

Privacy Policy

Trot World, Inc. (“**we**” or “**our**”) takes your privacy seriously. This Privacy Policy applies to all visitors to our Trot website (the “**Site**”) and to users of the Trot Marketplace located on our Site (“**you**” or “**your**” or “**user**”). The Trot Marketplace is more particularly described in our [Terms of Service](#) to which this Privacy Policy is incorporated. Please review our [Terms of Service](#) before using our Site or the Trot Marketplace. Certain capitalized terms in this Privacy Policy have the meanings ascribed to them in the Terms of Service.

We provide this Privacy Policy to inform you of the type of information we collect when you visit our Site, and how we use and share that information. Please review this Privacy Policy carefully to understand these terms and your rights and options.

You can visit our Site to learn about our business and the Trot Marketplace, to register as a Licensor or Trotter where you may access and receive Services through the Trot Marketplace, and to contact us to learn more.

This Privacy Policy is subject to change. If we make any material changes we will notify you by means of a notice placed on the Site prior to the change becoming effective and we will update the date above accordingly. We encourage you to periodically review this Privacy Policy. By using the Site and the Trot Marketplace, you agree to the terms and conditions in the most updated Privacy Policy.

Personal Information

“**Personal Information**” is information that identifies or can be used to identify a natural person. You are not required to provide Personal Information in order to use our Site, nor will we request Personal Information from you; however, you must provide Personal Information to register as a Trotter or Licensor and to use the Services offered on the Trot Marketplace.

Personal Information We Collect

We will collect certain Personal Information that you voluntarily provide to us through one of the interactive features on our Site.

- You may use the contact features to inquire about our business, to provide comments, or report any problems with our Site.
- If you register as a Licensor or Trotter user of the Trot Marketplace, you will be required to provide only your first name, last name, and email.
- We may from time to time request users of the Trot Marketplace to provide additional Personal Information for verification purposes.

- If you are a Licensor user of the Trot Marketplace, you will be required to provide additional Personal Information related to your Rental Space and Listings and financial information such as banking information.
- We offer Trotters and Licensors of the Trot Marketplace the opportunity to chat with each other through our chat feature located in the Trot Marketplace. We monitor the information shared in the chats and will collect Personal Information disclosed by Trotters and Licensors in the chat feature.
- Except as expressly stated above, we will not collect any other Personal Information from you through our Site or the Trot Marketplace.

Non-Personal Information We Collect

As with most websites, our Site automatically gathers information that cannot be used to identify you personally (“**Non-Personal Information**”). We collect Non-Personal Information through computer data or files, often called “**cookies,**” that may be sent by your web browser and stored on an individual computer to allow our server to “recognize” you through the navigation of the Site. Non-Personal Information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. Our support team may, from time to time, use Non-Personal Information such as viewer and usage traffic as part of an internal analysis to provide better, more relevant information for users.

How We Use Your Personal Information

We do not provide or sell any Personal Information to marketing research or bulk advertising sales companies.

- If you use our contact feature, the only Personal Information you will be required to provide is your first and last name and email. Any other information you choose to share in the subject and message fields is at your sole discretion. We will use this Personal Information to respond to your query and for no other purpose unless you disclose additional Personal Information after the initial response.
- If you disclose Personal Information through the chat feature located in the Trot Marketplace, we may use that Personal Information to improve our business offerings, the Site, the Trot Marketplace and user experiences.
- If you are a Licensor, we will use your Personal Information to contact you about you Rental Space and Listings and to engage in business opportunities.
- If you are a Trotter, and you express interest in a Listing, we will use your Personal Information to contact you about the Listing and to provide the Trot Marketplace Services to you.

- We may aggregate and de-identify the Personal Information in our database and create reports that do not personally identify any individuals.
- We may send emails to you about our business, Rental Spaces, and Listings based on your past browsing of the Site or use of the Trot Marketplace.

We will not use any Personal Information for any purpose outside of the original purpose for which it was provided to us. If you have requested more information from us, we will use the email you provided to us to send you that information. You may limit emails you receive from us by following the instructions in the “**Opt-Out**” Section below.

We may provide your Personal Information to our hosted service providers or to third party providers who maintain and support our Site. If we must disclose your Personal Information for these purposes, the disclosures will be limited to the contact email you provided. These third party providers are only authorized to use your Personal Information as necessary to provide these services. All conversations using this Site’s support platforms will be kept confidential including, but not limited to, inquiries for information, emails, and other forms of communication. By providing your Personal Information you are giving us your consent to use your Personal Information for these purposes.

Links to Third Party Sites

Our Site contains links to websites run and controlled by third parties (“**Third Party Sites**”). These links are provided to users as a convenience and services to our users. Some links may take you to a Third Party Site containing information that may be useful or of interest to you.

We do not control the means by which your Personal Information is collected through any Third Party Site or the software used to collect it, nor do we control the security implemented by the third party that controls any Third Party Site. All Third Party Sites are operated independently from us. You understand and agree when you link to any Third Party Sites, this Privacy Policy and the practices that we follow under this Privacy Policy will cease to apply. Rather, the privacy policy offered on the Third Party Site will apply to the Personal Information you provide through that Third Party Site. Please review the privacy policies listed on every Third Party Site that you visit.

We are not responsible for the content, accuracy, or opinions expressed on any Third Party Site or for the privacy practices of any third party. We will not, and are under no obligation to, investigate, monitor or check the Third Party Site for accuracy or completeness, or for any obscene, scandalous, inflammatory, pornographic, indecent, profane, defamatory or unlawful content or materials. Inclusion of any Link to a Third Party Site does not imply approval or endorsement of the Third Party Site.

Security

We have put in place suitable physical, electronic and managerial procedures to safeguard and secure Personal Information from unauthorized use or disclosure. However, due to the open communication nature of the Internet, we cannot guarantee that communications between us will be free from unauthorized access by third parties.

Children Under the Age of 13

The Site and the Trot Marketplace are provided for and targeted to adults. We do not knowingly collect Personal Information from children under the age of 13. If you believe we have been provided Personal Information from or about a child under 13, please contact us at the email below. If we have stored any such Personal Information in our database, we will delete it as soon as reasonably practicable after receiving notice from you.

Opt-Out

You may choose to limit or cease receiving correspondence from us by using the opt-out option in e-mails you receive from us, or by emailing or calling us at the email and/or phone numbers below. We will process your request within 30 days.

Your California Privacy Rights

If you are a California resident, California Civil Code Section § 1798.83 (the California Consumer Privacy Act or “CCPA”) applies to you.

The CCPA provides California residents with rights to receive certain disclosures regarding the collection, use and sharing of Personal Information as well as rights to access, delete, and restrict the same of certain Personal Information we collect about them. This Notice for California Residents explains how we collect, use, and share Personal Information, as well as how California residents can exercise their CCPA privacy rights.

If you are visually impaired, have another disability or seek support in other language, you may access our Notice for California Residents by emailing at info@trotflex.com.

Collection and Use of Personal Information

For the purposes of the CCPA, “**Personal Information**” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include deidentified or aggregated information.

For each category of Personal Information, the category of sources from which that information is collected, as well as the purpose of collection and use, is indicated in the table below:

Category of Personal Information	Category of sources	Purpose of collection and use
<p>Identifiers. Name, address, online identifier, Internet Protocol (IP) address, email address, account name or other similar identifiers.</p>	<p>Directly from you when you provide it to us, such as when you register as a user of the Trot Marketplace. From our service providers and third parties with whom you directly share your Personal Information. From our systems when you use our Site, such as your IP address.</p>	<ul style="list-style-type: none"> • To provide our Site, the Trot Marketplace and related services. • To fulfil or meet the purpose for which you have provided the information. • To maintain and improve our existing Site, the Trot Marketplace, and services and create new products, services, and features. • To provide marketing and advertising. • To personalize our Site, the Trot Marketplace, and services.
<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). Name, signature, address, telephone number, education, employment, employment history, bank account number, credit card number, debit card number or any other financial information. Some Personal Information included in this category may overlap with other categories.</p>	<p>Directly from you when you provide it to us, such as when you register as a user of the Trot Marketplace. From our service providers and third parties with whom you directly share your Personal Information with.</p>	<ul style="list-style-type: none"> • To provide our Site, the Trot Marketplace, and services. • To fulfil or meet the purpose for which you have provided the information. • To maintain and improve our existing Site, the Trot Marketplace, and services and create new products, services, and features. • To provide marketing and advertising. • To personalize our Site, the Trot Marketplace, and services.

<p>Commercial information. Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>From when you complete a transaction with us. From service providers and third parties who provide products and services or support on our behalf.</p>	<ul style="list-style-type: none"> • To provide our Site, the Trot Marketplace, and services. • To fulfil or meet the purpose for which you have provided the information. • To maintain and improve our existing Site, the Trot Marketplace, and services and create new products, services, and features. • To provide marketing and advertising. • To personalize our Site, the Trot Marketplace, and services.
<p>Internet or other similar network activity. IP address, login data, unique device identifiers, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, mobile device carrier and other technology on the devices you use to access the Site; as well as usage information, such as information about how you use the Site and our products and services, referring/exit web pages, date/time stamps, error logs, and the frequency of your use of the Site</p>	<p>From our systems when you use our Sites, such as your IP address. From service providers and third parties who provide products and services or support on our behalf.</p>	<ul style="list-style-type: none"> • To provide our Site, the Trot Marketplace, and services. • To maintain and improve our existing Site, the Trot Marketplace, and services and create new products, services, and features. • To provide marketing and advertising. • To personalize our Site, the Trot Marketplace, and services.
<p>If applicable: Professional or employment-related information. Job title and place of work.</p>	<p>If applicable: Directly from you when you provide it to us. From service providers and third parties who provide products and services or support on our behalf.</p>	<ul style="list-style-type: none"> • To fulfil or meet the purpose for which you have provided the information.

Disclosure of Personal Information for a Business Purpose

We have disclosed within the preceding 12 months the following categories of Personal Information to the following categories of third parties for a business purpose, including to our service providers and third parties with whom you direct us to share your Personal Information, and to comply with legal obligations:

Category of third parties	Category of Personal Information
<p>Affiliates, including our parent company</p> <p>Service providers, contractors and vendors who provide products and services or support on our behalf</p> <p>Third parties receiving Personal Information pursuant to a valid warrant, subpoena, court order or as necessary for the University to defend or exercise a legal claim or investigation</p>	<ul style="list-style-type: none"> • Identifiers • Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) • Commercial information • Internet or other similar network activity • Professional or employment-related information

Sale of Personal Information and Right to Opt-out

The CCPA defines “sale” or “sell” as disclosing or making available to a third-party Personal Information in exchange for monetary or other valuable consideration. While we do not disclose Personal Information to third parties in exchange for monetary compensation, we do disclose or make available Personal Information to third parties in order to receive certain services or benefits from them, such as in connection with cookies that third parties we partner with may have collected on our Site. If you have visited our Site in the preceding 12 months, cookies and other metadata about you may have been obtained by our third parties for their commercial use, unless you have disabled or opted-out of the use of "cookies" when you visited the Site.

The categories of Personal Information that we may “sell”, as defined under the CCPA, are as follows:

Category of Personal Information	Category of third parties
Identifiers	<ul style="list-style-type: none"> • Affiliates • Data analytics providers • Social media platforms
Commercial information	<ul style="list-style-type: none"> • Data analytics providers
Internet or other similar network activity	<ul style="list-style-type: none"> • Data analytics providers • Social networks

The CCPA provides California residents with the right to opt-out of the sale of their Personal Information to third parties. To exercise the right to opt-out of the sale of your Personal Information, you (or your authorized representative) may submit a request to us by emailing us at info@trotflex.com. Please note that your right to opt-out does not apply to our sharing of data with service providers, with whom we work and who are required to use the data only on our behalf. To opt-out of the sale of Personal Information collected through cookies, please review our cookie policy in the section titled, “**Non-Personal Information We Collect.**”

Your California Privacy Rights

If you are a California resident, you have the following rights with respect to your Personal Information and subject to certain limitation under the CCPA:

- **Access Right.** The right to know or request that we disclose what Personal Information of yours we collect, use, disclose, and sell over the preceding 12 months:
 - The categories of Personal Information we collected about you.
 - The categories of sources for the Personal Information we collected about you.
 - Our business or commercial purpose for collecting that Personal Information.
 - The categories of third parties with whom we share that Personal Information.
 - The specific pieces of Personal Information we collected about you.
 - If we disclosed your Personal Information for a business purpose, a list disclosing the disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- **Deletion Right.** The right to request that we delete Personal Information collected by us in certain circumstances provided by law.
- **Opt-out Right.** The right to opt-out of the “sale” of your Personal Information by us.

You also have the right not to receive discriminatory or differentiated treatment by us because you exercised any of these rights.

How to Exercise Your Access, Data Portability and Deletion Rights

To exercise the access, data portability and deletion rights described above, please submit a request by: Emailing us at info@trofflex.com

We cannot respond to your request or provide you with Personal Information without verifying your identity or verifying your authority to make the request. To verify your identity, we will request that you confirm or match specific pieces of information you have previously provided us with. We will only use Personal Information provided in a request to verify your identity or authority to make the request. Additionally, if we retain your Personal Information only in de-identified form, we will not attempt to re-identify your Personal Information from that de-identified data to verify your identity.

If you wish to authorize a third party to make a request on your behalf through an authorized representative, you must provide a valid California power of attorney or comparable documentation of written permission from you and verification of your identity.

Response Timing, Process, and Format

We will respond to your request within 45 days of receipt, provided, that we reserve the right to extend this period for an additional 45 days if necessary to verify your information and the veracity of your request. We will notify you of any such extension prior to the end of the initial 45 day period. The information will be provided to you either by mail or electronically. Any disclosures we provide will only cover the 12-month period preceding the receipt of the request or explain the reasons we cannot comply with a request, if applicable.

For an Access Request, we will select a format to provide your Personal Information that is reasonably useable for transmittal of the information from one entity to another entity.

For a deletion request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies. If an exception applies, we may deny your deletion request, and will inform you of the basis for the denial.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Governing Law

This Privacy Policy and any related disputes will be governed by and construed in accordance with the laws of the State of New York, exclusive of its choice of law provisions.

How to Contact Us

If you have any questions or concerns regarding the Privacy Policy related to our website, please feel free to contact us at the following email, telephone number or mailing address.

Email: info@troflex.com

Headquarters: 1270 Broadway, Suite 911, New York NY 10001