. Such measures include, for example, limiting

access to personal information only to staff and authorized service providers on a need-to-know or contract limiting basis for the purposes described in this Privacy Policy, as well as other administrative, technical, and physical safeguards.

We endeavor to take all reasonable steps to protect your personal information but cannot guarantee the security of any data you disclose online. Please note that email is not a secure medium and should not be used to send confidential or sensitive information. By providing information online, you accept the inherent security risks of providing information over the Internet and will not hold us responsible for any breach of security, unless it is due to our negligence or willful default.

When We Transfer Information Internationally

We do not currently market our products and services outside of the United States. In the event that we do so in the future, we will be guided by the following considerations: Your personal information may be transferred to or shared across our integrated computer networks with one or more of our vendors in other countries that may not be subject to data protection laws similar to those prevailing in the jurisdiction in which such information is provided to or received by us. However, we will endeavor to assure that our vendors adhere to the same or similar procedures with respect to your personal information, including this Privacy Policy.

In the event that it becomes necessary to transfer personal information from the United Kingdom or the EEA to a country outside the EEA (or to an international organization), such actions would be taken in order to provide our staff with access to the personal information of a customer, vendor or supplier or representative of a customer, vendor or supplier, to enable them to perform our contracts and provide support for our or obtain their products and services, wherever they are located, and for related purposes as set out in this Privacy Policy.

Cookies

A cookie is a small file of letters and numbers that is sent by our web server to your computer or mobile device when you access our website. Our website may use persistent cookies, which enable our web server to recognize your device and browsing preferences each time you visit our website. For more information on cookies, visit www.allaboutcookies.org.

We use cookies only for the purposes set forth in the table above.

Cookies can be disabled by changing the settings on your browser, though some parts of the website may not function well if you choose to do so.

By continuing to use this without changing your browser settings, you agree to our use of cookies as described above.

Google Analytics

Our website and our mobile application may, from time to time, use Google Analytics, a web analytics service provided by Google, Inc. ("Google"), currently headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics employs cookies that are stored to your computer in order to facilitate an analysis of your use of the site. The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted by Google to Google's location in the US and stored there.

In using Google Analytics our website employs the extension "anonymizeIp". In doing so, Google abbreviates and thereby anonymizes your IP address before transferring it from EU/EEA member states. Google uses this information to analyze your use of our site, to compile reports for us on internet activity and to provide other services relating to our website and our mobile application.

Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will in never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly as noted elsewhere in this Privacy Policy. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

You can prevent the data generated by cookies about your use of the website (incl. your IP address) from being passed to Google, and the processing of these data by Google, by downloading and installing the browser plugin available at the following link: tools.google.com/dlpage/gaoptout.

"Do Not Track" Browser Settings

We do not use technology that recognizes a "do-not-track" signal from your web browser, because we do not track users other than for aggregate statistical purposes.

How We Retain the Information

We will only retain your personal information for as long as necessary for the purposes for which that information was collected as set out in this Privacy Policy or for longer as required under any applicable legal, regulatory, accounting, or reporting requirements. Should you opt out or no longer wish to receive marketing messages from us, we will securely delete your personal information from the relevant mailing list(s).

Questions, Comments or Additional Information Regarding Our Privacy Policy

If you have any questions or comments in connection with this Privacy Policy, or for further information on our processing activities and your rights in relation to your personal information, please contact our Data Protection Officer at mark.absher@servingscore.com

Notification of Changes

We may occasionally update this Privacy Policy as our services and privacy practices change, or as required by applicable legal or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes. However, the last update date is posted below, and we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.

Last updated: October 10, 2020